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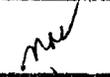
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**IN THE MATTER OF THE
INVESTIGATION INTO U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

**JOINT CLEC BRIEF REGARDING
QWEST'S CHANGE
MANAGEMENT PROCESS**

AT&T Communications of the Mountain States, Inc., TCG Phoenix, Covad Communications Company, and WorldCom, Inc., on behalf of their regulated subsidiaries (collectively "Joint CLECs"), hereby submit this Brief regarding Qwest's Change Management Process ("CMP").¹ For the reasons stated below, the Joint CLECs recommend that the Commission withhold judgment of Qwest's CMP process pending receipt of actual proof that: (1) Qwest has submitted a final revised draft of the CMP document that fully reflects all the agreements reached during the redesign process; (2) Qwest has actually implemented and is adhering to the redesigned process; (3) Qwest has responded to and resolved all the outstanding Exceptions and Observations that the third-party testers have issued concerning Qwest's CMP; (4) Qwest has available a stable, stand alone test environment ("SATE") fully reviewed and approved by third-party testers; and (5) Qwest has updated -- through the product and process part of CMP -- its

¹ Qwest's CMP was previously known as the Co-Provider Industry Change Management Process or "CICMP."

PCAT and Technical Publications such that they are consistent with the Statement Of Generally Accepted Terms (“SGAT”) upon which Qwest intends to rely, not only in seeking this Commission’s recommendation, but on proving its compliance with its § 271 obligations before the Federal Communications Commission (“FCC”).

Without the actual proof of demonstrated compliance as noted above, Qwest is simply asking that this Commission find that Qwest complies with its § 271 obligations based upon nothing more than “mere promises to perform”; empty promises are neither acceptable “evidence” to the courts nor, importantly, to the FCC in its § 271 review.² Likewise, this Commission deserves more; it deserves real proof of *actual* compliance, regardless of Qwest’s desire to rush to the “271 finish line.”

No one, not this Commission, Qwest nor the CLECs have had any significant experience using the redesigned CMP. Because CMP is an important part of the § 271 investigation and because CMP is an area of the record that is underdeveloped at best, the Joint CLECs offer the following suggestions to remedy the situation.

I. INTRODUCTION

According to the FCC, the change management process refers to the methods and procedures that the Regional Bell Operating Company (“RBOC”) employs to

² The FCC states “in order to gain in-region, interLATA entry, a BOC must support its application with actual evidence demonstrating its present compliance with the statutory conditions for entry, instead of prospective evidence that is contingent on future behavior. Thus, we must be able to make a determination based on the evidence in the record that a BOC has actually demonstrated compliance with the requirement of section 271.” *In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, Memorandum Opinion and Order, CC Docket No. 99-295, FCC 99-404 (rel. Dec. 22, 1999) at ¶ 37 (hereinafter “*BANY 271 New York Order*”).

communicate with competing carriers regarding the performance of, and changes to, the RBOC's Operational Support Systems ("OSS").³ Further, the FCC notes:

By showing that it adequately assists competing carriers to use available OSS functions, [an RBOC] provides evidence that it offers an efficient competitor a meaningful opportunity to compete. As part of this demonstration, the Commission will give substantial consideration to the existence of an adequate change management process and *evidence* that the [RBOC] *adhered to this process over time*.⁴

Qwest, as it frequently asserts, has had a CMP process in place since 1999. What is missing from this statement, however, is Qwest's acknowledgement that its 1999 CMP process was inefficient and essentially non-functional for actual use by competitive local exchange carriers ("CLECs"). In fact, consistent with the *actual* evidence that the Joint CLECs proffered during the workshops,⁵ third-party testers proclaimed that Qwest's original CMP was deficient because it was inefficient, with response intervals far too long for use, and no adherence to practices and procedures documented in its CMP material.⁶ In short, Qwest's CMP was not "successfully managed" nor was Qwest adhering to it according to these independent third parties.

In an effort to remedy this problem, Qwest requested that the CLECs agree to take the CMP temporarily out of the § 271 workshop investigations and place "CMP" in the change management process itself for "redesign."⁷ One important goal of the redesign

³ *In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enter. Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania*, Memorandum Opinion and Order, CC Docket No. 01-138, FCC 01-269 (rel. Sept. 19, 2001) at ¶ 41 (hereinafter "**Verizon PA 271 Order**").

⁴ *Joint Application by SBC Communications Inc., Southwestern Bell Tel. Co, 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*, Memorandum Opinion and Order, CC Docket No. 01-194, FCC 01-338 (rel. Nov. 16, 2001) at ¶ 40. (emphasis added).

⁵ See AZ 6 ATT 5; CO 6 ATT 55; Multi-State S8-ATT-MFH-1; WA 851.

⁶ IWOs 1076 & 1078. Exceptions 2003, 3094, 3110, 3094, 3102 & 3111. Observation 3066.

⁷ See e.g., 6/28/01 Multi-State Tr. at 6.

process was to create an initial CMP document that described how Qwest would administer changes to its OSS and how Qwest would communicate those changes to the CLECs. The redesign process began in earnest in mid-July of 2001.

In addition to the redesign needs, throughout the many § 271 workshops, Qwest also asked that several disputed issues be removed from discussion at the workshops and resolved in the CMP process.⁸ Those issues have generally been referred to as the “product and process” issues. They include things like ensuring that Qwest technical publications and its PCAT⁹ are consistent with the SGAT. Without such consistency, this Commission has no way of knowing whether Qwest has actually implemented the SGAT or whether Qwest is, in fact, complying with it.

In short, this Commission’s review of the CMP is one of the last steps necessary to an open, full and fair investigation of Qwest’s actual performance. Until Qwest presents all five pieces of the necessary proof identified above, this Commission and the FCC do not have sufficient evidence to determine whether Qwest’s CMP process is compliant with the law or not.

II. DISCUSSION

The FCC has outlined five criteria against which an RBOC’s change management process is measured to determine whether the change management plan can be considered adequate to afford an efficient competitor a meaningful opportunity to compete. Those elements are:

⁸ See e.g., regarding the updates to technical publications and the PCAT moved to CMP: WA 7/9/01 Tr. at 159; WA 7/11/01 Tr. at 162-63; WA 7/31/01 Tr. at pp. 165, 173, 175; AZ 3/6/01 at 23-4; AZ 4/9/01 Tr. at 27; AZ 5/16/01 Tr. at 53-7; Az 6/15/01 Tr. at 6/15/01 at 154-55; CO 2/21/01 at 13; Multi-State 6/25/01 Tr. at 133; Multi-State 6/28/01 Tr. at 140.

⁹ Technical publications and the PCAT are the documents that Qwest and CLEC field personnel use when actually implementing the SGAT and performing under other interconnection agreements.

- (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.¹⁰

Assuming an RBOC is able to demonstrate that its plan meets these FCC requirements, it must then demonstrate a pattern of compliance with its plan.¹¹ Since many of the re-designed elements of CMP are brand new or yet to be developed, the Commission cannot determine Qwest's compliance or lack thereof until Qwest provides the necessary evidence. Below, the Joint CLECs offer what it believes the necessary evidence entails.

A. Qwest's Draft CMP Document Does not Reflect Compliance with § 271 or the Completed Redesign Plan.

On numerous occasions, Qwest has complained that it has done more than any other RBOC with respect to its CMP process. The Joint CLECs submit that this is not accurate. The difference between Qwest's CMP process and the ones that the FCC has previously considered is summed up in the Bell Atlantic New York 271 Order. There, the FCC found:

Competing carriers have had a substantial role in the development of Bell Atlantic's change management process in New York. As part of a collaborative process *dating back to October 1997 and conducted under the auspices of the New York Commission*, Bell Atlantic and competing carriers developed a detailed process of managing changes to the Bell

¹⁰ *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas*, Memorandum Opinion and Order, CC Docket No. 00-65, FCC 00-238 (Rel. June 30, 2000) at ¶ 108 (hereinafter "*SWBT Texas 271 Order*").

¹¹ *Id.*

Atlantic systems and interfaces that affect competing carriers. *This process resulted in the May 1998 document.* Although there have been subsequent modifications to the Change agreement, *the basic process and timelines set out in this document are still applicable.*¹²

Unlike other RBOCs, Qwest's CMP process, the one it offers for judgment, dates back only to mid-July. The "basic process" is not fully documented nor has Qwest adhered to such a process for any length of time.

In response to this "not yet fully documented nor implemented and adhered to problem," Qwest often cites to the Texas § 271 order, arguing that, because Southwestern Bell Telephone ("SWBT") was not required to run a "major" EDI release through its CMP process,¹³ Qwest needn't complete its redesign documentation or prove any portion of implementation and adherence. Contrary to Qwest's interpretation of this FCC order and the facts in that case, SWBT had a final draft of its CMP document and it had implemented that process, with the exception of "versioning." Moreover, SWBT provided evidence that it was adhering to the process since September of 1999. Neither can be said of Qwest and its CMP process.¹⁴ Similarly, the FCC held in the Bell Atlantic New York order that,

Bell Atlantic's basic change management process *is memorialized* and set forth in a single document, the Change Agreement. As a result, Bell Atlantic's change management process documentation is clearly organized and readily accessible to competing carriers. Competing carriers can readily access the Change Agreement on Bell Atlantic's Telecommunications Industry Services (TIS) web page. Modifications to this document are also available on the TIS web page.¹⁵

¹² BANY 271 New York Order at ¶ 104 (emphasis added).

¹³ SWBT Texas 271 Order at ¶ 114.

¹⁴ SWBT Texas 271 Order at ¶¶ 110 – 114.

¹⁵ BANY 271 New York Order at ¶ 107 (emphasis added); *see also, In the Matter of Application of Verizon New England Inc., Bell Atlantic Commun., Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Co. (d/b/a Verizon Enter. Solutions) and Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, Memorandum Opinion and Order, CC Docket No. 01-9,

Here, while Qwest CMP document is now on its web site, that document is nothing more than a *draft* redesign document and not the final, basic process memorialized after completing the collaborative redesign.

All the CLECs are fully aware that the CMP process itself may change over time, but what distinguishes Qwest's CMP process from others is that Qwest never had a compliant basic document to begin with; it is just now putting the finishing touches on that document and the Commission should ensure that Qwest finishes that project and supplies the final draft before it determines that Qwest has collaboratively developed "a change management document that is clearly organized, readily accessible to CLECs."¹⁶

Current Status of the CMP Redesign Demonstrates that the Draft CMP Document is Incomplete and, Therefore, Qwest's CMP is not Reflected in a Single Document.

As noted above, Qwest and CLECs have been working on the redesign of Qwest's CMP since mid-July 2001. Before it is complete, the CMP Redesign will continue for a few more months. Briefly reviewing the procedural history and ending on the current status provide evidence that Qwest's CMP document is not only incomplete, but also not reflected in a single document.

As a result of workshops and hearings in Arizona and Colorado, two significant things happened in the month of February that have impacted the work that CLECs and Qwest have been doing in the CMP Redesign meetings. First, at the February 25, 2002 Colorado hearing, the Colorado Commission directed Qwest and CLECs to file, on April

FCC 01-130 (Rel. Apr. 16, 2000) at ¶104 (finding that plan was memorialized and set forth in a single document)(hereinafter "*Verizon Mass. 271 Order*").

¹⁶ *Id.* at ¶ 110.

8, 2002, briefs on CMP issues that require resolution by the that Commission.¹⁷ Second, at a workshop held in Arizona on February 25, 2002, the Arizona Staff requested that CLECs submit a list of issues that needed to be closed prior to Qwest receiving § 271 approval. AT&T filed its issues with the Arizona Commission on March 6, 2002.¹⁸ Covad and WorldCom filed their additions to AT&T's list on March 8, 2002.

Because of the April 8, 2002, filing deadline, the CLECs and Qwest at CMP redesign assembled a priority list of issues to address before moving to other issues. This list was based on the priority issues identified in Arizona and was divided into two parts: (i) issues that could result in impasse¹⁹ requiring state commission resolution (referred to as "1s") and (ii) issues not likely to result in impasse (referred to as "0s").²⁰ These issues lists were developed at the redesign meeting held on March 5 – 7, 2002.²¹ The redesign team attempted to reach consensus on a "conceptual basis" for each issue; and, if that was not possible, they agreed to identify impasse issues that required resolution by State Commissions for the April 8, 2002 filing. The parties worked on these issues at the CMP redesign meetings held on March 5 – 7, March 18 – 19 and April 2 – 4, 2002.

¹⁷ Since that time, other states have adopted April 8, 2002 as the filing date for CMP issues.

¹⁸ "AT&T's List of Priority CMP Issues" included CMP Redesign issues that needed to be concluded, but also included other matters that need to be addressed, including the requirement that Qwest adhere with the redesigned CMP over time and that the OSS test issues relating to CMP must be resolved. These additional matters are addressed herein.

¹⁹ Note that the Joint CLECs and Qwest identified a CMP impasse issue in their comments filed in February 2002. That issue was whether CRs relating to Qwest Performance Indicator Definitions ("PIDs") and Performance Assurance Plans ("PAPs") should be treated as regulatory changes in CMP, giving them a preferred status. The Colorado Commission, in a decision meeting held March 13, 2002, decided the issue in favor of the CLEC position (e.g. PID and PAP changes are not regulatory changes subject to higher priority). Qwest has agreed to accept this resolution for all states. Thus, no further issue exists for Commission resolution in any other states.

²⁰ A third category was identified, but a separate list was not created. This category was labeled as "x" and indicates items that need not be discussed. There were only two such issues. One is the PID/PAP impasse that was previously identified by the parties and briefed in Arizona and Colorado. The other had to do with regulatory changes, a topic on which the parties had reach consensus on a conceptual level.

²¹ The list of priority CMP Redesign issues (1s and 0s) is provided as **Exhibit A**.

For purposes of this discussion, it is important to note that reaching “conceptual” agreement on issues involved discussion of issues at a very high level, attempting to identify only the major points of concern. This did not involve drafting language for the “Master Red-lined CLEC-Qwest CMP Re-Design Framework Interim Draft” document (“Draft CMP Document”). This drafting will take place at a later time, and it will require a more detailed discussion of the issues with the potential that when such detailed language is drafted, the parties may identify additional significant issues that require Commission resolution. Through these more detailed discussions the parties’ views become clearer to one another and they may uncover disagreement that they previously had not realized existed. Nevertheless, the Joint CLECs are hopeful that language for the Draft CMP Document will be drafted without encountering impasse issues.

The Joint CLECs are pleased to report that after the most recent CMP redesign session held on April 2 – 4, 2002, the parties reached “consensus” on a conceptual basis on all but two of the priority issues. Attached, as **Exhibit B**, is a summary of the conceptual agreements. In addition, the parties were able to draft language for the Draft CMP Document on a few of these issues. For most of the “consensus” issues, however, the parties still need to draft language. Once drafted, Qwest would add this language to the Draft CMP Document. At that point, Qwest should be in a position to implement the agreements on these issues.

Given the incomplete nature of the Draft CMP Document, Qwest cannot demonstrate that its CMP is reflected in a single document, as required by the FCC. Consequently, Qwest’s CMP does not yet meet the FCC’s requirement “that information relating to the change management process is clearly organized and readily accessible to

competing carriers.” In addition, Qwest is not yet in a position to implement several aspects of the redesigned CMP, which makes it impossible at this point for Qwest to demonstrate a pattern of compliance with the redesigned CMP.

B. Qwest Must Provide Evidence that it has Actually Implemented and Adhered to the Redesigned Process.

“After determining whether the [RBOC’s] change management plan is adequate, [the FCC] evaluate[s] whether the [RBOC] has demonstrated a pattern of compliance with this plan.”²² Because Qwest’s newly redesigned plan has hardly, if at all, been fully implemented, Qwest cannot develop a pattern of compliance over time. At a minimum, it must, nonetheless, show adherence where it has implemented the plan.

While proof of complete compliance with every detail of the redesigned process is preferable, the Joint CLECs are not asking that Qwest provide such proof. Rather, the Joint CLECs are asking that the Commission ensure that Qwest is complying with at least the fundamental procedural safeguards contained in the redesigned CMP. Anything less would be unfair to the CLEC community that has, not only given Qwest innumerable hours on an expedited basis working on this process, but also deserves some Commission support in demanding that Qwest actually does what it has promised to do, before it obtains any § 271 rewards.

To date, the Joint CLECs can only offer evidence of Qwest’s non-compliance with its redesigned CMP process. For example, in the following opportunities to comply, Qwest has failed.

1. Qwest has Failed to Observe the CMP Production Support Process.

²² *SWBT Texas 271 Order* at ¶ 108 (judging adherence over time); *BANY 271 New York Order* at ¶ 112(judging adherence over time); *Verizon Mass. 271 Order* at ¶ 105 (judging adherence over time).

Attached, as **Exhibit C**, are two Incident Work Orders (“IWOs”) issued by Cap Gemini Ernst & Young (“CGE&Y”), the third-party tester in Arizona²³ as part of the OSS test. One has to do with Qwest not sending access records to CLECs on the daily usage feed (“DUF”). The other has to do with Qwest dropping WATS call records. Both IWOs identified that Qwest was not sending billing records to CLECs, which impacted a CLEC's ability to bill for certain services, thereby adversely affecting CLEC revenues. Qwest responded to these IWOs, stating that it made certain systems “fixes.” AT&T asked whether Qwest notified the CLECs about the systems “fixes.” Qwest responded as follows:

In accordance with CMP, Qwest did not provide CLEC notification of these fixes because the fixes did not require CLECs to change their system or processes.²⁴

Not only is this statement is incorrect, but it indicates that Qwest did not adhere to the production support process found in the Draft CMP Document, which Qwest purportedly implemented on February 1, 2002.²⁵ The systems fixes, identified in the IWOs, took place on February 7 and 18, 2002, after the alleged implementation.

When a CLEC or Qwest identifies a systems trouble, the correct path for resolution is by opening a trouble ticket with the Qwest IT Wholesale Systems Help Desk. The production support process contains four severity levels of systems troubles;²⁶ and, once the trouble is reported, a severity level is assigned. The trouble identified by IWOs 2127 and 2128 should have been assigned a severity level of 1 or 2 (*e.g.*, moderate to large number of CLECs affected, moderate to major impact on revenue, files lost). If

²³ IWOs 2127 and 2128, respectively.

²⁴ IWO 2128.

²⁵ Attached as **Exhibit D** is the Draft CMP Document dated April, 2002. Section 11 contains the Production Support process.

²⁶ Draft CMP Document, Section 11.5.

the trouble impacts multiple CLECs, Qwest is required to send an Event Notification to the CLECs.²⁷ Event Notifications provide several pieces of information, including the resolution of the trouble once determined.

AT&T raised this issue with Qwest at the CMP redesign meeting held on March 19, 2002. Jeff Thompson of Qwest acknowledged that the production support process should have been followed (e.g., Qwest should have opened an IT Help Desk trouble ticket and sent an Event Notification).

2. Qwest is Unable to Address the Adverse Impacts of its Preferred Local Carrier Freeze (“PLOC”), and CLEC Attempts to Resolve the Issue in CMP Demonstrates that Qwest’s CMP is still an Ineffective Process Upon Which Qwest Seeks Premature Recommendations from this Commission.

Recently, Qwest made available to retail customers a preferred carrier local service freeze.²⁸ Qwest’s product catalog or PCAT describes the local service freeze as follows:

Local Service Freeze prohibits an unauthorized change of an end-user's local service from one local service provider to another. The customer of record places the Local Service Freeze on the end-user account. The customer of record may be a Competitive Local Exchange Carrier (CLEC), a Reseller, or a Qwest retail end-user. *The Local Service Freeze indicator must be removed from the account before processing a request to change local service providers. The end-user must request their existing local service provider to remove the Local Service Freeze from their account.* Local Service Freeze is offered at no charge. This option is available to prevent local service slamming. (emphasis added)

Local Service Freeze is available on all voice services (dial tone) at the working telephone number line level. The customer may freeze one line or all lines on their account.²⁹

²⁷ Draft CMP Document, Section 11.6.

²⁸ The local service freeze is referred to as LEFV in some of the correspondence attached to this brief.

²⁹ Qwest’s PCAT documentation on Local Service Freeze is located on the web at <http://www.qwest.com/wholesale/clecs/lsfreeze.html>

As the language above indicates, if a local service freeze is in place, it must be lifted from an account before Qwest will honor a competitor's order or a local service request ("LSR") to switch the retail customer's service over to the competitor.

During the week of February 18, 2002, Qwest rejected AT&T LSRs because of its PLOC Freeze placed on retail customer accounts. Despite following the appropriate process for removal of the PLOC Freeze, AT&T and the customers desiring its service have experienced repeated difficulty with having Qwest remove the PLOC Freeze such that the customers who have chosen AT&T may switch their local service provider.

Because the inability to switch customers desiring service from a competitor is an absolute barrier to competition, AT&T has been in constant correspondence and discussions with Qwest attempting to resolve the difficulties it has getting Qwest to lift the freezes efficiently and timely. To date, Qwest has offered nothing more than a band-aid "work-around" on frozen accounts. This work-around is required on the vast majority of accounts that have a freeze, and it always requires that AT&T delay the due date of service on its orders.

AT&T submitted a change request ("CR") in CMP asking Qwest to develop an effective process for lifting the freezes on residential accounts.³⁰ Qwest responded that because it was litigating this issue, it should not be addressed in CMP and its team would not be prepared to discuss any PLOC freeze policy issues. This decision had an adverse impact on AT&T's business, so AT&T requested that its CR be expedited, using the newly redesigned expedite process, in CMP. Although Qwest discussed AT&T's request

³⁰ For a more detailed chronology of the events regarding the freeze issue, please see **Exhibit E**.

during several CMP meetings, Qwest has not resolved the problem and the CMP process has proven to be less than effective.³¹

The rule in CMP should be that all changes, especially Qwest-initiated changes such as the PLOC freeze, are implemented seamlessly with all impacts to CLECs anticipated and addressed in advance. That said, the Joint CLECs recognize that, for various reasons, this will not always happen. Should the implementation of a change take place and CLECs are adversely impacted in a way that could not be anticipated, Qwest must have a way to address those problems promptly whether it be through withdrawing the change for some period of time or through the establishment of a “swat team” type of approach to quickly fix the problems. AT&T has experienced neither with respect to the impacts caused by the freeze, a situation where Qwest *should* have anticipated that its inability to lift the freezes would cause significant adverse impacts on CLECs.³²

3. Qwest Fails to Adhere to its Notification of Retail Changes/Retail Parity Process.

As part of the redesign discussion regarding Qwest’s notification of product and process changes that are CLEC-impacting, CLECs questioned how Qwest ensured that notice of product and process changes on the retail side (*e.g.*, new products, etc.), which also impacted wholesale customers, would be communicated to those wholesale customers. Qwest responded that it had in place a “checklist” (which it subsequently posted on its CMP redesign website on October 15, 2001) that was always reviewed and adhered to whenever product and process changes were made on the retail side to ensure

³¹ *Id.*

³² In the CMP Redesign session conducted on March 18 – 19, 2002, CLECs and Qwest discussed a process for more immediate reaction from Qwest and resolution of systems and product/process problems. This process still requires a good deal of work and then implementation. In the CMP Redesign session conducted on April 2 – 4, 2002, the CLECs discussed the CMP exception process and conceptually identified improvements to it. This process requires further work as well, particularly with regard to timeframes for resolution and the availability of Qwest operations SMEs to resolve issues quickly.

that, where necessary, notice was provided to wholesale customers. Further, Qwest stated, in response to written questions posed by AT&T, that retail changes were reviewed prior to implementation on the retail side to determine whether any changes, modifications or delay were required in order to ensure retail and wholesale parity.³³ Based on Qwest's commitment to utilize and adhere to the "checklist" for purposes of CLEC notification of retail changes, CLECs believed that Qwest had in place adequate processes to ensure timely and adequate notification to wholesale customers of retail changes that impacted them as well as to ensure parity between Qwest's retail and wholesale customers.

Unfortunately, Qwest has not adhered to its supposed process for notification of retail changes to its wholesale customers. By way of background, in approximately March of 2000, Qwest informed at least some of its CLEC customers that it could not provision ISDN loops where there was integrated pair gain ("IPG") on that loop.³⁴ As a consequence, certain CLECs determined that they would not place orders for ISDN loops where IPG was present since that ordering activity was fruitless and would never result in a provisioned loop. By pure happenstance, CLECs learned just a few weeks ago, in March 2002, that Qwest is now able to and, in fact, has been, provisioning ISDN loops where IPG is present for some unspecified period of time for its retail customers. Significantly, Qwest *never* notified its wholesale customers of this change in retail product and process (to CLECs' significant competitive and economic detriment), as it explicitly was required to do by its own written policies and procedures, and oral

³³ See **Exhibit F**.

³⁴ See Affidavit of Sheila Hoffman, attached as **Exhibit G**.

statements during the redesign meetings.³⁵ It is clear, therefore, that while Qwest may have some purported process in place to ensure notification through CMP of CLEC-impacting retail changes, it has not complied with that policy. This failure of compliance is fatal to Qwest's attempt to prove it has a Section 271 sufficient CMP, particularly to the extent that Qwest's failure to provide notice goes to the heart of the non-discrimination requirements of the Act.

4. Qwest Fails to Adhere to its Timing of Notification of CLEC-Impacting Changes Process.

A key issue upon which the parties reached conceptual agreement in the CMP redesign is the timing of the advance notice provided by Qwest for Qwest-initiated product and process changes. Each type or category of Qwest-initiated product or process change is designated as a specific level of change, with Level 1 product and process changes requiring the least amount of notice, going up through Level 4 changes, which require the most advance notice as well as the submission of a change request. Depending upon the level of impact on the CLEC's business and operating procedures, a Qwest-initiated product or process change is placed at a higher level and more notice is given to ensure that adequate time is provided for the CLEC to prepare for and implement (or challenge) the noticed change. Further, the parties agreed that the category of changes included within each level would be exhaustive. Finally, Qwest agreed and subsequently confirmed that the parties' initial categorization of types of changes by level would be implemented on or before April 1, 2002.

During the parties' discussion regarding the categorization of types of changes, all parties agreed that NC/NCI code changes were a "Level 3" type change that required at

³⁵ *Id.*

least thirty-one (31) calendar days notice prior to implementation of any code changes.³⁶ Despite implementation of the product and process notice requirements on April 1, a mere three days later, on April 4, Qwest notified CLECs that it was changing certain NC/NCI codes *effective that same day*.³⁷ Thus, despite the supposed implementation of the notice requirements, Qwest already disregarded them, thereby failing to demonstrate that it can and will comply with the agreed-upon process for notification of Qwest-initiated product and process changes. Here again is another example of Qwest's failure and refusal to comply with the unambiguous and agreed-upon processes for change management.

Through these examples, Qwest cannot be found in § 271 compliance until it demonstrates a pattern of adherence to the processes to which it agreed in its redesigned CMP.

C. Qwest Must Address and Adequately Resolve all Outstanding Exceptions and Observations of the Third-Party Tester Before Commissions can Find Compliance.

Throughout their review to the CMP process, the third-party testers from Arizona and the Regional Oversight Committee ("ROC") have issued what are called "Exceptions" and "Observations." The exceptions and observations serve as notice to Qwest of the various deficiencies and concerns the testers have in regard to Qwest's CMP. In general, Qwest was to address each observation and exception and resolve any issues detected. Attached, as **Exhibit J**, is a matrix showing the current status of the various exceptions and observations.

³⁶ See **Exhibit H**.

³⁷ See **Exhibit I**. Notably, Qwest acknowledged that such changes would result in "CLECs unable to submit orders"

As further evidence of Qwest's premature request to have Commissions review its CMP process, Qwest has cut-short resolution of all the outstanding Exceptions and Observations. The Commissions, State and FCC alike, should not accept Qwest's proposal. Rather, Qwest should be ordered to complete the process it put in place so as to ensure that CMP becomes the effective tool it is supposed to be under the law.

Three Exceptions in the ROC test merit discussion here because -- given Qwest's rush to seek premature approval -- the third-party tester has been forced to close the Exceptions either "unresolved" or "inconclusive." The three Exceptions are 3094, 3110 and 3111, which are discussed in detail below.

1. Exception 3094 Describing Lack of Adherence to CMP Remains Unresolved.³⁸

Exception 3094 was opened on December 12, 2001, and stated that Qwest did not adhere to its established change management process for notifying CLECs about a proposed change. It allowed input from all interested parties. On April 4, 2002, KPMG recommended that this exception be closed unresolved and stated:

KPMG Consulting recognizes that Qwest and CLECs have yet to agree on key components of a comprehensive Product/Process CMP. Qwest implemented an *ad hoc* process to manage Qwest-initiated Product/Process changes as of April 1, 2002. Although CLECs and Qwest have reached an "agreement in principle" for this interim process, it is KPMG Consulting's understanding that the referenced process remains subject to further development, modifications, and negotiations in CMP Redesign. KPMG Consulting is not able to conduct a thorough evaluation until the prescribed process is formalized, the Redesign sessions are complete, and the process is fully implemented and confirmed. However, the current schedule is for Redesign meetings to continue until June, 2002.

Qwest has requested that KPMG Consulting conduct no further testing. Since the *ad hoc* process is not final and third party testing is concluding, KPMG was unable to conduct retesting to ensure that a complete and functioning Product/Process CMP was in place.

³⁸ See Exhibit K (Exception 3094).

2. Exception 3110 Describes Qwest's Further Lack of Adherence to CMP.³⁹

Exception 3110 was opened on January 24, 2002, and stated that Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.

On April 2, 2002, KPMG recommended that this Exception be closed as "inconclusive," stating:

Summary of KPMG Consulting's Retest Activities:

Exception 3110 identified six issues with the notifications that Qwest distributes to the CLEC community. KPMG Consulting conducted retesting of Qwest notifications with respect to issues (1) and (4). KPMG Consulting reviewed Qwest's responses along with substantiating material, and confirmed that Qwest had taken steps to address issue (2) and (5). Issue (3) relates to advance intervals for notifying CLECs about unanticipated system fixes, patches, or unplanned outages. KPMG Consulting determined that this issue falls within the scope of another report, Exception 3112, and will address it accordingly. KPMG Consulting was unable to fully test for resolution of issue (6) since established intervals and milestones will occur outside of the scope of the Change Management Process test execution phase.

Summary of KPMG Consulting's Retest Results:

KPMG Consulting reviewed a total of 278 notifications that Qwest distributed between February 1, 2002 and March 22, 2002 and identified one incident in which Qwest experienced a delay of two days between the time the document was prepared and actual distribution. Among the reviewed notifications, KPMG Consulting identified three planned outage notices, all of which met the advanced notice interval requirement. KPMG Consulting was satisfied with retest results and considered issues (1) and (4) resolved.

KPMG Consulting received a corrected notification shortly after Qwest had distributed the inaccurately titled notification in issue (2). KPMG Consulting recognizes that Qwest employed an ad hoc process to address such anticipated errors, and considers issue (2) resolved.

³⁹ See Exhibit L (Exception 3110).

KPMG Consulting observed that Qwest notified CLECs on March 1, 2002 about restructured rates for Washington State. It appeared that Qwest had implemented a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting subsequently closed issue (5).

Issue #6 Lack of Adequate Tracking and Verification

During the O/E Focus Call on March 21, 2002, Qwest confirmed that CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are being followed for all upcoming software releases. KPMG Consulting reviewed Qwest internal process documents and verified that software and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the *Master Redlined CLEC-Qwest CMP Redesign Framework*. Due to the recent implementation of these process changes, KPMG Consulting has not been able to observe adherence to the documented process for notification interval management. Since Qwest has requested that KPMG Consulting conduct no further testing, KPMG Consulting will not be able to determine if Qwest's documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals.

3. Exception 3111 Describing Lack of Clarity for Prioritization of CLEC Requested Changes.⁴⁰

Exception 3111 was opened on January 30, 2002, after Observation 3067 was converted to an exception, and stated that Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package.

On April 4, 2002, KPMG recommended that this Exception be closed "inconclusive" stating:

Summary of KPMG Consulting's Retest Activities:

KPMG Consulting identified five issues in Exception 3111 that related to inadequate processes and a pattern of information-sharing that prevented

⁴⁰ See Exhibit M (Exception 3111).

CLECs from making informed decisions during the CR Prioritization Process for Change Management. KPMG Consulting conducted a retest by reviewing Qwest-provided documentation and by observing Change Management activity and meetings up through April 4, 2002. Due to the current schedule of this test, KPMG Consulting will be unable to observe the complete prioritization and packaging processes, as now documented, for IMA Release 11.0 or SATE 11.0.

Summary of KPMG Consulting's Retest Results:

KPMG Consulting reviewed various internal documents, verifying that Qwest had adequately addressed each of the five issues raised in this Exception through documentation modifications and enhancements to the process. However, KPMG Consulting observed that Qwest and CLECs had not finalized the prioritization and packaging processes before prioritization for IMA Release 10.0 took place. Therefore, adherence to the new process was unable to be confirmed for at least two of the original issues raised in Exception 3111 - issue reference numbers (2) and (5).

Exception 3111 was the subject of the Focus Call on March 21, 2002. Qwest requested that KPMG Consulting review IMA Release 10.0 to test its applicability to the current processes since packaging for IMA Release 11.0 is not scheduled to occur until after the conclusion of OSS 271 Third Party Testing. KPMG Consulting stated in its March 27, 2002 response that there are several areas where the new prioritization and packaging process was either not established, or not followed, for IMA 10.0. Since the process was not completely established and followed for IMA Release 10.0, and packaging and prioritization for Release 11.0 is scheduled to occur beyond the completion of this Test, KPMG Consulting was unable to test adherence to the complete prioritization and packaging process for a new IMA Release.

Given the significance of prioritization and packaging processes in allocating IT resources and managing overall changes applied to Qwest Wholesale OSS interfaces, KPMG Consulting cannot reach a definitive conclusion regarding current processes without verifying the participants' adherence. Qwest requested on April 3, 2002, that KPMG Consulting conduct no further testing related to this Exception. Qwest recognized that this will not allow KPMG to observe Qwest's adherence to the complete end-to-end prioritization and packaging processes for a single major system release.

In short, these examples clearly reveal a problem with Qwest's current CMP, and neither this Commission nor the FCC can find other than Qwest fails to adhere to its

CMP process and that the process is, as yet, not adequate to meet the FCC's five criteria required for approval.

D. Qwest Must Prove it Has a Stable Testing Environment that Mirrors Production.

The stand alone test environment ("SATE") is a software test bed that CLECs may use to test their OSS interfaces with Qwest's IMA without risking customer impacts on a live production system. SATE can be used to test new releases of IMA or for testing old IMA releases with new CLEC software. SATE uses the same IMA business rules as the production system, but mimics the back end legacy systems. CLECs enter local service orders into SATE as they would enter them in the production environment. Order flow is simulated by SATE, giving the CLEC the appropriate firm order confirmation ("FOC") or error code, as appropriate.

Recent testing of SATE in Arizona by third-party tester Hewlett Packard ("HP") has shown that Qwest fails to meet the minimum acceptable standard of 95%, currently adopted by ROC and Arizona. Results for this testing are as follows:

Phase I – Expected Results Verification	92.21%
Phase II – Business Rules Testing	86.07%
Phase III – Expected Results Verification for Stability	94.62%

Thus, Qwest fails each phase by not complying with the ROC and Arizona standard.

In addition, continuing investigation by AT&T indicates that HP failed to record all the errors that it uncovered during its testing to obtain the results listed above.

Consequently, the conclusion of AT&T's investigation may show that the results are overstated and the actual performance is even lower. Because Qwest continues to have difficulty providing SATE software that meets minimum criteria of acceptability, the

result is software that will give erroneous results to CLECs who use it; this is hardly a stable test environment that mirrors production.

In fact, the SATE test environment is so unstable that eight releases had to be made in the first month that SATE 9.0 was available to fix problems. At least eight known problems, identified by HP, are still unresolved.

As with HP, where the ROC is concerned, KPMG -- as of April 3, 2002 -- indicated that there remained numerous unresolved problems with SATE. These problems include:

1. Exception 3077 Describing that SATE Does Not Offer CLECs Sufficient Testing Capabilities.⁴¹

Exception 3077 was opened on November 7, 2001, and stated that Qwest's Interconnect Mediated Access ("IMA") Electronic Data Interchange ("EDI") Stand Alone Test Environment did not offer CLECs sufficient testing capabilities.

This Exception remains open. On April 3, 2002, KPMG stated:

Since KPMG Consulting's January 24, 2002 response, Qwest has implemented the Virtual Interconnect Center Knowledge Initiator (VICKI) and flow through capabilities for POTS and UNE-P POTS for Western region LSRs in SATE 9.0. Based on these SATE enhancements, KPMG Consulting has readdressed the issues outlined in its January 8, 2002 response and the current status of SATE in relation to this Exception.

Other problems with SATE include:

- a. **SATE does not generate post-order responses in the same manner in which they are created in the production environment.**

In its response dated November 20, 2001, Qwest stated:

"Qwest will provide automated post-order responses in SATE by January 28, 2002. With the launch of automated post-order transactions in SATE, new test scenarios will provide the CLEC with the ability to experience the behavior of IMA consistent with production timing of post-order

⁴¹ See Exhibit N (Exception 3077).

transactions. It will also ensure that CLECs receive automated responses consistent with those received in production, negating any risk from manual handling.”

Qwest implemented the Virtual Interconnect Center Knowledge Initiator (VICKI) with the deployment of SATE 9.0 on January 28, 2002. As of the date of this response, KPMG Consulting has not been able to assess commercial activity associated with VICKI. Therefore, KPMG Consulting’s evaluation is strictly limited to process documentation regarding the functionality of VICKI.

KPMG Consulting reviewed the following sources of information:

1. *A White Paper on The Stand Alone Test Environment (SATE) Virtual Interconnect Center Knowledge Initiator, Version 1.00, December 7, 2001*
2. *IMA EDI SATE VICKI Paths for the Stand Alone Test Environment (SATE), Version 9.05, March 22, 2002*
3. *EDI Implementation Guidelines for Interconnect Mediated Access (IMA), Version 9.1, February 18, 2002*

Based on the documentation, it appears that VICKI provides CLECs the following:

- Ability to receive specific, expected responses to LSRs, based on the Product, Activity, and Supplemental Type for that LSR (known as “paths”)
- Predetermined time delays between responses, based on the Product, Activity, Supplemental Type, and Remarks field combination for the LSR
- Ability to request additional paths for new combinations that CLECs wish to test

CLECs employ VICKI by populating the “Remarks” field of the submitted LSR with the prescribed VICKI path. The Remarks field must also reflect whether the CLEC wants to receive responses with production-like intervals or with shorter time delays specifically designed for interface testing. The VICKI paths currently available in SATE are documented in the *IMA EDI SATE VICKI Paths* document. Post order transaction responses that are handled manually in production by an ISC representative will continue to be manually processed in SATE.

Although VICKI appears to have enhanced some aspects of EDI interface testing, KPMG Consulting noted certain limitations of the application, as noted described below:

- (1) **VICKI response times may not match production response times**

Qwest states, that “responses and timeframes may not exactly match a similar LSR submitted to production.”⁴² KPMG Consulting would expect that the automated post order response times would accurately reflect the response times obtained in the production environment. The fact that VICKI response times do not necessarily mimic production response times is an indication that the testing environment does not provide CLECs with an accurate depiction of production capabilities.

(2) VICKI response detail may not match production response detail

Qwest states, “due to the complexities of certain responses, the detail on these transactions may not match the detail received on a production response for a similar transaction. FOCs are provided with varying quantities of service orders. Also, with respect to the Service and Equipment detail of a Completion notice, VICKI is built to allow a CLEC to understand the EDI Map structure and content of a Completion. It does not return a Service and Equipment section specific to the CLEC’s test LSR. If a CLEC desires a specific Service and Equipment section be returned, they can request it be added to VICKI via the Data Request Process.”⁴³ KPMG Consulting would expect that the detail on the post order responses would be the same as the detail found in the production responses. The fact that VICKI response detail does not match the production response detail is another indication that the testing environment does not provide CLECs with an accurate depiction of production capabilities.

(3) VICKI does not support “real world scenario testing”

Although VICKI provides CLECs the opportunity to receive certain post order responses without manual intervention, it does not allow CLECs to experience “real world scenario testing”. As stated in the document, “*A White Paper on The Stand Alone Test Environment (SATE) Virtual Interconnect Center Knowledge Initiator*”::

“Qwest has also recently made plans to move ahead with Real World Scenario Testing for post-order transactions. With real world scenario testing, when a CLEC sends an LSR request to Qwest they are asking “what” would happen to this specific LSR if the telephone numbers, circuits, and facilities in SATE existed in Qwest’s Production Network and this specific LSR was sent to Production. Plans for Real World Scenario post-order testing will be addressed in the Flow-Through White Paper to be reviewed on January 8, 2002. These plans were also discussed

⁴² IMA EDI SATE VICKI Paths for the Stand Alone Test Environment (SATE), Version 9.05, March 22, 2002, at 4.

⁴³ IMA EDI SATE VICKI Paths for the Stand Alone Test Environment (SATE), Version 9.05, March 22, 2002, at 5.

in the SATE User Group Meeting on November 27, 2001. For post-order processing today, only the above interface testing scenario is supported. Real World Scenario Testing will allow CLECs to test the exact message they would receive in production for the LSR they sent. VICKI allows them to test message formats, messages, and maps for specific pre-determined test scenarios.”⁴⁴

KPMG Consulting would expect that a fully functioning and robust test environment would support real world testing as described above.

Although VICKI helps CLECs to understand the EDI mapping structure and to determine if their systems can accept certain types of responses for the orders submitted, by design, it does not appear to adequately support complete interface testing capabilities. The limitations described above prevent CLECs from experiencing transaction responses as they would be received in the production environment. By having to select predetermined paths in order to receive responses automatically, VICKI is inherently dissimilar to the way in which orders are processed in the production environment.

KPMG Consulting acknowledges that Qwest intends to implement a flow through component to SATE, as discussed in Issue #2 below. While the implementation of this component should alleviate the third identified limitation of VICKI, it will not completely overcome the deficiencies noted. Therefore, KPMG Consulting recommends that this issue remain open until the identified issues are addressed.

b. Flow through orders are not supported in SATE.

In its response dated November 20, 2001, Qwest states, “Qwest will enhance the SATE environment to add a test flow through system and test Service Order Processors (SOPs). Qwest will implement the test flow through capability for Western region POTS flow LSRs during the first quarter of 2002. Qwest will implement the remainder of test flow through capabilities by May 20, 2002. Once flow through is implemented in SATE, CLECs will have the option to choose when they want their SATE transaction to be sent to the test flow through systems, or receive a specific test scenario response. If the CLEC chooses to have their transaction sent through the test flow through systems, only flow through eligible LSRs will successfully flow. LSRs, which are not eligible for flow through, will be sent to the queue for manual handling. The option to send the test LSR to the flow through systems will allow the CLEC to experience an immediate response once the flow through order is successfully processed and a manual response if flow through is not successful.”

⁴⁴ *A White Paper on The Stand Alone Test Environment (SATE) Virtual Interconnect Center Knowledge Initiator*, Version 1.00, December 7, 2001, at 3.

Qwest further clarified the anticipated SATE flow through enhancements in its December 21, 2001 response by stating, "Qwest will implement the addition of flow thru capability to SATE in two phases. The first phase is scheduled to be available on February 20, 2001. This phase will include POTS and UNE-P POTS flow thru for Western region LSRs. The second phase will include implementation of all other flow thru eligible products and POTS and UNE-P POTS in the central and eastern regions. This phase is scheduled to be completed prior to May 20, 2002. Qwest will issue a Release Notice announcing the deployment of each release."

Qwest implemented the flow through capabilities for POTS and UNE-P POTS transactions in the Western region with the deployment of SATE 9.1 on February 25, 2002. As of the date of this response, KPMG Consulting has not been able to assess commercial activity for flow through orders. Also, KPMG Consulting does not have any SATE transaction testing results from the ROC 3rd Party Test to evaluate flow through capabilities. As with VICKI, KPMG Consulting's evaluation is strictly limited to documentation and a process review regarding SATE's flow through functionality.

KPMG Consulting reviewed the following documentation:

1. *A White Paper on Flow Through in The Stand Alone Test Environment (SATE), Version 1.00, January 3, 2002*
2. *EDI Implementation Guidelines for Interconnect Mediated Access (IMA), Version 9.1, February 18, 2002*
3. *Master Red-Lined CLEC-Qwest CMP Re-design Framework Interim Draft – Revised 03-27-02*

Based on the documentation, it appears that CLECs will be able to choose to have orders either sent to VICKI or to a flow through component of SATE. If a CLEC populates the remarks field with a path, then the order will employ the VICKI component; otherwise, the order will automatically be tested against the flow through system. Each order will either receive a FOC, an "Errored" status update if the order failed to flow through, or no response if flow through was not attempted. CLECs must have the Status Updates feature enabled to receive and "Errored" status update.

KPMG Consulting noted that flow through capabilities will not apply to all possible post order responses. The flow through documentation states, "Transactions not mentioned above, specifically those beyond service order creation such as Completions and Service Order Holds, will not be automated with this enhancement." It also states, "Note that no other

automated responses will be sent to CLECs beyond the automated FOCs or “Errored” Status Updates mentioned above.”⁴⁵

The functionality enhancement does not appear to provide CLECs with a full understanding of how an order could flow through to a “Completed” end state in the production systems. Without complete flow through functionality, CLECs may not be able to gain a complete understanding of how an LSR will react to a given set of conditions within the production environment. KPMG Consulting does not believe that this fundamental objective of interface testing can be fulfilled if CLECs can not perform end-to-end, real world testing.

As of the date of this response, the new flow through capabilities have only been rolled out to one region for two products. KPMG also noted in CMP documentation that certain components of the test environment have yet to be implemented. The CMP document states, “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.”⁴⁶ Until the flow through enhancements, including the service order processor, are completely implemented in SATE, the current test environment does not provide a CLEC with an accurate representation of the production environment’s flow through capabilities.

Based on the lack of end-to-end flow through functionality and the current implementation time frame, KPMG Consulting recommends that this issue remain open.

c. The volume of order responses supported in SATE is restricted due to manual response handling.

In its November 20, 2001 and December 21, 2001 responses, Qwest stated that it did not limit, but rather negotiated, the number of post order responses received by CLECs. However, KPMG Consulting noted several instances within the *EDI Implementation Guide* where it is explicitly stated that there are limitations to the number of FOCs that Qwest will provide to CLECs. The limitations appeared to stem from the manual response generation required for SATE. With the implementation of VICKI, the resource requirements necessary to support SATE transactions should have been diminished. KPMG Consulting would expect that with a production-like testing environment, Qwest would be able to support CLEC test order volumes without imposing limitations on the response

⁴⁵ *A White Paper on Flow Through in The Stand Alone Test Environment (SATE)*, Version 1.00, January 3, 2002, at 4.

⁴⁶ *Master Red-Lined CLEC-Qwest CMP Re-design Framework Interim Draft – Revised 03-27-02*, at 69.

activity. Limitations on the number of post order responses would not occur in the production environment under normal circumstances, and therefore, should not be imposed in the testing environment. Any such limitations are considered to be a deficiency of the test environment. Therefore, KPMG Consulting recommends that this issue remain open until Qwest can directly address the post order capacity restraint in SATE.

d. The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

Qwest stated in its December 21, 2001 response that it documents all known differences between IMA and SATE in the Overview section of the SATE Data Document. Additionally, Qwest stated that the proposed SATE PID (PO-19) will help ensure that Qwest has a complete and accurate data document.

KPMG Consulting's maintains its position that test environment transaction responses should mirror those from the corresponding production environment. Accordingly, CLECs can gain a reasonable level of assurance that they will receive the same results for the transactions they are testing, once they migrate into production. This should facilitate a smooth transition into production for CLECs, and minimize problems for both the CLEC and Qwest. Although the known differences between the behavior of SATE and the production environment are documented in the SATE Data Document, this does not negate the fact that SATE does not completely mirror the production environment.

While the proposed SATE PID, when implemented, will test the data in the data document by running transactions in SATE, it does not contain provisions to run the test deck in the production environment. Therefore, it provides no assurance that the same results will be achieved in the production environment.

Until Qwest can provide assurance that SATE produces results that are consistent with those that would be expected in the production environment, KPMG Consulting recommends that this issue remain open.

KPMG Consulting's expectation is that test environment transaction responses should mirror those from the related production environment. Although Qwest is continually enhancing the functionality of SATE, the test environment does not currently have sufficient end-to-end testing capabilities that would be expected of a robust and fully functional testing environment.

KPMG Consulting recommends that Exception 3077 remain open until Qwest can address the stated SATE deficiencies, and complete implementation of the proposed enhancements.

2. Exception 3095 Describes that SATE Does Not Offer CLECs Testing Capabilities for all Products.⁴⁷

Finally, Exception 3095 was opened on December 11, 2001, and stated that Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs testing capabilities for all Qwest products offered in production.

On April 2, 2002, KPMG recommended that this Exception remain open pending resolution of the identified issues, stating:

In its February 26, 2002 response, supplemented on March 26, 2002, Qwest focused on two issues regarding the current functionality of SATE, and the process for adding new functionality to SATE. Those issues are restated below with KPMG Consulting's respective responses.

1. "KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment."

KPMG Consulting reviewed the "CMP Change Requests -- Systems Interactive Report", noting the addition of the 30 SATE "production equivalent functionality" CRs (SCR021902-01 to SCR021902-30) that Qwest referenced in its February 26, 2002 response. Qwest stated that these CRs would be voted upon in the CMP meeting held on March 21, 2002. KPMG Consulting observed the prioritization and voting process for the SATE functionality CRs at the CMP meeting.

KPMG Consulting also received a copy of the SATE Prioritization Form and Instructions on March 25, 2002. KPMG reviewed the form, noting that it included 49 IMA CRs, including 22 of the 30 originally Qwest proposed SATE functionality additions. However, KPMG Consulting noted that the following CRs were removed from the list that Qwest originally proposed:

- SCR021902-9
- SCR021902-10

⁴⁷ See Exhibit O (Exception 3095).

- SCR021902-11
- SCR021902-12
- SCR021902-15
- SCR021902-20
- SCR021902-23
- SCR021902-25
- SCR021902-28
- SCR021902-30

KPMG Consulting is not sure why certain CRs were removed from the voting and prioritization form. Based on this omission, it does not appear that CLECs were offered the opportunity to vote on all products that could be added to SATE. With the exception of the removed CRs, KPMG Consulting noted that the voting form allowed CLECs to indicate whether or not they want to have the stated product functionality added to SATE for each CR.

Qwest stated in its March 26, 2002 response that it would provide a supplemental response to this Exception once the results of the CLEC vote for SATE CRs are available by April 3, 2002. Once Qwest clarifies the reasons for removing the ten SATE CRs listed above, and provides the results of the prioritization activity, KPMG Consulting will be able to assess CLECs desire to have the same products supported in SATE as what is available in IMA.

2. "Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE."

In its February 26, 2002 response, Qwest stated the following:

Qwest is investigating the general level of effort necessary for adding existing IMA products to SATE (depending upon product complexity) in order to address KPMG's concern regarding the timing of product availability. However, as Qwest has stated in its January 30, 2002 response Qwest believes that the CLECs have clearly expressed their interest during the CMP Redesign meetings in prioritizing all additions of functionality and products to SATE independently of IMA CRs. This separate prioritization provides the CLEC community with the flexibility to implement SATE specific changes ahead of other IMA functionality (for example, implementing flow through before a new product that no CLEC is planning to use in production). Qwest supports this CLEC desired process and believes the process should be adhered to.

In its March 26, 2002 response, Qwest further stated its position by stating:

The attached meeting minutes from the SATE Users Group on February 26, 2002 clearly indicates the CLECs desire to prioritize SATE CRs independently from IMA CRs. Additionally, the CLEC community has adopted this position, incorporating it into the CMP Master Redline document (see section 9.0 PRIORITIZATION). This process will be followed going forward.

KPMG Consulting observed the SATE User Group meeting on February 26, 2002, and reviewed the meeting minutes that were attached with Qwest's March 26, 2002 response. KPMG Consulting recognized through its observation and review of the meeting minutes that SATE users had many questions regarding the separate prioritization of SATE CRs. Participants needed clarification about the process that would be employed to prioritize SATE and SATE impacting CRs. However, it is not clear from the minutes that CLECs have expressed the desire to have the SATE CRs prioritized separately but rather that this was how Qwest presented the SATE enhancement decision-making process. Additionally, since only two CLECs and one service provider have actively participated in the SATE User Group meetings, it is misleading to extrapolate the conclusions drawn in those meetings to the entire CLEC community.

In its review of Section 9.0 of the *Master Redlined CLEC-Qwest CMP Redesign Framework* document updated on March 27, 2002, KPMG Consulting noted that the first sentence states, "Each OSS Interface and Test Environment release is prioritized separately." Additionally, the document states in Section 9.2.1, "Prioritization Review", that the prioritization objectives are to:

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

Beyond these generic references, there is no explicit, detailed documentation describing the process for separately voting and prioritizing SATE and SATE impacting CRs. Furthermore, KPMG Consulting would expect that prioritization results for features of upcoming IMA releases could have an impact on prioritization of SATE. Therefore, it is not definitively clear that the CLEC community has

adopted this approach, and subsequently incorporated it into the CMP documentation.

KPMG Consulting believes that separate prioritization of SATE CRs does not address the fundamental issue that was raised in Point #2 of this Exception. If a product is not currently supported in SATE and a CLEC decides to offer the product to its customers, then the CLEC will not be able to test that product in SATE. Instead, the CLEC must submit a request to add the functionality to SATE through CMP. The proposed CR may not be implemented until several releases of SATE have been developed and deployed. Therefore, the CLEC is unable to test the product and offer it to its customers during its current EDI implementation. Without a process for rapidly including product functionality into SATE, Qwest is placing CLECs at a competitive disadvantage relative to EDI product testing capabilities.

Qwest has requested that this Exception be closed “unresolved.”

These Exceptions clearly reflect that Qwest has failed to comply with the FCC’s change management requirements and further demonstrate that Qwest has not established a demonstrated pattern of compliance with its developing change management plan. Of great concern is Qwest’s requests with respect to Exceptions 3110 and 3111 that KPMG Consulting conduct no further testing related to these Exceptions. Exceptions 3077 and 3095 establish that Qwest has not developed a SATE that mirrors its production environment as required by the FCC. Finally, Exception 3094 confirms what the Joint CLECs contend: that although the CLECs and Qwest have reached an “agreement in principle” for this interim process, the process remains subject to further development, modifications, and negotiations in CMP Redesign and that KPMG Consulting is not able to conduct a thorough evaluation until the prescribed process is formalized, the Redesign sessions are complete, and the process is fully implemented and confirmed.

E. Regardless of its Desire to Ignore Product and Process Issues, Qwest Must—at a Minimum—Address the § 271 Compliance Issues it Moved to CMP.

To be in compliance with § 271, the FCC has declared that an RBOC, such as Qwest, must “support its application with *actual evidence* demonstrating its *present* compliance with the statutory conditions for entry.”⁴⁸ That is, Qwest must show that “it has ‘fully implemented the competitive checklist [item]... .’”⁴⁹ Thus, Qwest must plead, with appropriate supporting evidence, the facts necessary to demonstrate it has complied with the particular requirements of the checklist item under consideration.⁵⁰

For many, if not most of the revisions required to bring Qwest’s SGAT into compliance with its obligations under §§ 251 and 252, and hence § 271, there exist no PID measurements and no actual evidence demonstrating present compliance. In fact, much of the evidence of what Qwest actually does lies in its technical publications and its PCAT.⁵¹ The Joint CLECs and others pointed out during the workshops that Qwest’s SGAT was not consistent with its underlying documentation. Qwest’s response was that such documentation along with agreements reached through the workshop process would be fully addressed and implemented through the CMP process and it further acknowledged that any Commission order recommending that Qwest met a checklist item should be conditioned on Qwest’s compliance with this commitment.⁵²

At a minimum, the Commission should confirm for itself that Qwest has kept the commitment it made in relation to these document updates and it should further determine whether the CMP dispute resolution process is sufficiently set-up to address

⁴⁸ *BANY 271 New York Order* at ¶ 37.

⁴⁹ *Id.* at ¶ 44.

⁵⁰ *Id.* at ¶ 49.

⁵¹ The PCAT was formerly known and discussed during many workshops as the IRRG.

⁵² AZ Exhibit 4 Qwest 12; *see also*, CO Exhibit 4 Qwest 97.

disputes that may arise between the parties and Qwest when they cannot agree that Qwest has actually modified its technical publications and PCAT to conform to the SGAT.⁵³

In an effort to refine what is needed with respect to the universe of technical publications, the Joint CLECs offer the list of publications below. These publications were specifically selected because they are basic to Qwest's fulfillment of its SGAT obligations, and they are the minimal number of internal Qwest documents that the Commission should ensure are consistent with the SGAT.

Publication Number	Technical Publication Subject
77350	Installation guidelines
77383	Dark Fiber
77384	UNE Loop
77386	Collocation and Interconnection
77389	UNE Transport
77391	UNE Switching
77398	LIS Interconnection
77403	EEL
77405	Sub-Loop
77406	Shared Loop
77408	Packet Switching

Because the FCC is looking to State Commissions to make determinations based upon evidence that Qwest is in actual present compliance, and not on some promised future compliance, merely inserting the catch-all a provision into the SGAT that states it will govern over any conflicting documents as SGAT § 2 does, does not fully address the issue. More to the point, field personnel from either the CLEC or Qwest do not refer to the 300+ page SGAT when executing their jobs; rather, they rely on the PCAT and the technical publications. If these documents are inconsistent with the SGAT, Qwest's

⁵³ Qwest acknowledged that during the workshop process no "explicit" dispute resolution process was set up to hand the conflict between parties in relation to the PCAT and technical publications or any other issue in CMP. 3/27/01 Vol. I Multi-State Trans. at p. 86. It further acknowledged that dispute resolution would be addressed during the General Terms workshop. *Id.*

present actual conduct based upon such documents likewise is inconsistent. As a result, no finding of compliance is possible based upon such evidence.

III. CONCLUSION

For the foregoing reasons, the Joint CLECs request that the Commission withhold any findings of CMP compliance until Qwest provides actual, demonstrable and verifiable evidence showing:

- (1) that the final draft of the CMP redesign document is clearly organized and readily accessible to competing carriers (not merely an incomplete draft available on a web site);
- (2) that competing carriers had substantial input into the redesign by Qwest's actual incorporation of all the agreements into its final CMP document;
- (3) that the final CMP defines a procedure for timely resolution of disputes and that Qwest is actually adhering to that procedure;
- (4) that the SATE is, in fact, a stable testing environment that mirrors production; and
- (5) that the efficacy of Qwest's CMP documentation is demonstrated by Qwest actually following the process outlined therein and all third party observations and exceptions have been resolved.
- (6) that, consistent with its promises during the § 271 workshops, Qwest has adequately updated its technical publications and PCAT to be consistent with its SGAT.

Respectfully submitted this 9th day of April 2002.

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Exhibit A

**Ranking of ATT Priority List Items ("1s") – 03-19-02
(Have the potential to result in impasse issues)**

Concept Agreed To?	Issue #	Issue	Allegiance	AT&T	Covad	Eschelon	Qwest	WorldCom	Total
Yes	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	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.)	9	3	3	2	2	8	27
Yes		Also, discuss the Special Change Request Process (SCRIP)							
Yes	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.) 3/18: Team agreed that this item pertains to the IT Help Desk and ISC help desk relationship.	1	8	8	1	5	7	30
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	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	6	5	9	3	6	35
Preliminary Agreement *	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.)	2	10	7	6	7	4	36

* Eschelon representative basically agreed in concept, but wanted opportunity to obtain internal leadership concurrence

Concept Agreed To?	Issue #	Issue	Allegiance	AT&T	Covad	Eschelon	Qwest	WorldCom	Total
Yes	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.	10	4	4	7	10	3	38
Yes	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	5	9	9	11	6	1	41
Yes	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	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	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

**Priority List—Items Identified as 0's
(Not likely to result in impasse issues)**

Issue #	Issue
I.A.10	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)
I.A.4.	What are the criteria used to determine "level of effort" (i.e., S, M, L, XL) for a release? (CMP Issues Log #146.)
I.A.5.	Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, 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."
V.b.	Defined Terms used in the Redlined Draft CMP Document must be concluded. (CMP Issues Log ##106, 133, 141, 162, 182 & 248.)
V.e.	What process will be used to make changes to CMP once it has been "re-designed"?
V.f.	SGAT Section 12.2.6. (CMP Gap Analysis ## 148 & 149.)
Introductory language to Covad Issues #1 and #3	<u>Clarification of Scope of Issue.</u> 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 (see Covad Issues #1 and #3 below):
Covad Issue #1	(1) product, process and systems changes that are CLEC-impacting, and
Covad Issue #3	(2) retail changes that may be CLEC-impacting.
Covad Issue #2	<u>Additional Issue.</u> In addition to the issues identified by AT&T, Covad believes that an exception process must be 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.
WorldCom	Change Management improvement Document and Process to deploy Qwest CMP improvements.(Action Item #231). 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 # 116.)

Exhibit B

DESCRIPTION OF CONSENSUS CONCEPTS ON THE PRIORITY ISSUES IDENTIFIED AND DISCUSSED IN CMP REDESIGN IN THE CMP REDESIGN MEETINGS HELD ON MARCH 5 – 7, MARCH 18 – 19 AND APRIL 2 – 4, 2002

I. PRIORITY ISSUES DESIGNATED AS “1s” (possible they might result in impasse issues)

A12. Qwest to propose language on the criteria used to determine method of implementing regulatory changes

Consensus on concept:

- Unanimous agreement must be reached at the monthly CMP Systems meeting by Qwest and CLECs that a change request constitutes a Regulatory change.
- The general rule is that Qwest will implement a mechanized solution for a Regulatory change. If Qwest or a CLEC wish to implement a manual solution, either may propose such an implementation, the determination of which is subject to the information and voting described below.
- At this same meeting, Qwest will propose a mechanized or manual implementation plan required for compliance and provide cost analyses. The cost analyses shall include a description of the work to be performed and any underlying estimates Qwest has already performed for both manual and mechanized solutions.
- If one of the following exceptions applies, subject to a vote by Qwest and CLECs, a Regulatory change request will be implemented by a manual solution:
Exception A: The mechanized solution is not technically feasible, or
Exception B: There is significant difference in the costs for the manual and mechanized solutions. The cost estimates will allow for direct comparisons between mechanized and manual solutions, using comparable methodologies and time periods.
- The parties in attendance at the CMP meeting will determine by majority vote whether Exception A or B apply.
- Any party that disagrees with the majority decision associated with Exceptions A and B may initiate the dispute resolution process under the CMP. The majority decision will apply unless the outcome of a dispute alters the majority decision.
- CLECs and Qwest may otherwise agree to implement the Regulatory Change with a manual solution by unanimous vote.

A9-Part 1. Provide a decision on whether to provide copies of documentation regarding prioritization and sizing. This issue includes completion of the prioritization process within CMP.

Qwest's Position: No internal documentation (e.g., methods and procedures) will be shared with CLECs regarding procedures such as prioritization and sizing. CLECs raised objection to this position.

Consensus on concept. The Redesign team agreed in principle to the prioritization process for OSS Interfaces. CLECs and Qwest will prioritize all types of systems change requests (Qwest-initiated, CLEC-initiated, Regulatory and Industry Guideline). Prioritization of Industry Guideline and Regulatory change requests is limited to situations where such changes can be implemented in more than one release and still meet the mandated or recommended implementation date. Regulatory and Industry Guideline changes will not be prioritized if they must be implemented in the next major release in order to meet the mandated or recommended implementation date.¹

A9-Part 2. Discuss the Special Change Request Process (SCRP).

Consensus on concept. Qwest and CLECs agreed in principle to the SCRCP. If a change request is ranked low, a party may choose to fully fund the implementation of that change by using the SCRCP. When practicable, an SCRCP change will be included in the next release for the affected OSS Interface. There are open issues relating to timing and cost.

A11. What is the status of a change when the escalation or dispute resolution is invoked? Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs.

Consensus on concept:

- If a CLEC invokes the dispute resolution process on a Qwest-initiated Product/Process change and requests that implementation be delayed as part of the dispute resolution process, Qwest will delay implementation for at least 30 calendar days.
- A private arbitrator may be used to determine whether Qwest must delay implementation of the change pending the determination of the CLEC's request for delay as part of the dispute resolution process.
- Losing party pays the costs of the arbitrator.

Open issue. CLECs asked whether an arbitrator provided by a state Commission would be considered to resolve a disputed issue (including the discrete issue of whether to

¹ This is based on the understanding that a change may be treated as a Regulatory change only if CLECs and Qwest unanimously agree to such treatment.

delay implementation of the Qwest change). Qwest agreed to consider the issue and investigate further applicable state rules and procedures.

A2. State the criteria for Deny (reasons why) for the CR process.

Consensus on concept. The Redesign team agreed in principle that Qwest may deny a CR 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). *(Note: CLECs do not agree that the highlighted text belongs here. This was to be readdressed after the impasse issue on PID/PAP changes was resolved. Since Qwest agreed that the resolution reached in Colorado will apply across the region (e.g., PID/PAP changes will not be treated as regulatory changes, the highlighted language should come out), this language should be removed.)*
- **Outside the Scope of the Change Management Process**—the request is not within the scope of the Change Management Process (as defined in the Master Red-line Framework), requests for information.
- **Economically not feasible**—low demand, cost prohibitive to implement the request, or both.

Qwest agreed that it must apply the above criteria objectively and that it must apply the same criteria in evaluating whether to deny (or even initiate) a Qwest-initiated change request. Qwest agreed that a change request will not be denied solely on the basis that the change request involves a change to Qwest's back-end systems.

Further clarification from Qwest is required for the following proposed reason for denial of a change request:

- **Qwest policy** (consensus reached to rename this category)—the procedure is working, the requested change is not beneficial.

CLECs want the reference to "Qwest policy" deleted. There was agreement that a legitimate category may exist, but the CLECs wanted it defined in a more objective manner, renamed and discussed with CLECs.

The SCRIP may be used if Qwest or a CLEC chooses to fully fund the implementation of the request.

A1. Review the CR process to insure that the description of the output of each step of the process is clearly defined.

Consensus on concept. Qwest agreed to change the element from “Change Request Initiation Process” to “Change Request Process” and describe the end-to-end milestones. This process is critical to documenting an understanding of CMP. More discussion is necessary to develop details to this process.

Vc. What changes are CLEC-impacting and what process governs them? What is the process when a CLEC-impacting change occurs, but was not expected?

Preliminary consensus on concept. Qwest and CLECs re-scoped this issue to focus on the relationship between the IT Wholesale Systems Help Desk (IT Help Desk) and the Interconnect Service Center Help Desk (ISC Help Desk) when a system or process problem significantly impacts one or more CLECs. The Redesign Team agreed that when there is a problem that significantly impacts a CLEC(s), Qwest will troubleshoot the root cause of the problem, and if possible provide a workaround until the problem is fixed and problems with orders in the pipeline are resolved. Qwest and CLECs agreed to the following concept:

- **Potential systems problem**—When there is a major problem potentially caused by a systems problem and a CLEC reports the trouble (and magnitude of the problem) to the IT Help Desk, a trouble ticket will be created to begin the process of troubleshooting the systems problem. If the Wholesale IT Help Desk determines from the CLEC that this problem is preventing the CLEC from performing certain transactions, the ISC Help Desk will be bridged into the call. The ISC Help Desk will open a ticket, if applicable. The ISC Help Desk will relate the IT Help Desk ticket number to the ISC Help Desk ticket number. The ISC Help Desk agent will immediately escalate this problem to the ISC Help Desk manager to determine the appropriate next steps such as creating a workaround if possible (if not already created by the IT Help Desk), so that the CLEC can perform transactions once again and fall-outs or rejects can be successfully reprocessed. The CLEC will be asked to provide as much documentation (e.g., LSR, telephone numbers, circuit numbers) as possible to the ISC Help Desk by facsimile or electronic mail so that the root cause can be identified as quickly as possible. The workaround shall remain in place even after the system problem has been fixed, so that pipeline activities can be resolved. The ISC manager, or assigned representative, will coordinate the transition from workaround to the business-as-usual process with the CLEC. Qwest shall comply with the Production Support notification process and the ISC Help Desk personnel will receive and review all such notifications.
- **Potential process problem**—If the CLEC calls a significant problem into the ISC Help Desk, a ticket will be opened to track the trouble. The ISC Help Desk agent will immediately escalate this problem to the ISC Help Desk manager to determine the appropriate next steps such as creating a workaround if possible, so that the CLEC can perform transactions once again and fall-outs or rejects can be

successfully reprocessed. Once such a trouble is reported a project will be created within the ISC Help Desk and all related troubles will be reported for resolution as part of the project. The CLEC will be asked to provide as much documentation (e.g., LSR, telephone numbers, circuit numbers) as possible to the ISC by facsimile or electronic mail so that the root cause can be identified as quickly as possible. The workaround may require both Qwest and CLEC to perform temporary functions and the workaround shall remain in place until the process has been fixed and pipeline activities are resolved. The ISC Help Desk manager, or assigned representative, shall coordinate the transition from workaround to the business-as-usual process with the CLEC. Qwest will continue to communicate with the CLEC(s) during the workaround period.

The Redesign Team acknowledged that there is preliminary consensus on this concept, with the exception of Eschelon, which intended to review this process with its subject matter experts.

A7. Where will a CR that impacts both an OSS interface and process be addressed—at the Systems or Product/Process CMP meeting? Embedded in this issue is Part B of ATT's February CMP Comments: product/process must be addressed at least to the extent that there is a process to handle crossover issues.

Consensus on concept. CLECs and Qwest agreed conceptually to three crossover CR scenarios:

1) **Product/Process CR becomes a System CR**—If during a clarification call, it is determined that a product/process change should be mechanized, a new system CR will be created. The two CRs will be cross-referenced. The CR number will remain the same except with the change in the first two letters and an “x” somewhere in the CR number to indicate the CR is a crossover. The change will be handled as a system CR moving forward.

2) **Systems CR becomes to a Product/Process CR**—If it is determined that a system CR cannot be mechanized, but a manual process is feasible, the request will be handled as a Product/Process CR. The System CR will be closed and the Product/Process CR number would remain the same except the change in the first two letters and an “x” somewhere in the CR number to indicate the CR is a crossover. This change will be managed as a Product/Process CR moving forward.

3) **System CR with a manual interim solution**—These changes will be tracked as a Systems CR with an indicator of a combination solution. This CR will be managed at the monthly CMP Systems meeting.

Crossover CRs will remain in the same CR lifecycle as before the crossover whenever possible (in other words, there should be little or no loss in time just because the CR moved from one process to the other). An ad hoc clarification meeting may be necessary to address details of the crossover request with the appropriate subject matter experts. Once Qwest and

CLECs agree to the crossover, the CR will be moved over to the appropriate CR process and general CMP forum. The initial status of the crossover CR will be "transferred." The upcoming general CMP meeting distribution package will list CRs that have been crossed over for discussion.

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.

Consensus on concept. CLECs and Qwest agreed to five levels for Qwest-initiated product/process changes as follows:

Level 0: Changes that do not change the meaning of documentation and do not alter CLEC operating procedures. Level 0 changes are effective immediately without notice.

Level 1: Changes that do not alter CLEC operating procedures or changes that are time critical corrections to Qwest products or processes. Time-critical corrections may alter CLEC operating procedures, but only if such changes have first been implemented through the appropriate Level under CMP for such changes. Level 1 changes are effective immediately upon notice.

Level 2: 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 3: 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 4: 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 CLECs with an opportunity to have input into the development of the change prior to implementation.

Each Level of change in this process will have a list of changes that fit within the level. CLEC and Qwest agreed that the list of changes for each Level is exhaustive, not illustrative. This means that if a change is not listed within a Level, Qwest may not issue the notice within that Level (even if Qwest believes it should fit within that level). In exchange for Qwest's agreement to the concept of an exhaustive list, CLECs agreed (although Eschelon

reserved its right to disagree after review) that a Qwest change that did not fit into any currently defined change within a Level would be introduced as a Level 3 Qwest-initiated product-process change and discussed at the next CMP Product/Process meeting.

CLECs and Qwest have agreed to a process that provides for the parties to discuss requests to change the disposition level of noticed changes, or to establish new change categories under Levels 0 through 4, at the monthly CMP Product/ Process meeting. In the event that Qwest and CLECs are not able to reach consensus on any such request, Qwest and CLECs will take a vote to determine if the requested category should be changed to another level. The result will be determined by the majority. If the level of a specified change request is modified, from the date of the modification forward, such change will proceed under the modified level. When a change to the level of a specific CR also suggests that a new category of change be established under one of the levels, a separate vote shall be taken for each. The majority vote rules.

CLECs and Qwest agreed in concept. The Redesign Team agreed to continue to discuss the process for Qwest-initiated Product/Process changes with the CLEC community at the March 20, 2002 CMP Product/ Process meeting. The Levels 0 through 4 process will be implemented by Qwest as soon as practicable. Qwest and CLECs will further evaluate and modify this process as necessary. Further actions will be taken by the Redesign Team as follows:

- CLECs and Qwest will review product/process notices issued over the last few months in order to create a more exhaustive list of categories in each "level." This effort should be completed by April 16, 2002.
- Once this is completed and the language for the process is finalized, CLECs and Qwest will baseline this process, add the language into the Master Redline Framework and implement the process as modified.

A6. 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.

Consensus on concept. Qwest and CLECs agreed in concept that changes to PIDs, changes to how PIDs are measured, and changes to PAP that have an impact on matters that arise in CMP will be brought to the (yet to be established) long-term PID administration body to resolve. Furthermore, Qwest or a CLEC may initiate a change request (following the process for a Qwest or CLEC initiated change request) based on PID changes originated from the long-term PID administration body. These change requests will have no special status. The CLECs remain concerned that the long-term PID administration body has still not been established.

A3. Determine whether a process is necessary to address non-coding changes.

Consensus to consolidate this issue with V.c and III.Part H.

Vd. What is CMP's role in rate changes or rate "validation"?

Consensus to close issue. Qwest and CLECs agreed that rate changes and rate validation processes are not within the scope of CMP, but should be addressed as provided by interconnection agreements.

II. PRIORITY ISSUES DESIGNATED AS "0s" (not likely to result in impasse issues)

A10. Qwest to outline what the guidelines are for when an issue is appropriate for the CMP vs. when the Account team should handle it.

Consensus on concept. CLECs and Qwest agreed in concept that the CMP is not the forum to resolve isolated issues or CLEC specific problems that do not involve a change to the way Qwest does business. When issues of this kind arise, CLECs are to either go to their service managers at Qwest or to service specific contacts (e.g., billing, network repair). Qwest agreed to share this process, once it is written, with the service managers and other Qwest functional areas referenced in this process to ensure that CLECs do not have to educate Qwest employees on Qwest policy (an issue that does arise with some frequency).

A4. What are the criteria used to determine "level of effort" (i.e., S, M, L, XL) for a release?

Agreement reached on language. CLECs and Qwest agreed that level of effort refers to the estimated range of hours required to implement a change request. Qwest stated that it will no longer use the S, M, L or XL designation. The level of effort in hours will be provided for each systems CR and Qwest will also provide the number of person hours that are available for any given release.

A5. Clarify what notices will be communicated to CLECs via email, mail-outs, communiqués, and posted on the web site.

Consensus on concept. Qwest and CLECs agreed in concept that Qwest would include an identifier on all CMP notifications to indicate that they have to do with CMP. Notifications have come from different sources within Qwest, although Qwest states that they are all to come through the Qwest "mailout" process. Qwest agreed to provide a default method for CLECs to send comments to Qwest when the comment button on the web does not work. Qwest agreed that when CLECs comment on a proposed change in process, Qwest will aggregate all such comments and Qwest responses in one e-mail message that Qwest will distribute to all CLECs.

Vb. Defined Terms used in the Redlined Draft CMP Document must be concluded.

Agreement reached on language. CLECs and Qwest have reached agreement on the definitions of terms thus far identified in the CMP Redesign process.

Ve. What process will be used to make changes to CMP once it has been "redesigned"?

Consensus on concept. A party seeking a change to the CMP will send an e-mail with its proposed redlined language changes to a CMP e-mail address at least fourteen (14) days prior to a CMP Product/Process meeting. A proposal to change CMP will be included in the distribution package for the meeting and will be highlighted on the agenda. The initiator will present the proposed change at that meeting. The CMP body will determine an appropriate process to discuss and develop the change (e.g., at regular CMP meetings, establish a subcommittee to develop the issue, etc.). Each proposed change will be assigned a unique tracking number. A proposed change to the CMP will be presented in at least two CMP meetings before a vote can be taken on the change.

Incorporating a change into the CMP document requires a unanimous vote. Voting on such changes requires development because there are a large number of CLECs registered for CMP, but who do not participate, so a unanimous vote of all CLECs registered with CMP will not be possible. There must be ample notice on such changes, especially the fact that a vote will be taken. CLECs and Qwest present at the call or meeting may vote and the opportunity to vote by e-mail should be available as well. The parties also need to discuss the concept of a party giving its proxy to another party for voting on changes.

The CMP document will be dated, will be assigned version numbers and an historical log of changes will be maintained.

Vf. SGAT Section 12.2.6.

Agreement on language (but some language still open). At the end of the CMP Redesign meeting held on April 4, 2002, the parties to CMP Redesign agreed to the following

language for SGAT Section 12.2.6, however, Qwest was to propose further language on the topic of how changes to CMP become a part of the SGAT. The Joint CLECs have not received this additional language yet.

12.2.6 Change Management

Qwest agrees to maintain a change management process, known as the Change Management Process (CMP), that is consistent with or exceeds industry guidelines, standards and practices to address Qwest's OSS, products and processes. The CMP shall include, but not be limited to, the following: (i) provide a forum for CLEC and Qwest to discuss CLEC and Qwest change requests (CR), CMP notifications, systems release life cycles, and communications; (ii) provide a forum for CLECs and Qwest to discuss and prioritize CRs, where applicable pursuant to Exhibit G; (iii) develop a mechanism to track and monitor CRs and CMP notifications; (iv) establish intervals where appropriate in the process; (v) processes by which CLEC impacts that result from changes to Qwest's OSS, products or processes can be promptly and effectively resolved; (vi) process that are effective in maintaining the shortest timeline practicable for the receipt, development and implementation of all CRs; (vii) sufficient dedicated Qwest processes to address and resolve in a timely manner CRs and other issues that come before the CMP body; (viii) processes for OSS Interface testing; (ix) information that is clearly organized and readily accessible to CLECs, including the availability of web-based tools; (x) documentation provided by Qwest that is effective in enabling CLECs to build an electronic gateway; and (xi) a process for changing CMP that calls for collaboration among CLECs and Qwest and requires agreement by the CMP participants. Pursuant to the scope and procedures set forth in Exhibit G, Qwest will submit to CLECs through the CMP, among other things, modifications to existing products and product and technical documentation available to CLECs, introduction of new products available to CLECs, discontinuance of products available to CLECs, modifications to pre-ordering, ordering/Provisioning, maintenance/repair or Billing processes, introduction of pre-ordering, ordering/Provisioning, Maintenance/Repair or Billing processes, discontinuance of pre-ordering, ordering/Provisioning, maintenance/repair or Billing process, modifications to existing OSS interfaces, introduction of new OSS interfaces, and retirement of existing OSS interfaces. Qwest will maintain as part of CMP an escalation process so that CMP issues can be escalated to a Qwest representative authorized to make a final decision and a process for the timely resolution of disputes. The governing document for CMP, known as the Change Management Process, is attached as Exhibit G (the "CMP Document"). As of the date of filing, the CMP Document (Exhibit G) is the subject of ongoing negotiations between Qwest and CLECs in the ongoing CMP redesign process. Not all of the sections of Exhibit G have been discussed or considered during the ongoing CMP redesign process, and the CMP Document will be continued to be changed through those discussions. Exhibit G reflects the commitments Qwest has made regarding maintaining its CMP as of the date of filing, and Qwest commits to implement agreements made in the CMP redesign process as soon as practicable after they are made. Following the completion of the CMP Document, Exhibit G will be

subject to change through the CMP process, as set forth in the CMP Document. Qwest will maintain the most current version of the CMP Document on its wholesale website.

12.2.6.1 In the course of establishing operational ready system interfaces between Qwest and CLEC to support local service delivery, CLEC and Qwest may need to define and implement system interface specifications that are supplemental to existing standards. CLEC and Qwest will submit such specifications to the appropriate standards committee and will work towards their acceptance as standards.

Covad #1. Clarification of Scope of Issue. This issue was to clarify that with regard to changes that are CLEC impacting and the process to deal with them, this issue affects systems, products and processes.

Closed. This issue was closed as being addressed by other issues on the list.

Covad #2. Define the Exception Process

Consensus on concept. The parties agreed that the exception process could be used any time a party to CMP seeks to deviate from the established process. (e.g., shortening a CR life cycle or interval). The requesting party will send an exception form to the CMP CR distribution list (this form needs to be developed) and must demonstrate an emergency or other good cause for this process to apply. If there is sufficient time, the issue will be discussed at a regular CMP meeting otherwise a special meeting may be called. Qwest will provide notice at least two business days in advance of an exception call or meeting. The CMP body will vote on whether a matter may be addressed through the exception process. A majority vote determines the outcome.

Open issue in redesign. Qwest is considering the CLEC request that Qwest operational SMEs be made available to participate in calls and meetings where the issue being considered under the exception process is being discussed. This is extremely important to CLECs, because without such participation, calls and meetings are unproductive. Generally, only Qwest process people attend. They do not able to discuss issues in depth and are not able to problem solve with CLECs. This results in multiple meetings where very little gets accomplished, while a problem continues to exist.

Factual issue. CLECs and Qwest worked on a bulleted exception process in the fall of 2001. This process was not added to the Draft CMP Document. AT&T and Qwest each invoked the exception process at the CMP meeting held on March 20, 2002, on separate CRs they submitted to CMP. The Qwest CR has already been implemented. The AT&T CR has to do with the many problems AT&T is experiencing with the local service freeze Qwest has implemented. The way this issues is being handled, it is clear to AT&T that no effective exception process exists yet in Qwest's CMP. This is presently impacting AT&T's day-to-day

business. (See the discussion on local service freeze in Section II of the body of the Brief to which this Exhibit is attached).

Covad #3. Clarification of Scope of Issue. This issue is to clarify that changes on the retail side of Qwest's business may be CLEC-impacting in that if such changes are not made available to CLECs, there is a lack of parity between the retail and wholesale sides of Qwest's business.

Open. No consensus on concepts yet. An example of this lack of parity was discussed at the CMP Redesign meeting held on April 2 – 4, 2002. CLECs were not satisfied with the outcome of that discussion because it was an example where Qwest's retail business was successfully provisioning ISDN loops where integrated pair gain is on the line for purposes of providing IDSL service. CLECs were not informed or notified of this change in any way by Qwest (and discovered that Qwest is currently capable of provisioning ISDN loops where IPG is on the line only by happenstance), nor did Qwest ever identify the time at which it began providing this service to its own end user customers. (This issue is described further in Section II of the Brief to which this Exhibit is attached).

The Joint CLECs believe this is an example of Qwest's CMP being ineffective because processes within Qwest are not adequate to insure that retail changes that impact CLECs will be communicated to the Qwest wholesale business and promptly made available to CLECs.

WCom. Discuss change management improvement document and process to deploy Qwest CMP improvements. By what method does Qwest propose to prove that it has actually implemented changes as it represents it has done/is doing/will do?

Open. There continues to be disagreement on the time at which Qwest has implemented changes agreed upon CMP Redesign. In addition, there is lack of clarity on the extent to which certain processes were implemented on given dates. CLECs and Qwest will continue to work on a document that reflects a common understanding of implementation of the redesigned CMP.

III. PRIORITY ISSUES DESIGNATED AS "X" DO NOT REQUIRE ANY DISCUSSION

These issues are either at impasse or conceptual agreement was already reached by Qwest and CLECs.

A8. Qwest proposed re-visit Regulatory type of changes to address performance measure obligations (PID/PAP changes).

The Colorado PUC has ruled on this impasse issue. Qwest and CLECs agreed to revisit the Master Redline Framework to determine if clarifying language is necessary. Qwest has agreed that this resolution will be applied in all of the Qwest states.

Va. Discussion and documentation of the process for Industry Guideline changes must be completed.

Consensus on concept. Qwest and CLECs agreed in principle with the process for Industry Guideline changes.

Exhibit C



Test Vendor ID: IWO 2127
Qwest Internal Tracking ID: TI 853
Observation/IWO Title: Access Records Not Sent on DUF
Test Type/Domain: Functionality / Billing
Date Qwest Received: 02/19/2002
Initial Response Date: 02/21/2002
Supplemental Response Date: 03/05/2002

Test Incident Summary:

Access Records Not Sent on DUF: CGE&Y conducted a controlled supplemental test of the accuracy of Daily Usage Files (DUF) records to insure no issues remained in Arizona considering the multiple system updates by Qwest that may affect the generation of daily DUF records. These updates occurred from September 2001 through December 2001.

In Qwest's response to DR 264, Qwest stated that 92 DUF records had not been sent to the Pseudo -CLEC due to the situation of a service order converting an account to UNE on a Friday concurrent with the receipt of access records that are less than five days old. Qwest also stated that a fix was implemented for this problem on February 7, 2002.

Please provide the activities that led to the identification and resolution of this problem.

Qwest Response Summary:

As a result of this investigation, it was found that within the Central region, the time required to update a key file after a service order successfully posts to a customer's account was one day longer than realized. Within CRIS certain order types require two processing cycles to migrate working service to the new service account. In September, 2001 Qwest implemented a pending service order process with the purpose of capturing all wholesale related usage records dated on or after a service effective date. This process holds all wholesale service order related usage records until all source tables and files have been updated based on the service order information. Qwest determined that it needed to hold the associated usage one additional day to ensure that the source file used to process the UNE involved Non-800 Access records had been updated. Because the Access usage records were released to be processed before the updated service order information was made available, the impacted Access records were processed against the old Resale account disposition and were not passed to the DUF. To fix this problem, Qwest revised the pending service order process to hold usage one additional day, to ensure that the source files are correctly updated.

AT&T Comments (02/28/2002):

Why did CGE&Y not request that Qwest provide the DUF records in question that were not provided?

What was the notice to CLECs of the implementation of the February 7 system fix? Did CGE&Y review this notice?



Qwest Response to AT&T Comments (03/05/2002):

AT&T question, What was the notice to CLECs of the implementation of the February 7 system fix? Did CGE&Y review this notice?

In accordance with CMP, Qwest did not provide CLEC notification of this fix because the fix did not require CLECs to change their system or processes.

Attachment(s): None



Arizona IWO Formal Response

Test Vendor ID: IWO 2128
Qwest Internal Tracking ID: TI 854
Observation/IWO Title: WATS Call Records Dropped
Test Type/Domain: Functionality / Billing
Date Qwest Received: 02/19/2002
Initial Response Date: 02/21/2002
Supplemental Response Date: 03/05/2002

Test Incident Summary:

WATS Call Records Dropped: CGE&Y conducted a controlled supplemental test of the accuracy of Daily Usage Files (DUF) records to insure no issues remained in Arizona considering the multiple system updates by Qwest that may affect the generation of daily DUF records. These updates occurred from September 2001 through December 2001.

In Qwest's response to DR 264, Qwest stated that 41 DUF records for WATS access calls had not been sent to the Pseudo CLEC because the call records were dropped in error. Qwest reported that a fix was to be implemented for this problem on February 18, 2002.

Please provide the activities that led to the identification and resolution of this problem.

Qwest Response Summary:

Qwest found two separate situations that led to WATS access records not appearing on the P-CLEC's DUF. For one of those situations, a program fix was made to pass 8XX access attempts on to the DUF. Three (3) of the 41 DUF records fall into this category. For the second situation, 8XX access completed calls were made while a service order was pending and the messages did not appear on the DUF for the P-CLEC's UNE account. Thirty-eight (38) of the 41 DUF records fall into this category. Both of these situations have been fixed.

AT&T Comments (02/28/2002):

Why did CGE&Y not request that Qwest provide the DUF records in question that were dropped?

What were the notices to CLECs of the implementation of the system fixes? Were both fixes implemented on February 18? Did CGE&Y review the notices?

In Qwest's analysis of the first problem (8XX access attempts), is it CGE&Y's understanding that "attempts" means calls dialed to 8XX numbers that do not complete are "attempts"? If there is a different interpretation of "attempts", please explain what is meant by "attempts".

Qwest Response to AT&T Comments (03/05/2002):

AT&T question, What were the notices to CLECs of the implementation of the system fixes? Were both fixes implemented on February 18? Did CGE&Y review the notices?



Arizona IWO Formal Response

Both problems identified in Qwest's initial response were fixed by February 18, 2002, one problem was fixed on February 7, 2002, and the other on February 18, 2002. In accordance with CMP, Qwest did not provide CLEC notification of these fixes because the fixes did not require CLECs to change their system or processes.

Attachment(s): None

Exhibit D

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

**CHANGE MANAGEMENT PROCESS (CMP)
FOR LOCAL SERVICES ORDERING AND PROVISIONING**

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CHANGE MANAGEMENT PROCESS (CMP)

FOR LOCAL SERVICE ORDERING AND PROVISIONING

INTRODUCTION [NEED TO RE-ADDRESS AT A LATER DATE]

ACTION ITEM #17

THE CHANGE MANAGEMENT PROCESS (CMP) IS THE A FORMAL METHOD USED BY CUSTOMERS COMPETITIVE LOCAL EXCHANGE CARRIERS (CLECS) AND QWEST AND A LOCAL SERVICE PROVIDERS TO INITIATE, COMMUNICATE, PRIORITIZE, SCHEDULE, TEST COMMUNICATE ABOUT AND IMPLEMENT CHANGES ENHANCEMENTS CHANGES TO QWEST PROVIDER OPERATIONAL SUPPORT SYSTEMS (OSS) INTERFACES WHICH DIRECTLY OR INDIRECTLY IMPACT A CLEC. USED IN CONNECTION WITH RESOLD SERVICES AND UNBUNDLED NETWORK ELEMENTS. CHANGES INCLUDE NEW FUNCTIONALITY, ENHANCEMENTS TO EXISTING FUNCTIONALITY, DEFECT MAINTENANCE AND INTRODUCTION/RETIREMENT OF INTERFACES, BASED ON LOCAL SERVICE ORDERING GUIDELINES (LSOG).

THE CHANGE MANAGEMENT PROCESS CREATES A FRAMEWORK FOR MEETINGS IN WHICH CHANGES TO THE PROVIDER'S QWEST'S OSSS AND THEIR BUSINESS RULES MAY BE INTRODUCED OR DISCUSSED. THE CLECS CUSTOMER'S POINT OF CONTACT (POC) MAY REQUEST INTERFACE CHANGES FOR FUTURE CONSIDERATION BY SUBMITTING A CHANGE REQUEST FORM TO THE PROVIDER'S QWEST'S POC.

THE FCC REQUIRES INCUMBENT LOCAL EXCHANGE CARRIERS TO HAVE PROCESSES FOR MANAGEMENT OF MANUAL AND ELECTRONIC INTERFACES RELATIVE TO ORDER, PRE-ORDER, ACCOUNT MAINTENANCE, TESTING AND BILLING. THE SCOPE OF THIS DOCUMENT IS TO DEFINE ONLY THE

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 that are provided to CLECs.

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

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

PROCESSES FOR CHANGE MANAGEMENT OF MANUAL AND ELECTRONIC INTERFACES RELATIVE TO ORDER AND PRE-ORDER FUNCTIONS.

1.0 INTRODUCTION AND SCOPE

This document defines the processes for change management of **essOSS** interfaces, products and processes (including manual) as described below. **CMPmp** 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 **elecCLECs** to their end users.

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

Qwest will track changes to **essOSS** interfaces, products and processes. The **empCMP** includes the identification of changes and encompasses, as applicable, **[requirement definition, design, development, notification, testing, implementation and disposition of changes – revisit list]**. Qwest will process any such changes in accordance with the **empCMP** 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. ~~and the abridgement or expansion will not be permitted.~~

~~manual and electronic interfaces relative to pre-order, and pre-order, provisioning, maintenance/repair, and billing functions. Interface impact is defined as changes to field content or format, or changes in the business rules used to govern field population. This includes national guideline changes, e.g., LSOG, as well as provider Qwest specific interface process and system changes. Changes include new functionality, enhancements to existing functionality, introduction/retirement of interfaces processes and systems and maintenance activities affecting production defects. Desired changes should be submitted to the appropriate ATIS Forum.~~

~~This scope includes any pre-order, order business rules, interface system testing and maintenance that impact ongoing and future technical and operational processes, and changes~~

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~~that alter the relationship in the manner in which the provider Qwest and customer a CLEC do business.~~

~~The CMP provides a means for changes to the provider's OSSs and their business rules. The customer's Point Of Contact (POC) may request interface changes for future consideration by submitting a Change Request Form to the provider's POC. These requests may include new functionality or changes to existing functionality.~~

~~The types of changes that will be handled by this process are:~~

- ~~Software changes~~
- ~~System Environment Configuration changes~~
- ~~Changes resulting from new or changed Industry Guidelines / Standards~~
- ~~Product and Services (e.g., new services available via the in-scope interfaces)~~
- ~~Processes (e.g., electronic interfaces and manual processes relative to order and pre-order)~~
- ~~Regulatory~~
- ~~Documentation (e.g., business rules for electronic and manual processes relative to order and pre-order.~~
- ~~Defect resolution~~
- ~~Guidelines for provider-specific change management processes~~

~~The provider Qwest will track changes to the OSS interfaces as change requests and assign a tracking number to each change request. The CMP begins with the identification of the change request and encompasses requirement definition, design, development, notification, testing, implementation and decommissioning of the change request. The CMP is managed by customer CLEC and provider representatives each having distinct roles and responsibilities. The customer CLEC and the provider Qwest will hold regular meetings to exchange information about the status of existing change requests, the need for new changes, what changes the provider Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.~~

~~The CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings and is based on group consensus. 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 set forth by the procedures described in Ssection 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 abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such~~

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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 that are provided to CLECs.

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2.0 MANAGING THE CHANGE MANAGEMENT PROCESS

7-12.1 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.

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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 ~~Product/Process~~ 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.

2.35 Preferred Method of Communication

The preferred method of communication is e-mail with supporting information posted to the web site when applicable (see Section 38.3 Qwest Wholesale CMP Web Site). Communications sent by e-mail resulting from CMP will include in the subject line "CMP". ~~[Judy Schultz will investigate the feasibility of this. Action Item #272]~~

~~Qwest will utilize the web site to support large documents, like CMP distribution packages. Email notifications surrounding communications regarding document changes will include direct web site links to the related documentation. Similarly, Qwest will employ the web site as an archive for all historic meeting distribution packets and minutes. [Action Item #156]~~

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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 document by selecting the "Submit CommentsClick here to Submit Your Comments on a Specific Review Document" link associated with the document. The "Submit CommentsClick here to Submit Your Comments on a Specific Review Document." 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. Once CLECs select the "Submit" button at the bottom of the template, the template will be automatically emailed to a continuously monitored email box [Action Item #271] and CLEC comments will be posted to the Web. After the conclusion of [the agreed to the applicable CLEC comment time constraintperiod] CLEC comment period, Qwest will aggregate all CLEC comments with Qwest responses and distribute to all CLECs respond to all submitted CLEC comments. The Qwest response will be posted to the Web or sent to CLECs via Notification email within [the agreed to the applicable time constraintperiod]. [Action #145][Clean up with "Comments" Ref.]

7.4 — Governing Body

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

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

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

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

A standing agenda item at the regular change management meetings will provide an opportunity for Qwest and CLECs to assess the effectiveness of the CMP. Both the

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CLECs and Qwest will use this opportunity to provide feedback of instances of non-compliance and commit to taking appropriate action(s).

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

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

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

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

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3.0 MEETINGS

~~Change Management meetings will be conducted monthly.~~

FROM AUGUST 8, 2001 REDLINED FRAMEWORK

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

~~The provider is responsible for notifying customers and distributing agendas and other meeting materials to include, but not limited to, actual change requests received from the customers and documentation of industry guidelines and regulatory changes at least seven (7) calendar days in advance of the meeting.~~

~~Customers can choose to attend meetings in person or participate by conference call. The provider must make a conference bridge available for meetings. The agenda will include the dial-in number and the access information.~~

~~The provider will be responsible for preparing, maintaining, and distributing minutes following the meeting. The draft version of the minutes must be distributed no later than~~

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~~seven (7) calendar days after the meeting and must contain the name of each attendee and the company they represent. All attendees, whether in person or by phone, must identify themselves and the company they represent. The provider will also update the status of change requests after the meeting and distribute it following the meeting as part of the meeting minutes.~~

~~Emergency or special meetings may be held at the request of the provider or any qualified customer (as defined in this document). Emergency meeting notification must contain an agenda plus any supporting meeting materials. These meetings should be announced at least two (2) business days prior to their occurrence.~~

3.1 Meeting Materials [Distribution Package] for Change Management Meeting

FROM AUGUST 8, 2001 REDLINED FRAMEWORK

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

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

Agenda Items for Change Management Meeting

Agenda items should include but are not limited to, the following:

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- ~~Change Request discussions~~
- ~~Issues/Actions~~
- ~~Release Notice/12 Month Development View~~
- ~~Effectiveness of change management Process~~
- ~~Specifications for regulatory or industry originated change requests~~

~~II. Change Management Meeting Action Log and Change Request Status~~

~~The provider will maintain and distribute at the change management meeting an Action Item Log containing action items from previous meetings and status. Additionally, during the change management meetings, the provider will review status of the customer change requests. The meeting will include discussions of the provider's development view, as well as any customer's suggested development to the provider Operations Support Systems (OSSs).~~

FROM AUGUST 8, 2001 REDLINED FRAMEWORK

- 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.

~~The provider will take minutes during the meeting. Meeting minutes should include, but are not limited to, the following:~~

- ~~Current status of change requests and Release Notices~~

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Issues/Action items and status

Attendees/Company

~~A draft version of the minutes should be distributed to meeting participants for comments or revisions no later than seven (7) calendar days after the meeting. Customers need to respond to the provider with any modifications to the draft version within two (2) business days. Revisions and comments will be incorporated into the final minutes. The final minutes will be distributed within eleven (11) calendar days after the meeting.~~

3.3 ProviderQwest Change Management Process Wholesale CMP Web Site

~~[Need to re-visit -- ACTION ITEM #137G]~~ To facilitate access to CMP documentation, the providerQwest 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 ~~contain~~ include:

- Current version of the providerQwest 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 CLEC and Qwest each type of change requests and associated statuses histories
- Issue/Action items and statuses Meeting materials (distribution package)

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- Meeting minutes
- Release announcements and other CLEC notifications and associated requirements
- Directory to CLEC notifications for the month
- Business rules, SATE test case scenarios technical specifications, and user guides will be provided via links on the CMP web site, based on the LSOG and provider's specific requirements
- 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

AThe Change Rrequest should fall into one of the following classifications:

1. Type 1 (Production Support) Change

A Type 1 change corrects problems discovered in production versions of an OSS application interface. Either the provider Qwest or the customer CLEC may initiate the change request. Typically, this type of change reflects instances where a technical implementation is faulty or inaccurate such as to cause correctly or properly formatted data to be rejected. Instances where providers Qwest or customer CLECs misinterpret interface 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 business process are identified and resolved during the change management review of the change request. Type 1 changes will be processed on an expedited basis by means of an emergency release of software/documentation.

Additionally, once a Type 1 change is identified, the change management team (see the Managing The Change Management Process section) must determine the nature and scope of the maintenance. Type 1 changes are categorized in the following manner:

***Severity 1:** Production Stopped: Interface Unusable – Interface discrepancy results in totally unusable interface requiring emergency action. Customer CLEC Orders/Pre-Orders cannot be submitted or will not be accepted by the provider Qwest and manual work-arounds are not feasible. Correction is considered essential to continued operation. The provider Qwest and customer CLECs should dedicate resources to expedite resolution.*

Acknowledgment Notification = 1 hour

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~~Status Notification~~ ————— = ~~bi-hourly~~

~~**Severity 2:** — Production Degraded: Interface Affecting — An interface discrepancy that requires a work-around(s) on the part of the customerCLEC or the providerQwest. The change is considered critical to continued operation. It does not stop production, but affects key applications.~~

~~Acknowledgment Notification~~ = ~~4 hours~~

~~Status Notification~~ ————— = ~~weekly~~

~~Implementation time~~ ————— = ~~14 – 30 calendar days~~

~~**Severity 3:** — Process Impacted: Pre-order / Order requests can be submitted and will be accepted through normal processes / interfaces. Clarification is considered necessary to ongoing operations.~~

~~Acknowledgment Notification~~ = ~~7 calendar days~~

~~Implementation time~~ ————— = ~~30 – 60 calendar days~~

~~II. Type 2 (Regulatory) Change~~

~~4.1 Regulatory Change~~

A ~~Regulatory~~Type 2 ~~C~~ehange 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. ~~In determining whether a Regulatory Change has arisen from a change in circumstance, consideration must be~~

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~~given to the recency of the change in circumstance.~~ Either the ~~customer~~CLEC or the ~~provider~~Qwest may initiate the change request.

III.4.2 ~~Type 3 (Industry Guideline) Change~~

~~A Type 3 change implements telecommunications~~An ~~Industry~~ ~~Guideline Change implements~~ ~~Industry Guidelines~~ using a national implementation timeline, ~~if any~~. Either ~~the provider~~Qwest or the ~~customer~~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)

III.4.3 ~~Type 4 (Provider Originated) Change~~ Qwest Originated Change

~~A Type 4~~ A Qwest Originated change is originated by ~~the provider~~Qwest ~~does not fall within the changes listed above and is within the scope of CMP and affects interfaces between customers and the provider. These changes may involve system enhancements, manual and/or business processes].~~

III.4.4 ~~Type 5 (Customer CLEC Originated) Change~~ CLEC Originated Change

~~A Type 5~~ A CLEC Originated change is originated by the ~~customer~~CLEC ~~does not fall within the changes listed above and is within the scope of CMP and affects interfaces between customers and the provider. These changes may reflect a business process improvement that the customer CLEC is seeking to implement and implies a change in the way in which the customer CLEC wishes to interact with the provider Qwest.~~

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3-05.0 CHANGE REQUEST INITIATION PROCESS

3-15.1 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.

~~(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT THE CMP REDESIGN TEAM HAS PROPOSED CHANGES TO THE CHANGE REQUEST FORM THAT WOULD CLARIFY THE CHANGE THAT IS BEING REQUESTED AND PROVIDE MORE GUIDANCE FOR QWEST TO ASSESS ABILITY TO SUPPORT AND LEVEL OF EFFORT. WCOM COMMENTS: WE NEED TO HAVE PARITY LANGUAGE FOR CHANGES MADE TO ALL INTERFACES AT THE SAME TIME INSERTED THROUGH OUT THIS DOCUMENT.)~~

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.

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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 ~~first~~ 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.

Implementation Plan for Regulatory CRs

If agreement is reached at the monthly CMP meeting that a CR constitutes a Regulatory Change~~is regulatory~~, then at that same meeting, Qwest will ~~present~~ propose an implementation plan for compliance with a regulatory mandate at a monthly CMP Systems meeting. The proposal will include the criteria that Qwest used to determine the ~~proposed~~ recommended method of implementation, including estimated demand 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. ~~For example, if relied upon~~ considered, the criteria may also include; cost, estimated volume, number of CLECs, technical feasibility, parity with retail, or effectiveness/feasibility of manual process.

CLECs and Qwest will attempt to reach agreement on the implementation plan. 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.

At that meeting, if any CLEC does not agree on the implementation plan the objecting CLEC may initiate the dispute resolution process. Final determination of the implementation plan will be made by Qwest with input from CLECs at that monthly meeting, and documented in the meeting minutes. Qwest's determination to implement a mechanized solution will include consideration of

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~~the technical feasibility of the solution and the cost-effectiveness of the solution based on demand for the functionality. If Qwest is unable to fully implement the 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 demand estimated volume for the functionality justifies implementation of a mechanized solution. In that situation, the a subsequent CR to implement the mechanized change must be submitted when demand estimated volume justifies implementation of the mechanized solution and will be 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.~~

~~When Qwest's implementation plan specifies compliance through a manual solution, a level of effort and demand estimates will be shared with CLECs when the CR is presented at a monthly CMP Systems meeting. 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 demand volume, the CLEC must submit information to Qwest demonstrating that Qwest's demand 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 demand 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 demand volume estimate is appropriate. If it has revised the demand volume estimate, Qwest will include the revised demand volume estimate and will state whether the revised demand volume estimate results in a change to Qwest's estimated levels of effort to implement a manual and/or mechanized solution. If the demand 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~~

~~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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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 demand 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 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: **(WCOM COMMENT: THE WAY THIS READS, QWEST INITIATED CRS FOLLOW THIS SAME PROCESS, IS THAT THE INTENT? WCOM BELIEVES IT SHOULD BE.)**

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.

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- 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 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 preliminary Llevel of eEffort in hours(S, M, L, XL) required to implement the CR. **(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A**

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REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)

- Identification of any CR which is a duplicate, in part or whole, to the CR being presented.
- ☐ Small—requires changes to only one subsystem of a single system
- ☐ Medium—requires changes to 2 or more subsystems of a single system
- ☐ Large—requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
- ☐ Extra Large—requires extensive redesign of at least one system.
- “Denied” (Qwest will not implement the CLEC or Qwest request) with basis for the denial, in writing, including reference to substantiating material. **(WCOM COMMENT: AGAIN THE WAY THIS READS, QWEST INITIATED CRS MAY BE DENIED AS WELL. THIS IS APPROPRIATE GIVEN THAT THE CMP REDESIGN TEAM AGREED THAT QWEST AND CLEC ORIGINATED CRS GO THROUGH THE SAME PROCESSES.) (incorporate reasons for Denial here. Include statement obligating Qwest to apply reasons for denial before initiating its own CRs).** CLEC-initiated OSS Interfaces and Product/Process change request may be denied for one or more of the following reasons. ~~This list is not intended to be all inclusive.~~
 - Technologically not feasible—a technical solution is not available, ~~or a solution is available but there would be major technological or process impacts to the CLECs and/or Qwest (+)~~
 - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, implementing the request may negatively impact a **performance measurement (PID) (readdress after the impasse issue is resolved) 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 (rename)—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. (+)
 - ☐ ~~Duplicative Change Request—the request is covered by another Change Request~~
 - **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 10.2x. The results of the ranking will produce a release candidate list.

~~Qwest or CLEC originated CRs for changes to an existing OSS interface will then be prioritized by the CLECs and Qwest resulting in the initial release candidate list. CLEC or Qwest originated CRs for introduction of a new interface or retirement of an existing interface are not subject to prioritization and will follow the introduction or retirement processes outlined in Sections x and x, respectively. (1st sentence moved into the previous paragraph and modified to mirror language in "CR Prioritization". 2nd sentence moved to "CR Prioritization" section)~~

53.2 CLEC-Qwest OSS Interface Change Request Lifecycle

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

53.2.1 Business and ~~S~~systems ~~R~~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

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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.

5-3.2.2 Packaging

Qwest and CLECs will discuss grouping candidates with affinities may be addressed more efficiently if taken together. [AT&T comment: this may not be exactly the right description. We just wanted to add this to this list of steps.] 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 estimate of the 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.

5-3.2.3 Design:

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

5-3.2.4 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.

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53.2.5 Code & Test:

Qwest engineers will perform the coding and testing by Qwest required to complete the work associated with each candidate 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 code and test work is completed on a per candidate basis in priority order. 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 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.

53.2.6 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. Using the initial release candidate list, Qwest will begin business and system requirements.

At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release. (WCOM COMMENT: PLEASE CLARIFY? IT SOUNDS LIKE QWEST CANNOT PACKAGE CRS UNTIL THE BUSINESS AND SYSTEM REQUIREMENTS PHASE IS COMPLETE WHICH IS AFTER PRIORITIZATION HAS TAKEN PLACE...THUS IT IS CONCEIVABLE THAT CRS THAT MAY HAVE BEEN CONSIDERED LOW PRIORITY COULD HAVE AFFINITY WITH A HIGH PRIORITY CANDIDATE AND BY ASSOCIATING THE TWO, A HIGHER PRIORITY CANDIDATE MAY NOT MAKE IT TO THE DESIGN PHASE BECAUSE OF THE PROCESS THAT WOULD BE IN PLACE WHICH LOOKS AT PRIORITY ORDER. QUESTION: IS IT POSSIBLE FOR QWEST TO PACKAGE CRS PRIOR TO THE PRIORITIZATION PHASE? IF SO, WE COULD AVOID THE ABOVE POSSIBILITY.) (this is all addressed in the above development milestones) (moved to the Business and System Requirements section above)

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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 ~~(AT&T Comment) discuss the CLECs, in the next CMP meeting, (AT&T Comment) either the removal of that candidate from the list (AT&T Comment) or a delay in the release date to incorporate that candidate. If the candidate is removed from the list,~~ Qwest will also advise the CLECs as to whether or not the candidate could become a candidate for the next point release, with appropriate disclosure as part of the current major release of the OSS interface. Alternatively, the candidate will be returned to the pool of CRs that are available for prioritization in the next OSS interface release. (this was moved into the code and test description)

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.

3.2.5.3.3 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).

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- the CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
- Description of CR
- originating CLEC
- assigned CRPM 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.
This list is not intended to be all inclusive.
 - Technologically not feasible—a technical solution is not available, **or a solution is available but there would be major technological or process impacts to the CLECs and/or Qwest (+)**
 - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, implementing the request may negatively impact a **performance measurement (PID)** **(readdress after the impasse issue is resolved) incorporated into**

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- a performance assurance plan, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions) (+)
- Qwest policy (rename)—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. (+)
 - ☐ ~~Duplicative Change Request—the request is covered by another Change Request~~
 - 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.
 - 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.

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

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

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

From Master Redline 10-03-01

INTRODUCTION OF A NEW INTERFACE

QWEST PROPOSED INTRODUCTION OF AN OSS INTERFACE PROCESS__ **REVISED 11-01-01**

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64.0 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; include:

- 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 is 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, if applicable
- Date for issuing Final Technical Specifications
- Testing period, if applicable
- 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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7.4.0 INTRODUCTION OF A NEW OSS INTERFACE

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

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.

7.4.1 Introduction of a New Application-to-Application Interface Release Planning

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. ~~share the new interface plans via web site posting and CLEC notification.~~

7.4.1.1 Release Announcement

Where practicable, the Release Announcement and Preliminary Interface Implementation Plan will include: Qwest will share preliminary plans for the new interface, including:

- Proposed functionality of the interface including whether the interface will replace an existing interface
- Proposed ~~detailed~~ implementation time line (e.g., milestone dates, CLEC/provider ~~Qwest~~ comment ~~cycle/response turnaround dates~~)
- Proposed meeting date to review the Preliminary Interface Implementation Plan
 - ~~Provider constraints~~
 - Exceptions to industry guidelines/standards, etc. if applicable
 - ~~Proposed CLEC/provider meeting plans~~
 - ~~Requirements~~
 - ~~Design & Development~~
 - ~~Connectivity and Firewall Rules~~
 - ~~Test Planning~~
- Planned Implementation Date

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Change Control 74.1.2 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.

74.1.3 1.32 — **Initial Interface Technical Specifications**

Qwest will provide draft technical specifications at least one hundred twenty (120) calendar days prior to implementation ~~at the release, unless the CMP Exception Process (see Section xx) has been invoked.~~ In addition, Qwest will confirm the schedule for the walk-through of technical specifications, ~~and~~ CLEC comments, and Qwest response cycle.

74.1.4 1.32.1 — **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

74.1.5 1.43 — **Walk Through of Draft Interface Technical Specifications**

Qwest will sponsor a walk through, including the appropriate internal subject matter experts (~~SMEs~~ 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.

74.1.6 1.43.1 — **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.

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Qwest will follow-up on all action items, and notify CLECs of responses 100 calendar days prior to implementation.

74.1.7 1.54 — CLEC's Comments on Draft Interface Technical Specifications

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

74.1.8 1.65 — QwestWEST 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.

74.1.9 1.76 — 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:

Detailed requirements

Connectivity and Firewall Rules

Test Plan

- 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

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I.7 Content of Final Notification Letter

The Final Release will include the following:

Summary of changes from Qwest response to comments

Indication of type of change (e.g., documentation change, business rule change, clarification change)

Changed requirements pages from initial notice, or reference to web site for final technical specifications

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, 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 Emergency changes within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change.

II.1.2 CLEC and Qwest Comments/Responses/Comments

~~Upon review of the preliminary plans for the interface if the CLEC wishes to provide feedback the CLEC must send a written response to Qwest. These responses must be provided no later than seven (7) calendar days prior to the first scheduled meeting. The CLEC's response will specify the CLEC's questions, issues and any alternative recommendations.~~

~~CLECs may provide feedback to Qwest during CLEC/provider meetings. Additional CLEC feedback may be provided in accordance with the dates outlined in the detailed implementation time line.~~

~~III. Provider Responses/Comments~~

~~Qwest will maintain both a proprietary and non-proprietary issue log containing CLEC comments and Qwest responses. This non-proprietary issue log will be posted to Qwest's web site upon receipt of CLEC feedback. Qwest will respond to the CLEC feedback in accordance with the dates outlined in the detailed implementation time line. Qwest will also communicate its base line interface development plans via web site~~

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 that are provided to CLECs.

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~~posting and CLEC notification in accordance with the dates outlined in the detailed implementation time line.~~

~~IV.1.4 Final Release Requirements Announcement~~

~~CLECs via web site posting and a carrier CLEC notification.~~

~~74.2 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 (six (28) 26) calendar days in advance of the target implementation date of a new GUI interface, Qwest will issue a Release Announcement, post the Interface Overview on Qwest's web site and may host a design and development meeting. At a minimum, the Release Announcement will include:~~

- ~~• Draft User Guide~~

~~Proposed functionality of the interface~~

~~Implementation time line (e.g., milestone dates, CLEC/Qwest comment cycle)~~

~~Proposed CLEC/Qwest meeting to review the Interface Overview.~~

~~Initial CLEC implementation requirements (e.g., hardware, software, connectivity, firewall rules, etc.)~~

- ~~• How and When Training will be administered~~

~~Implementation date~~

~~74.2.1 11.1 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.~~

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74.2.2 II.2.1 CLEC Comments and Qwest Response

At least twenty-five (25) No more than four (4) calendar days prior to the Release Production Date following the Release Announcement CLECs must forward their written comments and concerns questions to Qwest. Qwest will consider ~~ele~~CLEC comments and may address them Qwest will respond to CLEC comments with the release of the Final Notification. at the Interface Overview Meeting.

II.2 Interface Overview

The first scheduled meeting should be held no less than seven (7) calendar days following Qwest's notice issuance. At the meeting, Qwest will share an overview of the new interface, including:

Response to CLEC Comments

Proposed implementation timeline

74.2.3 II.3 Final Notification

Qwest will issue a final notice no less than twenty-one (21) cCalendar 14 days prior to the Release Production implementation date. The final notice will include:

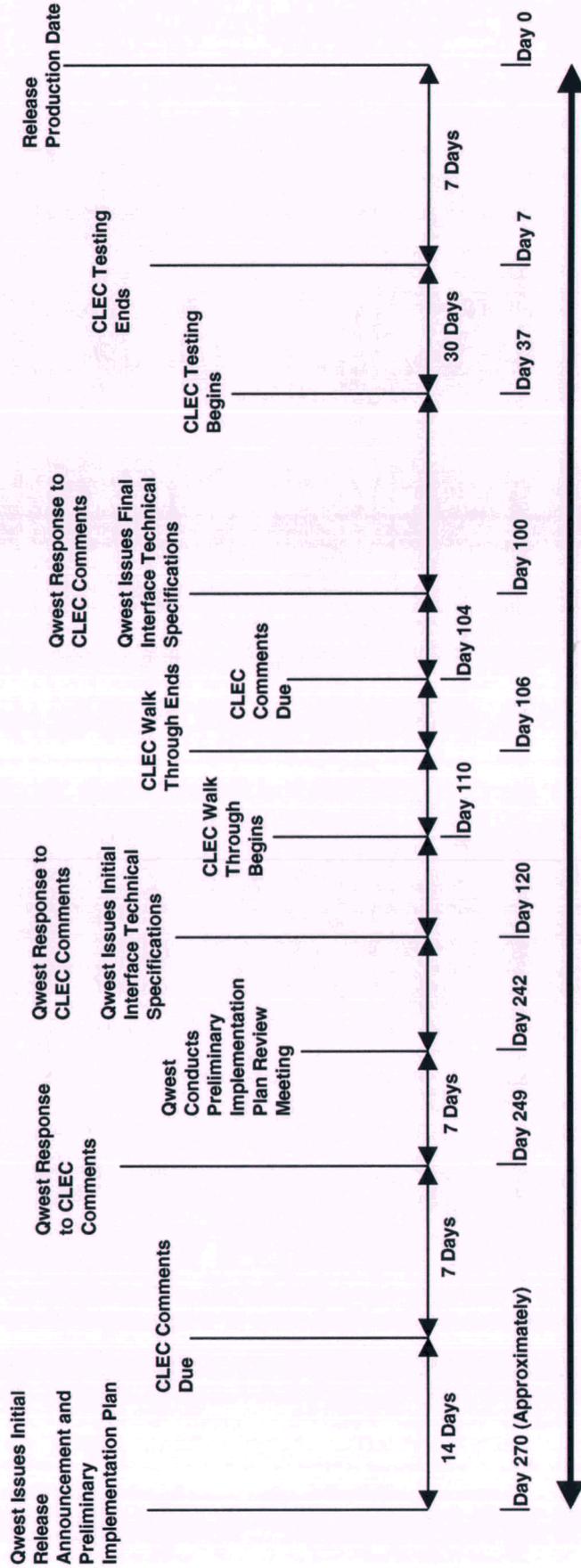
- A summary of changes from the initial notice, including type of changes (e.g., documentation change, clarification, business rule change).
- Final User Guide
- Final Training information
- Final Implementation date.

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Qwest-CLEC Change Management Process Introduction of A New Application-to-Application OSS Interface Timeline



9 Month Timeline (Approximately)

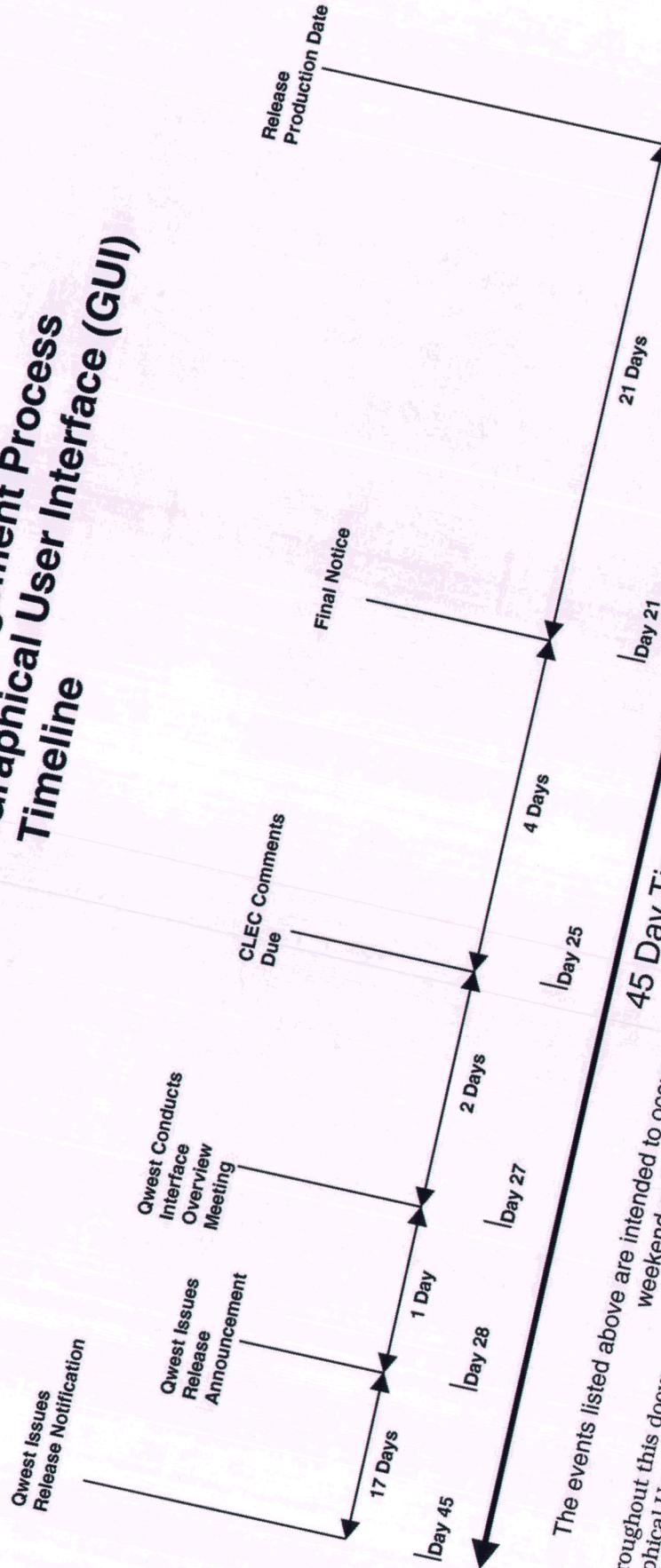
The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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 that are provided to CLECs.**

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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.

45 Day Timeline

Throughout this document, OSS Interfaces are defined as **existing or new** gateways (including application-to-application interfaces and billing capabilities **for local services provided by CLECs to their end users** that are **provided to CLECs** that support or affect the pre-order, order, provisioning, maintenance and repair, **but not limited to.**)

Note-Throughout this document *OB language not yet discussed by the CLEC-Qwest Re-Design Team.*

QWEST'S PROPOSED CHANGES TO EXISTING OSS INTERFACES
LANGUAGE — 10-09-01 REVISSED 10-16-01 10-30-01

85.0 CHANGE TO EXISTING OSS INTERFACES

~~Pre-order, Order application to application Change Process (Action item#)~~

~~As part of its development view, Qwest will prepare a preliminary package of the required changes and will share these plans at scheduled change management meetings. At the first emp CMP CMP systems monthly meeting of each quarter, Qwest will also provide a rolling twelve ((12) month td view of its oss 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 {AT&T to check — action item} 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 should make available two (2) versions of an interface between the sunrise and sunset dates. Qwest will support the previous major interconnect mediated access (ima IMA) ima EDI release for six (6) months after the subsequent major ima edi IMA EDI release has been implemented.~~

~~Past version Releases of ima edi 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. Will be implemented in past versions of ima edi. All other changes become candidates for future ima edi IMA EDI releases.~~

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

~~Unless mandated, Qwest will implement no more than four (4) releases requiring coding changes to the CLEC interfaces within a calendar year. These changes should occur no less than three (3) months apart.~~

1.1. _____ Versioning of TYPE 1 Changes

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For ~~TYPE 1~~ changes, the version number will not be incremented and will not cause the oldest dot version of the current version to be retired as a result of the implemented fix.

~~II. Versioning of TYPE 2 Changes~~

For ~~TYPE 2~~ changes that must occur between regularly scheduled releases, Qwest will not retire the oldest version in order to implement the ~~TYPE 2~~ change. The ~~TYPE 2~~ change will be implemented as either a dot release or a sub-dot release of all versions (except a retired version), unless the structure of the old version could not accommodate the ~~TYPE 2~~ change or the old version is scheduled to be retired within the next six months.

If the ~~TYPE 2~~ change results in an interface implementation, before applicable industry guidelines are finalized at the appropriate industry forums, dot release versioning is issued. An example of dot versioning of ~~A PROVIDER'S QWEST'S~~ LSOG Issue 5 implementation is V5.1.

If the ~~TYPE 2~~ change results in an interface implementation that is in line with industry guidelines, sub-dot release versioning is issued. An example of sub-dot release of ~~A PROVIDER'S QWEST'S~~ LSOG Issue 5 implementation is V5.0.1.

~~TYPE 2~~ changes that occur at the time of a regularly scheduled release will be made in all versions (except a retired version). If the structure or intent of the old version cannot accommodate the change then, via the Prioritization process a joint ~~PROVIDER QWEST/CLEC~~ decision is made that the mandate should not be implemented in an old version.

~~III. Versioning of TYPE 3 Changes~~

For ~~TYPE 3~~ changes, the base version identity should follow the LSOG issue identity. For example, the first release of ~~A PROVIDER'S QWEST'S~~ LSOG Issue 5 implementation should be V5.0.

~~IV. Versioning of TYPE 4 AND TYPE 5 Changes~~

~~TYPE 4 AND TYPE 5~~ changes will be implemented as a sub-dot release of all versions, unless the structure of the old version could not accommodate ~~THE TYPE 4 OR TYPE 5~~ change.

If the ~~TYPE 4 OR TYPE 5~~ change results in an interface implementation, before applicable industry guidelines are finalized at the appropriate industry forums, dot release versioning is issued. An example of dot versioning of ~~A PROVIDER'S QWEST'S~~ LSOG Issue 5 implementation is V5.1.

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If the ~~TYPE 4 OR TYPE 5~~ change results in an interface implementation that is in line with industry guidelines, sub-dot release versioning is issued. An example of sub-dot release of ~~A PROVIDER'S LSOG~~ QWEST'S Issue 5 implementation is V5.0.1.

Graphical User Interface (GUI)

Qwest makes one versionRelease of a guiGUI available at any given time and will not support any previous versionReleases.

VERSIONRELEASEVERSIONRELEASEVERSIONRELEASE

Interconnect mediated access (ima) ima guiIMA GUI changes for a pre-order or ordering gui will be implemented at the same time as in conjunction with an IMA EDI release.

85.1 Requirements Review—Application-to-Application Interface

This section describes the timelines that Qwest, and any CLEC choosing to implement on the Qwest Release Production Date (date the Qwest release is available for use), will adhere to in changing existing interfaces. ²For 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.

V.85.1.1 Draft Interface Release RequirementsTechnical Specifications

[make sure CR process and this process are linked properly in final document]

Prior to Qwest implementing ~~a new interface~~ or a change to an existing interface, Qwest will notify CLECs of the draft ~~release requirements~~ Technical specificationsSpecifications.

~~Notification and confirmation time lines for TYPE 1 are determined on an individual case basis based on the severity of the problem.~~

~~Notifications for TYPE 2 changes are based on applicable law and / or regulatory rules.~~

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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TYPE 3 time lines are based on CLEC / **PROVIDER QWEST** agreement in conjunction with the rollout of national guidelines, subject to any overriding regulatory obligations.

Generally, a Type 4 and Type 5 change notification will occur at least 73 calendar days prior to implementing the change. Draft business rules / technical specifications will be produced and distributed to CLECs 66 calendar days prior to implementation. CLECs have fifteen (15) calendar days from the initial publication of draft documentation to provide comments / questions on the documentation. Change confirmation will occur 45 calendar days prior to implementation through publication of final business rules / 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 process (see Section ~~xx~~8.0) has been invoked.** Technical specifications are documents that provide information the CLECs need to code the interface. **CLECs have eighteen (185) calendar days from the initial publication of draft technical specifications to provide written comments/questions on the documentation.**

For **TYP_E 4 OR TYPE 5** change requests more or less notification may be provided based on severity and the impact of the change. For example, Qwest can implement the change in less than 45 calendar days.

Documentation of new or revised error messages associated with **Type 4 or Type 5** change requests will be provided no later than 30 calendar days prior to implementation date.

VI.85.1.2 Content of Draft Interface Release Requirements 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. Any cross-reference to updated documentation such as the Users Guide. This type of documentation should also include a summary of changes made to the document.**DRAFT DOCUMENTATION, OR INSTRUCTIONS ON HOW TO ACCESS DOCUMENTATION ON THE WEB SITE.**

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VII.85.1.3 Walk Through of Draft Interface Release Requirements Technical Specifications

If requested by one or more CLECs within fourteen (14) calendar days of receiving the initial Release Requirements, Qwest will sponsor a walk through with the appropriate internal subject matter experts. Qwest will hold this walk through no later than thirty (30) calendar days prior to the scheduled implementation. 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 later 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.

85.1.3.1 III.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

85.1.3.2 III.2 Conduct the Walk-through

Qwest will lead the review of technical specifications and 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.

VIII.85.1.4 CLEC's Comments on Draft Interface Release Requirements Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send written comments a written response to Qwest and the CLEC's Account Manager QWEST AND THE CLEC'S ACCOUNT the Systems CMP Manager no sooner later than fifty-five (55) 8 calendar days prior to implementation. Qwest must receive the CLEC's response seven (7) calendar days prior to the date of the Initial Release Requirements. The response will specify the CLEC's questions, issues and any other alternative recommendations for implementation.

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IX.85.1.5 QwestWEST Response to Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns **WITHIN SEVEN (7) no later 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.**

X.85.1.6 Final Interface Release Requirements Technical Specifications

The notification letter resulting from the CLEC's ~~response comments~~ from the Initial Release Notification will constitute the Final ~~Release Requirements~~ **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.

XI.85.1.7 Content of Final Interface Release Requirements Notification Letter

~~In addition to the content of interface initial release requirements,~~ The Final Release will include the following:

- Reference to Final Technical Specifications, or web site
- ~~Summary of changes from Qwest response to comments~~
- ~~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)
- ~~Changed requirements pages~~

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- Final Joint Test Plan including transactions which have changed
 - Joint Testing Period~~JOINT TESTING PERIOD~~
 - Release date
- ~~Interval before implementation of release~~

Qwest's planned implementation date will ~~not be~~ at least sooner than forty-five (45) calendar days from the date of the final release requirements, unless the exception process has been invoked. ~~Qwest will post notification to provider's web site to inform the CLECs of possible impact to CLEC ordering ability. Qwest will post this information forty-five (45) calendar days prior to the scheduled implementation of such changes, if possible, but not less than thirty (30) calendar days prior to implementation. The implementation time line for the release will not begin until all related documentation is final specifications are provided.~~ Production Support type of Emergency changes that occur within the thirty (30) calendar day test window can that occur without advance notification but will be posted within 24 hours of the change.

85.1.8 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.

85.2 Requirements Review—Graphical User Interface (GUI)

85.2.1 Draft GUI Release Notice

Prior to implementation of of a new interface or 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-oneeight (218) calendar days prior to implementing the release unless an exception process has been invokedgranted. This notification maywill -include draft user guide information if necessary.

CLECs must may provide comments/questions on the documentation no laterless than 17twenty-five (25) calendar days prior to implementation.

Final notice for the release will be published at least twenty-one fifteen (2115) calendar days prior to production release date implementation.

85.2.2 Content of Draft Interface Release Notice

The notification will contain:

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- 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.

In addition to the content of Interface Initial Release Requirements, the Final Release will include the following:

- Summary of changes from Qwest response to comments**
- Indication of type of change (e.g., documentation change, business rule change, clarification change)**
- Changed requirements pages**
- Release date**

Interval before implementation of release

85.2.3 CLEC Comments on Draft Interface Release Notice

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

85.2.4 Qwest Response to Comments

Qwest will consider eleeCLEC comments and may address them review and respond with written answers to all elec issues, comments and concerns regarding in the initial-final GUI release notice within fourtwo (42) calendar days after receipt of CLEC comments. The answers will be shared with all clecs, unless the elec 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 final notification letter.

FINAL INTERFACE RELEASE NOTICE

THE FINAL NOTIFICATION LETTER WILL CONSTITUTE THE FINAL RELEASE NOTICE.

85.2.5 Content of Final Interface release Notice

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

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

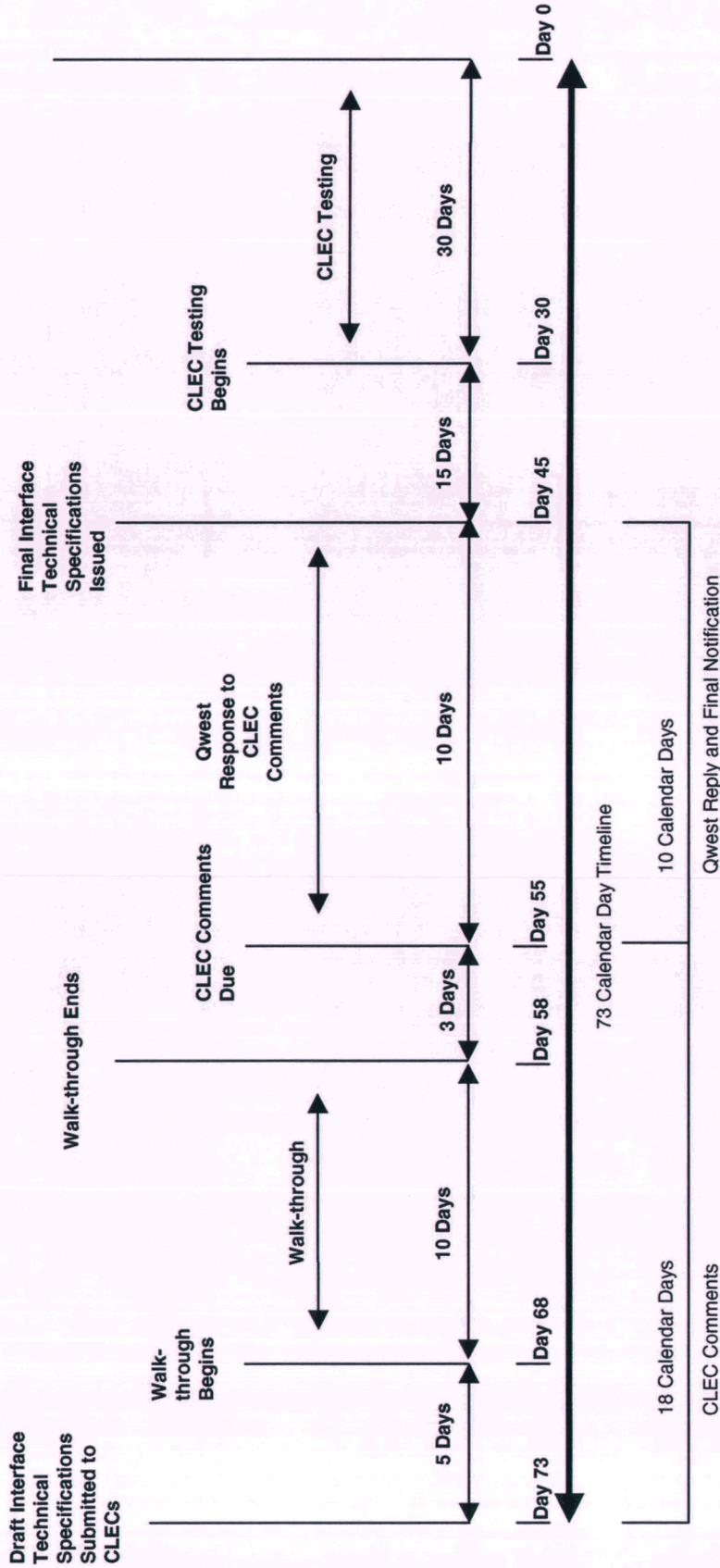
Qwest's planned implementation date will not be no later sooner than twenty-one fifteen (2115) calendar days from the date of the final release notice. Qwest will post this information on the CMP web site. Production support type emergency changes that occur without advance notification will be posted 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 Timeline



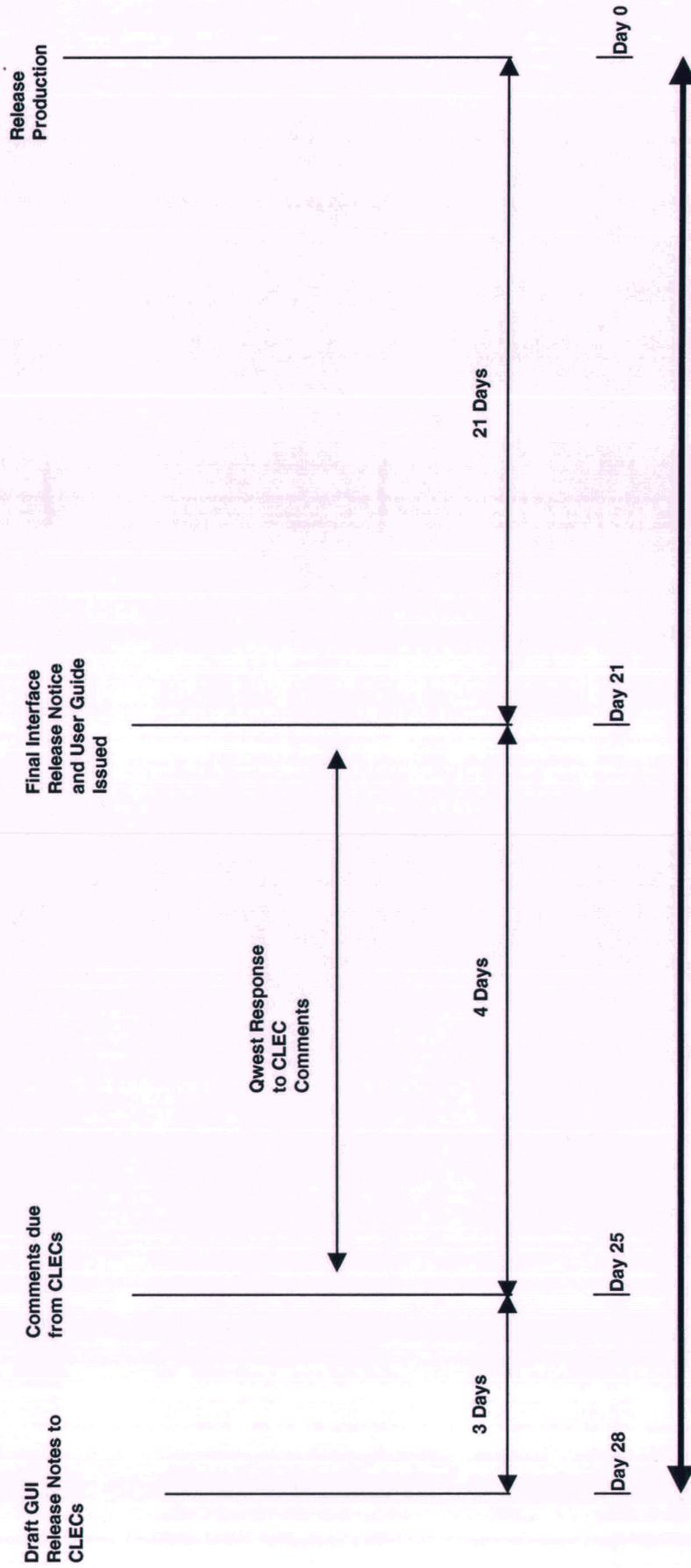
The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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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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96.0 QWEST PROPOSED CHANGES TO 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.

96.1 Application-to-Application OSS Interface

XVIII.96.1.1 Initial Retirement Plans

Application-to-Application Interface

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.

XIX.96.1.2 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

96.1.3 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.

96.1.4 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

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grandfathered until the retirement of the interface. Qwest will ensure that an interface with C-comparable f-Functionality is available no less than six months prior to retirement of an Application-to-Application interface.

96.1.5 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

96.2 Graphical User Interface (GUI)

96.2.1 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.

96.2.2 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

96.2.3 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.

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69.2.4 Comparable Functionality

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

96.2.5 Final Retirement Notice

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

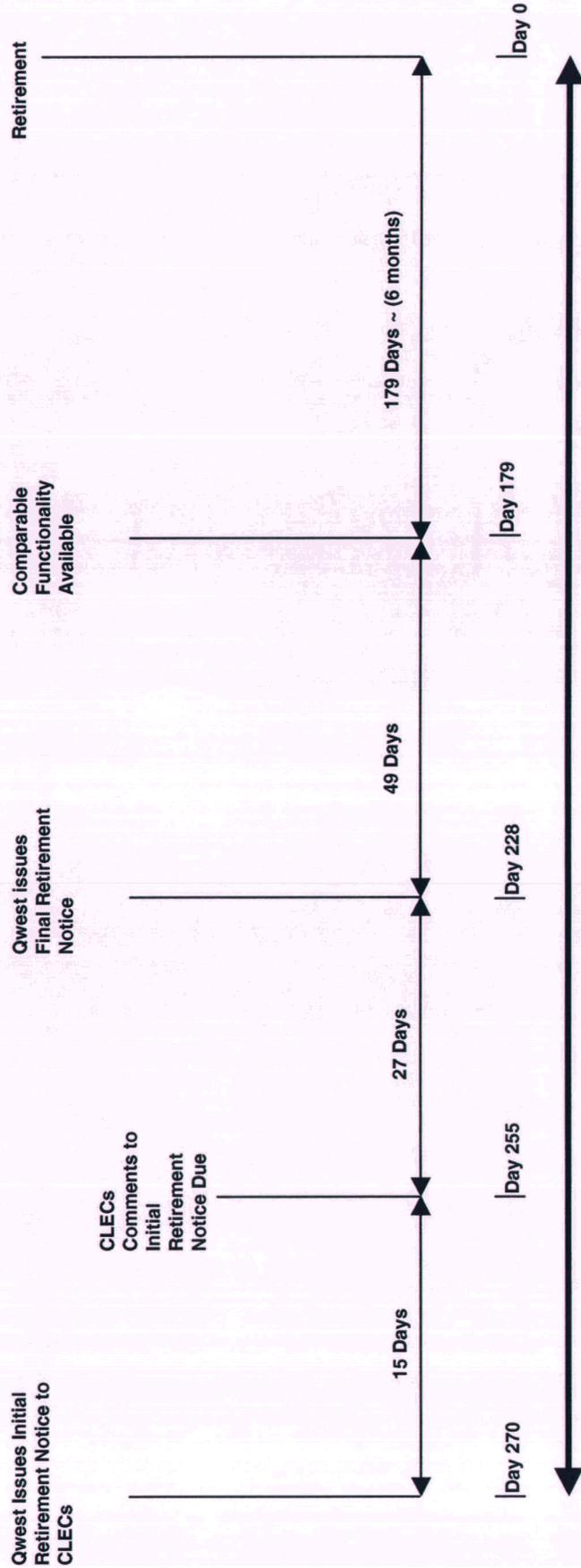
- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

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



9 Months (Approximately)

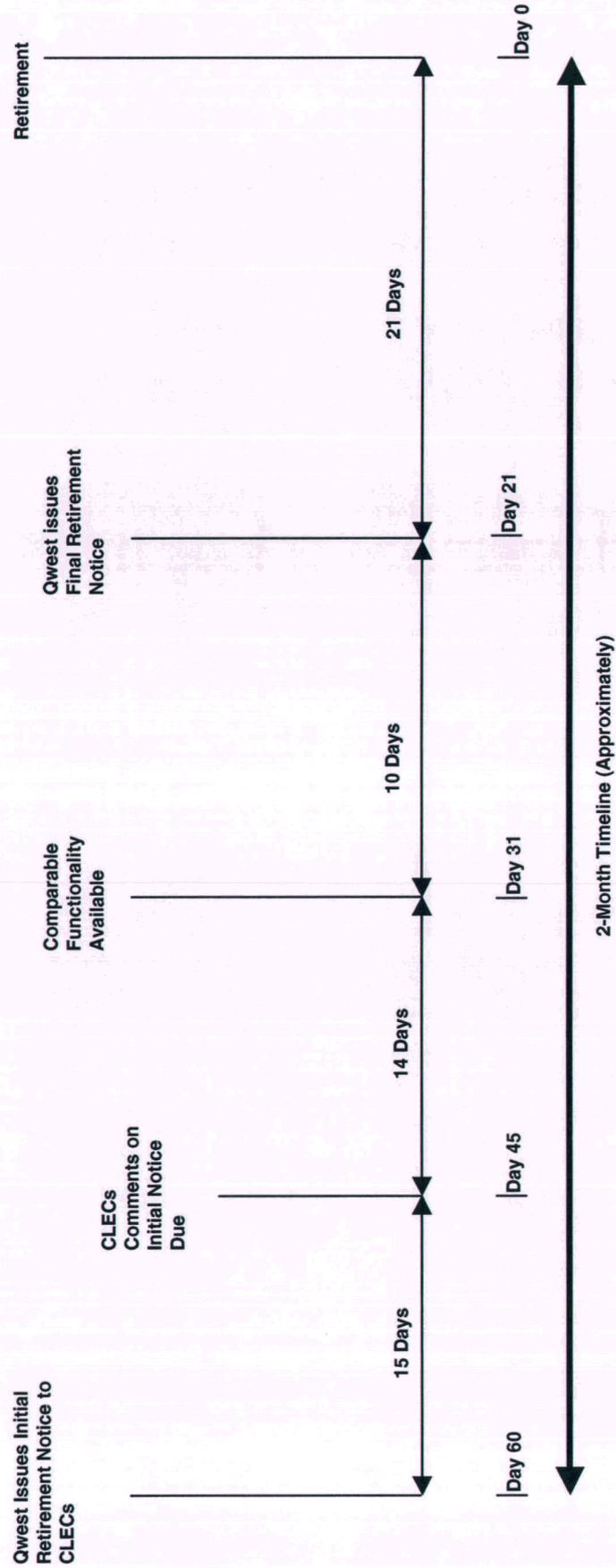
The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

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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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109.0 PRIORITIZATION

9.0 Prioritization Review

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 ~~review 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 7.0x and 9.0x, respectively. [See Action Items 212, 170, 169, 168, and 167]

~~(WCOM COMMENTS: PAP CHANGES SHOULD NOT BE CONSIDERED REGULATORY BECAUSE QWEST TRULY ISN'T OBLIGATED TO FIX THE PROBLEMS, THEY COULD SIMPLY CHOOSE TO PAY THE PENALTIES AND CONSIDER COST OF DOING BUSINESS. WCOM COMMENT: WE SHOULD DEFINE HOW OFTEN PRIORITIZATION TAKES PLACE. THIS DOCUMENT INDICATES IT IS DONE PRIOR TO EACH MAJOR REALEASE, BUT HOW OFTEN? IS THERE A SCHEDULE OF WHEN THESE WILL TAKE PLACE, IE. DURING WHICH MONTHLY MEETINGS WILL CLECS BE ASKED TO PRIORITIZE CR'S SO THEY CAN BE CONSIDERED FOR THE NEXT RELEASE.)~~

9.1 ~~109.1~~ Regulatory and Industry Guideline Change Requests

[See Action Items 212 and, 170, 169, 168, and 167]

~~Note: Qwest considers changes related to PID/PAP items to be separate from all discussions in this Section. (IMPASSE ISSUE) [Qwest's understanding of the CLEC proposal of 01-24-02 assumes that Qwest and CLECs will agree to a Special Change Request Process.]~~

~~Regulatory and Industry Guideline changes, as are defined in Section 4x2.0. above, are not voluntary, but are required to comply with newly passed legislation, regulatory requirements, court rulings, PAPs, or industry guidelines. Qwest is required to implement these changes within a designated timeframe. Therefore, sSeparate 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 Ssection 53.1.~~

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 53.1. Regulatory and Industry Guideline CRs will also be identified in the CMP Systems Monthly Meeting Distribution Package.

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9.1.1 Regulatory Changes

~~For Regulatory eChanges, arising from newly passed legislation, regulatory requirements, court rulings, or PAP;~~ 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 (Highlighted text indicates impasse issue).** **[Bold text in Section 10.1.1 indicates Impasse Issue.]** ~~After the legislation, regulatory requirement, court ruling, or applicable standard in a PAP becomes effective, Qwest will implement Regulatory changes as soon as practicable.~~

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.

109.1.2 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.~~

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.

109.1.3 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 Where Regulatory and/or Industry Guideline CRs could be prioritized into more than one Major Release prior to the mandated or recommended implementation date, 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

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~~CR is not included in a prior release, it will be implemented in the latest release specified by Qwest. Where an implementation date is specified for a Regulatory or Industry Guideline change, there may be one or more releases prior to the last release before the required implementation date in which Qwest could implement a Regulatory or Industry Guideline change. For each of these CRs, Qwest will determine the scheduled releases in which the Regulatory or Industry Guideline CR could be implemented, based on the required implementation date, the development cycle, resource allocation, and other scheduled Regulatory or Industry Guideline CRs. 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. If Qwest determines that there is more than one release in which Qwest could implement a Regulatory or Industry Guideline CR, the prioritization process outlined above applies to any possible releases before the latest release in which Qwest could implement the CR.~~

9.2 ~~109.2~~ Prioritization Process

9.1.2 ~~109.2.1~~ Prioritization Review

At the last Monthly Systems CMP Meeting before Prioritization, Qwest will facilitate a Prioritization Review including the ~~a~~ discussion for all CRs eligible³ ~~[define in terms #248]~~ for prioritization in a major release ~~each CR~~. 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 ~~to for~~ prioritization. (see Appendix A - Sample – IMA ~~110.0 Rank Eligible CRs~~ Candidates for Prioritization List)

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 ~~P~~prioritization ~~R~~review objectives are to:

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

³ *Eligible CR's are Qwest and CLEC initiated CR's as defined in Section X. . **[AT&T Comment: ~~†~~This will definition may change depending on how we the CMP Redesign Team resolves regulatory and industry guideline changes]***

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9.2 Prioritization Process 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 ~~X - above/below~~. Refer to Appendix B: Sample – IMA 11.0 Initial Prioritization Form ~~-(AT&T Comment) Ranking~~
- 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 ~~X - above/below~~. ~~-(AT&T Comment)~~ Refer to Appendix C ~~X - Sample - IMA 11.0 Prioritization List~~ ~~Qwest CMP Prioritization Process Example~~.

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 ~~release candidate 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 ~~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.

B. CLECs and Qwest will rank all systems CRs, including Regulatory and Industry Guideline CRs.

(QWEST COMMENT: The CR Initiation process also includes a description of the release life cycle. Recommend removing it from the Prioritization Process so that it only resides in one process.)

9.3 Qwest OSS Interface Release Life Cycle

Following CR Prioritization and ranking, the Qwest OSS release life cycle is comprised by the succession of three major phases of work. These phases are performed to prepare, implement, deploy, support, and retire an OSS interface.

9.3.1 Initiation Phase

During the Initiation Phase definition and design activities occur.

Definition Activities -- The high-level business requirements, systems requirements, and Level of Effort for a release are further refined. For example, system functions are derived from user scenarios, system performance and security constraints are identified for mitigation, and data requirements are identified.

Design Activities -- The architecture (system context diagram, data design, analysis of requirements satisfaction, software services/technologies accepted, mapping of components to hardware, etc.) is analyzed to meet the baseline requirements.

At the conclusion of the initiation phase a detailed Level of Effort is determined by Qwest and CR packaging is presented to the CLECs. CR packaging is a process during which Qwest IT groups CRs into packages based on ranking, coding affinities and system synergy. These packages are presented to the CLECs at the Monthly Systems CMP Meeting. The CLECs select the package which they wish to be implemented with the release.

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9.3.2 Development Phase

During the Development Phase the following activities occur to prepare a release for deployment:

Build Activities – The code is baselined and delivered to system test and a system test plan (system test cases, costs, and schedule, test environment, test data, etc.) is completed.

Test Activities – The system is tested as meeting system test requirements, certification is completed on the system readiness for production, and pre-final documentation is reviewed and baselined.

9.3.3 Deployment Phase

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.

109.3 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 53.0 (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 request 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 and request^{ing} information not included in the original SCRCP e-mail. When the SCRCP e-mail is complete, the confirmation e-mail will include:

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

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

Additional input to consider SCRP may be invoked prior to prioritization. Analysis on the cost would be done for a fee. CLEC may decide to invoke SCRP 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.

AT&T Comment: Timing will be important because, assuming the desire is to get this in the next release, doesn't the business and systems development work have to be done in tandem with the business and systems development work on the prioritized CRs for the release? This form shall be accompanied by the non-refundable Processing Fee specified in Attachment X. AT&T Comment: How much? 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 SCRP originator's request. AT&T Comment: what additional information does Qwest think it needs? With a CR, Qwest proceeds with the information contained in the CR and through clarification. Wouldn't it be the same for SCRP CRs? Also, how does Qwest intend to do the work? Through contractors?:

- [Information TBD]

As soon as feasible, but in any case within (x) business days after receipt of a completed SCRP form, Qwest will provide the SCRP originator with a SCRP quote. AT&T Comment: (1) See comment above regarding timing; (2) is this a firm quote?; (3) does Qwest intend to assign a dollar figure to a person hour? (4) if there are affinities in packaging, might the quote go down in recognition of these affinities? The SCRP quote will, at a minimum, include the following information:

- A description of the work to be performed
- ☐ Development costs
- AT&T Comment: Schedule for all the steps that apply to any other systems CR – business and systems requirements, packaging, etc. – wouldn't this schedule match the schedule for the CRs that were prioritized high enough to make the next release?
- Targeted release AT&T Comment: isn't it the next release?
- [Additional elements TBD] Qwest agrees with AT&T Comments

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

Once development work has begun, if at any time the SCRP originator decides to cancel the SCRP, the SCRP 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 SCRP request. Like CLECs, Qwest will have to apply separate, additional resources to CR it seeks to implement through the SCRP.

QWEST PROPOSED INTERFACE TESTING LANGUAGE UPDATED 11-13-01,
PROPOSED ACTION ITEM LANGUAGE - 11-20-01 - REVISED 11/27/01

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110.0 APPLICATION-TO-TO-APPLICATION INTERFACE TESTING

[ACTION ITEM 208 – ADD LANGUAGE TO ADDRESS ISSUE OF FINDING A BUG IN THE PRODUCTION CODE IN THE TEST ENVIRONMENT.]

[Redesign 02-06-02]

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 ~~will~~ provides a separate Customer Test Environment (CTE) for the testing of transaction based application-to-application interfaces for pre-order, ~~and~~ 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)

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~~Qwest will provide test files for . Billing~~ There are two types of testing: ~~Qwest provides initial implementation~~ ~~new release 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. [see action item #182 TERMS]~~ ~~production support for all types of change requests.~~ ~~New release~~ ~~Such~~ testing provides the opportunity to test the code associated with releases for ~~Type~~ those OSS Interface ~~ex2 through 5~~ change requests. ~~The CTE will also provide the opportunity for regression testing of OSS Interface functionality.~~ ~~Production support testing allows CLECs and Qwest to test changes made as a result of Type 1 change request implementation.~~

1. New Release & Production Support

110.1 Testing Process

in the CLEC Test Environment (CTE)

~~Qwest will send an industry notification, including testing schedules (see Ssection 8.0X – Changes to Existing OSS Interfaces), to CLECs so they may determine their intent to participate in the test. CLECs wishing to test with Qwest migrate to the new release 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) ~~should make arrangements with Qwest~~ ~~When applicable, CLECs and Qwest will perform interface testing, as mutually agreed upon and documented in a migration project plan~~

~~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

~~Each testing CLEC will meet with Qwest and agree on its own set of test scenarios that will be included in the test and the test schedule~~ ~~Qwest will communicate~~ ~~publish 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 connectivity option as it uses in~~

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~~production, the CLEC should, in general, experience response times similar to production. However, the CTE environment is not intended for volume testing.~~

~~This section provides information regarding the CTE and the procedures for new release and Production Support testing.~~

~~The CTE is a separate environment that contains the application-to-application interface and gateway applications for preordering and ordering. This environment is used for CLEC testing—both new release testing and new entrant testing. CLECs are responsible for establishing and maintaining connectivity into the CTE. Provided a CLEC uses the same software components and similar connectivity configuration ~~connectivity option~~ 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. (Action #185) Production code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section 124.0.~~

~~Any special procedures required due to geographical or system differences will be reviewed with the participating CLEC prior to the implementation of their testing phase~~

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II. NEW RELEASE TESTING

NEW RELEASE TESTING IS THE PROCESS CLECS USE TO TEST AN UPCOMING QWEST SYSTEMS RELEASE THAT IMPACTS THE INTERFACE AND BUSINESS RULES BETWEEN CLECS AND QWEST.

III. GETTING READY FOR THE NEW RELEASE TESTING

CLECS SHOULD BE NOTIFIED OF THE CONTENT OF THE RELEASE THROUGH THE CHANGE MANAGEMENT PROCESS. CLECS SHOULD REVIEW THE CONTENT OF THE RELEASE AND DETERMINE IF THEY WANT TO PARTICIPATE IN THE TEST AND WHAT TRANSACTIONS THEY WOULD LIKE TO SUBMIT AS PART OF THE TEST.

QWEST WILL SEND AN INDUSTRY NOTIFICATION, INCLUDING TESTING SCHEDULES, TO CLECS SO THEY MAY DETERMINE THEIR INTENT TO PARTICIPATE IN THE TEST. CLECS WISHING TO PARTICIPATE IN THE TEST SHOULD MAKE ARRANGEMENTS WITH QWEST TESTING COORDINATOR. QWEST WILL PUBLISH ANY CHANGES TO THE SCHEDULE.

IV. PRODUCTION SUPPORT TESTING

PRODUCTION SUPPORT TESTING OCCURS IN A PRODUCTION LIKE ENVIRONMENT USED IN SUPPORT OF NEW ENTRANT TESTING. NEW ENTRANT

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~~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.~~

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121.0 PRODUCTION SUPPORT

[Action Item 209 – Qwest to propose language and the time frame for scheduled maintenance, notification and inclusion of known patches or any other CLEC impacting changes, and whether schedule maintenance should be included under production support or in another section in the Redline Document.]

121.1 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.

121.2 1.1 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 121.X02. 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.

121.3 1.2 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

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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. **(see Action Item # 189)**

Qwest will assign each CLEC-generated and Qwest-generated IT Trouble ticket a Severity Level 1 to 4, as defined in **Section 121.X4**. Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency release of process, software or documentation (known as a patch). If Qwest and CLEC deem implementation is not timely, and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming patches, major releases and point releases and any synergies that exist with work being done in the upcoming patches, major releases and point releases.

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

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

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

For "Date TBD" trouble tickets, either Qwest or a CLEC may initiate the Change Request to correct the problem. **(See Section 5.0X for CR Initiation.)** If the initiating party knows that the CR

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relates to a trouble ticket, it will identify the trouble ticket number on the CR.I.1 Newly Deployed Changes

Following the implementation of an OSS Interface change, Qwest will use existing production procedures for maintenance of a newly released software. Qwest will monitor troubles reported by CLECs to the IT Wholesale Systems Help Desk. A week after the deployment of a software 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. A Type 1 change corrects problems discovered in production versions of an OSS interface.

I.2 Request for a Production Support Change

Severity 1 (critical—production stopped) and Severity 2 (production or functionality degraded) corrections will be implemented immediately by means of an emergency release of process, software or documentation and CLECs notified according to the IT Wholesale Systems Help Desk procedures (refer to CMP web site). Severity 3 (limited use, but workaround in place) and Severity 4 (low or no impacts to CLECs) types, will not be fixed immediately but will follow the CR process under this CMP. For Severity 3 and Severity 4 production support issues, either Qwest or a the CLEC may initiate the Change Request to correct the Severity 3 or Severity 4 problem. (See Section X for CR Initiation.) Typically, this type of change reflects instances where a technical implementation is faulty or inaccurate such as to cause correctly or properly formatted data to be rejected.

Instances where Qwest or CLECs misinterpret interface-Technical sSpecifications 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 business processOSS Interface are identified and resolved during the change management review of the change request.

121.4 I.3 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.

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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.

121.5 1.4 Severity Levels

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

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

Severity 1: Critical Impact

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

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.

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- A sSoftware dDefect 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:

- Equipment taking hardHardware errors, no impact yet.

Severity 4: Minimal Impact

- Low or no visibility.
- No direct impact on CLEC.
- Few functions impaired.

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- 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.

121.6 1.5 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 ~~must~~ 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: [Redesign 02-07-02]
- Description of the problem
- Impact to the CLECs (e.g. geographic area, products affected, business implications)
- Ticket status (e.g. open, no change, resolved)
- 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).

121.7 1.6 Ticket Notification Response Intervals

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

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~~sent by Qwest to all CLECs who subscribe to the IT Wholesale Systems Help Desk are known as Event Notifications. Event Notifications will be sent to all CLECs within the time frame set forth in the table below and will include all related system trouble ticket number(s). The affected CLEC(s) and Qwest will attempt to reach consensus on resolution of the problem. When no consensus is reached, any party may use the Technical Escalation Process described in section X.~~

~~Status Notification will be provided during the IT Wholesale Systems 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 affected CLEC(s) as needed. A severity 2 problem may be worked outside the IT Wholesale Systems Help Desk normal hours of operation on a case-by-case basis. Severity three and four tickets can result in a CLEC or Qwest initiated Change Request. The tickets will be resolved as Closed, to be taken to the CMP Process.~~

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

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

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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.

ProvidersQwest –may conduct customerCLEC workshops. CustomerCLEC workshops are organized and facilitated by ~~the providerQwest~~ and can serve any one of the following purposes:

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

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143.0 ESCALATION PROCESS

FROM SEPTEMBER 20, 2001 REDESIGN SESSION

FROM SEPTEMBER 20, 2001 REDESIGN SESSION

I.143.1 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 ~~customer~~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. ~~can involve issues related to the CMP, itself~~
- ~~Escalations involving change requests,~~ the expectation is that escalation should occur only after normal change management procedures have occurred per the CMP.

~~Three (3) levels of escalation shall be available. They are:~~

~~1. The customer's change management director (or designated agent) to provider's change management director~~

~~2. The customer's change management director to provider's account director~~

~~3. The customer's vice-president to provider's vice-president~~

~~Each level of escalation will go through the same cycle, as follows:~~

II.143.2 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.~~ URL to be established ~~the~~ appropriate 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

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- 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.
- Subject of e-mail must be customer (Customer Name) ESCALATION-(GR# if applicable)-Level of Escalation
- Content of e-mail must include
- Definition and escalation of item
- History of item
- Reason for escalation
- Desired outcome of customer
- 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. [see action item]
 - Qwest will give notification that an escalation has been requested via the Industry Mail Out process [in a time frame to be determined – Jarby]
 - 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”
- Impact to customer of not meeting the desired outcome or item remaining on current course of action as previously discussed at the prioritization review (if escalation is associated with a change request)
- Impact to customer of a rejected change request
- Contact information for appropriate level including Name, Title, Phone Number, and e-mail ID
- It is not necessary to repeat information for level 2 and 3 escalations. However, the e-mail submission should include any additional information since the last distribution, including the reason that the matter could not be resolved at previous level

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- ~~The provider will reply to the escalation request with an acknowledgment of receipt within 1 business day~~
- ~~Within seven (7) calendar days of receipt, the appropriate provider change management executive (Level 1-2: Director or Level 3: Vice President) will reply through provider change management with provider position and explanation for that position~~
- Qwest will respond with a binding position e-mail including supporting rationale aAs soon as practicable, but no later than:
 - For escalated CRs, seven (7) fourteen (14) calendar days of sending the acknowledgement e-mail, Qwest will respond with a binding position e-mail including supporting rationale.
 - For all other escalations, fourteen (14) calendar days of sending the acknowledgment e-mail.
- ~~The escalating customer should CLEC will respond to the provider Qwest within seven (7) calendar days with a binding position e-mail. as to whether escalation will continue or the provider response has been accepted as closure to the item~~
- ~~If the provider's position suggests a change in the current disposition of the item, a conference call will be held within 1 business day of the provider's decision in order to arrive at consensus with the appropriate executives~~
- ~~The provider will publish the outcome of the conference call via e-mail~~
- ~~For escalations associated with Type 1 changes, the provider has a one day turnaround rather than 5 for each cycle of escalation~~
- When the escalation is closed, the resolution will be subject to the CMP.

3.4.2.1 Flow of Escalation Table

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154.0 DISPUTE RESOLUTION PROCESS

FROM SEPTEMBER 20, 2001 REDESIGN SESSION

CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP ~~[define Good Faith]~~. In the event that an impasse issue develops, ~~is not resolved through the Escalation Process described in Section xx has been followed without resulting in a resolution, a party may pursue the dispute resolution processes set forth below: the dispute shall be resolved by either method 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. ~~[URL to be established]~~ 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.
- ☐ Qwest or any CLEC affected by the dispute, may request mediation by a third party. If mediation is requested, parties shall participate in good faith. Qwest and the CLECs affected by the dispute must agree to the terms of the mediation, including the payment of costs and fees. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute. If mediation is not successful in resolving the issue, Qwest or any CLEC may use the process set forth below. ~~[action item for proposed language]~~

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- Without the necessity for a prior ADR Process~~[contingent on first bullet]~~, 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.

However, 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	1SCR013002-6	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	2SCR013002-7	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	124652	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 OCn capable loop LSR to IMA	ELI	IMA Common	DS1, DS3 & OCn 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 TOS 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 #162	Competitive Local Exchange Carrier (CLEC) is is an entity authorized to provide Local Exchange Service that does not otherwise qualify as an Incumbent Local Exchange Carrier. <u>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.</u>
CLEC Operating Procedures Impacting #110, #137, #179	[Team to define][AT&T Comment: we should discuss the status of this relative to the product/process tiers we recently discussed.]
<u>Software</u> Defects	A problem with a system <u>software</u> that is not working according to the Technical Specifications or that <u>and</u> is causing detrimental impacts to the users.
Design, Development, Notification, Testing, Implementation and Disposition #106	<p>Design: To plan out in a systematic way. Design at Qwest includes the Business Requirements Document and the Systems Requirements Documents. These two documents are created to define the requirements of a Change Request (CR) in greater detail such that programmers can write system code <u>software</u> to implement the CR.</p> <p>Development: The process of writing code to create changes to a computer system or sub systems <u>software</u> 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. [AT&T Comment: we assume this refers to the overall CMP and not a subset, like Design or Development] <u>Notifications apply to both Systems and Product & Process changes</u></p> <p>Testing: The process of confirming <u>verifying</u> that the capabilities of</p>

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Term	Definition
	<p>a new software Release were developed in accordance with the Technical Specifications and <u>will performs</u> as expected. <u>Testing would apply to both Qwest internal testing and joint Qwest/CLEC testing.</u></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 Change Request. <u>CR final disposition can be [rejected,] implemented or canceled. [AT&T Comment: we still have an issue around the criteria for rejection.]</u></p>
Good Faith	"Good faith" means honesty in fact and the observance of reasonable commercial standards of fair dealing.
<u>Level of Effort</u>	<u>Qwest determines the work effort to implement a Change Request by people hours. This information allows Qwest and CLECs to rank change requests during prioritization against the capacity for a specific Major Release.</u>
<u>Non-Coding Changes</u>	<u>Non-coding changes do not require a CLEC to make OSS Interface coding changes but may affect CLEC operations or processes.</u>
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.
<u>OSS Application to Application Interface Testing</u> <input type="checkbox"/> Controlled Production Testing #182	Controlled Production process is designed to validate CLEC ability to transmit <u>transactions EDI [AT&T Comment: limited to EDI?] data</u> that meets <u>X12-industry</u> 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

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Term	Definition
Testing #182	Controlled Production results to determine operational readiness for full production turn-up.
☐ Initial Implementation Testing #182	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. [AT&T Comments: Is this the first time a CLEC codes to an interface or does this apply for each Release the CLEC codes to? If to each Release, how is this different from Interoperability testing?]
☐ Interoperability Testing Environment #182	A production copy of IMA. (except during production transition to a new release)[AT&T Comment: What does this mean?? In addition, how is the Interoperability Test Environment different from Interoperability Testing?]. It interfaces directly with Qwest's production systems for pre-order and order submission 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. [AT&T Comment: clarify that this uses the production OSS and the Business processing layer. Does it include back-end systems, i.e., PREMIS or the SOP?]
☐ Level of Effort	Estimated range of hours required to implement a Change Request
☐ Migration Testing #182	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 #182	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

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Term	Definition
	or exit criteria within an implementation process. Regression Testing includes testing transactions previously tested, or certified.
Qwest #162	An Incumbent Local Exchange Carrier required to offer and provide to any requesting CLEC network interconnection, access to Unbundled Network Elements, ancillary services, and Telecommunications Services for resale pursuant to the Telecommunications Act of 1996.
Release <ul style="list-style-type: none"> • <u>Major Release</u> • <u>Point Release</u> • <u>Patch Release</u> 	A Release is <u>an implementation of changes resulting from a CR or production support issue using for a particular OSS Interface that may include enhancements.</u> There are <u>two-three</u> types of releases for IMA. [AT&T Comment: this definition is limited to IMA. Shouldn't it be broader?]: <ul style="list-style-type: none"> • <u>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).</u> • <u>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.</u> • <u>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.</u>
Release Production Date	?? <u>The Release Production Date is the date that a software Release is first available to the CLECs for issuance of production transactions.</u>
Sub-systems #162	A collection of tightly coupled software modules that is responsible for performing <u>a-one or more specific functions</u> [AT&T comment: should this be "one or more specific functions"?] in an OSS interface.

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Stand-alone Testing Environment (SATE) #182	A Stand- alone - <u>Alone</u> Testing Environment is a test environment that can be used by CLECs for <u>Initial Implementation Testing</u> , Migration Testing and Regression Testing [AT&T Comment: any others?] . 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 #141	Detailed documentation that contains all of the information that a CLEC will need in order to build a particular <u>version-release</u> of an OSS application-to-application interface. Technical Specifications include: <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 Technical Specification Appendices <u>for IMA</u> may include: <ul style="list-style-type: none"> • <u>Developer Worksheets</u> • <u>IMA Additional Edits</u> (edits from backend OSS systems) • <u>Developer Worksheets Change Summary</u> (field by field, release by release changes) • <u>EDI Mapping and Code Conversion Changes</u> (release by release changes) • <u>Facility Based Directory Listings</u> • <u>Generic Order Flow Business Model</u> <u>The above list may vary for non-IMA application to application interfaces</u>
Version	A version is the same as an OSS Interface Release (Major or Point Release)

<i>Term</i>	<i>Definition</i>
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CUSTOMER CLEC	<i>Party originating a request (LSR)</i>
INTERFACE	<i>A mechanism to communicate between customer CLEC/provider or trading partners (e.g., paper, GUI, gateway) <input type="checkbox"/> A new interface is the provider Qwest's introduction of paper, GUI, gateway, etc., to all customer CLECs for the first time. <input type="checkbox"/> A change to an interface may include: <input type="checkbox"/> Paper to GUI <input type="checkbox"/> Changes of EDI to CORBA</i>
ISSUE	<i>The specific OBF LSOG Issue (e.g., Local Services Ordering Guidelines (LSOG) document, Issue 5, August 2000)</i>
PROVIDER	<i>Party receiving request (LSR)</i>
RELEASE	<i>Implementation of version (Type 3 change) using a particular interface. A release may include enhancements or customization (Type 1, 2, 4 or 5 change) to an LSOG version by a provider as well as customer CLEC/provider business requirements.</i>
VERSION	<i>The supported OBF LSOG Issue (e.g., Local Services Ordering Guidelines (LSOG) document, Issue 5, August 2000) (Type 3 change)</i>

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GLOSSARY OF TERMS

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

Field	Checklist	Description	Instructions	Action Required
1	Optional	Optional field for the initiator to use for internal tracking. The request may be generated prior to submission into the Provider Qwest's change control process.	No action	
2	Mandatory	Date Change Request sent to Provider .	Return to Sender	Date entry required
3	Mandatory	Indicate type of Change Request: Customer CLEC or Provider initiated Industry Standard or Regulatory.	Return to Sender	Company designation required
4	Mandatory	Enter company name for the Change Request .	Return to Sender	Company name required
5	Mandatory	Enter originating company's Change Control Initiator's name .	Return to Sender	Initiator's name required
6	Mandatory	Enter originating company's Change Control Initiator's phone number .	Return to Sender	Initiator's phone number required

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Field	Checklist	Description	Instructions	Action Required
7	Mandatory	Enter originating company's Change Control Initiator's Email address.	Return to Sender	Initiator's Email address required
8	Mandatory	Enter originating company's Change Control Initiator's fax number.	Return to Sender	Initiator's fax number required
9	Mandatory	Enter originating company's alternate contact name.	Return to Sender	Alternate contact name required
10	Mandatory	Enter originating company's alternate contact phone number.	Return to Sender	Alternate contact number required
11	Mandatory	For the purpose of referencing the Change Request, assign a short, but descriptive name.	Return to Sender	Title required—maximum length 40 characters.
12	Mandatory	Identify request category for the Change Request.	Return to Sender	Category required
13	Mandatory	Identify originating company assessment of impact	Return to Sender	Entry required
14	Mandatory	Describe the proposed Change Request, indicating the purpose and benefit of request. If additional space is needed, use additional sheet.	Return to Sender	Description of Change Request required
15	Mandatory	Indicate any known dependencies relative to the Change Request. If none are known, enter "None known".	Return to Sender	Entry required
16	Mandatory	Indicate whether additional information accompanies/supports the proposed Change Request. If yes, list all documents attached or reference where they can be found, including internet address and standards reference, if applicable.	Return to Sender	Supporting documentation must accompany request

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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

Field	Checklist	Description	Instructions	Action Required
17	Mandatory Provider	A Change Request Log Number generated by the "Change Request Logging system" upon receipt of the Change Request. The number should be sent back to the initiator on the acknowledgment receipt. This # will be used to track the Change Request.	Return to Sender	Log number—system generated
18	Conditiona l Provider	Indicates whether clarification is needed on the Change Request.	Return to Sender	
19	Conditiona l Provider	Date clarification request sent to Initiator.		
20	Conditiona l Provider	Date clarification due back from Initiator.	Return to Sender	
21	Mandatory Provider	Indicate status of proposed Change Request (i.e., clarification, validation, pending, etc)		
22	Mandatory Provider	Assign date when Change Request will appear on agenda.	Return to Sender	
23	Mandatory Provider	A soft date for implementation. Updated based on Candidate Release Package info.		
24	Mandatory Provider	Field that communicates who last updated the request.		
25	Mandatory Provider	Field that communicates when the last update occurred.		
26	Mandatory Provider	Change Request results captured from the Change Review meeting.		
27	Conditiona l Provider	Cancelled Change Request reasoning.	Return to Sender	
28	Conditiona l Provider	Concurrence with Change Request originating company. Show date of concurrence.	Return to Sender	
29	Conditiona l Provider	Change Request Escalation indication.		
30	Conditiona l Provider	Detailed description of the escalation considerations.		
31	Mandatory Provider	Indicate agreed release date from Project Release Plan.		
32	Mandatory Provider	Results of Internal Defect Validation		

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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 that are provided to CLECs.

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APPENDIX B: CHANGE REQUEST PRIORITIZATION FORM

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

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APPENDIX C: CMP PRIORITIZATION PROCESS EXAMPLE

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

Pre-order	CustomerCL EC #1	CustomerCL EC #2	CustomerCL EC #3	TOTAL	Average
E1	5	5	5	15	5
E2	1	2	1	4	1
E3	3	1	5	9	3
E4	5	3	4	12	4
E5	2	5	2	9	3
E6	4	4	3	11	4

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 that are provided to CLECs.

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

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

Exhibit E

**CHRONOLOGY OF PLOC FREEZE
CMP ISSUES**

A brief chronology and summary of events follows, commencing with the submission of an AT&T CR (business-to-business discussions had been ongoing since February 22, 2002 regarding this issue)¹.

CHRONOLOGY

March 8, 2002, AT&T submitted CR #PC 030802-1 to CMP requesting a process for the removal of the Local Service Freeze from Qwest residential accounts.² AT&T initiated this CR because the information contained in the PCAT regarding the local freeze was incomplete and inaccurate.

March 14, 2002, AT&T's Service Manager at Qwest informs AT&T "that as Local Service Freeze issues are not being addressed through CMP and that Qwest is in litigation regarding Local Service Freeze, that all discussion regarding this topic should remain in these same arenas. The Qwest Team in attendance of the Broad Band call will not be prepared to discuss any policy issues regarding Local Service Freeze on the call. I would suggest that any questions you have be addressed through CMP." This Qwest position shut the door to the Service Manager who is the normal avenue for resolution of issues impacting AT&T's ability to process orders with Qwest. In addition, it aggravated the situation because CMP is too slow and cumbersome to effectively resolve customer impacts real time.

March 18, 2002, Qwest held the clarification call on AT&T's CR PC030802-1. AT&T submitted its request to CMP that CR PC 030802-1 be expedited under the CMP

¹ Attachment 1 is a redacted e-mail message with minutes from a regularly scheduled quality call between Qwest and AT&T held on March 1, 2002. Issue 5 deals with the Local Service Freeze.

² Attachment 2 is a copy of CR PC030802-1.

Exception Process. This request was discussed at the CMP Product/Process meeting held on March 20, 2002, and the CMP body approved processing this request as an exception to the normal CMP procedures.³ A few of the problems identified in this letter include: (i) customer required to call Qwest multiple times to remove LEFV, (ii) no established process to remove the LEFV at the Qwest retail offices, (iii) inconsistent information between the account team and the PCAT pertaining to submission of the LSR, (iv) inconsistent process between removing the LEFV and the updating of the CSR.

March 26, 2002, a meeting was held between Qwest and CLECs on the Local Service Freeze issue. Instead of problem solving, Qwest treated it as another clarification call and did not bring operations subject matter experts who could fashion a resolution to the problems.⁴

March 29, 2002, AT&T Broadband Phone of Washington, LLC, filed a formal complaint with the Washington Utilities and Transportation Commission over Qwest's implementation of the Local Service Freeze.⁵

April 4, 2002, another meeting was held between Qwest and CLECs to further discuss the issue. Qwest was only prepared to discuss a letter it had sent answering questions raised by AT&T.⁶ Qwest, again, was not in a position to discuss process changes to resolve the local freeze issues, because operational subject matter experts were not in attendance. AT&T requested again that Qwest suspend the local service

³ AT&T's March 18, 2002, letter from Terry Bahner to Todd Mead of Qwest is Attachment 3.

⁴ Attachment 4 is a letter dated March 28, 2002, from Terry Bahner, AT&T, to Todd Mead, Qwest, expressing disappointment with the March 26th meeting and the absence of appropriate Qwest subject matter experts from the meeting.

⁵ Attachment 5 is a copy of the AT&T complaint filed in Washington on March 29, 2002.

⁶ Attachment 6 is a letter dated April 2, 2002, from Harriett Berry, Qwest, to Terry Bahner, AT&T.

freeze as an offering until it develops an effective process to remove a freeze on an account.⁷

April 5, 2002, Qwest sent a message to AT&T and others stating that it had not determined whether it will lift the Local Service Freeze offering, but continued to consider the request. Another status update is to be provided on April 8, 2002.⁸

There are several facets to the problems AT&T has experienced dealing with removal of the Local Service Freeze from customer accounts:

- i) Qwest introduced a change in its systems and/or process that caused the rejection of LSRs due to a Local Service Freeze being in place. AT&T's daily operations have been adversely impacted by this change and Qwest has not been able to promptly and effectively address these impacts. When AT&T employed the normal process of reporting and escalating these troubles, AT&T found that Qwest personnel did not know about the Local Service Freeze and did not know how to resolve the problems AT&T was experiencing;
- ii) AT&T tried to work with its Service Manager at Qwest, however, the Service Manager directed AT&T to employ the CMP to resolve the time critical impacts caused by Qwest's inability to remove the Local Service Freeze from customer accounts. The CR process in CMP is not designed to resolve immediate customer-impacting problems, because implementation of a CR takes months;
- (iii) AT&T submitted a CR to CMP on the Local Service Freeze and requested that the CR be expedited under the CR "exception" process. AT&T's expectation

⁷ Attachment 7 is a letter dated April 5, 2002, from Terry Bahner, AT&T, to Todd Mead, Qwest, expressing disappointment with April 4, 2002 meeting, where no progress was made toward resolving the problems AT&T encounters when trying to have a local service freeze lifted from a Qwest retail account.

⁸ Attachment 8 is an e-mail dated April 5, 2002, from Todd Mead, Qwest, to various recipients.

was that the CR exception process would result in a prompt disposition of AT&T's CR with heightened attention to the problem by Qwest. This expectation has not been met. In the three weeks since AT&T invoked the CR exception process, there have been two meetings but virtually no progress has been made in establishing a process to lift the Local Service Freeze from customer accounts without a workaround and rescheduling the customer due date.

iv) Because Qwest cannot promptly remove a Local Service Freeze and allow the processing of LSRs, Qwest was not prepared for the implementation of the Local Service Freeze offering. Qwest should not have implemented the offering until such processes were in place.

Attachment 1

ATTACHMENT 1

From: tbahner@att.com on behalf of Bahner, Teresa L (Terry) - NCAM
Sent: Friday, March 01, 2002 3:20 PM
To: cwpark2@uswest.com; cquinns@qwest.com; caipend@aegiscomgroup.com; fairleyd@aegiscomgroup.com; dhighla@qwest.com; emangin@notes.uswc.uswest.com; jtberg@qwest.com; mmadill@qwest.com; pbudner@uswest.com; rpotvie@qwest.com; Goldenb@aegiscomgroup.com; rubiog@aegiscomgroup.com; tfsimmo@qwest.com; tbessey@uswest.com; fierrost@aegiscomgroup.com; vstedma@qwest.com; Linenberger, Cynthia - Broadband; Burge, Kevin - Broadband; Morgan, Dave - Broadband; Nefzger, Chuck - Broadband; Partin, David@broadband.att.com; Smith, Robert - Broadband; York, Vernise - Broadband; Burke, Kerri - Broadband; Cecere, Chris - Broadband; Christiansen, Clete - Broadband; Cohen, Jeffrey S (Jeff) - HRSVC; COLEMAN, LELA M - HRSVC; Dietz, Tammy - Broadband; Fairchild, Janice - Broadband; Gornik, Kasha - Broadband; Zborowski, Gregory - HRSVC; Griffith, Kristy - Broadband; Bellamy, Holly - Broadband; Hood, Teri - Broadband; Hegeman, Jennifer - Broadband; Longstreet, Edward - Broadband; Martinez, Laura - Broadband; Stampley, Tina M - HRSVC; Topkis, William - Broadband; Fuller, Laura - Broadband; Harwood, Kristen@broadband.att.com; Leiva, Anthony - Broadband; Watkis, Lindel - Broadband; Wolf, Jonathan - Broadband; Purkey, Dan - Broadband; Dean, David - Broadband; Eichbauer, Luke - Broadband; Mossing, Patricia - Broadband; Sutton, Dustin - Broadband; Limonta, Jeannie - Broadband; Klinefelter, Tim - Broadband; Orr, Linda - Broadband; Reyes, Dusty - Broadband; Richter, MaryLou - Broadband; Baker, Brian - Broadband; Eggert, Mike - Broadband; Tirado, Jonathan - Broadband; Moilanen, Cheryl - Broadband; Opitz, Scott - Broadband; Beard, Paul - Broadband; Eicher, Scott - Broadband; Whittier, Vicki - Broadband
Cc: Osborne-Miller, Donna - NCAM; Scherer, Esther A - NCAM; Van Meter, Sharon K - NCAM; DAINAUSKI, MATTHEW A (Matt) - HRSVC; Potts, Douglas G - HRSVC
Subject: MINUTES: 03/01/2002 WEEKLY CONFERENCE CALL QWEST & ATT BROADBAND 9AM MTN

AT&T Broadband and Qwest:

Here are the minutes from our conference call this morning. Thank you for your participation and hanging in there. We covered a lot and the call extended beyond the usual hour. If you left the call early, please make sure you check the ACTION ITEMS. Several issues were walked on and need a response from you to continue the discussion. If you don't respond, the issue will be closed. Thanks again from snowy Denver.



MINUTES Qwest ATT
Broadband 03...

NOTICE: (3/01/2002) - Qwest will continue the courtesy calls a third week (March 2-8) when they issue a jeopardy after an LSR has been FOC'd. Qwest will issue an internal notice to all their centers.

Terry L. Bahner
AT&T LSAM
Western Region
303-298-6149 work
303-298-6455 fax
tbahner@att.com
1-888-858-PAGE PIN 104524
or terry.bahner@my2way.com (text msgs to pgr)
PROPRIETARY-Restricted pursuant to the AT&T/Qwest non-disclosure agreement

NOTE: ATTACHMENT 1a IS BEING FILED UNDER SEAL WITH THE COLORADO PUBLIC UTILITIES COMMISSION. INDIVIDUALS/PARTIES EXECUTING A NON DISCLOSURE AGREEMENT PURSUANT TO 4 CCR 723-16 ET.SEQ. WILL RECEIVE THIS DOCUMENT.

Qwest / AT&T Broadband Weekly Quality Call*
Minutes 03/01/2002

Specifics

Purpose of Meeting Review and introduce new issues pertinent to business to business operations		Meeting Date 3/01/2002	Start Time 09:00 am MDT	End Time 10:00 am MDT
Location Conference Bridge		Call-In Number 877-213-9444, passcode 548454		
Meeting Chair Terry Bahner	Documentation Terry Bahner	Next Meeting: Friday, March 8th 09:00 am MST Call in: 877-213-9444, passcode 548454		

Attendees

AT&T	AT&T Broadband	Qwest
Terry Bahner	Seattle	Dawn Capien
Esther Scherer	Portland	Jane Berg
Donna Osborne-Miller	Salt Lake	Jan Williamson
	Denver	Pete Budner
	NSA	Chris Quinn-Struck
	Twin Cities	Emily Mangin

*PROPRIETARY-Restricted pursuant to the AT&T/Qwest non-disclosure agreement

Minutes of meeting will be distributed by COB day of meeting. All corrections to minutes must be submitted to Terry Bahner no later than COB the following Monday. The Agenda with status on action items generated from the previous conference call will be distributed on Thursday prior to Friday's weekly conference call.

Issue and Action Descriptions:

5. ISSUE: (2/22/2002) – Portland, Seattle Metro Markets and NSA said LEFV creating process issues.
- STATUS: (2/25/2002) – Terry Bahner receives time interval from Qwest for updating a CSR once LEFV is lifted. It takes 3-5 days per Chris Quinn-Struck.
 - (02/22/2002) - Lindel Watkis (Portland) provides examples of receiving jeopardy due to the local service freeze - PON XXXXXX - VER XX - LSR ID: XXXXXXXX & PON XXXXXX - VER XX - LSR XX - The jeopardy notification message: Order XXXXXXXXXX and XXXXXXXXXX SX-Error identified after the FOC was sent to the CLEC - Comments: A

response is required by the time provided or order associated to this LSR will be canceled. The LSR will be held for 30 days before rejecting.

- (02/26/2002) - Portland (Lindel Watkis) said they received a good FOC from Qwest on Feb 19th for due date of Feb 28, Qwest then cancelled LSR/FOC due to the local freeze (ACCT# XXXXXXXX-XX/XXXXXXXXXXXXXXXXX/BTN XXX XXX XXXX).
- (02/26/2002) - Portland provided example where customer had to call twice to remove LEFV - TN XXX XXX XXXX - customer XXXXXXXXXXXXX - XXXXXXXX called Qwest on 2/14 and again on 2/18 to remove the local service freeze - LEFV code was still present on the CSR on 2/26/2002.
- STATUS: (2/27/2002) - E-mail sent to Chris Quinn-Struck (after COB) stating current concerns on the LEFV process. These are the issues:
 - The time it takes Qwest to remove the freeze. Portland believes it can be removed immediately.
 - Qwest's business office refusing to allow the end customer to have AT&T Broadband on the line at the time the request is being made
 - Customer has to ask Qwest several times before the freeze is lifted
 - COMMENTS: (3/01/2002) - Chris asked if any examples had been identified. Terry Bahner said she did not have any but had asked Portland (Jonathan Wolf) to send the specifics on this issue.
 - Customers are saying they are not aware that their account is frozen
 - COMMENTS: (3/01/2002) - Chris asked if any examples had been identified on this second scenario. Terry Bahner said she did not have any but had asked Portland (Jonathan Wolf) to send the specifics on this issue also.
 - No way to move the order forward (a work around) when the freeze has been lifted; LSR must be resubmitted starting the service interval over with a new DD which causes reschedules for the Portland market.
- COMMENTS: (3/01/2002) - No one on call from Portland to answer Qwest's questions regarding provided examples. Chris said Qwest couldn't remove any customer's LEFV without their permission. Terry Bahner asked Qwest if they had been informed of a vice-president escalation from Jonathan Wolf across to Scott Shipper. No was aware of such an escalation. Chris said example Laura Fuller provided (TN XXX-XXX-XXXX) indicated the LEFV had been removed within 4 hours. She said the LEFV for simple accounts are generally removed within 24 hours of customer request. It can take 3-5 business days for the CSR to update if account is complex. Chris Quinn-Struck will work with a Qwest process manager to provide more definition around the process.
- ACTION ITEM: (03/01/2002) - Terry Bahner to forward Portland list of examples.
- STATUS: (03/01/02) - List e-mailed to Chris Quinn-Struck.
- ACTION ITEM: (03/01/2002) - Terry Bahner to find out status of vice-president escalation from Jonathan Wolf and status Chris Quinn-Struck ASAP.
- STATUS: (03/01/2002) - Terry Bahner requested status from Jonathan Wolf via e-mail and left voice message. Terry will call Jonathan on 3/4/2002 if no response and forward to Chris Quinn-Struck.
- ACTION ITEM: (02/27/2002) - E-mail to Chris Quinn-Struck sent (after COB) to review process and research answer to above questions. (REVISED: 3/01/2002) *delayed until Qwest process manager returns to the office in one week*

Attachment 2

Report Line Number		20		
CR #	Title	Current Status: Organization	Area Impacted	Products Impacted
		Date		
PC030802-1	Local Service Freeze - Process to remove LEFV from Qwest residential accounts (being executed under the exception process)	Presented 4/02/02	Wholesale ProdProc	Pre-Ordering, Ordering, Provisioning, Billing Loop, UNE

Originator: Osborne-Miller, Donna
Originator Company Name: AT&T
Director: Burson, Susan
Owner: Berry, Harriett
CR PM: Mead, Todd

Description Of Change

VALIDATE THESE FOLLOWING BULLET ITEMS AS PART OF THE PROCESS:

- Caller must be a Qwest retail customer
- Customer must call business office and say they wish to "remove the freeze off of their local service"
- Do not instruct the customer to use the word "PIC". This is used for inter and intra lata services and causes confusion which can delay removing the LEFV
- CLEC can be a third party on the call to Qwest by the local customer
- Customer can call up to 7pm in his local service area to remove the freeze
- The LEFV resides in a repository that is worked overnight which means it will be removed off the customer's account that night and the LSR can be sent the next day without rejection
- Although updates to a CSR can take up 3-5 days, the removal of the freeze is not dependent on that CSR being updated.
- Qwest does not charge \$5 to remove the freeze
- A Communicator will be sent to the CLEC community when the PCAT is updated

The last 2 bullet points can be removed from the CR as per clarification call 03/18/02

Scope expanded to include business accounts as well (per CLEC request 03/20/20)

Status History

03/08/02 - CR Submitted by AT&T (03/08/02 reflects the date notification was sent advising the receipt of this CR at cmpcr@qwest.com and not the 03/05/02 submitted date shown on the CR.)

03/08/02 - CR acknowledged by P/P CMP Manager

03/08/02 - CLEC contacted (e-mail) to organize clarification meeting

03/14/02 - Clarification call cancelled by Qwest. Call rescheduled for Monday March 18th.

03/18/02 - Clarification call held with AT&T

03/19/02 - Clarification draft meeting minutes sent to AT&T by e-mail

03/19/02 - AT&T advised Qwest they would like this CR expedited (on letter dated March 18)

03/20/02 - March CMP Meeting: AT&T 'walked-on' this CR and requested the use of the exception process. CMP meeting participants agreed. AT&T also requested a call next week with Qwest SME's and the CLEC community. CR Status changed to "Evaluation." Meeting discussions will be set forth in the Product/Process Meeting Minutes to be posted on the CMP Web site

03/20/02 - AT&T e-mail requesting Qwest to work with them on specific customer issues related to removing local service freeze

03/20/02 - Reply e-mail from Judy Schultz stating she would be investigating the issue

03/21/02 - Notification CMPR.03.21.02.F.01239.CR_Meeting issued to CLECs informing them of a call on 03/26/02 to discuss this issue

03/26/02 - CR scope expanded to include business accounts

03/26/02 - General clarification call held

03/27/02 - Draft general clarification meeting minutes sent to participating CLECs via e-mail

03/28/02 - E-mail from AT&T seeking clarification on the IMA 9.0 edit

03/28/02 - Letter from AT&T expressing their disappointment with the general clarification call held on 03/26/02

03/29/02 - E-mail from AT&T asking for status and description of potential systems fix

04/01/02 - Minutes from general clarification call (03/26/02) updated to reflect AT&T's comments. Last bullet point modified to reflect AT&T's request to lift freeze until all issues addressed.

04/01/02 - E-mail from AT&T to Qwest with an example of rejected LSR

04/01/02 - Reply e-mail from Qwest with R-Order details

04/01/02 - Notification CMPR.04.01.02.F.01248.CR_Meeting issued to CLECs informing them of a call on 04/04/02 for a follow up discussion on this issue

04/01/02 - Reply e-mail from AT&T expressing their reservation about the effectiveness of the escalation process

04/02/02 - Draft response dated 04/02/02 sent to AT&T for discussion at Thursday's (04/04/02) general call. CR Status changed to "Presented"

04/02/02 - Notification PROS.04.02.02.F.00414.Local_Service_Freeze issued informing CLECs of PCAT update

04/03/02 - Draft response dated 04/02/02 posted to the P&P Interactive report on the CMP web site at:

<http://qwest.com/wholesale/cmp/changerequest.html>

04/04/02 - Follow-up meeting held

04/05/02 - Letter from AT&T expressing their disappointment with Qwest's response presented in the follow-up meeting on 04/04/02

Action Items (AI) Associated with this CR:

AI Number **Date Initiated** 3/22/02 **Date Due** 4/17/02 **Date Complete**

Responsible Party Berry, Harriett **AI Status** Pending Closure

Short Title Where is this process documented?

Description During March's CMP Meeting AT&T asked whether the process to remove Local Service Freeze is currently documented on the Wholesale web site. AT&T reiterated that the PCAT had been updated on 3/14 but they do not believe it outlined the process. Qwest will take an action to communicate where this process is documented.

Resolution 04/02/02 - Notification PROS.04.02.02.F.00414.Local_Service_Freeze issued informing CLECs of PCAT update

Announcement Date: April 2, 2002

Effective Date: April 3, 2002

Document Number: PROS.04.02.02.F.00414.Local_Service_Freeze

Notification Category: Process Notification

Target Audience: CLECs, Resellers

Subject: Options to Remove Local Service Freeze

Beginning April 4, 2002, Qwest will issue updates to its Wholesale Product Catalog that includes new/revised documentation for Local Service Freeze.

The Local Service Freeze PCAT will be updated to outline the options of requesting the removal of the Local Service Freeze. The PCAT also lists the information the retail end-user needs to provide to have the Local Service Freeze removed.

Actual updates are found on the Qwest Wholesale Web site at this URL:

<http://www.qwest.com/wholesale/clecs/lrfreeze.html>

Project Meetings

04/05/02 - Letter from AT&T expressing their disappointment with Qwest's response presented in the follow-up meeting on 04/04/02

1875 Lawrence St.
Denver, CO 80202-1847

April 5, 2002

Todd Mead
CMP Manager
Qwest Communications
1801 California Street
Denver, Colorado 80202

RE: Change Request PC 030802-1

Dear Todd:

This reconfirms AT&T's repeated request that Qwest suspend the local service freeze until a collaborative Qwest-CLEC process can ensure an effective, efficient and prompt way to remove the LEFV with no impact to the end customer. AT&T does not believe Qwest's draft response presented at the April 4th conference call meets our company's immediate needs.

AT&T is disappointed that Qwest cannot recognize the impact the LEFV has on our daily LNP operations. It is very disturbing when Qwest continues to fail to bring to the table a workable solution. It is discouraging when Qwest continues to ignore our requests to engage the appropriate Qwest subject matter experts to participate in discussions with AT&T to help resolve this issue quickly. Had the appropriate operational SMEs from Qwest participated on the call yesterday, we might have made progress resolving these issues. Unfortunately, once again such individuals were absent.

AT&T's expectations of the LEFV process is really quite simple. The end customer should be able to remove the LEFV with one call. AT&T Broadband should then be able to submit the LSR to port the customer immediately after the customer has taken the appropriate step to remove the LEFV without fear of an order rejection or a jeopardy condition being issued after the FOC. And last, if the process fails, there is a working escalation process to effectively handle the issue quickly.

Up to this point, Qwest has made minimal effort to work with AT&T to hammer out a workable solution. We view this as a dismal Qwest failure. First, it demonstrates Qwest's inability to perform a normal function adequately. Second, it clearly shows Qwest does not acknowledge nor recognize the urgency related to the CMP exception process. Third, it demonstrates Qwest's inability to effectively manage changes to its processes when they adversely impact CLECs.

AT&T will send to Qwest written comments embedded in Qwest's April 2, 2002, rough draft response to change request PC 030802-1. It will also include AT&T's proposed resolutions. In the meantime, AT&T will continue to direct the end customer to call AEGIS directly to remove the LEFV from his account. We are expecting at least a verbal response from Sue Burson by close of business today regarding AT&T's request to suspend LEFV until a workable process can be implemented. AT&T would expect Sue to then send a written response to AT&T. Please insure the minutes from the April 4th conference call reflect AT&T has officially escalated this to Sue Burson.

Sincerely,

Terry Bahner
Supervisor
AT&T Local Services Access Management
Western Region
303-298-6149

Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz
Mike Mason

04/02/02 - Notification PROS.04.02.02.F.00414.Local_Service_Freeze issued informing CLECs of PCAT update

Announcement Date: April 2, 2002

Effective Date: April 3, 2002

Document Number: PROS.04.02.02.F.00414.Local_Service_Freeze

Information Current as Friday, April 05, 2002

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CR #

PC030802-1

Notification Category: Process Notification
Target Audience: CLECs, Resellers
Subject: Options to Remove Local Service Freeze

Beginning April 4, 2002, Qwest will issue updates to its Wholesale Product Catalog that includes new/revised documentation for Local Service Freeze.

The Local Service Freeze PCAT will be updated to outline the options of requesting the removal of the Local Service Freeze. The PCAT also lists the information the retail end-user needs to provide to have the Local Service Freeze removed.

You will find a summary of these updates on the attached Web Change Notification Form. Actual updates are found on the Qwest Wholesale Web site at this URL: <http://www.qwest.com/wholesale/clecs/lrfreeze.html>

You are encouraged to provide feedback to this notice through our web site. We provide an easy to use feedback form at <http://www.qwest.com/wholesale/feedback.html>. A Qwest representative will contact you shortly to discuss your suggestion.

03/28/02 - Letter from AT&T expressing their disappointment with the general clarification call held on 03/26/02

1875 Lawrence St.
Denver, CO 80202-1847

March 28, 2002

Todd Mead
CMP Manager
Qwest Communications
1801 California Street
Denver, Colorado 80202

RE: Change Request PC 030802-1

Information Current as Friday, April 05, 2002

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CR #

PC030802-1

Report Name: 03 rptOpenDetailed_ProdProc

Dear Todd:

AT&T is greatly disappointed with the conference call Qwest facilitated March 26, 2002 to discuss the expedited CR PC 030802-1. Qwest stated at the March 20, 2002 Product and Process CMP monthly meeting they understood the urgency of this change request regarding the local service freeze (LEFV). There was no need for a second clarification call. A clarification call had already been held on March 18, 2002.

We believed Qwest was willing to resolve the issue expediently, Todd, when you indicated you would have your subject matter experts available on the March 26th call. I then indicated to you that I was expecting my AT&T Broadband subject matter experts to also be available to help resolve the issue in the e-mail I sent March 22, 2002 (RE: CR # 5582295 - Updated Matrix). I suggested, in order getting to immediate resolution, that you include operational subject matter experts. I was very clear about AT&T's expectations for the March 26th conference call.

AT&T also believes Qwest implied a resolution would be forthcoming by indicating the temporary 800 telephone number was directly dependent on the outcome of the March 26th meeting. If Qwest was not ready to problem solve the issue then there should never have been a question about keeping the 800 number available. While AT&T appreciates Qwest extending the use of the 800 telephone to help ease the burden of this issue, we should not have had to explain why we needed the extended use of it.

AT&T once again reminds Qwest of the negative impact the LEFV has imposed on our ability to port a customer. It continues to affect our daily ability to port a customer who wants our local service. This truly is unacceptable to us. AT&T has identified and shared with Qwest some of the most basic obstacles in a letter sent March 18, 2002 (RE: Change Request PC 030802-1).

Since Qwest has indicated a formal response will be issued to the CLEC community on April 3rd without a collaborative effort between Qwest and the CLEC community, AT&T clearly expects Qwest to be open to additional suggestions on the follow up conference call scheduled April 4th. AT&T expects that conference call to resolve outstanding issues and the appropriate decision-making individuals from Qwest will attend.

We believe going forward explicit timelines should be provided and adhered to by Qwest for an expedited CR. It should mirror the expedited CR Qwest presented as a walk on at the same March 20 meeting. Qwest clearly defined the timeframe and expectations of the CLEC community during that presentation. It should not be any different for an expedited CLEC CR.

AT&T looks forward to partnering with Qwest and the CLEC community to enhance the Interim Exceptions Process for OSS interfaces, Product and Process Changes (RE: Qwest Re-Design Web site) in future re-design CMP sessions. We believe use

of the process, as it now stands for this specific change request, clearly indicates its' lack of substance.

Sincerely,

Terry Bahner
Supervisor
AT&T Local Services Access Management
Western Region
303-298-6149

Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz
Mike Mason

03/27/02 - Draft general clarification meeting minutes sent to participating CLECs via e-mail

General Clarification Meeting

3:00 p.m. (MDT) / Tuesday 26th March 2002

1-877-564-8688
ID 626-5401 #

PC030802-1 Local Service Freeze - Process to remove LEFV from Qwest residential accounts

Attendees:

Terry Bahner / AT&T
Carla Dickinson-Pardee / AT&T
Sharon Van Meter / AT&T
Lindel Watkis / AT&T
Mike Mason / AT&T

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CR # PC030802-1

Leilani Hines / Worldcom
Susan Travis / Worldcom
Monica Avila / VarTec Telecom, Inc.
Judy Schultz / Qwest
Todd Mead / Qwest
Harriett Berry / Qwest
Pam DeLaitre / Qwest
Gay Abrahamson / Qwest
Joan Smith / Qwest
Connie Winston / Qwest

Introduction:

Qwest presented a brief history of the CR, (submitted 03/08/02, clarification call 03/18/02, AT&T expedite letter 03/19/02, AT&T walked-on @ CMP 03/20/02 and general notification to all CLECs advising them of this meeting 03/21/02, Note: Notification CMPR.03.21.02.F.01239.CR_Meeting issued on 03/21/02 to CLECs informing them of a call on 03/26/02 to discuss this issue. Standard P&P Redline guidelines of 5 business days for notifications to CLECs not followed due to expedited status of this CR.

Review Description of Change:
Terry Bahner read out the following from Change Request PC030802-1:
VALIDATE THESE FOLLOWING BULLET ITEMS AS PART OF THE PROCESS:

- Caller must be a Qwest retail customer
- Customer must call business office
- Do not instruct the customer to use the word "PIC". This is used for inter and intra lata services and causes confusion which can delay removing the LEFV
- CLEC can be a third party on the call to Qwest by the local customer
- Customer can call up to 7pm in his local service area to remove the freeze
- The LEFV resides in a repository that is worked overnight which means it will be removed off the customer's account that night and the LSR can be sent the next day without rejection
- Although updates to a CSR can take up 3-5 days, the removal of the freeze is not dependent on that CSR being updated.
- Qwest does not charge \$5 to remove the freeze *

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- A Communicator will be sent to the CLEC community when the PCAT is updated *
- *Removed as per clarification meeting 03/18/02
- Terry also read out additional scope as per AT&T's expedite request (AT&T letter dated 3/19/02)
- Customer required to call Qwest multiple times to remove LEFV
- No established process to remove the LEFV at the Qwest retail offices
- No consistent confirmation number provided by the Qwest retail offices to note customer account
- Inconsistent information between the account team and the PCAT pertaining to submission of the LSR
- Inconsistent Quality Check process at the Sierra Vista Center
- Inconsistent escalation process at the Denver CSIE once confirmation has been received
- Qwest retail office confusing end customers by referring to the LEFV as a PIC freeze (Repeated above 3rd bullet)
- IMA 9.0 edit pulled and no notice sent to the CLEC
- IMA 9.0 edit to be implemented at a future date without CLEC notice
- Jeopardy condition codes issued after the FOC affecting CLEC due date
- Inconsistent Qwest retail process where CLEC can be a third party on the call with end customer
- Inconsistent process between removing the LEFV and the updating of the CSR
- Confusing reject /jeopardy condition message issued by Qwest
- AT&T reiterated they would like all of the above bullet points validated by Qwest and the process clearly documented in the PCAT
- AT&T confirmed they would like the CR scope expanded to include Business Accounts as per CLEC request at the March CMP meeting. Todd will adjust CR documentation.
- AT&T stated that 68% of all orders for removing LEFV in the Portland region had to be rescheduled last month. AT&T are seeking clarification on what exactly is the process for removing LEFV. AT&T also asked for an extension on the 800 number until the LEFV process is clarified and documented.
- Qwest reiterated that they are working as expeditiously as possible to resolve this issue, and they aim to present a written draft response to the CLECs next week.
- AT&T said they are willing to wait for the written response next week but need immediate 'relief' now. Immediate 'relief' was defined by AT&T as:
 - Keeping the 800 number live until next week (and include Saturday availability)
 - Someone in CSIE to take the lead on this issue and be nominated as the Single Point of Contact (SPOC)
- Qwest would confirm later in the day on the status of this request.
- AT&T also stated that they believe 100% of customers they talk too, insist they never asked for the freeze to be installed. AT&T would like to know what type of validation/questions Qwest ask to believe the customer has requested this product.
- AT&T also asked for clarification on the R-Number and whether the order number is sufficient as some LSRs are currently

being rejected with this information.

- Worldcom and VarTec Telecom expressed their continued interest in this issue.
- Qwest restated that they are currently not aware of anything that was 'backed out' of IMA 9.0 and also reiterated that the only work currently pending for IMA is in the prioritization list for all CLECs to vote on.
- AT&T stated that since February 18th 2002, this process has not been working. They requested that in light of Qwest's inability to support the process and the fact that the freeze placed on accounts were questionable as far as customer approval to begin with. That the best and quickest way to fix this matter was to lift the freeze and go back to the way we were prior to February 18th and not go back until all the issues were properly addressed and good process was actually in place. Qwest stated that a number of States were 'turned-up' on Feb 18th so this may be a volume issue. AT&T believe their volume did not change on Feb 18th and asked for the freeze to be lifted until a working process is put in place by Qwest. Qwest replied they understood AT&T's concern and reiterated they are working as fast as possible on getting an accurate and workable solution for all CLECs.

Establish Action Plan:

Next Meeting: Thursday 4th April @ 11:30 am (MDT) - same bridge number as this call. Qwest will present written response.
Qwest will investigate and report back to AT&T this afternoon on providing ongoing 'relief'

03/21/02 - Notification CMPR.03.21.02.F.01239.CR_Meeting issued to CLECs informing them of a call on 03/26/02 to discuss this issue

Qwest will host a general clarification meeting on CLEC Change Request (CR) PC030802-1 (Process to remove LEFV from Qwest residential accounts) on Tuesday March 26, 2002.

Date: Tuesday, March 26, 2002

Time: 3:00 p.m. MST

Conference Line: 1-877-564-8688 Passcode 626-5401 #

Details of the CR can be found in the Product/Process Interactive report at:
<http://qwest.com/wholesale/cmp/changerequest.html>

Sincerely,

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CR # PC030802-1

Todd Mead

03/19/02 AT&T advised Qwest they would like this CR expedited

1875 Lawrence St.
Denver, CO 80202-1847

March 18, 2002

Todd Mead
CMP Manager
Qwest Communications
1801 California Street
Denver, Colorado 80202

RE: Change Request PC 030802-1

Dear Todd:

AT&T is requesting Qwest to officially expedite PC 030802-1. The local service freeze (LEFV) is critically affecting AT&T Broadband's ability to port customers. This LEFV has presented multiple obstacles. We are requesting to have an immediate discussion between Qwest and AT&T Broadband subject matter experts to discuss the many problems associated with LEFV. What have been identified to date are the following:

- Customer required to call Qwest multiple times to remove LEFV
- No established process to remove the LEFV at the Qwest retail offices
- No consistent confirmation number provided by the Qwest retail offices to note customer account
- Inconsistent information between the account team and the PCAT pertaining to submission of the LSR
- Inconsistent Quality Check process at the Sierra Vista Center
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CR #

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- IMA 9.0 edit to be implemented at a future date without CLEC notice
- Jeopardy condition codes issued after the FOC affecting CLEC due date
- Inconsistent Qwest retail process where CLEC can be a third party on the call with end customer
- Inconsistent process between removing the LEFV and the updating of the CSR
- Confusing reject /jeopardy condition message issued by Qwest

It is critical Qwest establish a team to address the customer impact and at the same time improve the processes. As I have indicated both in e-mail and on the clarification call to Qwest, this is now a high profile issue between both companies. Mike Mason, Vice-President AT&T Broadband, has escalated this to Scott Shipper, Vice-President Qwest.

AT&T's account team has declined to work directly with AT&T to resolve this issue and has instructed AT&T to move all discussion to CMP. In addition Todd, you stated on the clarification call held March 18, 2002, Qwest would not provide a resolution to this CR until the monthly CMP forum in May. This is unacceptable to AT&T.

AT&T requests Qwest to expedite PC 030802-1 immediately. AT&T will present this CR as a "walk on". Please inform Jim Beers. Under the Interim Exception Process for OSS Interfaces, Product and Process Changes (RE: Qwest Re-Design Web site) this can be addressed at Wednesday's monthly CMP meeting and voted on as an expedited issue by the CLEC community.

Sincerely,

Terry Bahner
Supervisor
AT&T Local Services Access Management
Western Region
303-298-6149

Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz

- IMA 9.0 edit to be implemented at a future date without CLEC notice
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It is critical Qwest establish a team to address the customer impact and at the same time improve the processes. As I have indicated both in e-mail and on the clarification call to Qwest, this is now a high profile issue between both companies. Mike Mason, Vice-President AT&T Broadband, has escalated this to Scott Shipper, Vice-President Qwest.

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Sincerely,

Terry Bahner
Supervisor
AT&T Local Services Access Management
Western Region
303-298-6149

Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz

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Clarification Meeting

11:00 a.m. (MDT) / Monday 18th March 2002

1-877-564-8688

ID 626-5401 #

PC030802-1 Local Service Freeze – Process to remove LEFV from Qwest residential accounts

Attendees:

Terry Bahner / AT&T

Donna Osborne-Miller / AT&T

Cynthia Linenberger / AT&T

Lindel Watkis / AT&T

Mike Harggart / AT&T

Harriett Berry / Qwest

Chris Quinn-Struck / Qwest

Pete Budner / Qwest

Todd Mead / Qwest

Review Requested (Description of) Change:

Terry read out the change request:

VALIDATE THESE FOLLOWING BULLET ITEMS AS PART OF THE PROCESS:

- * Caller must be a Qwest retail customer
- * Customer must call business office and say they wish to "remove the freeze off of their local service"
- * Do not instruct the customer to use the word "PIC". This is used for inter and intra lata services and causes confusion which can delay removing the LEFV
- * CLEC can be a third party on the call to Qwest by the local customer
- * Customer can call up to 7pm in his local service area to remove the freeze
- * The LEFV resides in a repository that is worked overnight which means it will be removed off the customer's account that night and the LSR can be sent the next day without rejection
- * Although updates to a CSR can take up 3-5 days, the removal of the freeze is not dependent on that CSR being updated.
- * Qwest does not charge \$5 to remove the freeze
- * A Communicator will be sent to the CLEC community when the PCAT is updated

- AT&T asked for more clarification around the 6th Bullet as the updated PCAT indicated the LSR can be submitted

immediately after the LEFV is removed (not the next business day).

- The last two bullet points can be removed from the original CR. Todd will adjust the CR documentation.
- AT&T asked for clarification around the edit that is going into IMA
- AT&T asked for Qwest to explain the role and also train the duty pager on the Local Service Freeze process. AT&T have experienced significant problems with issues they have escalated to the duty pager
- AT&T also asked Qwest to provide clarification on what remarks to expect in the remarks section of the jep notification re:

Joan Wells

Confirm Areas & Products Impacted:

Products: LNP, Private Line, Unbundled Loop & UNE

Areas: Pre-ordering, Ordering & Provisioning - Billing was added

Confirm Right Personnel Involved:

Harriett confirmed she is the correct person to be the Qwest SME in relation to this CR.

Identify/Confirm CLEC's Expectation:

AT&T want to see a clear and concise process around removing the Local Service Freeze, verified and documented in PCAT.

Establish Action Plan (Resolution Time Frame):

General clarification – April CMP meeting. Qwest's initial response presented at May CMP meeting. AT&T will send Change Management a letter this afternoon requesting Qwest expedite this CR. AT&T will 'walk-on' this CR at Wednesday's CMP meeting.

Qwest Response

Draft Response for Discussion on General Clarification Call to be held April 4th

April 2, 2002

Terry Bahner

Supervisor

AT&T Local Services Access Management

1875 Lawrence St.

Denver, CO 80202-1847

SUBJECT: Qwest's Change Request Response - CR # PC 030802-1 "Local Service Freeze Removal for Residence and Business Customers"

Following are responses to your list of issues and questions from CR #PC030802-1, your additional list of issues dated March 19, as well as questions from our March 26, 2002 conference call.

1. Caller must be a Qwest retail customer
This is a true statement. The Qwest Retail end user may contact their Qwest Retail business office to have their local service freeze removed. Their new CLEC may be on the phone with them at the same time (Three-way call).
2. Customer must call business office and say they wish to "remove the freeze off of their local service"
This is a true statement. When the end user customer contacts the Qwest Retail business office, they should ask to have their local service freeze removed. If the end user customer simply states that they are moving to AT&T, there may be some confusion as to whether this is a PIC change or the customer is moving their local service to AT&T.
3. Do not instruct the customer to use the word "PIC". This is used for inter and intraLATA services and causes confusion which can delay removing the LEFV
This is true. It is helpful in guiding the end user customer through the process since they may have a PIC, LPIC, and Local Service Freeze. The Sales Consultants have been provided training and job aids to help determine the customer's need.
4. CLEC can be a third party on the call to Qwest by the local customer
See question #1
5. Customer can call up to 7pm in his local service area to remove the freeze
Qwest has customers across three different time zones.

The Residence end user customer may call their Qwest Retail business office until the close of business in the Pacific time zone.

- Central time zone until 9:00 PM (they will be routed to a center in the Mountain or Pacific time zones after 7:00 PM local time)
- Mountain time zone until 8:00 PM (they will be routed to a center in the Pacific time zone after 7:00 PM local time)
- Pacific time zone until 7:00 PM

The hours for the Business, Federal Government, Education, Public Access Lines business offices are listed in the April 3,

2002 update to the PCAT.

6. The LEFV resides in a repository that is worked overnight which means it will be removed off the customer service record. Qwest has a Local Freeze Repository where all frozen phone numbers are stored. That repository is updated on a daily basis as orders are issued to add or remove local freeze. When an order is issued to remove the freeze, the telephone number is removed from the Repository that night. The LEFV will not be removed from the CSR for 3-5 days.

See further explanation in response to question 7.

7. Although updates to a CSR can take up 3-5 days, the removal of the freeze is not dependent on the CSR being updated. The Customer Service Record does not update for 3-5 days after the R order is issued to add or remove the Local Service Freeze.

When a LSR is issued and there is LEFV on the CSR, the Wholesale Service Delivery Coordinators are checking system notations to determine if an order has been issued to remove the local service freeze. If there is a notation, they will process the LSR. In addition, if the LSR contains the R order number (of the freeze removal) the SDC will allow the order to be processed.

The following questions were submitted by AT&T in a letter to Qwest dated 03/19/02

8. Customer required to call Qwest multiple times to remove LEFV
The customer should be able to accomplish removal of the local service freeze in one call to Qwest.

9. No established process to remove the LEFV at the Qwest retail offices
Qwest has had established processes in place for local service freeze removal since March 10, 2001 when Local Service Freeze was first implemented.

10. No consistent confirmation number provided by the Qwest retail offices to note customer account
Qwest Sales Consultants are currently providing the R order number to any end user customer or CLEC (on 3-way call) who requests it. We have determined that a specific work group has been providing 'confirmation numbers' instead of the R order numbers. That situation has been corrected by the issuance of internal memo (MCC) and managing the performances of the involved individuals. Do not hesitate to request the R order that is being issued to remove the freeze.

11. Inconsistent information between the account team and the PCAT pertaining to submission of the LSR

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The PCAT is the Qwest official source for CLEC information.

12. Inconsistent Quality Check process at the Sierra Vista Center
Calls and orders are monitored on a regular basis to ensure quality.
13. Inconsistent escalation process at the Denver CSIE once confirmation has been received
There are several determining factors as to how the escalation is handled. Each escalation is reacted to on an individual case basis.
14. IMA 9.0 edit pulled and no notice sent to the CLEC
Qwest did not remove any IMA 9.0 edits; therefore, notification to the CLECs was not necessary. There was a non-IMA edit in place that was checking the CSRs for LEFV which was relaxed so LSRs could flow through and allow the Service Order Processors to check the Freeze Repository and edit for a freeze at that point in the process.
15. IMA 9.0 edit to be implemented at a future date without CLEC notice
All planned CLEC Impacting changes to IMA are currently being presented to the CLECs for prioritization. There are no plans to implement a 9.0 edit pertaining to Local Service Freeze.
16. Jeopardy condition codes issued after the FOC affecting CLEC due date
Qwest has listened to the concerns raised by AT&T on this issue and has taken steps to fortify existing processes to alleviate this problem.
17. Inconsistent Qwest retail process where CLEC can be a third party on the call with end customer
See question #1
18. Inconsistent process between removing the LEFV and the updating of the CSR
See question #6
19. Confusing reject/jeopardy condition message issued by Qwest
The reject/jeopardy message currently being used is the only existing message that fits the local service freeze situation.
Requests for new reject messages go through the CMP CR process.

LSRs received to change lines/accounts with a local service freeze are rejected with the error message "Features on account are not compatible with requested features." In the Customer Comments section of the Reject Notice Qwest will include the

following: "Please have end user contact current local service provider to have local service freeze removed."

20. AT&T reiterated they would like all of the above bullet points validated by Qwest and the process clearly documented in the PCAT. The PCAT will be updated April 3, 2002.

21. What kind of questions does Qwest ask a Retail end user customer before adding a local service freeze?
Upon initial contact with the end user customer, the Qwest Sales Consultant informs the customer of the availability of the freeze as follows: "We offer free protection to ensure that your provider of local service, long distance service, and local long distance service cannot be changed unless you contact us directly. You may remove this protection from your account at any time by contacting Qwest directly with a verbal, written, or electronically signed authorization. Would you be interested in setting that up now?"

If the end user customer indicates they would like a freeze established, they are transferred to a Third Party Verifier (TPV) who asks the customer for the Billing Name on the account, Billing Address, the last four digits of their Social Security Number, and their date of birth. In addition, they ask if the caller is over 18 years old and is responsible for the account, and if they have permission to place the local service freeze on each specific line of the account.

22. What changes have been made in the Local Service Freeze Removal process since 02/18/02? The process was working well before that date.

Qwest has had established processes in place for local service freeze since March 10, 2001 when Local Service Freeze was first implemented. The only changes made to the process have been made within the past two weeks as a result of this CR.

Sincerely,

Harriett Berry
Senior Process Analyst
Qwest

Cc: Sue Burson, Director Process Management, Qwest

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CR # PC030802-1

Report Name: 03 rptOpenDetailed_ProdProc

Attachment 3



1875 Lawrence St.
Denver, CO 80202-1847

March 18, 2002

Todd Mead
CMP Manager
Qwest Communications
1801 California Street
Denver, Colorado 80202

RE: Change Request PC 030802-1

Dear Todd:

AT&T is requesting Qwest to officially expedite PC 030802-1. The local service freeze (LEFV) is critically affecting AT&T Broadband's ability to port customers. This LEFV has presented multiple obstacles. We are requesting to have an immediate discussion between Qwest and AT&T Broadband subject matter experts to discuss the many problems associated with LEFV. What have been identified to date are the following:

- Customer required to call Qwest multiple times to remove LEFV
- No established process to remove the LEFV at the Qwest retail offices
- No consistent confirmation number provided by the Qwest retail offices to note customer account
- Inconsistent information between the account team and the PCAT pertaining to submission of the LSR
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- Inconsistent escalation process at the Denver CSIE once confirmation has been received
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- IMA 9.0 edit pulled and no notice sent to the CLEC
- IMA 9.0 edit to be implemented at a future date without CLEC notice
- Jeopardy condition codes issued after the FOC affecting CLEC due date
- Inconsistent Qwest retail process where CLEC can be a third party on the call with end customer
- Inconsistent process between removing the LEFV and the updating of the CSR
- Confusing reject /jeopardy condition message issued by Qwest

It is critical Qwest establish a team to address the customer impact and at the same time improve the processes. As I have indicated both in e-mail and on the clarification call to Qwest, this is now a high profile issue between both companies. Mike Mason, Vice-President AT&T Broadband, has escalated this to Scott Shipper, Vice-President Qwest.

AT&T's account team has declined to work directly with AT&T to resolve this issue and has instructed AT&T to move all discussion to CMP. In addition Todd, you stated on the clarification call held March 18, 2002, Qwest would not provide a resolution to this CR until the monthly CMP forum in May. This is unacceptable to AT&T.

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Sincerely,

Terry Bahner
Supervisor
AT&T Local Services Access Management
Western Region
303-298-6149

Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz

Attachment 4



1875 Lawrence St.
Denver, CO 80202-1847

March 28, 2002

Todd Mead
CMP Manager
Qwest Communications
1801 California Street
Denver, Colorado 80202

RE: Change Request PC 030802-1

Dear Todd:

AT&T is greatly disappointed with the conference call Qwest facilitated March 26, 2002 to discuss the expedited CR PC 030802-1. Qwest stated at the March 20, 2002 Product and Process CMP monthly meeting they understood the urgency of this change request regarding the local service freeze (LEFV). There was no need for a second clarification call. A clarification call had already been held on March 18, 2002.

We believed Qwest was willing to resolve the issue expediently, Todd, when you indicated you would have your subject matter experts available on the March 26th call. I then indicated to you that I was expecting my AT&T Broadband subject matter experts to also be available to help resolve the issue in the e-mail I sent March 22, 2002 (RE: CR # 5582295 - Updated Matrix). I suggested, in order getting to immediate resolution, that you include operational subject matter experts. I was very clear about AT&T's expectations for the March 26th conference call.

AT&T also believes Qwest implied a resolution would be forthcoming by indicating the temporary 800 telephone number was directly dependent on the outcome of the March 26th meeting. If Qwest was not ready to problem solve the issue then there should never have been a question about keeping the 800 number available. While AT&T appreciates Qwest extending the use of the 800 telephone to help ease the burden of this issue, we should not have had to explain why we needed the extended use of it.

AT&T once again reminds Qwest of the negative impact the LEFV has imposed on our ability to port a customer. It continues to affect our daily ability to port a customer who wants our local service. This truly is unacceptable to us. AT&T has identified and shared with Qwest some of the most basic obstacles in a letter sent March 18, 2002 (RE: Change Request PC 030802-1).

Since Qwest has indicated a formal response will be issued to the CLEC community on April 3rd without a collaborative effort between Qwest and the CLEC community, AT&T clearly expects Qwest to be open to additional suggestions on the follow up conference call scheduled April 4th. AT&T expects that conference call to resolve outstanding issues and the appropriate decision-making individuals from Qwest will attend.

We believe going forward explicit timelines should be provided and adhered to by Qwest for an expedited CR. It should mirror the expedited CR Qwest presented as a walk on at the same March 20 meeting. Qwest clearly defined the timeframe and expectations of the CLEC community during that presentation. It should not be any different for an expedited CLEC CR.

AT&T looks forward to partnering with Qwest and the CLEC community to enhance the Interim Exceptions Process for OSS interfaces, Product and Process Changes (RE: Qwest Re-Design Web site) in future re-design CMP sessions. We believe use of the process, as it now stands for this specific change request, clearly indicates its' lack of substance.

Sincerely,

**Terry Bahner
Supervisor
AT&T Local Services Access Management
Western Region
303-298-6149**

**Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz
Mike Mason**

Attachment 5

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T BROADBAND PHONE OF)	
WASHINGTON, LLC,)	
)	Docket No. UT-
Complainant,)	
)	COMPLAINT FOR EMERGENCY
v.)	RELIEF FOR VIOLATION OF
)	WAC 480-120-139
QWEST CORPORATION,)	(REVERSE SLAMMING)
)	
Respondent.)	
_____)	

Pursuant to RCW 80.04.110, WAC 480-09-400 & WAC 480-090-510, AT&T Broadband Phone of Washington, LLC (“AT&T Broadband”), brings the following Complaint against Qwest Corporation (“Qwest”). In support of its Complaint, AT&T Broadband alleges as follows:

PARTIES

1. Complainant. AT&T Broadband is registered and classified by the Commission as a competitive telecommunications company. AT&T Broadband is authorized to provide switched and non-switched local exchange and long distance services in Washington.

2. Respondent. Qwest is an incumbent local exchange company (“ILEC”), as defined in 47 U.S.C. § 251(h) and provides local exchange and other telecommunications services throughout the State of Washington.

JURISDICTION

3. Commission Jurisdiction. The Commission has jurisdiction over this Complaint and Respondent Qwest pursuant to RCW 80.04.110 (complaints), RCW 80.36.170 (unreasonable preference), and WAC 480-120-139 (changes in local exchange and intrastate toll services).

BACKGROUND

4. Service Areas Affected. AT&T Broadband provides facilities-based local exchange service in Washington, including Vancouver (as part of the greater Portland, Oregon market) and the greater Puget Sound area, including Seattle. Qwest is the ILEC that provides local service in these areas, and AT&T Broadband obtains services from Qwest to enable AT&T Broadband to provide local service to its customers, particularly local number portability ("LNP").

5. Qwest Rejection of AT&T Broadband Orders. During the week of February 18, 2002, AT&T Broadband began receiving rejections from Qwest when placing orders for LNP in Vancouver. The rejection notices stated, "Please have end user contact current local service provider to have local service freeze removed."

6. Qwest Local Service Freeze Implementation. The number of these rejections quickly increased during the week of February 25, 2002. AT&T Broadband contacted Qwest about these rejections, and Qwest informed AT&T Broadband that Qwest was now offering preferred carrier local service freezes in Washington, and that customers are required to contact Qwest to have the freezes removed.

7. Customer Inability to Remove Freeze. AT&T Broadband notified its customers that they would need to contact the Qwest business office to have the preferred carrier freezes on local service removed. The vast majority of these customers informed AT&T Broadband that they had not authorized any freeze on their local service. Virtually every customer also notified AT&T Broadband that when they contacted Qwest to remove the freeze, the Qwest customer service representatives were unable to assist them. The customers' most common complaints to AT&T Broadband were that Qwest failed to remove the freeze despite multiple requests from the customer to do so. In at least one case, the customer informed AT&T Broadband that Qwest had told the customer that a fee of \$5.00 would be added to the customer's next bill to cover the cost of removing the local service freeze.

8. AT&T Broadband Escalation Attempt. On or about March 4, 2002, AT&T Broadband escalated the issue to Qwest Western Region personnel. Qwest informed AT&T Broadband of the following process: AT&T Broadband should instruct the customer to call the business office to have the freeze removed. The customer service record would be updated in three to five days to reflect the removal, but AT&T Broadband would be able to submit a local service request ("LSR") on the next business day without receiving a rejection or delaying the service installation.

9. Continued Customer Inability to Remove Freeze. Qwest, however, has not implemented this process. Customers continued to contact AT&T Broadband complaining that they were unable to get Qwest to remove the freeze on their local

service, and AT&T Broadband continued to receive rejection notices from Qwest after the customer had notified Qwest to remove the local service freeze.

10. AT&T Broadband Subsequent Escalation Attempt. On March 7, 2002, AT&T Broadband again escalated this issue, this time through a contact at Qwest's Executive Branch. This contact assisted AT&T Broadband and one customer immediately to remove a local service freeze that the customer previously had been unable to get Qwest to remove. When AT&T Broadband requested assistance with another customer, the contact became upset and stated, "Why should I help you take our customer?" The contact discontinued the conversation when the AT&T Broadband representative tried to explain that the customer was making the choice to move to another service provider.

11. AT&T Broadband Attempts to Assist Customers. AT&T Broadband representatives have joined customers on three-way conference calls with Qwest to remove the local service freeze. They have spent hours being transferred to, or being required to call a variety of, toll free numbers to have the local freezes removed. Qwest now is referring such requests to a third party vendor for processing. Qwest provided a temporary toll-free number to assist AT&T Broadband and its customers to work through the backlog of customer requests to remove local service freezes. This contact has been only of moderate assistance because of its limited availability and effectiveness. Customers are continuing to experience substantial delays in getting Qwest to remove their local service freeze, if Qwest removes those freezes at all, and AT&T Broadband is

continuing to have its LSRs rejected long after the customer has notified Qwest to remove the freeze.

12. AT&T Broadband Further Escalation Attempts. AT&T Broadband continued to attempt to resolve this issue with Qwest. On or about March 20, 2002, AT&T Broadband provided Qwest with a written list of concerns, including customers' complaints that they are required to call Qwest multiple times to remove the local service freeze and the lack of any process for, or consistency in, removing local service freezes through the Qwest retail office or available escalation measures. During a conference call on March 26, 2002, Qwest failed to provide any substantive response to these concerns, representing only that Qwest would respond in writing on April 3, 2002. Attempts to escalate the issue to Qwest law department personnel have similarly met with unreturned messages or vague assurances that Qwest is aware of AT&T Broadband's concerns.

13. Qwest Unauthorized Freezes. AT&T Broadband repeatedly has requested that Qwest provide documentation that it or its third party vendor has properly frozen these customers' preferred carrier for local service. To date, Qwest has provided no such documentation, although Qwest claims to possess such documentation. Over 95% of the Vancouver-area customers experiencing problems with removing a local service provider freeze from their Qwest account to obtain service from AT&T Broadband deny authorizing any such freeze. In addition, five Seattle-area AT&T Broadband employees with Qwest local service contacted Qwest to determine whether there is a local service provider freeze on their account. Qwest informed three of the five that they had

authorized a freeze on their local service provider, and all three of those employees deny authorizing any such freeze. The scant undocumented information that Qwest has provided to AT&T Broadband, moreover, includes Qwest's representations that some customers requested a local service provider freeze *after* those customers requested that AT&T Broadband provide their local service.

14. Customer Inability to Change Local Service Provider. As of March 26, 2002, approximately 124 Qwest customers seeking local service from AT&T Broadband in Vancouver have had problems removing the local service freeze Qwest has imposed. AT&T Broadband, as a result, has been unable to install local telephone service to these customers by the customer-requested installation date, if at all, and is devoting substantial resources in largely unsuccessful attempts to assist these customers. AT&T Broadband has been compelled to reschedule 67% of these customers' service installations at least once and has been able to install only 14% on the initial date requested by the customer. Their common lament is, "I just want to change my phone company." Approximately 15% of these customers have ordered a new telephone number, rather than continue to attempt to port their existing telephone number, to obtain local service from AT&T Broadband while approximately 10% have cancelled their request for service from AT&T Broadband altogether. Qwest has subjected customers seeking local service from AT&T Broadband in Seattle to similar difficulties when attempting to change their local service provider.

CLAIMS FOR RELIEF

A. Violation of WAC 480-120-139 (Preferred Carrier Freezes)

15. Reallegation. AT&T Broadband realleges and incorporates by reference the allegations in paragraphs 1-14 above as if fully set forth herein.

16. Preferred Carrier Freeze. All local exchange companies must offer preferred carrier freezes, but “[t]he carrier offering the freeze must obtain separate authorization for each service for which a preferred carrier freeze is requested.” WAC 480-120-139(5). “No local exchange carrier may implement a preferred carrier freeze unless the customer’s request to impose a freeze has first been confirmed in accordance with the procedures outlined for confirming a change in preferred carrier.” WAC 480-120-139(5)(c).

All local exchange carriers must offer customers, at a minimum, the following procedures for lifting a preferred carrier freeze:

.....

(ii) A customer’s oral authorization to lift the freeze. This option must include a mechanism that allows a submitting carrier to conduct a three-way conference call with the executing carrier and the customer in order to lift the freeze.

WAC 480-120-139(5)(d).

17. Unauthorized Preferred Carrier Freezes. Qwest has imposed preferred carrier freezes on customers’ local exchange service without proper authorization in violation of WAC 480-120-139(5).

18. Refusal to Lift Preferred Carrier Freezes. Qwest has failed or refused to lift preferred carrier freezes on customers’ local exchange service despite repeated

customer requests, including during three-way conference calls with the customer and AT&T Broadband, in violation of WAC 480-120-139(5)(d).

B. Violation of RCW 80.36.170 (Unreasonable Preference)

19. Reallegation. AT&T Broadband realleges and incorporates by reference the allegations in paragraphs 1-14 above as if fully set forth herein.

20. Unreasonable Disadvantage. RCW 80.36.170 provides in relevant part:

No telecommunications company shall make or give any undue or unreasonable preference or advantage to any person, corporation, or locality, or subject any particular person, corporation, or locality to any undue or unreasonable prejudice or disadvantage in any respect whatsoever.

21. Qwest Violation of RCW 80.36.170. Qwest's unauthorized imposition of preferred carrier freeze on local service and refusal to lift preferred carrier freezes on local service in response to customer requests is a form of slamming, is anticompetitive, and subjects AT&T Broadband and customers seeking local service from AT&T Broadband to undue and unreasonable prejudice or disadvantage in violation of RCW 80.36.170.

22. Need for Emergency Relief. Qwest's practices of reverse slamming of local service is an immediate danger to the public welfare requiring immediate action by the Commission as authorized in WAC 480-09-510.

PRAYER FOR RELIEF

WHEREFORE, AT&T Broadband prays for the following relief:

- A. An immediate or expedited order from the Commission requiring Qwest:
- (1) to discontinue any and all preferred carrier freezes on local service until Qwest has developed, adopted, and implemented Commission-approved policies and procedures for imposing and removing such freezes in compliance with WAC 480-120-139(5);
 - (2) to refund all customer payments for providing local service to customers who had not requested a preferred carrier freeze on their local service and/or for whom Qwest refused to lift a preferred carrier freeze for the month during which the customer requested local service from another local service provider and for any subsequent months, pursuant to WAC 480-120-139(6); and
 - (3) as authorized under RCW 80.04.380, to pay penalties of \$1,000 for each violation of WAC 480-120-139, *i.e.*, \$1,000 for each customer for whom Qwest has implemented an unauthorized preferred carrier freeze on local service and \$1,000 per customer for whom Qwest refused to lift a preferred carrier freeze on local service for each day after the customer requested that Qwest lift the freeze until the freeze was lifted; and

B. Such other or further relief as the Commission finds fair, just, reasonable, and sufficient.

DATED this _____ day of March, 2002.

DAVIS WRIGHT TREMAINE LLP
Attorneys for AT&T Broadband Phone of
Washington, LLC

By _____
Gregory J. Kopta
WSBA No. 20519

VERIFICATION

Mike Mason certifies as follows: I am a telephony operations senior manager for AT&T Broadband Phone of Washington, LLC; that I have read the foregoing Complaint, know the contents thereof and believe the same to be true.

Mike Mason

SUBSCRIBED AND SWORN to before me this _____ day of March, 2002.

NOTARY PUBLIC in and for the State of _____,
residing at _____.

Attachment 6



April 2, 2002

Terry Bahner
Supervisor
AT&T Local Services Access Management
1875 Lawrence St.
Denver, CO 80202-1847

Draft Response for Discussion on General Clarification Call to be held April 4th

**SUBJECT: Qwest's Change Request Response - CR # PC 030802-1
Local Service Freeze Removal for Residence and Business Customers**

Following are responses to your list of issues and questions from CR #PC030802-1, your additional list of issues dated March 19, as well as questions from our March 26, 2002 conference call.

1. Caller must be a Qwest retail customer

This is a true statement. The Qwest Retail end user may contact their Qwest Retail business office to have their local service freeze removed. Their new CLEC may be on the phone with them at the same time (Three-way call).

2. Customer must call business office and say they wish to "remove the freeze off of their local service"

This is a true statement. When the end user customer contacts the Qwest Retail business office, they should ask to have their local service freeze removed. If the end user customer simply states that they are moving to AT&T, there may be some confusion as to whether this is a PIC change or the customer is moving their local service to AT&T.

3. Do not instruct the customer to use the word "PIC". This is used for inter and intraLATA services and causes confusion which can delay removing the LEFV

This is true. It is helpful in guiding the end user customer through the process since they may have a PIC, LPIC, and Local Service Freeze. The Sales Consultants have been provided training and job aids to help determine the customer's need.

4. CLEC can be a third party on the call to Qwest by the local customer

See question #1

5. Customer can call up to 7pm in his local service area to remove the freeze

Qwest has customers across three different time zones.

The Residence end user customer may call their Qwest Retail business office until the close of business in the Pacific time zone.

- Central time zone until 9:00 PM (they will be routed to a center in the Mountain or Pacific time zones after 7:00 PM local time)
- Mountain time zone until 8:00 PM (they will be routed to a center in the Pacific time zone after 7:00 PM local time)
- Pacific time zone until 7:00 PM

The hours for the Business, Federal Government, Education, Public Access Lines business offices are listed in the April 3, 2002 update to the PCAT.

6. The LEFV resides in a repository that is worked overnight which means it will be removed off the customer service record.

Qwest has a Local Freeze Repository where all frozen phone numbers are stored. That repository is updated on a daily basis as orders are issued to add or remove local freeze. When an order is issued to remove the freeze, the telephone number is removed from the Repository that night. The LEFV will not be removed from the CSR for 3-5 days.

See further explanation in response to question 7.

7. Although updates to a CSR can take up 3-5 days, the removal of the freeze is not dependent on the CSR being updated.

The Customer Service Record does not update for 3-5 days after the R order is issued to add or remove the Local Service Freeze.

When a LSR is issued and there is LEFV on the CSR, the Wholesale Service Delivery Coordinators are checking system notations to determine if an order has been issued to remove the local service freeze. If there is a notation, they will process the LSR. In addition, if the LSR contains the R order number (of the freeze removal) the SDC will allow the order to be processed.

The following questions were submitted by AT&T in a letter to Qwest dated 03/19/02

8. Customer required to call Qwest multiple times to remove LEFV

The customer should be able to accomplish removal of the local service freeze in one call to Qwest.

9. No established process to remove the LEFV at the Qwest retail offices

Qwest has had established processes in place for local service freeze removal since March 10, 2001 when Local Service Freeze was first implemented.

10. No consistent confirmation number provided by the Qwest retail offices to note customer account

Qwest Sales Consultants are currently providing the R order number to any end user customer or CLEC (on 3-way call) who requests it. We have determined that a specific work group has been providing "confirmation numbers" instead of the R order numbers. That situation has been corrected by the issuance of internal memo (MCC) and managing the performances of the involved individuals. Do not hesitate to request the R order that is being issued to remove the freeze.

11. Inconsistent information between the account team and the PCAT pertaining to submission of the LSR

The PCAT is the Qwest official source for CLEC information.

12. Inconsistent Quality Check process at the Sierra Vista Center

Calls and orders are monitored on a regular basis to ensure quality.

13. Inconsistent escalation process at the Denver CSIE once confirmation has been received

There are several determining factors as to how the escalation is handled. Each escalation is reacted to on an individual case basis.

14. IMA 9.0 edit pulled and no notice sent to the CLEC

Qwest did not remove any IMA 9.0 edits; therefore, notification to the CLECs was not necessary. There was a non-IMA edit in place that was checking the CSRs for LEFV which was relaxed so LSRs could flow through and allow the Service Order Processors to check the Freeze Repository and edit for a freeze at that point in the process.

15. IMA 9.0 edit to be implemented at a future date without CLEC notice

All planned CLEC Impacting changes to IMA are currently being presented to the CLECs for prioritization. There are no plans to implement a 9.0 edit pertaining to Local Service Freeze.

16. Jeopardy condition codes issued after the FOC affecting CLEC due date

Qwest has listened to the concerns raised by AT&T on this issue and has taken steps to fortify existing processes to alleviate this problem.

17. Inconsistent Qwest retail process where CLEC can be a third party on the call with end customer

See question #1

18. Inconsistent process between removing the LEFV and the updating of the CSR

See question #6

19. Confusing reject /jeopardy condition message issued by Qwest

The reject/jeopardy message currently being used is the only existing message that fits the local service freeze situation. Requests for new reject messages go through the CMP CR process.

LSRs received to change lines/accounts with a local service freeze are rejected with the error message "Features on account are not compatible with requested features". In the Customer Comments section of the Reject Notice Qwest will include the following: "Please have end user contact current local service provider to have local service freeze removed."

20. AT&T reiterated they would like all of the above bullet points validated by Qwest and the process clearly documented in the PCAT

The PCAT will be updated April 3, 2002.

21. What kind of questions does Qwest ask a Retail end user customer before adding a local service freeze?

Upon initial contact with the end user customer, the Qwest Sales Consultant informs the customer of the availability of the freeze as follows: "We offer free protection to ensure that your provider of local service, long distance service, and local long distance service cannot be changed unless you contact us directly. You may remove this protection from your account at any time by contacting Qwest directly with a verbal, written, or electronically signed authorization. Would you be interested in setting that up now?"

If the end user customer indicates they would like a freeze established, they are transferred to a Third Party Verifier (TPV) who asks the customer for the Billing Name on the account, Billing Address, the last four digits of their Social Security Number, and their date of birth. In addition, they ask if the caller is over 18 years old and is responsible for the account, and if they have permission to place the local service freeze on each specific line of the account.

**22. What changes have been made in the Local Service Freeze Removal process since 02/18/02?
The process was working well before that date.**

Qwest has had established processes in place for local service freeze since March 10, 2001 when Local Service Freeze was first implemented. The only changes made to the process have been made within the past two weeks as a result of this CR.

Sincerely,

Harriett Berry
Senior Process Analyst
Qwest

Cc: Sue Burson, Director Process Management, Qwest

Attachment 7



1875 Lawrence St.
Denver, CO 80202-1847

April 5, 2002

Todd Mead
CMP Manager
Qwest Communications
1801 California Street
Denver, Colorado 80202

RE: Change Request PC 030802-1

Dear Todd:

This reconfirms AT&T's repeated request that Qwest suspend the local service freeze until a collaborative Qwest-CLEC process can ensure an effective, efficient and prompt way to remove the LEFV with no impact to the end customer. AT&T does not believe Qwest's draft response presented at the April 4th conference call meets our company's immediate needs.

AT&T is disappointed that Qwest cannot recognize the impact the LEFV has on our daily LNP operations. It is very disturbing when Qwest continues to fail to bring to the table a workable solution. It is discouraging when Qwest continues to ignore our requests to engage the appropriate Qwest subject matter experts to participate in discussions with AT&T to help resolve this issue quickly. Had the appropriate operational SMEs from Qwest participated on the call yesterday, we might have made progress resolving these issues. Unfortunately, once again such individuals were absent.

AT&T's expectations of the LEFV process is really quite simple. The end customer should be able to remove the LEFV with one call. AT&T Broadband should then be able to submit the LSR to port the customer immediately after the customer has taken the appropriate step to remove the LEFV without fear of an order rejection or a jeopardy condition being issued after the FOC. And last, if the process fails, there is a working escalation process to effectively handle the issue quickly.

Up to this point, Qwest has made minimal effort to work with AT&T to hammer out a workable solution. We view this as a dismal Qwest failure. First, it demonstrates Qwest's inability to perform a normal function adequately. Second, it clearly shows Qwest does not acknowledge nor recognize the urgency related to the CMP exception process. Third, it demonstrates Qwest's inability to effectively manage changes to its processes when they adversely impact CLECs.

AT&T will send to Qwest written comments embedded in Qwest's April 2, 2002, rough draft response to change request PC 030802-1. It will also include AT&T's proposed resolutions. In the meantime, AT&T will continue to direct the end customer to call AEGIS directly to remove the LEFV from his account. We are expecting at least a verbal response from Sue Burson by close of business today regarding AT&T's request to suspend LEFV until a workable process can be implemented. AT&T would expect Sue to then send a written response to AT&T. Please insure the minutes from the April 4th conference call reflect AT&T has officially escalated this to Sue Burson.

Sincerely,

Terry Bahner
Supervisor

**AT&T Local Services Access Management
Western Region
303-298-6149**

**Cc: Tim Boykin
Sharon Van Meter
Donna Osborne-Miller
Judy Schultz
Mike Mason**

Attachment 8

ATTACH 8 - Qwest Status Update PC030802-1.txt

From: Todd Mead [tmead@qwest.com]

ATTACHMENT 8

Sent: Friday, April 05, 2002 4:20 PM

To: Bahner, Teresa L (Terry) - NCAM; Van Meter, Sharon K - NCAM;
Menezes, Mitchell H - LGA; Bonnie Johnson; Klclauson@eschelon.com; Terry
Wicks; Leilani Jean Hines; Susan.a.travis@wcom.com; Monica Avila
Cc: Judy Schultz; Berry, Harriett; DeLaittre, Pamela; Riley, Scott;
Budner, Peter; Brown, Carolyn; Burson, Susan
Subject: Qwest Status Update PC030802-1

Status Update: Per action from April 4th CLEC Meeting

All,

Qwest continues to review and analyze AT&T's request made yesterday to lift the Local Service Freeze.

Qwest has not arrived at its final position at this time, however executive management is deeply engaged. We will follow up with another status update prior to close of business Monday April 8th 2002.

CR details can be found in the Product & Process Interactive report. The Product & Process Interactive report can be found at:
<http://qwest.com/wholesale/cmp/changerequest.html>

Thanks

Todd Mead

CRPM

PS Terry, could you please pass onto the rest of the AT&T people on yesterday's call. Thanks.

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **Joint CLEC Brief Regarding Qwest's Change Management Process**, Docket No. T-00000A-97-0238, were sent by overnight delivery on April 9, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on April 9, 2002 to:

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Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Mark A. DiNunzio
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and a true and correct copy was sent by U. S. Mail on April 9, 2002 to:

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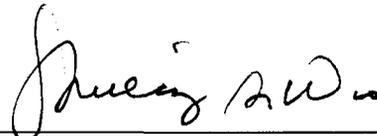
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Portland, OR 97204

Executed on April 9, 2002 in San Francisco, California.



Shirley S. Woo

Exhibit F

TO: Judy Schultz

FROM: AT&T CMP Redesign Team

DATE: December 10, 2001

RE: Excerpts from Qwest Code of Conduct and Retail Wholesale Process – posted 10-15-01.

On October 15, 2001, Qwest posted on the CMP Redesign website (i) an excerpt from its code of conduct, (ii) Wholesale Impact Checklist Methods, (iii) Response Methods for the Wholesale Impact Checklist, (iv) a spreadsheet on process, systems &/or center impacts. AT&T has several questions about these materials, as follows. AT&T would like to review the requested documents and discuss these questions and their answers, with the knowledgeable Qwest personnel present, at a CMP Redesign meeting:

A. Wholesale Impact Checklist Methods

1. Who are the retail personnel who use this process (what work groups are they in that dictate the requirement to follow this process)? Is this separately managed by center or work group?

Primarily the Process Analysts on the Methods & Procedures staff. They are involved in the vast majority of process or system changes being implemented. Center Operations Support have been trained and access to the Wholesale Impact Checklist and the Wholesale Impact Checklist Methods to report changes where Retail Process is not involved, such as Center hours.

2. How do Qwest retail personnel know to follow this process? Is it really followed “When Retail makes any changes to Processes, Systems or Center Operations”?

It is part of the Retail Process Analysts’ Wholesale Impact Checklist Methods they have been trained and have access to the Wholesale Impact Checklist and the Wholesale Impact Checklist Methods. Yes, it is followed.

3. How is adherence to this process monitored?

It is part of a required Quarterly Performance Review done by the Managers.

4. Second paragraph, fourth line down - “it is the responsibility of both parties to negotiate an agreement before implementation” – to what parties does this refer? What is the nature of the agreement? Implementation by whom and of what?

“If it is determined that the operational or system change will impact Wholesale, it is the responsibility of Retail Process & Quality Organization and the Wholesale Project Management Organization to come to an agreement whether and/or to the extent to which the Retail change must be modified, delayed or cancelled in order to ensure Wholesale and Retail parity.” - This quote is from the most current version of the Wholesale Impact Checklist Methods. Any necessary implementation would be by Retail

and Wholesale of the result of the Retail Process & Quality and Wholesale Project Management Organization's agreement as to the Retail change that triggered the process.

5. Second paragraph, fifth and sixth lines down – “The Wholesale contact will respond with the type of impact Major, Minor, or No Impact, and will include a brief and thorough description of what impact the change will have” –

- who makes this determination?

The Wholesale single point of contact, in combination with any other Wholesale resources that may be required to assess the impact.

- on what basis is this determination made (impacts to whom or what)?

Based on the information provided in the Wholesale Impact Checklist as completed by the Retail contact.

- What objective criteria exist for “The Wholesale contact” to make these determinations?

Will vary based on the type of change being considered, but those criteria may include Retail and Wholesale Business Requirements, Job-Aids, Methods and Procedures, etc.

6. Second paragraph, eighth line down refers to “all appropriate Wholesale contacts” (seems to tie to Step 12). Who would these people be and how do the retail personnel know whom to contact (what guidance do they have that directs the communications)?

The appropriate contacts are those people listed in the checklist next to specific areas of possible impact. In the most current version of the checklist there is only one contact, who is responsible for making any additional Wholesale contacts necessary to assess the impact.

7. Who is Andy Simpson (end of second paragraph and Step 9)? Who are Denise Martinez and Bill Casurella (Step 9)?

Andy Simpson is a Process Specialist in the Wholesale Service Delivery Organization

Denise Martinez is a Process Analyst in the Retail Organization

Bill Casurella is a Manager of Process Management for Global Business

The most current version of the checklist and methods, Joann Garramone is the single point of contact for Wholesale. Joann is a Lead Process Analyst in the Wholesale Process Organization.

8. Step 1 in the table. What is located at http://dmpweb-ne1.uswc.uswest.com/training/Process%20Helper/Table_of_Contents.htm? AT&T would like for CLECs to have the opportunity to review this.

This is an internal Retail website that has a link to the Wholesale Impact Checklist and the Wholesale Impact Checklist Methods.

9. AT&T would like CLECs to be able to review and discuss with Qwest examples of what is produced at Steps 10, 13 and 14.

B. Response Methods for the Wholesale Impact Checklist

1. What wholesale groups would receive notification from retail? How do Qwest wholesale personnel know to follow this process?

Retail submits the Wholesale Impact Checklist to the Wholesale single point of contact listed on the checklist. The single point of contact then goes to the designated Wholesale contacts for the function(s) that might be impacted. These designated Wholesale contacts have been trained and have access to the Checklist Response Methods for Wholesale Impacts.

2. Step 3 refers to functions impacted and that they are associated to the PIDs listed on each line in Column. AT&T would like CLECs to have an opportunity to discuss this Step with the table, including all columns and rows that Qwest personnel view, available for CLECs to view (column J, K, L, others?).

Does the reference to PIDs in Step 3 mean that the only change that goes through this process is one measured by the PIDs?

No, all changes that potentially have Wholesale impacts go through this process.

What are the PID relationships referenced in Step 3?

Where there is a PID that addresses a Wholesale equivalent of a Retail function, those PIDs are in the hidden column (L) of the Wholesale Impact Checklist so the Wholesale contact can identify any additional wholesale contacts.

3. If impacts are determined to exist, (i) what is the process on the wholesale side to incorporate that change into the wholesale business and processes and (ii) what steps are taken to insure that the change on the wholesale side occurs at the same time as it occurs on the retail side?

"If it is determined that the operational or system change will impact Wholesale, it is the responsibility of Retail Process & Quality Organization and the Wholesale Project Management Organization to come to an agreement whether and/or to the extent to which the Retail change must be modified, delayed or cancelled in order to ensure Wholesale and Retail parity." - This quote is from the most current version of the Wholesale Impact Checklist Methods. Any change required on the Wholesale side will be subject to the Change Management Process.

4. How does Qwest determine to redact from retail what it provides to wholesale? For example, if a website or database is available to retail, how does Qwest determine to make only certain information/fields from such website/database available to wholesale customers?

Qwest determines what information to provide by analyzing each data element in relation to Qwest's obligation to provide nondiscriminatory access to its OSS for pre-order, order, provisioning, maintenance and repair and billing.

5. Step 15 appears to have some text missing.

There is no text missing

C. Last Page (Untitled spreadsheet)

1. Is this the "Wholesale Impact Spreadsheet" referenced in the above processes?"

This is the Wholesale Impact Checklist, which is reference above.

2. Are we seeing the entire spreadsheet as it is seen by the Qwest retail and wholesale personnel? AT&T would like CLECs to have the opportunity to see the entire document as used by Qwest retail and wholesale personnel.

Retail uses the checklist as you see it. Wholesale has access to a hidden column (L), as referred to in item B2 above, to help them correlate retail processes/systems to wholesale processes/systems to identify wholesale contacts to assess potential impacts.

3. AT&T would like CLECs to have the opportunity to see samples of this spreadsheet completed by Qwest retail and wholesale personnel.

4. Is the submitter the retail person?

Yes

5. What documentation exists to explain the criteria for completing the columns under "Process, Systems, &/or Center Impacts?"

The Wholesale Impact Checklist Methods

6. "Contact & Tel. No." column. Are these retail or wholesale contacts? Other? Does this list represent all of the (wholesale/retail?) contacts at Qwest for notification of changes?

Wholesale contacts. With the most recent version of the Wholesale Impact Checklist and Wholesale Impact Checklist Methods there is a single point of contact that will make any additional contacts that are necessary to assess the impact.

7. It looks like this spreadsheet is to identify impacts, but we don't see where the change in systems, process or center is actually described. How is that communicated?

In the Description field and in any attachments submitted by the Retail contact.

Exhibit G

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO**

**IN THE MATTER OF THE)
INVESTIGATION INTO)
U S WEST COMMUNICATION,)
INC.'S COMPLIANCE WITH)
§ 271(C) OF THE)
TELECOMMUNICATIONS ACT)
OF 1996)**

DOCKET NO. 97I-198T

AFFIDAVIT OF SHEILA HOFFMAN

I, Sheila Hoffman, being of lawful age and having been duly sworn, state as follows:

1. My name is Sheila Hoffman. I am employed by Covad Communications Company ("Covad") at its offices located at 7901 Lowry Boulevard, Denver, CO 80230. I am employed by Covad as a senior service delivery specialist, and have primary responsibility for supervising the agents who manage orders placed by Covad with Qwest and that fall out of the "success path" – that is, orders that do not flow through the Qwest ordering and provisioning systems to successful completion.

2. Covad provides xDSL services to end user customers via a number of different Qwest loop-based products, including ISDN loops. In approximately March of 2000, Qwest informed Covad that Qwest could not provision any ISDN loop orders placed by Covad where there was integrated pair gain ("IPG") on that particular loop. Specifically, Qwest explained that, due to some type of software issue, it could not provision these types of orders and that no order placed by Covad for an ISDN loop where there was IPG on that loop could ever be successfully closed and provisioned.

3. In light of Qwest's unequivocal statements, Covad determined that it made no rational, economic or business sense to place those orders and therefore decided not to do so. Moreover, such a decision made sense if Covad was to effectively manage its end user customers' expectations. That is, Covad did not want to create the false impression that it could provide service to end user customers if such service ultimately could not be provided. In addition to the desire to avoid wasting resources on orders that could never be provisioned and creating unfulfillable expectations on the part of potential customers, Covad also sought to ensure that its reputation as a reliable service provider was not unnecessarily jeopardized by trying to place orders that, according to Qwest, could not be successfully provisioned.

3. Covad recently learned that Qwest now can provision ISDN orders where there is IPG on the loop and has been doing so for its retail customers for some unspecified period of time. Covad learned of Qwest's newfound capability *not* through any notification from Qwest, but rather through pure happenstance. In the absence of this particular fortuitous occurrence, Covad would have absolutely no knowledge of Qwest's ability to provision ISDN loops where there is IPG on the loop.

Further Affiant sayeth not.

Sheila Hoffman

Subscribed and sworn to before me this ___th day of April, 2002, by Sheila Hoffman.

Notary Public

Commission Expires: _____

Exhibit H

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~~ five 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 ~~representations of changes and exhaustive/ finite, finite but may be modified by agreement of the parties will be modified as necessary~~ [Discuss how the levels will be modified long term]. Qwest will utilize these lists when determining the disposition (e.g., Level 0-4) to which new changes should be categorized. The changes that go through these processes are not changes to systems.

3.1.13.4.1 Level 0 changes

Level 0 changes are defined as changes that do not change the meaning of documentation and do not alter CLEC operating procedures. Level 0 changes are effective immediately without notice.

Level 0 Change Categories are:

- Font and typeface changes (e.g., bold to un-bold or bold to italics)
- Capitalization
- Spelling corrections
- Hyphenation
- Acronym vs. non-acronym (e.g., inserting words to spell out an acronym)
- Symbols (e.g., changing bullets from circles to squares for consistency in document)
- Word changes from singular to plural (or vice versa) to correct grammar
- Punctuation
- Changing of a number to words (or vice versa)
- Changing a word to a synonym
- Contact personnel title changes where contact information does not change

For any change that Qwest considers a Level 0 change that does not specifically fit into one of the categories listed above, Qwest will bring the type of change to the CMP Monthly Meeting for discussion.

3.4.1.1 Level 0 Process/Deliverables

For Level 0 changes, Qwest will not provide a notification, web change form, or history log to CLECs. Changes to the documentation will be updated and posted immediately.

3.4.2 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 Changes Categories include are:

- ~~Verbiage clarifications/wordsmithing~~
 - Time Critical Corrections to information that adversely impacts CLECs ability to conduct business with Qwest
- 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/clarifications/additional information that does not change the product or process initial purpose of a document
 - Corrections Document corrections to synch up with existing documentation with systems capabilities documentation (notice needs to include reference to systems documentation)
 - Process options that do not supercede the existing processes with no mandatory deadline and that do not impose changes regardless of whether the CLEC exercises the option
 - Modifications to Frequently Asked Questions that do not change the existing product or process
 - Re-notifications issued within 6 months after initial notification (notice will include reference to date of initial notification or, if not available, reference to existing PCAT)
 - Regulatory Orders that mandate a Product/Process change to be effective in less than 21 days
 - Training information 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)
 - ~~Type corrections, grammar corrections, product branding changes~~

- ~~☐ Update Invalid Contact Information~~
 - ~~☐ Update Contact lists when contact no longer work for Qwest (e.g. Escalation Contacts List)~~
 - ~~→ • Contact information updates from organizational changes~~
 - URL changes with redirect link
- ~~☐ Optional way to perform a task for which a process already exists and will continue to exist~~
 - Changes to whether fields are required

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.

3.1.1.13.4.21.1 Level 1 Process/Deliverables

For Level 1 changes, Qwest will provide a notification to CLECs. Level 1 notifications will state the disposition (e.g. Llevel 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.~~

3.4.23 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 Cchanges Ccategories include are:

- ~~Email address changes~~
- ~~Contact Information updates excluding time critical corrections (includes email, fax, TN, personnel changes)~~
- Changes to a form
- ~~TN changes~~
- ~~FAX TN changes~~
- Changes to existing eliminate/replace existing Web content functionality will be available for 21 days until comments are addressed. (New URL is implemented in parallel with existing; includes reference to existing and vice versa.)
- Removal of data stored under an archive URL

- Elimination of a URL re-direct
- Addition of new Web functionality (e.g., CNLA)
- Re-notifications issued 6 months or more after the initial notification (notice will include reference to date of initial notification or, if not available, reference to existing PCAT)
- Updates (e.g. CLEC Questionnaire)
- Documentation concerning existing processes/products not previously documented

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.

3.1.1.23.4.23.1 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.

3.4.34 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 ~~changes~~ Change eCategories include are:

- NC/NCI code changes
- Product enhancements (excluding resale) that do not drive new processes
- Customer-facing Center hour changes
- New manual process
- Modify/change existing -manual process

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 to level 4** (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 **stay or delay/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 For a request 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. consider the request and supporting information, and respond within the timeframes put forth above. If Qwest accepts the request to change the disposition (e.g., upgrade to level 4), Qwest’s response to comments will indicate change in the disposition and be moved into the Level 4 procedures. In some circumstances it may be beneficial for Qwest and the parties to complete the Level 3 deliverable, with a written comments committing to a follow-up Level 4 effort to enhance or revise the Level 3 implementation.~~

For a request ~~to stay or delay~~ **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.

3.4.45 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 ~~changes~~ **Change include Categories are:**

- New products, features, services (excluding resale)
- Interval changes
- Change to ~~a pre-order~~ **any Wholesale Service Delivery** step
- New PCAT/**Tech Pub** for new processes
- **New processes related to product enhancements**

3.1.1.43.4.45.1 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, than 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.

Exhibit I



IT Wholesale Systems Help Desk

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest CLEC Implementation Team
Date: April 4, 2002
Subject: IMA GUI and EDI Notification – Outdated NC/NCI Code Combinations – Closure

Initial Date/Time: 3/4/02
 16:30 MST

Update Date/Time:

Closure Date/Time: 04/04/02
 06:00 MST

This Event Notification is sent to advise you that Qwest had experienced trouble with the below system:

Ticket Number: 5868375 Ticket Severity: 3

Event Onset

Time: 09:30 MTN

AM PM

Date:

Description of Trouble: Qwest has discovered several outdated NC/NCI Code combinations in the IMA NC Code Validation database. Effective April 4, 2002, these code combinations will no longer be considered valid and the code sets as documented in Technical Publication 77384 will be required. The table below shows the outdated NC/NCI Code Combinations and the associated NC/NCI Code combinations from the Technical Publication.

Outdated Code Combination			Technical Publication Code Combinations		
NC	NCI	SECNCI	NC	NCI	SECNCI
AD--	02QC5.OOS	02IS5	AD--	02QC5.OOS	02IS5.N
LX-N	02QC3.OOS	02IS5	LX-N	02QC3.OOS	02IS5.N
LX-N	02QC5.OOS	02IS5	LX-N	02QC5.OOS	02IS5.N

Business Impact: CLECs unable to submit orders using outdated NC/NCI combinations.

Work Around: Not Required.

System/Application:

IMA-GUI
 IMA-EDI
 TELIS/EXACT
 E-Commerce Gateway
 CEMR
 Resale Product Database
 MEDIACC

Client Region:

Eastern
 Central
 Western
 All Regions

Estimated resolution Time: 0600 MTN AM PM Date: April 4, 2002

Event Closure Resolution: Documentation and system will be updated on 4/4/02.

Time: 0600 MTN

AM PM

Date: 04/04/02

 This System Event Notification has been closed.

Escalation:

Additional questions may be directed to the Qwest IMA EDI Implementation Lead Project Manager at 303-896-4279.

Exhibit J

Qwest Change Management Process Issues

Note: The Qwest Change Management Process (CMP) is undergoing redesign through discussions with CLECs. This commenced in July 2001 and continues. Meetings are scheduled through June 2002 and may continue past that date. Many of the issues described below are part of the redesign discussions.

There are four major issues that have been raised through the Arizona and ROC 3rd Party OSS Tests:

- a) The CMP is deficient (generally, these findings pre-date Qwest's re-design process.) Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.
- b) Qwest fails to adhere to the practices and procedures documented in its CMP
- c) CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed
- d) The CMP does not address issues reasonably defined as CMP issues

These issues are grouped in the tables below (to keep this relatively brief, in several cases the statements of the Testing Issue or Qwest Response were summarized. For their full statements, please refer to the IWO, Exception or Observation identified):

IWO -- Incident Work Orders identified in the Arizona test

E -- Exceptions identified in the ROC test

O -- Observations identified in the ROC test

- A.** The CMP is deficient (generally, these findings pre-date Qwest's re-design process.) Nevertheless, these findings ratify the position of the CLECs that the process requires significant revamping to afford CLECs access to a fair and viable CMP.
IWO1076
IWO1078
- B.** Qwest fails to adhere to the practices and procedures documented in its CMP
Exception 2003
Exception 3094
Exception 3110
Observation 3066
- C.** CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed
Exception 3093
Exception 3102
Exception 3111 (previously tracked as Observation 3067)
- D.** The CMP does not address issues reasonably defined as CMP issues
IWO 1075
Exception 3112
Observation 3052

<p>a). The CMP is deficient</p>							
<p>IWO1076 4/8/02 status update</p>	<p>The CMP is inefficient as too much time elapses between initiation and implementation of CLEC Change Requests ACC Staff required CGE&Y to conduct an evaluation of the Qwest Change Management Process Redesign. The CGE&Y evaluation report is the subject of workshops scheduled for April 17-19, 2002.</p> <table border="1"> <thead> <tr> <th data-bbox="429 244 652 553">Testing Issue:</th> <th data-bbox="429 553 652 851">Qwest Response</th> <th data-bbox="429 851 652 1930">AT&T Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="652 244 842 553"> <p>The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.</p> <p>Despite the application of fairly conservative time intervals to individual steps of the CR process, the length of time it takes an average CR to make it through the process, not even taking into account making it into a release, is simply too long. If the length of time it takes a CR to actually make it into a release is taken into account, the length of time can double or even triple.</p> </td> <td data-bbox="652 553 842 851"> <p>10/25/01 - The Change Request (CR) Processes used in the Change Management Process (CMP) have been reviewed, re-designed, and implemented.</p> <p>Qwest implemented the following measures to improve the timeliness and accuracy of the CR Process:</p> <p>Project Managers were added to Qwest's CMP Staff to ensure the timely resolution of CRs and action items.</p> <p>Qwest Subject Matter Experts (SMEs) now conduct a Clarification Meeting with the CLEC originator of a CR prior to the first CMP Monthly Meeting following receipt of a CR.</p> <p>*****</p> <p>A database was developed to track CR status.</p> <p>A report that captures all of this information is provided on the web for the CLECs.</p> </td> <td data-bbox="652 851 842 1930"> <p>AT&T remains concerned about the overall time it takes for CRs to go through the process to implementation. CLECs requested that Qwest provide and overall timeline to discuss this issue. That discussion has not taken place yet.</p> <p>CMP Redesign is far from complete. The parties have a twenty page open issues list and meetings currently scheduled through April 2002 for redesign.</p> <p>Qwest states that the Interim Qwest Product and Process Change Request Initiation Process was agreed to and that Qwest implemented this process by November 15, 2001. Qwest has <i>not</i> implemented this process as agreed to with CLECs. CLECs continue to wait for Qwest to full and properly implement this process.</p> <p>Improving the timely flow of Change Requests from initiation to implementation is critical.</p> </td> </tr> </tbody> </table>	Testing Issue:	Qwest Response	AT&T Comments	<p>The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.</p> <p>Despite the application of fairly conservative time intervals to individual steps of the CR process, the length of time it takes an average CR to make it through the process, not even taking into account making it into a release, is simply too long. If the length of time it takes a CR to actually make it into a release is taken into account, the length of time can double or even triple.</p>	<p>10/25/01 - The Change Request (CR) Processes used in the Change Management Process (CMP) have been reviewed, re-designed, and implemented.</p> <p>Qwest implemented the following measures to improve the timeliness and accuracy of the CR Process:</p> <p>Project Managers were added to Qwest's CMP Staff to ensure the timely resolution of CRs and action items.</p> <p>Qwest Subject Matter Experts (SMEs) now conduct a Clarification Meeting with the CLEC originator of a CR prior to the first CMP Monthly Meeting following receipt of a CR.</p> <p>*****</p> <p>A database was developed to track CR status.</p> <p>A report that captures all of this information is provided on the web for the CLECs.</p>	<p>AT&T remains concerned about the overall time it takes for CRs to go through the process to implementation. CLECs requested that Qwest provide and overall timeline to discuss this issue. That discussion has not taken place yet.</p> <p>CMP Redesign is far from complete. The parties have a twenty page open issues list and meetings currently scheduled through April 2002 for redesign.</p> <p>Qwest states that the Interim Qwest Product and Process Change Request Initiation Process was agreed to and that Qwest implemented this process by November 15, 2001. Qwest has <i>not</i> implemented this process as agreed to with CLECs. CLECs continue to wait for Qwest to full and properly implement this process.</p> <p>Improving the timely flow of Change Requests from initiation to implementation is critical.</p>
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<p>IWO1078 4/8/02 status</p>	<p>CLECs do not receive Qwest specifications in time to conduct analysis, perform programming, conduct testing, and implement system changes. The CMP needs to provide orderly flow of information for timely implementation. ACC Staff required CGE&Y to conduct an evaluation of the Qwest Change Management Process Redesign. The CGE&Y evaluation report is the subject of workshops scheduled for April 17-19, 2002.</p>						

<p>a). The CMP is deficient</p>	<p>update</p>	<p>Testing Issue: “Final” EDI design documents are only released to the CLECs three weeks prior to a new EDI release. This issue has been repeatedly brought up at CICMP meetings by both the CLECs and third party EDI software vendors.</p>	<p>The existence of stable, unchanging requirements is an absolute pre-requisite to CLECs being able to code their own systems to match Qwest’s. The lack of a true “requirements freeze” a sufficient time prior to production release, coupled with the lack of a true EDI testing environment, make it difficult for CLECs to successfully code their systems and do true user acceptance testing.</p>	<p>Qwest Response 10/25/01 - As part of the Change Management Process (CMP) re-design, Qwest has proposed to implement the following schedule effective with the IMA 10.0 Release. This schedule meets or exceeds the national industry standards as prescribed in OBF Issue 2233.</p> <p>Qwest will provide a 12-month view of its OSS Interface Development Schedule.</p> <p>Qwest will provide draft technical specifications at least 73 calendar days prior to implementing the release unless the Exception Process has been invoked</p> <p>Technical specifications are documents that provide information the CLECs need to code the interface.</p> <p>CLECs have 15 calendar days from the initial publication of the draft technical specifications to provide written comments/questions regarding the documentation.</p> <p>Qwest will sponsor a walkthrough for the CLECs beginning 68 calendar days prior to implementation.</p>	<p>AT&T Comments While CLECs and Qwest have agreed to language for the process to make changes to implemented, we have not seen this process implemented. IMA 10.0 will not go into production until June 2002. As a result, we are still six months out and there are steps in this process that need to be completed to insure that Qwest implements it as agreed and meets the expectations of the parties.</p> <p>For example, one problem has been the time by which Qwest provides CLECs with sufficient information (specifications, EDI mapping, etc.) to enable CLECs to code. Qwest has agreed to provide such draft information 73 days in advance of the production date and final technical specifications 45 days in advance of the production date. Until Qwest actually goes through these steps, we cannot be certain about what Qwest will provide and whether it actually addresses the concerns previously raised.</p>
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<p>b). Qwest fails to adhere to the practices and procedures documented in its CMP</p>	<p>Release notification procedures are not followed; complete and accurate notifications are required</p>		
<p>E 2003</p>	<p>Testing Issue: Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases. 5/14/01 – The P-CLEC outlined many problems it had with the release of IMA 6.0. 12/21/01 – HP (the P-CLEC) recommends keeping the exception open pending the successful implementation of the changed CICMP process.</p>	<p>Qwest Response June 28, 2001 – Qwest proposes to address this issue in the redesign of CMP and outlines its proposal to change its CMP to meet evolving industry directions. 12/21/01 Qwest points to the CMP Redesign (document and ongoing negotiations) to respond to HP questions about: (i) the impact that changes to published target release dates have on CLECs' ability to plan for a new release on a shortened timeframe; (ii) requirements for re-certification notice to co-providers that re-certification and migration plans need to be developed, including timeframe and content; (iii) issues with regard to the multiple releases of disclosure document addenda and release notification release; (iv) deficiencies in Qwest's release change management process related to Qwest's release of addenda to its documentation.</p>	<p>AT&T Comments Topics relating to this issue have been discussed in CMP redesign between Qwest and CLECs. More have yet to be discussed. However, the core of this issue is about Qwest performing in a manner that is inconsistent with the written process it has agree to follow. The redesign of CMP will not resolve this problem. By this exception, it is clear that Qwest has not followed the process it had in place prior to CMP Redesign. The only way to know if Qwest adheres to the redesign process is to continue to have the kind of review HP and KPMG have been conducting to observe Qwest's implementation of the redesigned process.</p>
<p>4/8/02 Status Update</p>	<p>HP accepted Qwest's explanation regarding its commitments for CMP and for actively engaging the co-provider community in the process. HP also found that the discussions held in the CMP redesign meetings show that Qwest has actively engaged the CLEC community in addressing the issues raised in the Exception.</p>	<p>Qwest did not provide notification about a proposed change; failed to provide adequate opportunity for CLEC input; ignored CLEC input; and did not update CR documentation.</p>	
<p>E 3094</p>	<p>Testing Issue: Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all</p>	<p>Qwest Response 12/21/01 - This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the <i>Interim</i></p>	<p>AT&T Comments This Exception demonstrates that there has been confusion in the implementation of some of the changes resulting from the CMP Redesign. If it is difficult for Qwest to know which process applies to a</p>

b). Qwest fails to adhere to the practices and procedures documented in its CMP

interested parties.
Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.

Qwest Initiated Product/Process Change Request Initiation Process that was developed in the CMP Redesign Sessions.

At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs *only* for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop.

Qwest then responded to each of the points raised by KPMG. By way of summary, these responses state that Qwest submitted a CR in good faith, that it conducted several meetings with CLECs, that the CR is being escalated by CLECs, that Qwest updates its CMP database statuses on an "every third day basis" and that the CR did not include a rate change.

given situation, imagine how difficult it is with multiple CLECs trying to use the process. By stating that the interim process does not apply, Qwest concedes that it is applying the old process. This points to the problems that arise with CMP moving from an existing process to a redesigned process.

This exception illustrates a serious problem that currently exists in CMP.

- When Qwest initiates a CR, it goes through to implementation over the objections of CLECs.
- CLECs' only recourse is escalation or dispute resolution.
- However, if a CLEC initiates a CR, it will not get implemented unless Qwest agrees.

If Qwest does not agree, CLECs need to escalate or pursue dispute resolution. **CLEC CRs do not have the same opportunity to succeed through CMP as Qwest CRs.** CLECs should have an equal right to deny/reject Qwest CRs and let Qwest go through the dispute resolution process (since escalation is all within Qwest, one would expect escalation to yield the result Qwest wants).

The CR that is the subject of this exception is being escalated by certain CLECs.

4/8/02 status update	<p>b). Qwest fails to adhere to the practices and procedures documented in its CMP</p> <p>Qwest has requested that KPMG Consulting conduct no further testing. Since the ad hoc process is not final and third party testing is concluding, KPMG was unable to conduct retesting to ensure that a complete and functioning Product/Process CMP was in place.</p>
E3110	<p>Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.</p>
	<p>Testing Issue:</p> <p>Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:</p> <ol style="list-style-type: none"> 1. Delayed distribution 2. Erroneous topic 3. Late notice of system changes 4. Inadequate interval for planned outage notices 5. Inadequate information 6. Lack of adequate tracking and verification
	<p>Qwest Response</p> <p>Qwest's response is due 2/14/02 (not received.)</p>
	<p>AT&T Comments</p> <p>AT&T's experience in receiving timely and accurate notifications from Qwest regarding all manner of system events corresponds to those observed by KPMG.</p> <p>KPMG notes in the Exception the magnitude of the mailouts CLECs receive: "KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001." When these are issued with incorrect titles, are issued late or with such short notice that AT&T cannot make alternate plans for use of the systems and interfaces, the notifications are extremely disruptive.</p>
4/8/02	<p>Summary of KPMG Consulting's Retest Results:</p>

<p>status update</p>	<p>b). Qwest fails to adhere to the practices and procedures documented in its CMP</p>						
	<p>KPMG Consulting reviewed a total of 278 notifications that Qwest distributed between February 1, 2002 and March 22, 2002 and identified one incident in which Qwest experienced a delay of two days between the time the document was prepared and actual distribution. Among the reviewed notifications, KPMG Consulting identified three planned outage notices, all of which met the advanced notice interval requirement. KPMG Consulting was satisfied with retest results and considered issues (1) and (4) resolved.</p> <p>KPMG Consulting received a corrected notification shortly after Qwest had distributed the inaccurately titled notification in issue (2). KPMG Consulting recognizes that Qwest employed an ad hoc process to address such anticipated errors, and considers issue (2) resolved.</p> <p>KPMG Consulting observed that Qwest notified CLECs on March 1, 2002 about restructured rates for Washington State. It appeared that Qwest had implemented a notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting subsequently closed issue (5).</p> <p>Issue #6 Lack of Adequate Tracking and Verification</p> <p>During the O/E Focus Call on March 21, 2002, Qwest confirmed that CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are being followed for all upcoming software releases. KPMG Consulting reviewed Qwest internal process documents and verified that software and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the <i>Master Redlined CLEC-Qwest CMP Redesign Framework</i>. Due to the recent implementation of these process changes, KPMG Consulting has not been able to observe adherence to the documented process for notification interval management. Since Qwest has requested that KPMG Consulting conduct no further testing, KPMG Consulting will not be able to determine if Qwest's documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals.</p> <p>KPMG Consulting recommends that Exception 3110 be closed as inconclusive.</p> <p>Minor changes that do not impact CLEC operations can be made without notice through the CMP; all others must be implemented through CMP</p>						
<p>O 3066</p>	<table border="1"> <thead> <tr> <th data-bbox="1222 1415 1263 1840">Testing Issue:</th> <th data-bbox="1222 670 1263 1415">Qwest Response</th> <th data-bbox="1222 138 1263 670">AT&T Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="1263 1415 1503 1840"> <p>Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access</p> </td> <td data-bbox="1263 670 1503 1415"> <p>12/20/01 - Qwest and the CLECs have already reached interim agreements on numerous processes associated with CLEC-impacting systems changes including those related to point releases. These agreements are documented and include:</p> <ul style="list-style-type: none"> • CR origination processes for Qwest and CLEC OSS </td> <td data-bbox="1263 138 1503 670"> <p>The problem arises when Qwest initiates a change that does not go through the CR process but has an impact on CLECs. This has happened many times and it is not clear that Qwest has a handle on what changes will have an impact on a CLEC's ability to conduct business.</p> </td> </tr> </tbody> </table>	Testing Issue:	Qwest Response	AT&T Comments	<p>Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access</p>	<p>12/20/01 - Qwest and the CLECs have already reached interim agreements on numerous processes associated with CLEC-impacting systems changes including those related to point releases. These agreements are documented and include:</p> <ul style="list-style-type: none"> • CR origination processes for Qwest and CLEC OSS 	<p>The problem arises when Qwest initiates a change that does not go through the CR process but has an impact on CLECs. This has happened many times and it is not clear that Qwest has a handle on what changes will have an impact on a CLEC's ability to conduct business.</p>
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b). Qwest fails to adhere to the practices and procedures documented in its CMP

<p>(IMA) interface.</p> <p>The absence of a defined process for identifying CLEC-impacting changes, combined with inconsistent use of the documented CMP process, makes it difficult for CLECs to prepare for and respond to Qwest point releases.</p> <p>This exposes CLECs to unnecessary risks from changes that could impact their business operations and service to end-use customers.</p>	<p>Interface CRs</p> <ul style="list-style-type: none"> • Introduction of a New OSS Interface • Changes to an Existing OSS Interface • Retirement of an OSS Interface. <p>Qwest and the CLECs have agreed to implement these processes coincidentally with the implementation of the IMA 10.0 release in June 2002. Qwest and the CLECs will continue to collaboratively monitor and refine these processes through CMP.</p> <p>To ensure that these agreed to processes are implemented quickly and effectively, Qwest is developing internal CMP training that is mandatory for Qwest IT personnel who work with systems that impact the CLECs.</p>	<p>A good example is when Qwest makes changes to its back-end systems. Qwest often does this with only notice to CLECs and no CR. CLECs then encounter problems and have to go through, what has to date been, a difficult process to get the issue addressed.</p> <p>Another problem with CRs is Qwest's ability to reject them and a CLEC's only recourse is to escalate and pursue dispute resolution. At this point Qwest has not agreed that CLECs should have the ability to reject Qwest CRs and make Qwest go through the dispute resolution process. This is an important issue to CLECs that will be discussed further in the CMP Redesign process.</p>
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b). Qwest fails to adhere to the practices and procedures documented in its CMP

KPMG Consulting's response to each of the remaining issues identified in this Observation is listed below.

(1) *Qwest's OSS Release Calendar does not include dates for point release notes;*

Qwest updated the OSS Release Calendar on March 18, 2002 (available at <http://www.qwest.com/wholesale/cmp/oss/calendar.html>). KPMG Consulting reviewed the updated document, noting that dates for IMA 9.01 and IMA 10.01 Release Notes were posted. KPMG Consulting considers this issue resolved.

(2) *Mailout Notifications were not found for the release notes for the two most recent point releases: IMA 8.01 (deployed November 19, 2001) and IMA 9.01 (March 25, 2002);*

KPMG Consulting received and reviewed the referenced Qwest Communicator for IMA 8.01, which was distributed on October 29, 2001. Qwest stated in its March 15, 2002 response that no separate notifier was sent to CLECs when the release notes were posted since there were no CLEC code impacts identified to IMA Release 9.01. KPMG Consulting considers consistency in the flow and distribution of information as a key element to managing the Qwest-CLEC business relationship, and would expect Qwest to notify CLECs of the existence of Release Notes even if Qwest had not identified CLEC-impacting changes in IMA 9.01. Release Notes for IMA 10.01 are currently scheduled for availability on July 29, 2002.¹ Due to the limited duration of this test, KPMG Consulting will be unable to observe the distribution of Release Notes for IMA10.01. Therefore, KPMG Consulting considers this issue resolved.

(3) *CMP documentation does not specify the 30-day interval for distribution of point release notes.*

Qwest's March 15, 2002 response indicated that Qwest had mistakenly stated that Release Notes would be supplied to the CLEC community 30 days prior to the implementation date. Instead, Qwest clarified that, in accordance with Section 5.2 of the *Master Redlined CLEC Qwest Redesign Framework - Revised 03-07-02*, Qwest would post Release Notes to the Wholesale Web site 21 days prior to the scheduled release date. KPMG Consulting reviewed the referenced document and confirms that it includes the 21-day interval. Based on the above document review, KPMG Consulting considers this issue resolved.

KPMG Consulting recommends that Observation 3066 be closed.

4/8/02
status
update

¹ Based on the current OSS Release Calendar located at: http://www.qwest.com/wholesale/downloads/2002/020315/Qwest_OSS_Calendar_Version_06.doc

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>Qwest's document management practices are not reliable</p>						
<p>E 3093</p>	<table border="1"> <thead> <tr> <th data-bbox="365 155 525 470">Testing Issue:</th> <th data-bbox="365 470 525 1389">Qwest Response</th> <th data-bbox="365 1389 525 2006">AT&T Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="525 155 1078 470"> <p>Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.</p> <p>The absence of consistent document management makes it difficult for the CLEC to identify changes, implement training, update systems, and comply with Qwest practices.</p> </td> <td data-bbox="525 470 1078 1389"> <p>12/19/01 - Based upon CLEC-Qwest processes agreed to in CMP Redesign for managing PCAT and Tech Pub documentation, Qwest is in the process of developing documentation control methodologies that can be implemented for all CLEC documentation. All documentation applicable to CLECs will follow these processes as soon as they are implemented. These processes will be in place and communicated to the CLECs no later than January 31, 2002.</p> </td> <td data-bbox="525 1389 1078 2006"> <p>This issue has been a source of concern raised by CLECs in the CMP redesign. As a result of these concerns, Qwest and CLECs developed a process called the interim Qwest Product and Process Change Request Initiation Process.</p> <p>To date, Qwest has not implemented that process as written. CLECs anxiously await implementation that is consistent with the agreed upon process.</p> <p>Qwest's response to this exception mentions Technical Publication and the PCAT (Qwest Product Catalog) only. This is not the full scope of documents identified by KPMG as being deficient with regard to document management. Qwest will need to insure that all its documents meet adequate document management standards.</p> </td> </tr> </tbody> </table>	Testing Issue:	Qwest Response	AT&T Comments	<p>Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.</p> <p>The absence of consistent document management makes it difficult for the CLEC to identify changes, implement training, update systems, and comply with Qwest practices.</p>	<p>12/19/01 - Based upon CLEC-Qwest processes agreed to in CMP Redesign for managing PCAT and Tech Pub documentation, Qwest is in the process of developing documentation control methodologies that can be implemented for all CLEC documentation. All documentation applicable to CLECs will follow these processes as soon as they are implemented. These processes will be in place and communicated to the CLECs no later than January 31, 2002.</p>	<p>This issue has been a source of concern raised by CLECs in the CMP redesign. As a result of these concerns, Qwest and CLECs developed a process called the interim Qwest Product and Process Change Request Initiation Process.</p> <p>To date, Qwest has not implemented that process as written. CLECs anxiously await implementation that is consistent with the agreed upon process.</p> <p>Qwest's response to this exception mentions Technical Publication and the PCAT (Qwest Product Catalog) only. This is not the full scope of documents identified by KPMG as being deficient with regard to document management. Qwest will need to insure that all its documents meet adequate document management standards.</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

Summary of KPMG Consulting's Retest Results:

Based on the documentation review, the overall retest results by document category are as follows:

Document Category	Reviewed	Satisfied	Not Satisfied
Business Process	43	42	1
Technical Publications	2	2	0
Release Documentation	13	13	0
Training	14	10	4
Overall	72	67	5

KPMG Consulting noted that less than seven percent of the tested Qwest documents failed to completely follow the document management standards set forth in the *Change Management Process: Documentation Management Process* and that Qwest's performance for using the new documentation standards has significantly improved since the introduction of this issue in E3093 (i.e., the number of different errors occurring in the same document were minimal). KPMG Consulting is satisfied with the above retest results, and considers the identified issue to be resolved.

KPMG Consulting recommends that Exception 3094 be closed.

Qwest's inconsistent internal documentation will impede and impair successful operation of its CMP

E 3102	Testing Issue:	Qwest Response	AT&T Comments
	<p>Qwest's internal OSS interface change management documentation is inconsistent and unclear. KPMG identified four Qwest documents in making this observation.</p> <p>While the documents contain large portions of similar information, inconsistencies such as important definitions for CR types, categories, and database fields exist</p> <p>12/17/01 - KPMG still had concerns after receiving Qwest's 11/15/01 and 12/4/01 responses. The Qwest documentation still does not contain all necessary information. In addition, KPMG could not validate</p>	<p>11/15/01 – Qwest states that it is modifying its internal documents to reflect the change management process.</p> <p>12/4/01 – Qwest informed KPMG that two Qwest documents were retired on 12/1/01 and that it would provide two additional documents to KPMG.</p> <p>12/28/01 – Qwest has provided the IMA Change Management Plan and the IMA EDI Developer's Handbook. These documents define processes and procedures internal to the Interconnect Mediated Access (IMA) system.</p> <p>All interaction between Qwest and CLECs, including CLEC initiated Change Requests (CRs) and trouble tickets, prioritization of CRs, communication of status, etc., is defined and managed through the Qwest Wholesale CMP and is beyond the scope of the IMA</p>	<p>Qwest's internal documentation is very important because that is what Qwest personnel use to perform their duties. (NB. These documents do not appear to be available to CLECs generally, just to the P-CLEC under confidential treatment.) If those documents do not accurately reflect the processes agreed upon between Qwest and CLECs, there will be problems (i.e., Qwest will not be able to consistently adhere to its CMP).</p> <p>In CMP Redesign, there was a least one occasion when CLECs asked if they could see Qwest's internal documents for a particular process to aid in development of the redesigned CMP. Qwest was not willing to provide such documents,</p>

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>documents in question</p> <p>As part of its more detailed response, Qwest directs KPMG to other documents that Qwest believes are responsive to the concerns raised by KPMG.</p>	<p>stating they are confidential.</p> <p>Qwest points to the CMP document that CLECs and Qwest are negotiating in the CMP Redesign. While CLECs have tried to include sufficient detail in that document to understand what CLECs can expect, AT&T believes that all the processes in the redesigned CMP document would be written into internal Qwest documents, such as methods and procedures, in greater detail so that the Qwest staff personnel have a very detailed understanding of the steps they need to take to satisfy the process.</p> <p>Qwest states that it will “complete a Wholesale CMP Methods and Procedures document approximately 30 days after the completed wholesale CMP redesign.” While AT&T believes that this is important, it begs the question of what Qwest personnel will use to implement the redesigned process in the meantime. The CMP redesign is currently schedule through April, 2002. If it actually ends at that time, such a methods and procedures document would not be ready before sometime in May, if Qwest could actually complete such a document in 30 days.</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

The retest results for each of the identified issues are outlined below:

(1) **Issue:** Qwest documents lacked essential document management elements, including author and version control for determining the source and applicability of each document;

Qwest undertook several iterations of revision and updates to include the following changes in *IMA CMP*:

- Addition of document change log;
- Correction of the Table of Contents; and
- Correction of the Table of Figures.

KPMG Consulting reviewed the current version of *IMA CMP* and confirmed that the above improvements were applied. This issue is resolved.

(2) **Issue:** Internal OSS documents contained large portions of similar, but inconsistent information;

Qwest updated *IMA CMP* to absorb and integrate information from the following documents which it retired on December 1, 2001:

- *IMA Basic Classifications of Distributed Defect Tracking System (DDTS) CRs*;
- *IMA Process Description & Specification, CR Process*.

In addition, Qwest updated *EDI Developer's Handbook* to include the previously standalone document *EDI Development CR Process*.

KPMG Consulting reviewed revised documents and confirms the elimination of previously repetitive and inconsistent information. This issue is resolved.

(3) **Issue:** Documents included codes and abbreviations without definition;

KPMG Consulting confirms that the current version of *IMA CMP* includes definitions of all referenced codes and abbreviations. This issue is resolved.

(4) **Issue:** Certain process descriptions and process flows were either missing or unclear;

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<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>KPMG Consulting confirms that the current version of <i>IMA CMP</i> includes entry and exit criteria for relevant processes. KPMG Consulting reviewed the document and verified information about CR life cycle, which includes initiation, scheduling, preliminary evaluation, solution design, system analysis, approval, software development, and closure. This issue is <u>resolved</u>.</p> <p>In addition, Qwest provided KPMG Consulting with <i>Cross Release CCB Process</i>, which details the internal process for implementing emergency CRs. Qwest clarified, through the formal data request process, that its internal Change Control Board does not have the authority to deny or defer a CR that has been prioritized and packaged in CMP.</p> <p>(5) Issue: Documents lacked information about handling Change Requests (CRs) and communicating prioritization changes to stakeholders (i.e., internal systems development groups and the Wholesale CMP) appeared to be incomplete.</p> <p>KPMG Consulting received <i>PCRM Description</i> and <i>ClearDDTS User's Guide</i>, which contain information about the Qwest internal tools used to track trouble tickets and software development changes. In addition, Qwest updated <i>IMA CMP</i> to include references to production support and test environment. The revised document also specifies that, in accordance with CMP, Qwest will communicate to CLECs the status of CRs after release deployment. At the time of this Disposition Report, Qwest continuously updated the <i>Integration Document</i> to reflect CLEC-touch-point activities resulting from ongoing Qwest-CLEC negotiations in CMP Redesign. This issue is <u>resolved</u>.</p> <p>Based on the above retest results, KPMG Consulting believes that the identified issues have been resolved.</p> <p>KPMG Consulting recommends that Exception 3102 be closed.</p>						
<p>E 3111 (previously O 3067)</p>	<p>Qwest's internal processes do not provide for the CMP to be a part of its regularly performed systems development management process, including CR analysis, prioritization, resource allocation and packaging of CRs for implementation</p> <table border="1"> <thead> <tr> <th data-bbox="1214 1351 1247 2008">Testing Issue:</th> <th data-bbox="1214 680 1247 1351">Qwest Response</th> <th data-bbox="1214 159 1247 680">AT&T Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="1247 1351 1428 2008"> <p>Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).</p> <p>In the absence of guidelines for the</p> </td> <td data-bbox="1247 680 1428 1351"> <p>12/20/01 - Qwest responses to the 5 KPMG stated issues.</p> <p>1. "Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."</p> </td> <td data-bbox="1247 159 1428 680"> <p>In the CMP Redesign, CLECs have sought information from Qwest on the process it uses to determine the resources required to complete a systems CR. CLECs have also sought to understand the other steps in the Qwest process, including "packaging"</p> </td> </tr> </tbody> </table>	Testing Issue:	Qwest Response	AT&T Comments	<p>Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).</p> <p>In the absence of guidelines for the</p>	<p>12/20/01 - Qwest responses to the 5 KPMG stated issues.</p> <p>1. "Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."</p>	<p>In the CMP Redesign, CLECs have sought information from Qwest on the process it uses to determine the resources required to complete a systems CR. CLECs have also sought to understand the other steps in the Qwest process, including "packaging"</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.

Once approved by the Re-design Team, the **Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01**, located at <http://www.qwest.com/wholesale/cmp/redesign.html>, will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

2. "Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release."

Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.

3. "Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs."

Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:

- There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort.

(where CRs with "affinities" are grouped together) and business and systems requirements. These **discussions have been cut short and never completed.** Understanding this is important to CLECs because Qwest tells us that there is a limited pool of resources to complete work on a systems release. This has meant that only some of the CRs get worked for a given release. The ones that are not worked in this process need to compete for resources again in the next release and may never get completed.

Qwest's response to item 1 suggests that the redesign discussion has addressed the "roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs." In fact there has been no discussion beyond identifying steps in the process. CLECs have sought to understand this, but the information has not been forthcoming from Qwest.

(Item 4) While the language relating to sizing is in the redline document, as Qwest points out CLECs have requested further discussion and explanation of this step, to include the man hours necessary for the different levels of effort. This work still needs to be done.

KPMG's observation with item 5 is accurate. The packaging step remains vague. Hopefully, the discussions

<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>referenced will bring light to this step and further modification to the master redline CMP document, if appropriate.</p> <ul style="list-style-type: none"> • The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted. • Business and systems requirements are developed for more CRs than can ultimately be included in the release. <p>4. <i>“Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as “T-shirt size”) assignment for individual CRs.”</i></p> <p><i>The Co-Provider Industry Change Management Process document</i> does not have specific definitions for Level of Effort. However, in the <i>Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01</i> the following language has been agreed to in the <i>CLEC-Qwest OSS Interface Change Request Initiation Process</i> section:</p> <p>“Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.</p> <ul style="list-style-type: none"> • Small – requires changes to only one subsystem of a single system • Medium – requires changes to 2 or more subsystems of a single system • Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system • Extra Large – requires extensive redesign of at least one system.”
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<p>c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed</p>	<p>5. <i>Qwest documents lacked information on how Qwest identified CR package options "for a software release that it recommended to CLECs, following the CR Prioritization Process."</i></p> <p>The CLEC-Qwest OSS Interface Change Request Initiation Process section of the Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01 provides the following language which has been agreed to by the CLECs and Qwest:</p> <p>"At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release."</p>	<p>4/8/02 status update</p> <p>KPMG Consulting reviewed various internal documents, verifying that Qwest had adequately addressed each of the five issues raised in this Exception through documentation modifications and enhancements to the process. However, KPMG Consulting observed that Qwest and CLECs had not finalized the prioritization and packaging processes before prioritization for IMA Release 10.0 took place. Therefore, adherence to the new process was unable to be confirmed for at least two of the original issues raised in Exception 3111 - issue reference numbers (2) and (5).</p> <p>Exception 3111 was the subject of the Focus Call on March 21, 2002. Qwest requested that KPMG Consulting review IMA Release 10.0 to test its applicability to the current processes since packaging for IMA Release 11.0 is not scheduled to occur until after the conclusion of OSS 271 Third Party Testing. KPMG Consulting stated in its March 27, 2002 response that there are several areas where the new prioritization and packaging process was either not established, or not followed, for IMA 10.0. Since the process was not completely established and followed for IMA Release 10.0, and packaging and prioritization for Release 11.0 is scheduled to occur beyond the completion of this Test, KPMG Consulting was unable to test adherence to the complete prioritization and packaging process for a new IMA Release.</p>
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c). CMP documentation is inadequate to ensure that the CMP will be consistently and successfully managed

Given the significance of prioritization and packaging processes in allocating IT resources and managing overall changes applied to Qwest Wholesale OSS interfaces, KPMG Consulting cannot reach a definitive conclusion regarding current processes without verifying the participants' adherence. **Qwest requested on April 3, 2002, that KPMG Consulting conduct no further testing related to this Exception.** Qwest recognized that this will not allow KPMG to observe Qwest's adherence to the complete end-to-end prioritization and packaging processes for a single major system release.

KPMG Consulting recommends that Exception 3111 be closed inconclusive.

<p>d). The CMP does not address issues reasonably defined as CMP issues</p>	<p>CICMP is not collaborative; prioritization process excludes CLECs</p> <p>ACC Staff required CGE&Y to conduct an evaluation of the Qwest Change Management Process Redesign. The CGE&Y evaluation report is the subject of workshops scheduled for April 17-19, 2002.</p>						
<p>IWO1075 4/8/02 status update</p>	<table border="1"> <thead> <tr> <th data-bbox="396 1436 429 1840">Testing Issue:</th> <th data-bbox="396 755 429 1436">Qwest Response</th> <th data-bbox="396 212 429 755">Analysis</th> </tr> </thead> <tbody> <tr> <td data-bbox="429 1436 1115 1840"> <p>The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.</p> <p>The process, as it exists today, only addresses roughly a third of the changes that are made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems' primary users – the CLECs – in a collaborative effort with Qwest.</p> </td> <td data-bbox="429 755 1115 1436"> <p>10/25/01 - The re-designed Change Management Process (CMP) provides a collaborative process for making changes to CLEC-specific pre-order, order, and repair interfaces. The re-designed CMP defines four OSS Interface Change Request (CR) types. CLEC Originated and Qwest Originated OSS Interface CR types are prioritized exclusively by the CLECs.</p> <p>Regulatory and Industry Guideline OSS Interface CR types, which can be initiated by either a CLEC or Qwest are not subject to prioritization regardless of the source of origination.</p> </td> <td data-bbox="429 212 1115 755"> <p>CLECs have proposed that regulatory CRs should be subject to prioritization along with all other types of Change Requests, with the condition that for any mandated Regulatory Changes that have mandatory implementation dates, prioritization would not interfere with Qwest's ability to meet those dates.</p> <p>Industry Guideline changes are rarely mandatory so there would generally be no basis for putting these changes ahead of other change requests and they should be prioritized.</p> <p>The standard for determining into which category a given change requests falls requires agreement between Qwest and CLECs. There is recent experience that shows the significance of the needs for clear guidelines on defining the appropriate CR category.</p> </td> </tr> </tbody> </table>	Testing Issue:	Qwest Response	Analysis	<p>The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.</p> <p>The process, as it exists today, only addresses roughly a third of the changes that are made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems' primary users – the CLECs – in a collaborative effort with Qwest.</p>	<p>10/25/01 - The re-designed Change Management Process (CMP) provides a collaborative process for making changes to CLEC-specific pre-order, order, and repair interfaces. The re-designed CMP defines four OSS Interface Change Request (CR) types. CLEC Originated and Qwest Originated OSS Interface CR types are prioritized exclusively by the CLECs.</p> <p>Regulatory and Industry Guideline OSS Interface CR types, which can be initiated by either a CLEC or Qwest are not subject to prioritization regardless of the source of origination.</p>	<p>CLECs have proposed that regulatory CRs should be subject to prioritization along with all other types of Change Requests, with the condition that for any mandated Regulatory Changes that have mandatory implementation dates, prioritization would not interfere with Qwest's ability to meet those dates.</p> <p>Industry Guideline changes are rarely mandatory so there would generally be no basis for putting these changes ahead of other change requests and they should be prioritized.</p> <p>The standard for determining into which category a given change requests falls requires agreement between Qwest and CLECs. There is recent experience that shows the significance of the needs for clear guidelines on defining the appropriate CR category.</p>
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<p>E 3112</p>	<p>Qwest has not implemented a comprehensive and fully documented production support process to address changes that correct failures in the production version(s) of OSS interfaces.</p>						
<p>Testing Issue:</p> <p>KPMG Consulting has observed that Qwest does not have a documented</p>	<p>Qwest Response</p> <p>Qwest provided an "integration document" to KPMG via the data request process. The Integration Document addresses criteria A and</p> <p>AT&T Comments</p> <p>AT&T finds that the criteria cited by KPMG for the competency of the production support process are</p>						

<p>d). The CMP does not address issues reasonably defined as CMP issues</p>	<p>criteria C – G of this exception.</p> <p>Criteria B refers to evaluation, categorization, and prioritization procedures. The Wholesale CMP prioritization document has not been finalized, pending the completion of CMP Redesign. This portion of the redesign effort is anticipated to be completed by February 19, 2002. Qwest will provide an update on the status of this item by February 22, 2002.</p> <p>Qwest is in the process of making revisions to the Integration Document that address documentation management procedures and training procedures identified in criteria H & I above. Qwest will provide an updated version of the Integration Document by February 22, 2002 that will address criteria H and I.</p>	<p>reasonable. These are:</p> <ul style="list-style-type: none"> A. Identification and verification procedures; B. Evaluation, categorization, and prioritization procedures; C. Internal and external communication procedures; D. Status tracking and reporting procedures; E. Escalation procedures; F. Restoration and closure procedures; G. Testing procedures, including support for defects observed in test environments; H. Documentation management procedures; and I. Training procedures.
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d). The CMP does not address issues reasonably defined as CMP issues

KPMG Consulting reviewed the updated documentation, as well as Qwest's various responses to this Exception to determine if Qwest had enhanced the documents and addressed the remaining issues raised by KPMG Consulting.

The re-test results for each of the identified issues are outlined below:

1. *Applicability of Qwest response intervals to both Ticket Notifications and System Event Notifications*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the response intervals for both Ticket Notifications and System Event Notifications. **KPMG Consulting would expect future updates to this Production Support documentation to include clear references to intervals associated with each of the respective ticket types.**

2. *Definition of Qwest response intervals for Production Support notifications*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the response intervals for production support during normal and after hours of operations of the WSHD. KPMG Consulting noted that Qwest stated that it may work directly with a CLEC or various CLECs to resolve an issue, and may communicate with them informally during the problem solving activity. **However, KPMG Consulting expects that Qwest would still issue proper notification to CLECs regardless of potentially unique trouble situations.**

3. *Treatment of Severity 3 and 4 troubles through the Change Management Process*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the expectations regarding Severity Level 3 and 4 issues. KPMG Consulting recognizes Qwest has limited resources to devote to Severity Level 3 and 4 issues, and that those issues do not necessarily warrant the same level of attention. However, **KPMG Consulting believes that a more formal process could be established in the future by Qwest to ensure that such changes are handled in a procedural manner.**

4. *Varying level of detail and consistency on the roles and responsibilities for Tier 2 and 3 Production Support*

KPMG Consulting's review found that the updates and clarifications to the documentation and references define the roles and responsibilities of the Tier 2 and Tier 3 production support personnel. Qwest noted in its March 27, 2002 response that Tier 3 roles may not be documented in all product support documentation based on the purpose and scope of such documentation. **KPMG Consulting recommends that Qwest consistently document the**

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<p>d). The CMP does not address issues reasonably defined as CMP issues</p> <p>various product support functions in future updates, so that the process is uniformly understood and applied.</p> <p>5. Qwest notification to CLECs regarding known defects and target fix dates</p> <p>KPMG Consulting reviewed the <i>Unplanned Notification Process</i>, noting that the scope had been clarified to include that notifications will be sent to CLECs for back-end system changes that Qwest has identified. Qwest provided an example of an Event Notification in which Qwest discovered an issue, but for which the CLECs did not detect the fault. Qwest internal personnel identified and followed the process according to the Unplanned Notification Process. However, KPMG Consulting noted that the CLEC community is discussing this topic during CMP meetings. The outcome of the discussions in the CMP meetings may affect the outcome of future documentation updates and potential changes to the Production Support process.</p>	
<p>O 3052</p> <p>Contingency plans do not provide for a process to address problems encountered in production systems</p>	
<p>Testing Issue:</p> <p>Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces. KPMG Consulting observed that Qwest CMP does not have a documented process to address production support changes.</p> <p>KPMG further indicated that through its review of Qwest OSS contingency documents, it found no specific references to, and consideration of, Qwest interactions with CLECs</p> <p>These contingency plans</p>	<p>Qwest Response</p> <p>11/15/01: Qwest confirmed that contingency plans exist and described its internal process.</p> <p>11/28/01: Qwest provides KPMG with contingency plans and/or processes that exist to correct potential failures in the production versions of OSS interfaces via the usual data request process (DR no. TI-676S1) for the following systems: CPPD (CPS), CRIS, EXACT, IABS, IMA, and MEDIACC/CEMR. Still outstanding are documents for two other systems: HEET and TELIS.</p> <p>12/5/01: Qwest provides KPMG with the documents for HEET, but not TELIS stating that those documents are proprietary to a vendor.</p> <p>12/28/01: Qwest states that it has negotiated a production support document with CLECs for the CMP process. Qwest further states that he Qwest Wholesale Systems Help Desk will update its methods</p>
	<p>Analysis</p> <p>Qwest and CLECs did discuss and tentatively agree upon production support language for the redesigned CMP. One significant part of that process that has not yet been addressed is a technical escalation process to address problems that are not being worked to resolution in a timely manner.</p> <p>The CMP language for production support was completed (except for the technical escalation process) at the CMP Redesign meeting held on December 10 – 11, 2001. At that meeting, the Qwest SME stated that the production supported process would not be implemented before February 2002 (this is reflected in the draft minutes from the meeting). Qwest's response to KPMG that it would be implemented by January 3, 2002 should be</p>

<p>d). The CMP does not address issues reasonably defined as CMP issues</p>	<p>illustrate fragments of a production support framework, but do not constitute a comprehensive process that defines how this change category is integrated into the overall CMP.</p>	<p>and procedures and conduct training by January 3, 2002 to ensure that Help Desk personnel follow the procedures outlined in the CMP Production Support document</p>	<p>questioned.</p>
<p>4/8/02 status update</p>	<p>The original purpose of Observation 3052 was to address the lack of documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces. From the review of the existing documentation and the subsequent Qwest responses, KPMG Consulting determined that Qwest does not appear to have a well formed process for addressing failures in the production version(s) of OSS interfaces. Therefore, KPMG Consulting issued Exception 3112 to specifically address inadequacies in the Production Support process. Observation 3052 remained open to focus on the clarity, accuracy, and consistency of relevant process documentation. However, KPMG Consulting believes that one of the essential criteria that constitutes a well formed process is clear and comprehensive documentation that describes the process and all of its related components. Once Qwest has developed a clearly defined and consistently deployed production support process to address failures in the production version(s) of OSS interfaces, there is an inherent expectation that the process will be clearly documented for internal and external parties, as appropriate. Therefore, KPMG Consulting believes that the issues identified under Observation 3052 can and will be addressed completely within the context of Exception 3112.</p> <p>KPMG Consulting recommends that Observation 3052 be closed, and that all Production Support process documentation issues be addressed within the context of Exception 3112.</p>		

Exhibit K

Initial Release Date: December 12, 2001
First Response Date: January 7, 2002
Second Response Date: February 12, 2002
Third Response Date: March 28, 2002
Disposition Report Date: April 4, 2002

EXCEPTION DISPOSITION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Review, MTP Test 23.

Exception:

Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.

Summary of Exception:

The Qwest Product/Process Change Management Process (CMP) is the method used by both Qwest and CLECs to introduce and implement changes to Qwest wholesale products and business processes. The Qwest CMP managers are responsible for the administration of Change Requests (CRs) and Notifications, including changes to, and updates of, relevant Qwest documentation. The Qwest Subject Matter Experts (SMEs) are responsible for the products and processes associated with proposed changes.

KPMG Consulting observed an instance in which Qwest did not provide CLECs with complete information about, and a reasonable interval for, a CLEC-impacting CR. Qwest SMEs held meetings with CLECs but did not adequately address CLEC concerns. In addition, Qwest implemented the process change according to a pre-determined schedule despite CLEC objections. KPMG Consulting identified the following issues:

- Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
- Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change;
- Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.
- Qwest, through the CMP, did not update CR status on a timely basis;
- Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.

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Qwest OSS Evaluation

KPMG Consulting considered the fact that Qwest implemented CR PC100101-5 without taking into consideration CLEC objections, its failure to make available complete information sufficiently in advance of the scheduled change, as well as the subsequent impasse¹ about the process governing Qwest-initiated changes as indicative of lack of a defined and documented change management process.

Summary of Qwest's Initial and Supplemental Responses:

Qwest's initial position stated that Qwest and CLECs developed an *Interim Qwest Initiated Product/Process Change Request Initiation Process* during the early CMP Redesign Sessions. At the time Qwest issued the CR in question, Qwest believed that the interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. CLECs later stated that the interim process was only intended for changes stemming from 271 testing efforts. Therefore, Qwest did not believe that it was necessary for it to submit a CR, as this change was not under the scope of the interim process.

During the course of OSS Testing, Qwest and CLECs have engaged in a collaborative process to change and enhance the Qwest Change Management Process (officially referred to as CMP Redesign). As the CMP Redesign continued, Qwest recognized the fact that Qwest and CLECs were at impasse over the process that governs Qwest-initiated Product/Process changes. Qwest implemented an *ad hoc* process (also referred to by Qwest as the *Interim Qwest-Initiated Product/Process Change Management Process*) on April 1, 2002 to manage Qwest-initiated Product/Process changes.

In addition, the redesign team agreed that Qwest and CLECs would continue to evaluate and modify that process. The redesign team has begun to review product/process notices issued over the last few months in order to make the list of categories in each of the four "Levels" of product/process changes more exhaustive. As of the time that this Disposition Report was filed, the redesign team was working to try to finalize this initial effort by April 16, 2002. After this review, CLECs and Qwest will baseline the interim process. Qwest will then insert it into the Qwest Wholesale Change Management Process Document and implement the process, as modified. Qwest's response from April 3, 2002 also indicates that CLECs and Qwest have agreed to implementation of this process with changes occurring on an 'as needed basis only' as Redesign discussions continue.

¹ KPMG Consulting observed that Qwest and CLECs were at impasse about Qwest-initiated Product/Process changes from December 2001 to March 2002.

EXCEPTION 3094 – DISPOSITION REPORT
Qwest OSS Evaluation

KPMG Consulting's Disposition Report (04/04/02):

Summary of KPMG Consulting's Retest Activities and Results:

KPMG Consulting recognizes that Qwest and CLECs have yet to agree on key components of a comprehensive Product/Process CMP. Qwest implemented an *ad hoc* process to manage Qwest-initiated Product/Process changes as of April 1, 2002. Although CLECs and Qwest have reached an "agreement in principle" for this interim process, it is KPMG Consulting's understanding that the referenced process remains subject to further development, modifications, and negotiations in CMP Redesign. KPMG Consulting is not able to conduct a thorough evaluation until the prescribed process is formalized, the Redesign sessions are complete, and the process is fully implemented and confirmed. However, the current schedule is for Redesign meetings to continue until June, 2002.

Qwest has requested that KPMG Consulting conduct no further testing. Since the ad hoc process is not final and third party testing is concluding, KPMG was unable to conduct retesting to ensure that a complete and functioning Product/Process CMP was in place.

KPMG Consulting recommends that Exception 3094 be closed unresolved.

Exhibit L

Initial Release Date: January 24, 2002
First Response Date: March 13, 2002
Second Response Date: March 27, 2002
Disposition Report Date: April 2, 2002

EXCEPTION DISPOSITION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Review, MTP Test 23.

Exception:

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.

Summary of Exception:

Qwest utilizes the Mailout Notification System to distribute information that pertains to CLECs business operations. These notifications cover a wide range of topics including documentation updates, new product offerings, training availability, OSS planned outages, Qwest-CLEC meeting notices, Qwest's responses to CLEC-initiated change requests, and notices specifically concerning the Qwest Change Management Process (CMP). These distributions are critical to allow CLECs to make informed decisions about their business operations, as well as to maintain the Qwest-CLEC business relationship. CLEC representatives rely on accurate email headlines and timely notices to redistribute the emails within their respective organizations.

KPMG Consulting reviewed a total of 115 CLEC notifications that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:

- (1) Discrepancies between document dates and actual distribution dates indicated Qwest had not distributed some notifications in a timely manner;
- (2) Inaccurate description of notification in an email headline;
- (3) Late notice of system changes;
- (4) Inadequate interval for announcing planned outages;
- (5) Inadequate information about cost docket rate changes;
- (6) Lack of adequate tracking and verification of documentation intervals.

Summary of Qwest's Initial and Supplemental Responses:

Qwest's responses indicated that the following remedies were implemented to address issues identified in this Exception:

- (1) The Qwest Notification Department implemented a log-in process to ensure that all documents are distributed in a timely manner.
- (2) Qwest made corrections as soon as it had detected that an inaccurate description of notification had been applied – Qwest distributed a corrected notification with the appropriate headline shortly after the original email notification.

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- (3) Qwest implemented a notification process and corresponding set of intervals to provide CLECs with advance notice of bill rate validation activities. With respect to three other late notices of system changes, Qwest stated that it was unable to provide CLECs with advance notices prior to error resolution.
- (4) In accordance with results from CMP Redesign discussion, Qwest implemented the 48-hour interval for unplanned outages effective February 1, 2002.
- (5) Starting March 1, 2002, Qwest implemented a new notification process to inform CLECs at least 15 days in advance of the implementation of cost docket rate changes.
- (6) Qwest implemented a Web-based depository on January 31, 2002 so that CLECs could search and retrieve past notifications. Qwest also confirmed that although it does not employ a centralized database or other mechanism for tracking adherence to established CMP intervals, it does have documented procedures and project plans for tracking CMP deliverables.

KPMG Consulting's Disposition Report (04/02/2002):

Summary of KPMG Consulting's Retest Activities:

Exception 3110 identified six issues with the notifications that Qwest distributes to the CLEC community. KPMG Consulting conducted retesting of Qwest notifications with respect to issues (1) and (4). KPMG Consulting reviewed Qwest's responses along with substantiating material, and confirmed that Qwest had taken steps to address issue (2) and (5). Issue (3) relates to advance intervals for notifying CLECs about unanticipated system fixes, patches, or unplanned outages. KPMG Consulting determined that this issue falls within the scope of another report, Exception 3112, and will address it accordingly. KPMG Consulting was unable to fully test for resolution of issue (6) since established intervals and milestones will occur outside of the scope of the Change Management Process test execution phase.

Summary of KPMG Consulting's Retest Results:

KPMG Consulting reviewed a total of 278 notifications that Qwest distributed between February 1, 2002 and March 22, 2002 and identified one incident in which Qwest experienced a delay of two days between the time the document was prepared and actual distribution. Among the reviewed notifications, KPMG Consulting identified three planned outage notices, all of which met the advanced notice interval requirement. KPMG Consulting was satisfied with retest results and considered issues (1) and (4) resolved.

KPMG Consulting received a corrected notification shortly after Qwest had distributed the inaccurately titled notification in issue (2). KPMG Consulting recognizes that Qwest employed an ad hoc process to address such anticipated errors, and considers issue (2) resolved.

KPMG Consulting observed that Qwest notified CLECs on March 1, 2002 about restructured rates for Washington State. It appeared that Qwest had implemented a notification process to

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inform CLECs at least 15 days in advance of the implementation of cost docket rate changes. KPMG Consulting subsequently closed issue (5).

Issue #6 Lack of Adequate Tracking and Verification

During the O/E Focus Call on March 21, 2002, Qwest confirmed that CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are being followed for all upcoming software releases. KPMG Consulting reviewed Qwest internal process documents and verified that software and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the *Master Redlined CLEC-Qwest CMP Redesign Framework*. Due to the recent implementation of these process changes, KPMG Consulting has not been able to observe adherence to the documented process for notification interval management. Since Qwest has requested that KPMG Consulting conduct no further testing, KPMG Consulting will not be able to determine if Qwest's documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals.

KPMG Consulting recommends that Exception 3110 be closed as inconclusive.

Exhibit M

Initial Release Date (of O3067): December 12, 2001
First Response Date (to O3067): January 6, 2002
Second Response Date(to O3067): January 30, 2002
Initial Release Date (of E3111): January 30, 2002
First Response Date (to E3111): March 19, 2002
Second Response Date (to E3111): March 27, 2002
Disposition Report Date (of E3111): April 4, 2002

Exception 3111 was initially released as Observation 3067 on December 12, 2001. KPMG Consulting recommended on January 30, 2002 that Observation 3067 be closed and moved to Exception 3111.

EXCEPTION DISPOSITION REPORT

An Exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package.

Summary of Exception:

KPMG Consulting identified that Qwest lacked documented guidelines for the CR Prioritization Process of major software releases, specifically:

- (1) Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs;
- (2) Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release;
- (3) Detailed business analyses and system analyses from Qwest software development team were not performed for all CLEC-initiated CRs;
- (4) Qwest documents lacked definitions and criteria for the Level of Effort (LOE, formerly known as "T-shirt size") assignment for individual CRs; and
- (5) Qwest documents lacked information on how Qwest identified CR packaging options for a software release that it recommended to CLECs, following the CR Prioritization Process.

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Criteria for use by Qwest's software development teams to develop the priorities, capacity, and capabilities of a software release were neither documented nor fully defined. The lack of established and documented development criteria, and a clear process for Qwest resource allocation for wholesale OSS, may result in the Qwest software development teams' overlooking and/or ignoring CRs deemed important to CLECs, as determined by the results of the prioritization process. Failure on the part of Qwest to attend to CRs that CLECs deem critical to their business operations in a timely manner could result in lengthy delays in implementing these changes. This would prevent CLECs from receiving important order and pre-order functionality, thus inhibiting their ability to compete in the local exchange carrier market.

Summary of Qwest's Initial and Supplemental Responses:

Qwest's responses to Observation 3067 indicated that it had not documented the roles and responsibilities of the IT staff that conduct detailed business and system analyses of CLEC-initiated systems CRs. The amount of business information that Qwest communicates to CLECs prior to the CR Prioritization Process, such as release capacity and LOE definitions, was subject to ongoing Qwest-CLEC negotiation in the CMP Redesign Process. In addition, Qwest also stated that it did not have a systematic and consistent process to determine the CR packaging options that it recommended to CLECs, following the CR Prioritization Process. Based on the above information, KPMG Consulting closed Observation 3067 and issued Exception 3111.

Qwest subsequently developed documentation that details relevant internal IT processes, as well as the roles and responsibilities of the IT personnel involved in the analysis of CLEC-initiated systems CRs. In addition, Qwest and CLECs have negotiated the amount of release capacity and LOE information, both now defined in terms of person hours, that Qwest will disclose prior to the CR prioritization vote. Qwest indicated on February 12, 2002 that it would provide release capacity information, for use in the prioritization process, starting with IMA 11.0 and SATE 11.0.

Qwest reported during the Observation and Exception Focused call held March 21, 2002 and again in its March 27, 2002 and April 3, 2002 written responses to Exception 3111 that it adhered with each phase of the prioritization and packaging processes for major systems releases and that these processes were in place and agreed to via CMP at the time of execution of the process.

KPMG Consulting's Disposition Report (04/04/2002):

Summary of KPMG Consulting's Retest Activities:

KPMG Consulting identified five issues in Exception 3111 that related to inadequate processes and a pattern of information-sharing that prevented CLECs from making informed decisions during the CR Prioritization Process for Change Management. KPMG Consulting conducted a retest by reviewing Qwest-provided documentation and by observing Change Management activity and meetings up through April 4, 2002. Due to the current schedule of this test, KPMG

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EXCEPTION 3111 – DISPOSITION REPORT

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Consulting will be unable to observe the complete prioritization and packaging processes, as now documented, for IMA Release 11.0 or SATE 11.0.

Summary of KPMG Consulting's Retest Results:

KPMG Consulting reviewed various internal documents, verifying that Qwest had adequately addressed each of the five issues raised in this Exception through documentation modifications and enhancements to the process. However, KPMG Consulting observed that Qwest and CLECs had not finalized the prioritization and packaging processes before prioritization for IMA Release 10.0 took place. Therefore, adherence to the new process was unable to be confirmed for at least two of the original issues raised in Exception 3111 - issue reference numbers (2) and (5).

Exception 3111 was the subject of the Focus Call on March 21, 2002. Qwest requested that KPMG Consulting review IMA Release 10.0 to test its applicability to the current processes since packaging for IMA Release 11.0 is not scheduled to occur until after the conclusion of OSS 271 Third Party Testing. KPMG Consulting stated in its March 27, 2002 response that there are several areas where the new prioritization and packaging process was either not established, or not followed, for IMA 10.0. Since the process was not completely established and followed for IMA Release 10.0, and packaging and prioritization for Release 11.0 is scheduled to occur beyond the completion of this Test, KPMG Consulting was unable to test adherence to the complete prioritization and packaging process for a new IMA Release.

Given the significance of prioritization and packaging processes in allocating IT resources and managing overall changes applied to Qwest Wholesale OSS interfaces, KPMG Consulting cannot reach a definitive conclusion regarding current processes without verifying the participants' adherence. Qwest requested on April 3, 2002, that KPMG Consulting conduct no further testing related to this Exception. Qwest recognized that this will not allow KPMG to observe Qwest's adherence to the complete end-to-end prioritization and packaging processes for a single major system release.

KPMG Consulting recommends that Exception 3111 be closed inconclusive.

Exhibit N

EXCEPTION 3077 – THIRD RESPONSE
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EXHIBIT N

Initial Release Date: November 7, 2001
First Response Date: January 8, 2002
Second Response Date: January 24, 2002
Third Response Date: April 3, 2002

EXCEPTION REPORT

An exception has been identified as a result of the Qwest documentation review, and information gathered during interviews, for the Test 24.6 OSS Interface Development Review.

Exception:

Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs sufficient testing capabilities.

Background:

Qwest employs a phased approach for CLECs that wish to develop an IMA/EDI application-to-application interface with Qwest's OSS systems. The steps of the current process are listed below:¹

1. Initial Communications (includes Kick Off conference call)
2. Project Plan (proposed/negotiated)
3. Requirements Review (by the CLEC)
4. Firewall Rules and IA-to-IA Testing
5. Testing - Interoperability and/or SATE environment
6. Controlled Production
7. Production ("Turn-Up")

Qwest developed SATE in May 2001 as an alternative testing environment to the Interoperability environment. By creating SATE, Qwest now offers CLECs the option between the Interoperability environment and SATE for testing their IMA EDI interface. The latest version, SATE 8.01, was implemented as of October 22, 2001.

Issue:

KPMG Consulting has observed through interviews and documentation reviews, that the IMA EDI SATE does not provide sufficient testing capabilities for CLECs prior to connecting to Qwest's production systems. Certain limitations in the IMA EDI SATE have been identified, including the following:

- SATE does not offer true end-to-end testing capabilities through to Qwest's provisioning and billing systems. Currently, SATE does not generate post-order responses in the same manner

¹ EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.6.

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as they are created in the production environment. Specifically, a Test System Engineer (TSE) manually provides responses to the CLEC that would be system-generated in the production environment (e.g. firm order completion notices, and other post-order responses such as rejections). Manual response generation is not representative of the production environment, and does not provide adequate assurance that CLECs will see similar transaction behavior once in production. Additionally, manual intervention increases the risk of human error.

- Flow-through orders are not supported in SATE, even though these types of orders will be processed in the production environment. Therefore, CLECs are unable to truly test the ability of orders to flow-through (no manual intervention) the IMA systems in production. CLECs will only have limited ability to evaluate the behavior of the system in a manner that is consistent with flow-through orders in production. A test environment should mirror the production environment, and provide evidence of what is to be expected when entering production, including flow-through behavior.
- The volume of order responses supported in SATE is restricted due to manual response handling. As stated in the IMA EDI Implementation Guidelines²:

“As with the Interoperability environment, Post-Order responses are manually generated in SATE and may include Rejects, FOCs, Jeopardys, and Completions. Responses will be generated on posted SATE operation business days as follows:

- FOCs - each day for the first ten Order transactions received the prior business day.
- Progression responses - as negotiated in Project Plan
- Regression responses other than FOCs - within 5 days of a request for a response”

The number of responses that a CLEC receives in automated format should not be restricted. Because SATE does not support automated response handling, the CLEC can only receive a prescribed number of responses to its order transactions. This capacity limitation does not adequately mirror the production process, and does not allow the CLEC the ability to test large volumes of orders and the expected response behaviors.

- The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses. According to the IMA EDI Implementation Guidelines³:

“In SATE, pre-order and order transactions are created using Qwest-provided data that, when submitted to SATE, will return consistent responses. These responses will enable the SATE user to test the EDI mapping structure. *Those responses will hold data that could appear in production, however, may not match the response that would be*

² EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.16.

³ EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.15.

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received on the same query sent to the Interoperability or Production Environment. The error codes returned in SATE will mirror the Production environment. Verbiage on outbound responses in SATE may not exactly mirror what would be returned from Qwest production systems or represent the actual message/data content expected from the result of the transaction.”

The inability to provide consistent data within the EDI order responses impacts the CLEC’s ability to accurately assess the expected outcomes of orders. Additionally, it impairs the CLEC’s ability to analyze EDI problems when the CLEC cannot consistently compare actual data outcomes to expected data outcomes.

As a result of an interview with a Qwest employee on September 12, 2001, KPMG Consulting requested clarification for the paragraph quoted above from the EDI Implementation Guide (Data Request No. ID128). Qwest responded that identical queries created in SATE and production may receive different responses due to the differences between the test deck data in SATE and the account data in production. Qwest specifically stated⁴:

“For example, an address validation query for "999 Van Cleve Rd" would result in an "Exact Match" in SATE, but "No Match" in production. Alternatively, the address "1999 Broadway" would result in an "Exact Match" in production, but no match in SATE.”

KPMG Consulting understands that the differences in the test deck data could potentially yield different results in SATE and production. As long as the processing logic in SATE and production is identical, this is not considered a system deficiency. However, Qwest continues in its response as follows:

“Second, SATE stubs do not hold some of the error messages held in production. For example, a query in production for a certain telephone number might result in an error message that says "Host Not Found." In SATE, the CLEC might receive "Bad NPA/NXX." In all cases, the error message received will be a real production error message and in all likelihood, it will be the error message received on such a query, however, such functionality cannot be guaranteed. If a CLEC would like to receive a certain error message in SATE, they can request it be added via the SATE Data Request Process.”

KPMG does not understand how different error messages could be received in SATE versus production for identical queries. The response processing logic for SATE should replicate the logic in production, and therefore, no differences should exist between the error messages received in the two environments for identical queries. Based on Qwest’s clarification, KPMG Consulting still believes that there is a potential deficiency with SATE in that response data is not necessarily consistent with production.

⁴ Qwest response to Data Request ID128 received by KPMG Consulting on September 27, 2001

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Impact:

A limited or insufficient testing environment could delay the timely implementation of a CLEC's IMA EDI release. Also, problems could arise in the production environment that may have otherwise been avoided if SATE more closely mirrored the production environment. These factors could increase a CLEC's operating expenses as a result of additional time required to ensure the functionality of the systems, and could inhibit revenues if delays hinder a CLEC's ability to service its customers.

Qwest Formal Response (11/20/01):

The following paragraphs outline Qwest's response to the four concerns raised by KPMG regarding SATE. Each issue has been briefly recapped to more easily correlate the response. Each response identifies current capabilities that are provided and if Qwest has any current plans to enhance the SATE in that area.

1. KPMG concern: SATE does not generate post-order responses in the same manner as they are created in the production environment.

Currently, a Qwest Technical Support Engineer (TSE) uses IMA to create Firm Order Confirmations (FOCs), manual rejects, jeopardies and non-fatal error transactions. IMA then automatically sends the transaction to the CLEC. This manual generation represents what the Interconnect Service Center representative's actions would be in production. However, if the LSR were to flow through, SATE and the Interop environment do not currently automatically generate the FOC, Jeopardy, or Completion that could occur in production. An automatically generated FOC, Completion and other post-order response does occur when the CLEC is performing their Controlled Production Testing.

Additionally, Qwest will provide automated post-order responses in SATE by January 28, 2002. With the launch of automated post-order transactions in SATE, new test scenarios will provide the CLEC with the ability to experience the behavior of IMA consistent with production timing of post-order transactions. It will also ensure that CLECs receive automated responses consistent with those received in production, negating any risk from manual handling. While the current SATE and Interop environments allow the CLEC to test all post order transactions in their EDI interface, these changes will resolve any timing concerns or concerns resulting from manual handling.

- Note: Those post-order transactions currently done manually by an Interconnect Service Center (ISC) representative in production will not be automated. Those transactions, as well as the status updates that follow them, will be done manually using the same interface used today in production by an ISC representative.

2. KPMG concern: Flow through orders are not supported in SATE

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Qwest currently works with CLECs to improve their flow through numbers and help CLECs improve their business processes to achieve greater flow through in two ways. First, Qwest as part of its standard EDI implementation process educates CLECs on the key elements affecting flow through. Second Qwest works weekly on an individual basis as needed to provide training that can help a CLEC improve its flow through numbers. This training allows a CLEC to improve its business process, while SATE testing focuses on interface testing and therefore the timing based scenarios referenced in Item 1 above.

Additionally, Qwest will enhance the SATE environment to add a test flow through system and test Service Order Processors (SOPs). Qwest will implement the test flow through capability for Western region POTS flow LSRs during the first quarter of 2002. Qwest will implement the remainder of test flow through capabilities by May 20, 2002. Once flow through is implemented in SATE, CLECs will have the option to choose when they want their SATE transaction to be sent to the test flow through systems, or receive a specific test scenario response. If the CLEC chooses to have their transaction sent through the test flow through systems, only flow through eligible LSRs will successfully flow. LSRs, which are not eligible for flow through, will be sent to the queue for manual handling. The option to send the test LSR to the flow through systems will allow the CLEC to experience an immediate response once the flow through order is successfully processed and a manual response if flow through is not successful. CLECs will also be able to contact Qwest regarding the flow through of those LSRs sent to SATE for flow through testing.

3. KPMG concern: The volume of order responses supported in SATE is restricted due to manual response handling.

First, Qwest does not currently limit the number of post order transactions sent to those CLECs working to implement an EDI interface with Qwest or migrating to a new release of IMA. Qwest only limits the number of post order transactions within a certain window for those CLECs in regression testing. Qwest will however update its EDI Implementation process and the EDI Implementation guide by 12/03/01 to allow CLECs in regression testing to negotiate post-order transaction testing processes. At a CLEC's EDI kick-off conference call, Qwest will negotiate the number of, and manner in which, manual post-order transactions will be sent. The current process, previously agreed to via a CLEC vote, will be used as a starting point for all negotiations.

Second, the post order automation referenced in Item #1 will provide the CLECs with two enhancements. It insures that production timing and scenarios can be tested and it eliminates the need for much of the manual handling done for post order transactions in SATE today. For most post order transactions, a CLEC will no longer need to contact Qwest and request a manual post-order transaction be sent. They can request the specific transaction be sent as part of their test scenario and it will automatically be sent as a result. For those transactions still requiring manual handling (transactions manually handled by an Interconnect Service Center representative in production) after this automation, Qwest representatives will continue to issue responses manually as negotiated at the CLEC's EDI kick-off conference call.

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4. KPMG concern: The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

The data instances in SATE are different from production data instances in that SATE contains facilities, addresses, CSRs, and other data instances that do not exist in production. The type of data in SATE mirrors production data, but the SATE data instance is not identical to production data instances. SATE does not contain production data so that a CLEC can easily test any production scenario without concern for end-user or contract-based privacy issues. The CLEC does have the ability to test all relevant situations such as those described in the example of obtaining an “exact match” using the address “999 Van Cleve Rd”. A CLEC could test multiple situations in order to understand responses and the conditions that cause them to occur.

Second, SATE uses specific test data and planned test responses. The responses are similar to production responses as detailed below:

- SATE uses a production (or, in the month prior to an IMA release, pre-production) instance of IMA. Using a production release of IMA ensures that the condition and EDI format of all error messages sent to a CLEC are identical to those messages in production. The business rules by which a message is returned are also identical in SATE and IMA production.
- In SATE those error messages originating from a downstream system are SATE specific to test deck scenarios, which reflect actual production scenarios. These error messages are returned under the same business conditions as in production. If a CLEC wants additional test scenarios, they can request them via the SATE Data Request process.
- Qwest regularly reviews its SATE error messages to ensure that they match production error messages.

SATE allows CLECs to test their code and certify their system to IMA. A CLEC will generally not code to the content of an error message, but to the conditions of the error and the system’s published APIs to ensure the flexibility of the software and to decouple the dependency of their systems on Qwest’s systems. SATE returns error messages consistent with IMA business rules and EDI Disclosure Documents.

Conclusion

In addition to the above stated planned enhancements to SATE, Qwest has established a working sub-team of CMP members to further analyze and define test environment needs to ensure Qwest continues to meet the CLEC’s testing objectives. The introduction of the test environment requirement sessions was done at the 10-18-01 CMP meeting and the first meeting was held on 11-06-01. Qwest has included in this meeting minutes of this first meeting. The purpose of the sessions is to collaboratively define any additional needs for the test environment. System enhancements resulting from the CLEC requirements sessions will be submitted as Change Requests to the CMP process and prioritized for implementation. The Change Requests can also include upgrades to the test scenarios that will allow the CLECs to more extensively test either their EDI interface, or their business process and LSR construction.

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Qwest Supplemental Response (12/04/01):

Qwest stated the following in the 11/20/01 formal response:

“Qwest will however update its EDI Implementation process and the EDI Implementation guide by 12/03/01 to allow CLECs in regression testing to negotiate post-order transaction testing processes.”

Qwest completed the EDI Implementation process and guideline updates on 11/30/01. The EDI Implementation Guideline document is posted on Qwest’s Wholesale web site at:
<http://www.uswest.com/wholesale/ima/edi/document.html>

The associated industry notification was issued on 12/3/01 with the subject line, “EDI Implementation Guidelines for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) Updated.”

Qwest Supplemental Response (12/21/01):

The numbers below correspond to the number used in the 11/20/01 response:

2. Qwest will implement the addition of flowthru capability to SATE in two phases. The first phase is scheduled to be available on February 20, 2001. This phase will include POTS and UNE-P POTS flowthru for Western region LSRs. The second phase will include implementation of all other flowthru eligible products and POTS and UNE-P POTS in the central and eastern regions. This phase is scheduled to be completed prior to May 20, 2002. Qwest will issue a Release Notice announcing the deployment of each release.

3. Qwest does not limit the number of response transactions a CLEC may receive while testing in SATE.

The current IMA EDI Implementation Guide reflects the following information regarding the amount of transaction responses:

In the Project Plan Development/Negotiation section (page 11):

Qwest will negotiate the number of, and manner in which, manual post-order transactions will be returned to the CLEC. The current approach for returning these responses, previously agreed to via a CLEC vote in CMP, will be used as a starting point for all such negotiations.

In the SATE Transaction Responses section (page 25):

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Post-Order responses are manually generated in SATE and may include Rejects, FOCs, Jeopardies, and Completions. Responses will be generated on posted SATE operation business days as follows:

- FOCs - each day for the first ten Order transactions received the prior business day.
- Progression responses other than FOCs - as negotiated in the Scenario Summary

In Appendix A:

IMPLEMENTATION AREAS	PROGRESSION Interoperability Environment	PROGRESSION Stand Alone Environment	REGRESSION Stand Alone Environment
Number of Transactions Permitted	As negotiated in Project Plan	As negotiated in Project Plan	As negotiated in Usage Plan

These statements do not mean that responses are limited, only negotiated. As responses in the present environment are manual, Qwest has implemented processes to allow Qwest to ensure that proper staffing levels are available for all CLEC testing. Nothing in the above statements are intended to indicate that the volume is limited.

Additionally, when post-order responses are automated with the release of SATE 9.0, CLECs will be able to receive automated responses for their LSRs. The IMA EDI Implementation Guide will be updated accordingly. The updated IMA EDI Implementation Guide for 9.0 will be published on January 21, 2001 with an associated Release Notification.

4. All known differences between the production and IMA versions of SATE are included in the Overview section of the IMA EDI SATE Data Document. As part of the creation of the initial SATE requirements, any case where SATE had to differ from production due to a functional requirement for SATE was noted to be included in the data document.

On an ongoing basis, every candidate that is placed into IMA is placed into SATE. If the implementation in SATE causes the system behavior to differ from production, this will be added to the Overview section of the IMA EDI SATE Data Document.

The SATE PID (PO-19) will help ensure that Qwest has a complete and accurate data document in the future. The PID will test on a monthly basis that the data in the data document reflects the data in the system. This will help CLECs to feel confident that a successful test in SATE will mean a successful move to production.

Based upon the confidential information provided, Qwest observed a common theme in three of the four attached issues. Issue 1, 3, and 4 were all cases of manually generated responses not system generated responses. Thus, these are not problems with the system being out of synch with production. The implementation of automated post-order responses in SATE will resolve this issue. Qwest is modeling the content of the responses after actual similar post-order responses from production. This will ensure that the responses provided to CLECs in SATE reflect those used in production.

Issue 2 : In Qwest's CLEC CMP SATE User's Group, a CR has been created to change all SATE NPA-NXX values to utilize those that are valid in LERG.

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As part of the flowthru upgrade to SATE, Qwest must change all NPA-NXX and other central office values to match those valid in production. The flowthru system relies on valid production data. As a result, this request will be fulfilled in two phases to correspond to the SATE flowthru upgrades.

KPMG Consulting's First Response (01/08/02):

KPMG Consulting has addressed each of the points outlined in Qwest's November 20 and December 21, 2001 responses. Below, KPMG Consulting has recapped each of the major SATE issues, along with a response.

1. SATE does not generate post-order responses in the same manner in which they are created in the production environment.

In its response dated November 20, 2001, Qwest states that, *"Qwest will provide automated post-order responses in SATE by January 28, 2002. With the launch of automated post-order transactions in SATE, new test scenarios will provide the CLEC with the ability to experience the behavior of IMA consistent with production timing of post-order transactions. It will also ensure that CLECs receive automated responses consistent with those received in production, negating any risk from manual handling."*

Based on Qwest's response and proposed SATE enhancements, KPMG Consulting understands that Qwest plans to address the issue of post-order automation within SATE. Qwest has announced the introduction of the Virtual Interconnect Center Knowledge Initiator (VICKI) that will become effective in January 2002. In its White Paper released on January 3, 2002, Qwest has reiterated the business need driving this change: "Production-like Flow Through systems are needed for a CLEC to test whether a given LSR would Flow Through if sent to production.⁵" However, until such proposed enhancements are implemented, the current test environment does not provide a CLEC with an accurate representation of the production environment, due to its current manual handling of responses. Therefore, KPMG Consulting recommends that this issue remain open until the proposed enhancements are fully implemented in SATE.

2. Flow through orders are not supported in SATE.

In its response dated November 20, 2001, Qwest states, *"Qwest will enhance the SATE environment to add a test flow through system and test Service Order Processors (SOPs). Qwest will implement the test flow through capability for Western region POTS flow LSRs during the first quarter of 2002. Qwest will implement the remainder of test flow through capabilities by May 20, 2002. Once flow through is implemented in SATE, CLECs will have the option to choose when they want their SATE transaction to be sent to the test flow through systems, or receive a specific test scenario response. If the CLEC chooses to have*

⁵ A White Paper on Flow Through in The Stand Alone Test Environment (SATE), January 3, 2001, V1.00, p. 3.

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their transaction sent through the test flow through systems, only flow through eligible LSRs will successfully flow. LSRs, which are not eligible for flow through, will be sent to the queue for manual handling. The option to send the test LSR to the flow through systems will allow the CLEC to experience an immediate response once the flow through order is successfully processed and a manual response if flow through is not successful.”

Qwest further clarified the anticipated SATE flow through enhancements in its December 21, 2001 response by stating, “Qwest will implement the addition of flowthru capability to SATE in two phases. The first phase is scheduled to be available on February 20, 2001. This phase will include POTS and UNE-P POTS flowthru for Western region LSRs. The second phase will include implementation of all other flowthru eligible products and POTS and UNE-P POTS in the central and eastern regions. This phase is scheduled to be completed prior to May 20, 2002. Qwest will issue a Release Notice announcing the deployment of each release.”

Based on its responses and proposed SATE enhancements, KPMG Consulting acknowledges Qwest’s plans to address the issue of flow through capabilities within SATE. However, until such proposed enhancements are implemented, the current test environment does not provide a CLEC with an accurate representation of the production environment’s flow through capabilities. Therefore, KPMG Consulting recommends that this issue remain open until the proposed enhancements are fully implemented in SATE, and confirmed and reviewed by KPMG Consulting in cooperation with end users.

3. The volume of order responses supported in SATE is restricted due to manual response handling.

In its response dated November 20, 2001, Qwest states, “Qwest does not currently limit the number of post order transactions sent to those CLECs working to implement an EDI interface with Qwest or migrating to a new release of IMA. Qwest only limits the number of post order transactions within a certain window for those CLECs in regression testing.”

In its response dated December 21, 2001, Qwest quotes the latest version of the EDI Implementation Guide, stating:

“Post-Order responses are manually generated in SATE and may include Rejects, FOCs, Jeopardies, and Completions. Responses will be generated on posted SATE operation business days as follows:

- *FOCs - each day for the first ten Order transactions received the prior business day.*
- *Progression responses other than FOCs - as negotiated in the Scenario Summary.”*⁶

For SATE regression testing, the EDI Implementation Guide states:

⁶ EDI Implementation Guidelines—for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 8.0, Released November 30, 2001, Section 2, Implementation Activities—Progression Testing, p.25.

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“Qwest provides FOCs each business day for the first ten product Orders received the prior business day. ISC Rejects, Jeopardies, Non-Fatals, Status Updates, and Completions are provided within 5 business days of a request for a response.”⁷

Finally, Appendix A of the EDI Implementation Guide states the following regarding EDI responses⁸:

IMPLEMENTATION AREAS	PROGRESSION Interoperability Environment	PROGRESSION Stand Alone Environment	REGRESSION Stand Alone Environment
EDI Response	Provided by TSEs Qwest provides direct feedback on error conditions and responses as negotiated in the Project Plan	Provided by TSEs Qwest provides direct feedback on error conditions and responses as negotiated in the Project Plan	<i>Provided by TSEs</i> <i>Responses other than FOCs generated within 5 business days of e-mail request indicating specific PONs & INQNUMS needing a response.</i> FOCs sent each business day for the first ten Orders or transactions received the prior business day.

The section of Appendix A that Qwest provided in its December 21, 2001 response describes a limitation in the number of transactions submitted to SATE, not the number of post order responses received from the test environment.

For both progression and regression testing in SATE, it appears that Qwest currently places a limit on the number of FOCs generated, due to the manual handling of those responses. The other post order responses are negotiated, also due to the manual handling of those responses. This capacity limitation in SATE is not indicative of the production environment, and, therefore, is considered to be a deficiency in the test environment. Although Qwest intends to automate post order responses, as noted in Point 1 of Qwest’s November 20, 2001 response, CLECs are currently constrained by the number of post order responses that they can receive in SATE. Therefore, KPMG Consulting recommends that this issue remain open until Qwest can directly address the post order capacity restraint in SATE.

4. The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

In its response dated December, 2001, Qwest states, *“All known differences between the production and IMA versions of SATE are included in the Overview section of the IMA EDI*

⁷ EDI Implementation Guidelines—for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 8.0, Released November 30, 2001, Section 2, Implementation Activities—Regression Testing, p.41.

⁸ EDI Implementation Guidelines—for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 8.0, Released November 30, 2001, Appendix A, p.72.

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SATE Data Document. As part of the creation of the initial SATE requirements, any case where SATE had to differ from production due to a functional requirement for SATE was noted to be included in the data document. On an ongoing basis, every candidate that is placed into IMA is placed into SATE. If the implementation in SATE causes the system behavior to differ from production, this will be added to the Overview section of the IMA EDI SATE Data Document.”

KPMG Consulting’s expectation is that test environment transaction responses should mirror those from the related production environment. Accordingly, CLECs can gain a reasonable level of assurance that they will receive the same results for the transactions they are testing, once they migrate into production. This should facilitate a smooth transition into production for CLECs, and minimize problems for both the CLEC and Qwest. Although the known differences between the behavior of SATE and the production environment are documented in the SATE Data Document, this does not negate the fact that SATE does not completely mirror the production environment.

Additionally, in its response dated December 21, 2001, Qwest stated, *“The SATE PID (PO-19) will help ensure that Qwest has a complete and accurate data document in the future. The PID will test on a monthly basis that the data in the data document reflects the data in the system. This will help CLECs to feel confident that a successful test in SATE will mean a successful move to production.”*

Although the proposed SATE PID, when implemented, will test the data in the data document by running transactions in SATE, it does not contain provisions to run the test deck in the production environment. Therefore, it provides no assurance that the same results will be achieved in the production environment.

KPMG Consulting found specific examples, during its review of CLEC testing experiences, for which the EDI response in SATE differs from the EDI response that would be found in production. The differences relate to EDI segments and data that are normally found in production transactions, but did not appear in the equivalent SATE transactions. As per the Focus Observation & Exception Call held on Thursday, December 6, 2001, KPMG Consulting agreed to provide Qwest with specific examples for which SATE results did not match the results obtained in the production environment. KPMG Consulting provided these in a separate, confidential document.

After its review of the confidential data, Qwest stated in its response dated December 21, 2001, *“Issue 1, 3, and 4 were all cases of manually generated responses not system generated responses. Thus, these are not problems with the system being out of synch with production. The implementation of automated post-order responses in SATE will resolve this issue.”*

Qwest addresses the last item by stating, *“As part of the flowthru upgrade to SATE, Qwest must change all NPA-NXX and other central office values to match those valid in production.”*

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The flowthru system relies on valid production data. As a result, this request will be fulfilled in two phases to correspond to the SATE flowthru upgrades.

Based on Qwest's review of the confidential data and its response, KPMG Consulting believes that Qwest will address these issues with the SATE planned enhancements. However, until such proposed enhancements are implemented, the current test environment does not provide a CLEC with an accurate representation of the production environment. Therefore, KPMG Consulting recommends that this issue remain open until the proposed enhancements are fully implemented in SATE.

KPMG Consulting's expectation is that test environment transaction responses should mirror those from the related production environment. Accordingly, CLECs can gain a reasonable level of assurance that they will receive the same results for the transactions that they are testing, once they migrate into production. This should facilitate a smooth transition into production for CLECs, and minimize problems for both the CLEC and Qwest. Until Qwest can provide assurance that SATE produces results that are consistent with those that would be expected in the production environment, KPMG Consulting recommends that this issue remain open.

KPMG Consulting recommends that Exception 3077 remain open until Qwest can address the stated SATE deficiencies, or implement the proposed enhancements.

Qwest Supplemental Response (01/23/02):

Qwest committed to the following action item in the 12/21/01 response:

"When post-order responses are automated with the release of SATE 9.0, CLECs will be able to receive automated responses for their LSRs. The IMA EDI Implementation Guide will be updated accordingly. The updated IMA EDI Implementation Guide for 9.0 will be published on January 21, 2001 with an associated Release Notification."

Qwest completed the updates to the IMA EDI Implementation Guide on 1/22/02 (pp. 30-34).

The updated document can be accessed on Qwest's Wholesale web site at:

<http://www.qwest.com/wholesale/ima/edi/document.html>. The associated industry notification was issued on 1/22/02 with the subject line, "9.0 Release Implementation Guide, FAQ, IMA EDI Corrective Procedures and Error Codes Document and the FBDL EDI Corrective Procedures and Confirmation/Error Codes."

KPMG Consulting's Second Response (01/24/02):

KPMG Consulting reviewed the updated EDI Implementation Guide, dated January 21, 2002, about which Qwest notified CLECs on January 22, 2002. KPMG Consulting noted the additional and revised information relating to the upcoming implementation of the Virtual Interconnect Center Knowledge Initiator (VICKI) in SATE Version 9.0.

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As stated in previous responses to this Exception, Qwest has asserted that it will be making several enhancements to SATE over the coming months. Although these enhancements are expected to collectively address the identified test environment issues, Qwest does not anticipate completing the proposed changes until May 20, 2002. Therefore, KPMG Consulting will respond to each enhancement once it has been fully implemented, and the CLEC community has been notified per the release management schedule.

KPMG Consulting recommends that Exception 3077 remain open until Qwest can address the stated SATE deficiencies, or implement the proposed enhancements.

Qwest Supplemental Response (02/19/02):

In regards to flow through capability in SATE, the phase one addition as originally described in Qwest's 12/21/01 response, has been rescheduled for a 2/25/02 implementation. The first phase will include POTS and UNE-P POTS flow through for Western region LSRs.

Qwest Supplemental Response (02/25/02):

Qwest stated the following in the 2/19/02 response:

"In regards to flow through capability in SATE, the phase one addition as originally described in Qwest's 12/21/01 response, has been rescheduled for a 2/25/02 implementation. The first phase will include POTS and UNE-P POTS flow through for Western region LSRs."

Qwest completed implementation of phase one SATE flow through capability on 2/25/02. The associated industry notification was issued on 2/25/02 with the subject line, "Deployment of SATE 9.0 Flowthrough, Phase 1."

KPMG Consulting's Third Response (04/03/02):

Since KPMG Consulting's January 24, 2002 response, Qwest has implemented the Virtual Interconnect Center Knowledge Initiator (VICKI) and flow through capabilities for POTS and UNE-P POTS for Western region LSRs in SATE 9.0. Based on these SATE enhancements, KPMG Consulting has readdressed the issues outlined in its January 8, 2002 response and the current status of SATE in relation to this Exception.

- 1. SATE does not generate post-order responses in the same manner in which they are created in the production environment.**

In its response dated November 20, 2001, Qwest stated:

"Qwest will provide automated post-order responses in SATE by January 28, 2002. With the launch of automated post-order transactions in SATE, new test scenarios will provide the CLEC with the ability to experience the behavior of IMA consistent with production

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timing of post-order transactions. It will also ensure that CLECs receive automated responses consistent with those received in production, negating any risk from manual handling.”

Qwest implemented the Virtual Interconnect Center Knowledge Initiator (VICKI) with the deployment of SATE 9.0 on January 28, 2002. As of the date of this response, KPMG Consulting has not been able to assess commercial activity associated with VICKI. Therefore, KPMG Consulting’s evaluation is strictly limited to process documentation regarding the functionality of VICKI.

KPMG Consulting reviewed the following sources of information:

1. *A White Paper on The Stand Alone Test Environment (SATE) Virtual Interconnect Center Knowledge Initiator, Version 1.00, December 7, 2001*
2. *IMA EDI SATE VICKI Paths for the Stand Alone Test Environment (SATE), Version 9.05, March 22, 2002*
3. *EDI Implementation Guidelines for Interconnect Mediated Access (IMA), Version 9.1, February 18, 2002*

Based on the documentation, it appears that VICKI provides CLECs the following:

- Ability to receive specific, expected responses to LSRs, based on the Product, Activity, and Supplemental Type for that LSR (known as “paths”)
- Predetermined time delays between responses, based on the Product, Activity, Supplemental Type, and Remarks field combination for the LSR
- Ability to request additional paths for new combinations that CLECs wish to test

CLECs employ VICKI by populating the “Remarks” field of the submitted LSR with the prescribed VICKI path. The Remarks field must also reflect whether the CLEC wants to receive responses with production-like intervals or with shorter time delays specifically designed for interface testing. The VICKI paths currently available in SATE are documented in the *IMA EDI SATE VICKI Paths* document. Post order transaction responses that are handled manually in production by an ISC representative will continue to be manually processed in SATE.

Although VICKI appears to have enhanced some aspects of EDI interface testing, KPMG Consulting noted certain limitations of the application, as described below:

(1) VICKI response times may not match production response times

Qwest states, “responses and timeframes may not exactly match a similar LSR submitted to production.”⁹ KPMG Consulting would expect that the automated post order response times would accurately reflect the response times obtained in the

⁹ *IMA EDI SATE VICKI Paths for the Stand Alone Test Environment (SATE), Version 9.05, March 22, 2002, pg.4.*

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production environment. The fact that VICKI response times do not necessarily mimic production response times is an indication that the testing environment does not provide CLECs with an accurate depiction of production capabilities.

(2) VICKI response detail may not match production response detail

Qwest states, “due to the complexities of certain responses, the detail on these transactions may not match the detail received on a production response for a similar transaction. FOCs are provided with varying quantities of service orders. Also, with respect to the Service and Equipment detail of a Completion notice, VICKI is built to allow a CLEC to understand the EDI Map structure and content of a Completion. It does not return a Service and Equipment section specific to the CLEC’s test LSR. If a CLEC desires a specific Service and Equipment section be returned, they can request it be added to VICKI via the Data Request Process.”¹⁰ KPMG Consulting would expect that the detail on the post order responses would be the same as the detail found in the production responses. The fact that VICKI response detail does not match the production response detail is another indication that the testing environment does not provide CLECs with an accurate depiction of production capabilities.

(3) VICKI does not support “real world scenario testing”

Although VICKI provides CLECs the opportunity to receive certain post order responses without manual intervention, it does not allow CLECs to experience “real world scenario testing”. As stated in the document, *A White Paper on The Stand Alone Test Environment (SATE) Virtual Interconnect Center Knowledge Initiator*:

“Qwest has also recently made plans to move ahead with Real World Scenario Testing for post-order transactions. With real world scenario testing, when a CLEC sends an LSR request to Qwest they are asking “what” would happen to this specific LSR if the telephone numbers, circuits, and facilities in SATE existed in Qwest’s Production Network and this specific LSR was sent to Production. Plans for Real World Scenario post-order testing will be addressed in the Flow-Through White Paper to be reviewed on January 8, 2002. These plans were also discussed in the SATE User Group Meeting on November 27, 2001. For post-order processing today, only the above interface testing scenario is supported. Real World Scenario Testing will allow CLECs to test the exact message they would receive in production for the LSR they sent. VICKI allows them to test message formats, messages, and maps for specific pre-determined test scenarios.”¹¹

KPMG Consulting would expect that a fully functioning and robust test environment would support real world testing as described above.

¹⁰ IMA EDI SATE VICKI Paths for the Stand Alone Test Environment (SATE), Version 9.05, March 22, 2002, pg.5.

¹¹ A White Paper on The Stand Alone Test Environment (SATE) Virtual Interconnect Center Knowledge Initiator, Version 1.00, December 7, 2001, pg.3

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Although VICKI helps CLECs to understand the EDI mapping structure and to determine if their systems can accept certain types of responses for the orders submitted, by design, it does not appear to adequately support complete interface testing capabilities. The limitations described above prevent CLECs from experiencing transaction responses as they would be received in the production environment. By having to select predetermined paths in order to receive responses automatically, VICKI is inherently dissimilar to the way in which orders are processed in the production environment.

KPMG Consulting acknowledges that Qwest intends to implement a flow through component to SATE, as discussed in Issue #2 below. While the implementation of this component should alleviate the third identified limitation of VICKI, it will not completely overcome the deficiencies noted. Therefore, KPMG Consulting recommends that this issue remain open until the identified issues are addressed.

2. Flow through orders are not supported in SATE.

In its response dated November 20, 2001, Qwest stated, "Qwest will enhance the SATE environment to add a test flow through system and test Service Order Processors (SOPs). Qwest will implement the test flow through capability for Western region POTS flow LSRs during the first quarter of 2002. Qwest will implement the remainder of test flow through capabilities by May 20, 2002. Once flow through is implemented in SATE, CLECs will have the option to choose when they want their SATE transaction to be sent to the test flow through systems, or receive a specific test scenario response. If the CLEC chooses to have their transaction sent through the test flow through systems, only flow through eligible LSRs will successfully flow. LSRs, which are not eligible for flow through, will be sent to the queue for manual handling. The option to send the test LSR to the flow through systems will allow the CLEC to experience an immediate response once the flow through order is successfully processed and a manual response if flow through is not successful."

Qwest further clarified the anticipated SATE flow through enhancements in its December 21, 2001 response by stating, "Qwest will implement the addition of flowthru capability to SATE in two phases. The first phase is scheduled to be available on February 20, 2001. This phase will include POTS and UNE-P POTS flowthru for Western region LSRs. The second phase will include implementation of all other flowthru eligible products and POTS and UNE-P POTS in the central and eastern regions. This phase is scheduled to be completed prior to May 20, 2002. Qwest will issue a Release Notice announcing the deployment of each release."

Qwest implemented the flow through capabilities for POTS and UNE-P POTS transactions in the Western region with the deployment of SATE 9.1 on February 25, 2002. As of the date of this response, KPMG Consulting has not been able to assess commercial activity for flow through orders. Also, KPMG Consulting does not have any SATE transaction testing results from the ROC 3rd Party Test to evaluate flow through capabilities. As with VICKI, KPMG

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Consulting's evaluation is strictly limited to documentation and a process review regarding SATE's flow through functionality.

KPMG Consulting reviewed the following documentation:

1. *A White Paper on Flow Through in The Stand Alone Test Environment (SATE), Version 1.00, January 3, 2002*
2. *EDI Implementation Guidelines for Interconnect Mediated Access (IMA), Version 9.1, February 18, 2002*
3. *Master Red-Lined CLEC-Qwest CMP Re-design Framework Interim Draft – Revised 03-27-02*

Based on the documentation, it appears that CLECs will be able to choose to have orders either sent to VICKI or to a flow through component of SATE. If a CLEC populates the remarks field with a path, then the order will employ the VICKI component; otherwise, the order will automatically be tested against the flow through system. Each order will either receive a FOC, an "Errored" status update if the order failed to flow through, or no response if flow through was not attempted. CLECs must have the Status Updates feature enabled to receive an "Errored" status update.

KPMG Consulting noted that flow through capabilities will not apply to all possible post order responses. The flow through documentation states, "Transactions not mentioned above, specifically those beyond service order creation such as Completions and Service Order Holds, will not be automated with this enhancement." It also states, "Note that no other automated responses will be sent to CLECs beyond the automated FOCs or "Errored" Status Updates mentioned above."¹²

The functionality enhancement does not appear to provide CLECs with a full understanding of how an order could flow through to a "Completed" end state in the production systems. Without complete flow through functionality, CLECs may not be able to gain a complete understanding of how an LSR will react to a given set of conditions within the production environment. KPMG Consulting does not believe that this fundamental objective of interface testing can be fulfilled if CLECs cannot perform end-to-end, real world testing.

As of the date of this response, the new flow through capabilities have only been rolled out to one region for two products. KPMG also noted in CMP documentation that certain components of the test environment have yet to be implemented. The CMP document states, "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."¹³ Until the flow through enhancements, including the service order processor, are completely

¹² *A White Paper on Flow Through in The Stand Alone Test Environment (SATE), Version 1.00, January 3, 2002, pg.4.*

¹³ *Master Red-Lined CLEC-Qwest CMP Re-design Framework Interim Draft – Revised 03-27-02, pg.69*

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implemented in SATE, the current test environment does not provide a CLEC with an accurate representation of the production environment's flow through capabilities.

Based on the lack of end-to-end flow through functionality and the current implementation time frame, KPMG Consulting recommends that this issue remain open.

3. The volume of order responses supported in SATE is restricted due to manual response handling.

In its November 20, 2001 and December 21, 2001 responses, Qwest stated that it did not limit, but rather negotiated, the number of post order responses received by CLECs. However, KPMG Consulting noted several instances within the *EDI Implementation Guide* where it is explicitly stated that there are limitations to the number of FOCs that Qwest will provide to CLECs. The limitations appeared to stem from the manual response generation required for SATE. With the implementation of VICKI, the resource requirements necessary to support SATE transactions should have been diminished. KPMG Consulting would expect that with a production-like testing environment, Qwest would be able to support CLEC test order volumes without imposing limitations on the response activity. Limitations on the number of post order responses would not occur in the production environment under normal circumstances, and therefore, should not be imposed in the testing environment. Any such limitations are considered to be a deficiency of the test environment. Therefore, KPMG Consulting recommends that this issue remain open until Qwest can directly address the post order capacity restraint in SATE.

4. The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

Qwest stated in its December 21, 2001 response that it documents all known differences between IMA and SATE in the Overview section of the SATE Data Document. Additionally, Qwest stated that the proposed SATE PID (PO-19) will help ensure that Qwest has a complete and accurate data document.

KPMG Consulting maintains its position that test environment transaction responses should mirror those from the corresponding production environment. Accordingly, CLECs can gain a reasonable level of assurance that they will receive the same results for the transactions they are testing, once they migrate into production. This should facilitate a smooth transition into production for CLECs, and minimize problems for both the CLEC and Qwest. Although the known differences between the behavior of SATE and the production environment are documented in the SATE Data Document, this does not negate the fact that SATE does not completely mirror the production environment.

While the proposed SATE PID, when implemented, will test the data in the data document by running transactions in SATE, it does not contain provisions to run the test deck in the production environment. Therefore, it provides no assurance that the same results will be achieved in the production environment.

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Until Qwest can provide assurance that SATE produces results that are consistent with those that would be expected in the production environment, KPMG Consulting recommends that this issue remain open.

KPMG Consulting's expectation is that test environment transaction responses should mirror those from the related production environment. Although Qwest is continually enhancing the functionality of SATE, the test environment does not currently have sufficient end-to end testing capabilities that would be expected of a robust and fully functional testing environment.

KPMG Consulting recommends that Exception 3077 remain open until Qwest can address the stated SATE deficiencies, and complete implementation of the proposed enhancements.

Exhibit O

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EXHIBIT O

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Initial Release Date: December 11, 2001
First Response Date: January 6, 2002
Second Response Date: February 5, 2002
Third Response Date: April 2, 2002

EXCEPTION REPORT

An exception has been identified as a result of the Qwest documentation review, and information gathered during interviews, for the OSS Interface Development Review, Test 24.6.

Exception:

Qwest's Interconnect Mediated Access (IMA) Electronic Data Interchange (EDI) Stand Alone Test Environment (SATE) does not offer CLECs testing capabilities for all Qwest products offered in production.

Background:

Qwest employs a phased approach for CLECs that wish to develop an IMA/EDI application-to-application interface with Qwest's OSS systems. The steps of the current process are listed below:¹

1. Initial Communications (includes Kick Off conference call)
2. Project Plan (proposed/negotiated)
3. Requirements Review (by the CLEC)
4. Firewall Rules and IA-to-IA Testing
5. Testing - Interoperability and/or SATE environment
6. Controlled Production
7. Production ("Turn-Up")

Qwest developed SATE in May 2001 to serve as an alternate testing environment to its Interoperability environment. By creating SATE, Qwest now offers CLECs the option of using either the Interoperability environment or SATE for testing their IMA EDI interfaces. The latest version, SATE 8.01, was implemented as of October 22, 2001.

Issue:

KPMG Consulting has observed, through interviews and documentation reviews, that the IMA EDI SATE does not offer testing capabilities to CLECs, prior to connecting to Qwest's production systems, for all Qwest resale products. The following IMA EDI SATE limitations have been identified:

¹ EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 6.0, Released October 11, 2001, Section 2, Implementation Activities, p.6.

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- SATE does not allow for testing of all of the products that are supported in the IMA production environment. Currently, SATE only supports the following transactions²:

Pre-Order

- Address Validation (Numbered Addresses only)
- Appointment Scheduling
- Cancel TN/Appointment
- Connecting Facility Assignment
- Facility Availability (Unbundled ADSL, Convert POTS to Unbundled Loop, POTS Facility Availability)
- Meet Point Query
- Raw Loop Data Query
- Retrieve CSRs
- Service Availability
- TN Reservation Query (with TNSR following)

Order

- Centrex Plus
- Directory Listing Only
- Local Number Portability
- Loop with Number Portability (LNP only)
- POTS Resale
- Shared Loop
- Unbundled Loop
- UNE-P Centrex
- UNE-P POTS

PostOrder

- FOC
- Completion
- Reject
- Jeopardy
- Status Updates

The transactions above represent only a subset of the total transactions that are supported in the IMA EDI environment. Certain products that CLECs may offer to their customers may not be supported in the test environment. Therefore, SATE does not accurately and comprehensively support all of the transactions that are available in Qwest's production environment. This, potentially, prohibits CLECs from testing all of their products before migrating to the production environment.

² EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL), Version 7.0, Released November 9, 2001, Section 2, Implementation Activities – Progression Testing Phase, p.23.

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- If a CLEC desires to test a product that is not currently supported in SATE, the additional product(s) must be requested via a Change Request (CR), through the Change Management Process (CMP). The CR is then prioritized, in accordance with the CMP. As an example, Qwest announced at a SATE Enhancement User Group meeting on November 27, 2001, that it would submit two CRs for adding Line Splitting and Loop Splitting. Once these CRs are submitted, they will need to be discussed and prioritized within the parameters of the CMP. Given the current schedule for CMP, the requesting CLEC(s) may have to wait several months for a new release before the requested products are included in SATE's functionality. Therefore, the CLEC(s) cannot test all of its products for the current IMA release.

Impact:

A limited testing environment could prevent a CLEC from adequately preparing for its transition to a production environment. By not providing for testing of all of Qwest's available products in SATE, CLECs will not be able to sufficiently test all of the products that they can sell to their customers. This limitation, therefore, could negatively impact a CLEC's ability to offer products to its customers in the production environment. For products for which a testing capability is not offered, CLECs must venture blindly into the production environment, potentially jeopardizing their ability to offer those products to their customers, if the migration is unsuccessful.

Qwest Formal Response (12/19/02):

When Qwest initially deployed SATE, any product that a CLEC had implemented into production or was in the process of testing was included in SATE³. This ensured that when SATE was placed into production, it would support those products that the CLECs needed to be able to use SATE to migrate to the next release. Additionally, on June 29, 2001, prior to SATE deployment, Qwest conducted a CLEC meeting where the list of proposed SATE products was discussed. The CLECs⁴ expressed no concerns regarding the proposed product list. Qwest continues to support all products for which any CLEC has created a production EDI interface.

The current process for the addition of new products to SATE is for a CLEC to issue a CR through the change management process. The CR can then be processed by the CLEC community; this process ensures that Qwest is using its resources in the manner that is beneficial to the most CLECs.

Qwest has conducted five SATE Users' Group meetings. During these meetings, CLECs have an opportunity to suggest improvements to SATE. To date, no CLEC has requested the addition of products to SATE. However, Qwest continues to monitor the products that CLECs express interest in and has proactively added products or created CMP CRs to add products to SATE. Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability have recently been added to SATE, as Qwest anticipated future EDI implementations of these

³ The pseudo-CLEC was excluded when this analysis was performed.

⁴ AT&T, WorldCom, Fairpoint, Sprint, and Allegiance

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products. Additionally, Qwest is creating a CR for FBDL to be added to SATE, as this will be implemented as an IMA product in 9.0.

In the next SATE Users' Group Meeting on January 8, 2001, Qwest will ask CLECs to voice any concerns regarding the prioritization of new product implementations.

Furthermore, as part of the CMP Redesign process, Qwest and the CLECs are currently discussing a Bona Fide Request process to allow a CLEC to pay for CRs to be implemented when a CR does not get prioritized high enough to get worked based upon the available Qwest resources. If agreed upon, this process would allow a CLEC to add a product to SATE even if it is not a priority for the CLEC community.

KPMG Consulting's First Response (01/06/02):

KPMG Consulting acknowledges that Qwest worked with the CLEC community when initially developing SATE, and through user group meetings for continually enhancing SATE. Although SATE currently supports all products that CLECs are currently running in production, it does not support all products that a CLEC *could* run in production. A CLEC that decides to add a new product to the suite of products that it offers to its customers, but for which that product is not currently supported in SATE, must submit a CR through CMP in order to be certified to provide that service/product in production. Several major releases of SATE may be required before the new product is then added to the test environment. This does not allow a CLEC sufficient flexibility to offer new products in a timely manner; nor does it appear to offer a test environment that adequately mirrors production environment capabilities.

Qwest stated in its response dated December 19, 2001, the following:

"Qwest has conducted five SATE Users' Group meetings. During these meetings, CLECs have an opportunity to suggest improvements to SATE. To date, no CLEC has requested the addition of products to SATE."

However, at the November 13, 2001 SATE User's Group Meeting, a participant requested that Line Splitting and Loop Splitting products and all associated activities be added to those supported by SATE.⁵ Qwest then drafted a CR, on behalf of the participant, to present to the CMP forum.⁶ The requesting participant may have to wait for several versions of SATE to be released before being able to test transactions associated with these products, thereby potentially placing the CLEC at a competitive disadvantage with its customers. Sudden, unexpected demand to test new products in SATE has occurred, and could occur at any point in the future, yet SATE does not support all of the products offered in production.

Qwest also stated the following in its response dated December 19, 2001:

⁵ SATE Users' Group Meeting Minutes, Dated November 13, 2001, "Interoperability and SATE" section, p.1.

⁶ SATE Users' Group Meeting Minutes, Dated November 27, 2001, "Proposed CMP CRs" section, p.1; and SATE Users' Group Meeting Minutes, Dated December 4, 2001, "Proposed CMP CRs" section, p.1.

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“Furthermore, as part of the CMP Redesign process, Qwest and the CLECs are currently discussing a Bona Fide Request process to allow a CLEC to pay for CRs to be implemented when a CR does not get prioritized high enough to get worked based upon the available Qwest resources. If agreed upon, this process would allow a CLEC to add a product to SATE even if it is not a priority for the CLEC community.”

The Bone Fide Request process appears to present CLECs with an option to bypass the inherent constraints of the CMP process – specifically, the need for CR prioritization that will lead to implementation. However, this process will not be fully developed until the CMP redesign is completed. Additionally, although implementation of the Bone Fide Request process may allow CLECs to pay to implement a CR, regardless of its CMP-assigned priority level, it does not alter the fact that SATE does not currently support all of the products offered in production. KPMG Consulting believes that the functionality a fully functioning test environment should mirror that of the production environment.

KPMG Consulting recommends that Exception 3095 remain open until SATE supports the products that are offered in Qwest’s production environment.

Qwest Response to KPMG Comments (01/30/02):

Qwest supports the CMP processes through which the CLECs must prioritize all new functionality, including SATE changes. The addition of a new product, either at the initiation of Qwest or a CLEC, constitutes an addition in functionality to SATE. Based upon feedback during the SATE CMP Users’ Group meetings and the last CMP meeting, it appears that the CLECs want to prioritize all SATE functionality, including the addition of new products. During the January 17th CMP meeting, Qwest took an action item to further discuss the implementation of SATE prioritization at the February CMP Redesign sessions. Based upon discussions to date, Qwest and the CLEC community appear to be in agreement on this issue.

Even without the availability of a product in SATE, a CLEC has the ability to implement the product in EDI using the Interoperability environment. Therefore, CLEC(s) can test all of the products for the current IMA release. Additionally, Qwest has not seen or been informed by CLECs of “sudden, unexpected demand to test new products” in SATE as stated in KPMG’s First Response. While CMP CRs exist for two products to be added to SATE, no CLEC has requested an implementation of either of the products in EDI. With the availability to test within the Interoperability Test Environment and the fact that CLECs are not requesting these products be added to SATE, the impact identified in the initial release of this exception⁷ as noted below is an inaccurate statement.

⁷ KPMG original Impact statement: *“For products for which a testing capability is not offered, CLECs must venture blindly into the production environment, potentially jeopardizing their ability to offer those products to their customers, if the migration is unsuccessful.”*

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KPMG Consulting's Second Response (02/05/02):

KPMG Consulting acknowledges that Qwest has been working with the CLEC community through both the CMP Redesign sessions and the SATE Enhancement meetings. Part of the purpose of these discussions is to develop a sound, consistent process for supporting the CLECs with their EDI testing efforts. KPMG Consulting has attended all of these meetings, and has reviewed the meeting minutes from each. Based on those observations and reviews, KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment. KPMG Consulting's expectation is that a fully functional test environment should support all of the functionality and products that are available in the production environment, unless the CLECs have officially agreed through CMP, or an equivalent forum, that specific functionality is not required in the test environment.

Even if the CLEC community were to agree that not all production products must be supported in SATE, Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE. If CLECs wish to test a new release of Production, and that new release version offers an expanded array of new products, CLECs might not be able to test the new products until well after their implementation in Production.

This significantly impairs CLECs' ability to test products that they would like to implement and offer to their own customers. The fact that CLECs have not historically made unanticipated requests to test and implement products not currently supported in the test environment does not negate the fact that such an occurrence could happen, and that Qwest's testing process should account for the possibility of such an occurrence.

In an attempt to address this issue, Qwest's response, dated January 30, 2001, stated:

"Even without the availability of a product in SATE, a CLEC has the ability to implement the product in EDI using the Interoperability environment. Therefore, CLEC(s) can test all of the products for the current IMA release."

KPMG Consulting does not believe that the use of the Interoperability environment for testing products not currently supported in SATE can sufficiently address this concern. As KPMG Consulting previously outlined in Exception 3029, the Interoperability environment has the following limitations:

1. Interop does not generate post-order responses in the same manner as they are created in production,
2. Interop does not provide flow through,

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3. Production data must be used in Interop.

In Exception 3029, Qwest sought to address each of these Interop concerns by stating that SATE has, or will eventually have, the features and functionality necessary to overcome the deficiencies of Interop. Qwest also states, in its October 19, 2001 response to Exception 3029, "*Qwest has no plans to continue to enhance the Interop environment; Qwest will continue to enhance SATE.*" Finally, as outlined in KPMG Consulting's January 31, 2002 response to Exception 3029, Qwest has not yet adequately developed and documented a process for CLECs to seamlessly use both the Interop environment and SATE when testing for a single implementation of IMA EDI.

Based on the identified limitations of the Interop environment, and the assertions made in Exception 3029, KPMG Consulting believes that offering CLECs the Interop environment as an alternative for testing products that are not currently supported in SATE is insufficient.

KPMG Consulting recommends that Exception 3095 remain open until enhancements are made to the SATE testing process, so that SATE supports all of the functionality and products that are offered in Qwest's production environment.

Qwest Response to KPMG Supplemental Recommendation (02/26/02):

In the KPMG Second Response (02/05/02), KPMG noted several specific concerns regarding SATE supporting all functionality and products that are offered in Qwest's production environment. Each of the bullet points below represents Qwest's understanding of KPMG's concerns followed by Qwest's response.

1. *"...KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment."*

As of February 22, 2002, Qwest created 30 Change Requests (CRs) that identify adding to SATE those production products not currently supported in SATE (SCR021902-01 to SCR021902-30). This is in addition to the 2 CLEC sponsored CRs previously created for Loop Splitting and Line Sharing. These CMP CRs appear in the "CMP Change Requests -- Systems Interactive Report" on the Qwest CMP web site, and are eligible for presentation and CLEC voting at the Monthly Systems CMP Meeting to be held on March 21, 2002. An interactive report showing these requests may be accessed at: <http://www.qwest.com/wholesale/cmp/changerequest.html>.

Qwest believes that this formal CR presentation and voting will provide concrete evidence of CLEC support for SATE supporting less than 100% of products available in the production environment.

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2. "... Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE."

Qwest is investigating the general level of effort necessary for adding existing IMA products to SATE (depending upon product complexity) in order to address KPMG's concern regarding the timing of product availability. However, as Qwest has stated in its January 30, 2002 response Qwest believes that the CLECs have clearly expressed their interest during the CMP Redesign meetings in prioritizing all additions of functionality and products to SATE independently of IMA CRs. This separate prioritization provides the CLEC community with the flexibility to implement SATE specific changes ahead of other IMA functionality (for example, implementing flow through before a new product that no CLEC is planning to use in production). Qwest supports this CLEC desired process and believes the process should be adhered to.

Qwest will supplement this response with further detail regarding both issues by March 26, 2002 following the Monthly Systems CMP meeting.

Qwest Supplemental Response to KPMG Supplemental Recommendation (03/26/02):

In reference to item 3 above, the following discussion occurred around SATE ranking at the Systems CMP meeting held on March 21, 2002.

The prioritization process for SATE was discussed and the ballot and instructions will be sent out by 5 p.m. MST, March 25, 2002. Completed ballots (1 per CLEC) are due to Qwest by 5 p.m. MST, March 28, 2002. Qwest will then tally and tabulate the results with a prioritized list provided to CLECs by 5 p.m. MST, April 1, 2002. The prioritization form was reviewed and it was noted that Qwest has added CRs to add products in SATE. Qwest wants to gauge the level of interest on the CLECs part for adding specific products. As part of prioritizing each CR, Qwest asked that the CLECs additionally indicate yes or no if they are interested in adding these products in SATE. The prioritized list will include yes/no interest in product implementation.

In reference to item 4 above, the attached meeting minutes from the SATE Users Group on February 26, 2002 clearly indicates the CLECs desire to prioritize SATE CRs independently from IMA CRs. Additionally, the CLEC community has adopted this position, incorporating it into the CMP Master Redline document (see section 9.0 PRIORITIZATION). This process will be followed going forward.

Qwest will provide a supplemental response to this exception once the results of the CLEC vote for SATE CRs are available by April 3, 2002.

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Attachment(s): ROC_TI765_EXP3095_SATE Users Group Meeting Minutes 022602.doc

KPMG Consulting's Third Response (04/02/02):

In its February 26, 2002 response, supplemented on March 26, 2002, Qwest focused on two issues regarding the current functionality of SATE, and the process for adding new functionality to SATE. Those issues are restated below with KPMG Consulting's respective responses.

1. *"...KPMG Consulting has found no concrete evidence to support that CLECs have specifically agreed that it is acceptable for SATE to support less than 100% of the products available in the production environment."*

KPMG Consulting reviewed the "CMP Change Requests -- Systems Interactive Report", noting the addition of the 30 SATE "production equivalent functionality" CRs (SCR021902-01 to SCR021902-30) that Qwest referenced in its February 26, 2002 response. Qwest stated that these CRs would be voted upon in the CMP meeting held on March 21, 2002. KPMG Consulting observed the prioritization and voting process for the SATE functionality CRs at the CMP meeting.

KPMG Consulting also received a copy of the SATE Prioritization Form and Instructions on March 25, 2002. KPMG reviewed the form, noting that it included 49 IMA CRs, including 22 of the 30 originally Qwest proposed SATE functionality additions. However, KPMG Consulting noted that the following CRs were removed from the list that Qwest originally proposed:

- SCR021902-9
- SCR021902-10
- SCR021902-11
- SCR021902-12
- SCR021902-15
- SCR021902-20
- SCR021902-23
- SCR021902-25
- SCR021902-28
- SCR021902-30

KPMG Consulting is not sure why certain CRs were removed from the voting and prioritization form. Based on this omission, it does not appear that CLECs were offered the opportunity to vote on all products that could be added to SATE. With the exception of the removed CRs, KPMG Consulting noted that the voting form allowed CLECs to indicate whether or not they want to have the stated product functionality added to SATE for each CR.

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Qwest stated in its March 26, 2002 response that it would provide a supplemental response to this Exception once the results of the CLEC vote for SATE CRs are available by April 3, 2002. Once Qwest clarifies the reasons for removing the ten SATE CRs listed above, and provides the results of the prioritization activity, KPMG Consulting will be able to assess CLECs desire to have the same products supported in SATE as what is available in IMA.

2. *“... Qwest should be able to accommodate testing for any product that a CLEC decides it needs to test for its implementation of EDI. As stated previously, under the current process, CLECs that want to add new products to SATE must create a CR, which must then be prioritized through CMP. As such, the potential exists for requested products to not be available for testing for at least two major releases of SATE.”*

In its February 26, 2002 response, Qwest stated the following:

“Qwest is investigating the general level of effort necessary for adding existing IMA products to SATE (depending upon product complexity) in order to address KPMG’s concern regarding the timing of product availability. However, as Qwest has stated in its January 30, 2002 response Qwest believes that the CLECs have clearly expressed their interest during the CMP Redesign meetings in prioritizing all additions of functionality and products to SATE independently of IMA CRs. This separate prioritization provides the CLEC community with the flexibility to implement SATE specific changes ahead of other IMA functionality (for example, implementing flow through before a new product that no CLEC is planning to use in production). Qwest supports this CLEC desired process and believes the process should be adhered to.”

In its March 26, 2002 response, Qwest further stated its position by stating:

“The attached meeting minutes from the SATE Users Group on February 26, 2002 clearly indicates the CLECs desire to prioritize SATE CRs independently from IMA CRs. Additionally, the CLEC community has adopted this position, incorporating it into the CMP Master Redline document (see section 9.0 PRIORITIZATION). This process will be followed going forward.”

KPMG Consulting observed the SATE User Group meeting on February 26, 2002, and reviewed the meeting minutes that were attached with Qwest’s March 26, 2002 response. KPMG Consulting recognized through its observation and review of the meeting minutes that SATE users had many questions regarding the separate prioritization of SATE CRs. Participants needed clarification about the process that would be employed to prioritize SATE and SATE impacting CRs. However, it is not clear from the minutes that CLECs have expressed the desire to have the SATE CRs prioritized separately but rather that this was how Qwest presented the SATE enhancement decision-making process. Additionally, since only two CLECs and one service provider have actively participated in the SATE User Group meetings, it is misleading to extrapolate the conclusions drawn in those meetings to the entire CLEC community.

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In its review of Section 9.0 of the *Master Redlined CLEC-Qwest CMP Redesign Framework* document updated on March 27, 2002, KPMG Consulting noted that the first sentence states, “*Each OSS Interface and Test Environment release is prioritized separately.*” Additionally, the document states in Section 9.2.1, “Prioritization Review”, that the prioritization objectives are to:

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

Beyond these generic references, there is no explicit, detailed documentation describing the process for separately voting and prioritizing SATE and SATE impacting CRs. Furthermore, KPMG Consulting would expect that prioritization results for features of upcoming IMA releases could have an impact on prioritization of SATE. Therefore, it is not definitively clear that the CLEC community has adopted this approach, and subsequently incorporated it into the CMP documentation.

KPMG Consulting believes that separate prioritization of SATE CRs does not address the fundamental issue that was raised in Point #2 of this Exception. If a product is not currently supported in SATE and a CLEC decides to offer the product to its customers, then the CLEC will not be able to test that product in SATE. Instead, the CLEC must submit a request to add the functionality to SATE through CMP. The proposed CR may not be implemented until several releases of SATE have been developed and deployed. Therefore, the CLEC is unable to test the product and offer it to its customers during its current EDI implementation. Without a process for rapidly including product functionality into SATE, Qwest is placing CLECs at a competitive disadvantage relative to EDI product testing capabilities.

KPMG Consulting recommends that Exception 3095 remain open pending resolution of the identified issues.

Attachment(s): None