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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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6 IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
7 SECTION 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

DOCKET NO. T-00000A-97-0238

NOTICE OF FILING

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10 The Arizona Corporation Commission Staff ("Staff"), by its undersigned
11 attorneys, hereby files Staff's Supplemental Report on Qwest's Compliance with Checklist
12 Item 2, Access to Unbundled Network Elements (UNEs), that addresses Qwest's Re-designed
13 Change Management Process and Stand-Alone Test Environment.

14 RESPECTFULLY SUBMITTED this 8th day of May 2002.

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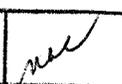
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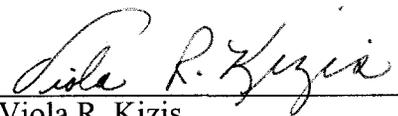
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**IN THE MATTER OF QWEST CORPORATION'S
SECTION 271 APPLICATION**

ACC Docket No. T-00000A-97-0238

**SUPPLEMENTAL REPORT ON
QWEST'S COMPLIANCE**

With

CHECKLIST ITEM: NO. 2 -

**ACCESS TO
UNBUNDLED NETWORK
ELEMENTS (UNEs)**

**CHANGE MANAGEMENT PROCESS
AND
STAND-ALONE TEST ENVIRONMENT**

MAY 7, 2002

I. FINDINGS OF FACT

A. PROCEDURAL HISTORY

1. On February 8, 1999, US West, now Qwest, filed notice with the Arizona Corporation Commission ("ACC") indicating that it intended to file an application with the Federal Communications Commission (FCC), pursuant to Section 271 of the Telecommunications Act of 1996 (1996 Act), to provide interLATA telecommunications services that originate in Arizona.

2. The ACC's Hearing Division issued a Procedural Order on June 8, 1999, in Docket No. T-00000A-97-0238 which required interested parties to submit comments on appropriate Operations Support Systems (OSS) performance standards that could be used to assess whether Qwest satisfies the expressed requirements of Section 271 pertaining to non-discriminatory access to its OSS. On the basis of responses to the June 8, 1999 Order, a second Procedural Order was issued by the ACC on July 2, 1999 that prescribed a series of open and collaborative workshops to determine appropriate OSS performance standards for Qwest.

3. The ACC's initial scope of testing included a limited evaluation of the functionality of Qwest's OSS. On the basis of the July 2, 1999 Order, the ACC expanded its scope of work to include preparation of a Draft OSS Master Test Plan (MTP) defining a comprehensive evaluation of Qwest's OSS. The Draft MTP, prepared by the Commission's consultant, DCI, was distributed to all participants in the Arizona 271 proceeding for comment.

4. A request for Proposal (RFP) to conduct a comprehensive Third Party Test of Qwest's OSS was issued by the ACC. Interested parties were invited to comment on the proposals submitted, and the ACC subsequently conducted a series of vendor interviews. Selection of an independent Test Administrator (TA) and a Test Transaction Generator (the Pseudo-CLEC) were made in the fourth quarter of 1999. Cap Gemini Telecom Media & Networks U.S.A., Inc. was chosen to be the TA. As a result of a subsequent merger Cap Gemini is now known as Cap Gemini Ernst & Young Telecom, Media & Networks ("CGE&Y"). Hewlett Packard (HP) was chosen to be the Pseudo-CLEC.

5. Participant comments and suggestions concerning the Draft MTP provided the basis for agendas for the first series of Workshops. Competitive Local Exchange Carriers ("CLECs") appearing at the Workshops included AT&T, WorldCom, Sprint, Electric Lightwave, Inc. (ELI), e.spire Communications, Inc., Eschelon Telecommunications of Arizona, Allegiance Telecommunications, and Z-Tel Communications, Inc.

6. During these initial Workshops, the parties established the Test Advisory Group (TAG) that was comprised of all interested CLECs, Qwest, Staff, its Consultant DCI, CGE&Y and HP. The TAG was designed to serve as a forum where OSS testing issues could be discussed and resolved on an ongoing basis.

7. The TAG met at least twice per month from its inception to the present. During the course of the Qwest Arizona OSS Test, more than 50 TAG meetings have been held, with each providing the CLECs and Qwest an opportunity to raise issues in an open forum. It established and implemented processes for recording and tracking issues that arose, and for initiating and completing Action items. In addition, two subcommittees of the TAG were established: a subcommittee on Statistics and one for Capacity Testing. The former ensured that test sample sizes led to statistically valid results. The latter sub-committee focused on the design of the Capacity Test. Any TAG member was allowed to take to "impasse" for ACC Staff resolution, any testing issues on which the TAG members could not reach agreement. Approximately 18 issues, out of the hundreds addressed, were taken to impasse for Staff resolution.

8. Workshops with TAG participation were conducted by CGE&Y to finalize the MTP. Through these workshops and associated TAG meetings, a number of significant changes to the MTP were agreed upon and adopted by the TA based on CLEC inputs and comments. CGE&Y also conducted workshops to allow for maximum input and comment on a Test Standards Document (TSD), which contained a more detailed rendition of each test and how it would be conducted. Explicit "Entrance" standards for commencing and "Exit" standards for concluding each of the tests were established as effective control mechanisms. The TSD also provided detailed Test Cases within the Scenarios, Scripts and other exact specifications as to how the tests would be conducted.

9. The MTP also provided that CGE&Y would initially conduct an extensive Performance Measurement Audit (PMA) of Qwest performance data. The TAG agreed that the PMA would be conducted in accordance with Government Accounting Office (GAO) standards and would determine whether Qwest was accurately calculating and reporting its performance in accordance with the Performance Indicator Definitions (PID) used by Qwest for reporting its performance in providing service to CLECs. The audit began in August of 2000 and was conducted in 3 phases.

10. The other four phases of the OSS test included the Functionality Test, the Retail Parity Test, the Relationship Management Test and the Capacity Test. Phase I of the Functionality Test began in December 2000 and ended in June, 2001. The Relationship Management Test was commenced immediately upon Pseudo-CLEC start-up and observations regarding Qwest's interactions with the CLECs continued throughout the remainder of the test. The retail Parity Test consisted of two phases which began on August 28, 2000 and February 12, 2001. The Capacity Test was conducted on August 10, 2001. Functionality and Retail Parity retesting was conducted in the fall of 2001.

11. The TAG agreed that after each part of the OSS Test was conducted, CGE&Y would issue interim reports containing its initial findings. After each interim report was issued, the ACC held workshops to allow TAG members and other 271 participants to question CGE&Y and HP on their interim findings and test conclusions. In Staff's opinion, the interim workshops were critical to successful resolution of the OSS Test. The interim workshops allowed test deficiencies and the parties' concerns to be identified early so that they could be resolved in a timely fashion. CGE&Y and Staff were able to resolve a significant number of the concerns identified with each test due to the interim workshop process.

12. Interim reports on the Retail Parity, Relationship Management, Capacity Test and Functionality Test were issued on July 5, 2001, September 27, 2001, October 1, 2001 and October 11, 2001 respectively. Workshops were held on the Retail Parity Interim Report on August 7-9, 2001, the Relationship Management Interim Report on October 9-11, 2001, the Capacity Test Interim Report on October 25-26, 2001, and the Functionality Test Interim Report on November 27-29, 2001. Interim Reports on the PMA were issued on October 6, 2000 and December 8, 2000. In addition, CGE&Y issued a Draft Final Report (covering all phases of the test) on December 21, 2001. A Workshop was held on January 28-31, 2002 to discuss the Draft Final Report. CGE&Y issued its Final Report on March 29, 2002. A Final Workshop was held on April 17-18, 2002 to discuss the Report and the Supplemental Reports issued by CGE&Y and HP.

13. On May 1, 2002, Staff issued a Supplemental Checklist Item 2 Report which contained the Staff's findings, conclusions and recommendations relative to CGE&Y and HP's test of Qwest's OSS.

14. As part of the Relationship Management Evaluation, CGE&Y evaluated Qwest's Change Management Process (CMP) and HP evaluated Qwest's Stand-Alone Test Environment (SATE). CGE&Y's initial findings regarding Qwest's CMP are contained in its March 29, 2002 Final Report. CGE&Y also issued a second report entitled "Qwest Change Management Process Re-Design Evaluation" dated March 25, 2002 with findings and conclusions on Qwest's Re-Designed CMP. HP issued a "SATE Summary Evaluation Report" on December 21, 2001 which sets forth its findings and conclusions on its evaluation of Qwest's IMA-EDI SATE. HP released a subsequent Report entitled "SATE New Release Test Summary Report" on March 27, 2002 which sets its findings and conclusions on Qwest's SATE's ability to handle full releases.

15. This Supplemental Report presents the ACC Staff's report and recommendations regarding the evaluations of both CGE&Y and HP on Qwest's Change Management Process and Stand-Alone Test Environment respectively.

16. This Supplemental Report gives an overview of the FCC requirements regarding Change Management Processes, an overview of Qwest's CMP, a summary of CGE&Y's conclusions regarding its evaluation of Qwest's CMP process, a summary of HP's conclusions regarding its evaluation of Qwest's SATE, a summary of Staff's

conclusions and recommendations, and finally, a discussion of the parties' positions relative to the CMP process and SATE.

B. QWEST'S CHANGE MANAGEMENT PROCESS

1. BACKGROUND

a. FCC Requirements

17 The phrase "Change Management Process" (CMP) refers to the methods and procedures that the Regional Bell Operating Company (RBOC) employs to communicate with competing carriers regarding the performance of, and changes to, the RBOC's Operational Support Systems.¹

18. The FCC has set forth six criteria against which to measure whether the CMP provides a CLEC with a meaningful opportunity to compete. Those criteria are as follows:

- a. Information relating to the Change Management Process is clearly organized and readily accessible to competing carriers;
- b. Competing carriers had substantial input in the design and continued operation of the Change Management Process;
- c. The Change Management Plan defines a procedure for the timely resolution of Change Management disputes;
- d. The availability of a stable testing environment that mirrors production; and
- e. Provide for timely, complete, and accurate notification and documentation of upcoming changes in a reasonable manner such that the efficient competitor has a meaningful opportunity to compete.
- f. The efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.

¹ 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 para. 41 (Verizon PA 271 Order).

b. Overview of CMP Evaluation Process

19. The evaluation of Qwest's Change Management Process was a component of CGE&Y's Relationship Management evaluation. The Relationship Management Evaluation examined Qwest's management of its overall business relationships with CLECs and included most related processes and documentation.

20. MTP Section 7.2 and TSD Section 6.1 set forth the purpose of the evaluation to be conducted by CGE&Y which was to determine if the CMP:

- a. Provides CLECs the ability to request changes to the CLEC-specific interfaces and processes and have them acted upon;
- b. Adequately notifies CLECs of both planned and unplanned system outages;
- c. Provides adequate documentation regarding CMP processes and procedures;
- d. Adequately prepares the CLEC community for upcoming changes to the CLEC-specific interfaces;
- e. Carries out the CMP process according to its own documentation;
- f. Has created a sound overall process for cooperative software change control.

21. CGE&Y'S initial analysis evaluated Qwest's adherence to its published methods and procedures for change management in accordance with Section 7.2.5 of the MTP and Sections 6.6.1 and 6.6.2.3 of the TSD.

22. CGE&Y subsequently also evaluated the overall adequacy of the Re-Designed CMP process.

23. CGE&Y reviewed the management methods, practices and procedures employed by Qwest for system performance and system updates, process change implementation, and carrier-carrier communications of related information. CGE&Y solicited input from Qwest, CLECs and the Pseudo-CLEC during its evaluation that was taken into consideration when formulating its opinions. In conducting its evaluation, CGE&Y limited the scope of its interest to those requirements previously identified by the FCC's decisions, a much narrower scope than sought by the CLECs who wanted to include CMP-related issues that fell outside of the framework suggested by the FCC's prior decisions.

24. To carry out its evaluation, CGE&Y attended CICMP meetings and Re-Design CMP meetings to the extent possible. CGE&Y also sent questionnaires regarding the Qwest's CMP to all of the CLECs whose names appeared on the CMP attendance sheets since the beginning of the process. CGE&Y conducted interviews with the CMP manager. CGE&Y reviewed documentation available to CLECs regarding the CMP process, including that available on the Qwest's web site.

25. Incident Work Orders (IWOs) were created by CGE&Y to resolve test exceptions when a system or process was either suspect or did not meet objective criteria, standards or expectations established in the MTP or TSD. CGE&Y assigned one of three "severity levels" to each IWO based on the experience at the time the incident occurred. Level One IWOs documented the least severe deficiencies and were akin to an "observation." Level Two IWOs identified more severe problems. Level Three IWOs addressed problems that were so severe that the OSS test would not continue until they were resolved. Retesting was potentially required to close any IWO.

c. Overview of Qwest's CMP

26. The Co-Provider Industry Change Management Process (CICMP) was Qwest's process for receiving, tracking, prioritizing and scheduling CLEC-requested changes to the various pre-ordering, ordering and M&R interfaces available to them which include:

- a. IMA-EDI
- b. IMA-GUI
- c. EB-TA
- d. CLEC billing interfaces
- e. Held, Escalated, and Expedited Tool (HEET)
- f. Customer Terminal Access System (CTAS)
- g. Telecommunications Information System (TELIS)

27. Qwest's CICMP was commenced in 1999. Prior to its commencement, CLECs made requests for new or enhanced systems functionality through their account management teams.

28. In December, 2000, the CICMP charter was modified to also include requested changes to the Qwest business processes that are specific to CLECs.

29. In June, 2001, Qwest initiated a collaborative process with interested CLECs to evaluate its existing change management processes and propose modifications. The product of that process, referred to formally as the Change Management Process ("CMP"), provides a dedicated forum for CLECs and Qwest to evaluate proposed changes, release notifications, systems release life cycles and carrier-carrier communications. By agreement among the participants of the Re-Design Process, the CMP was to provide CLECs:

- a. Notice of pending system changes; sufficient advance notifications of approved changes far enough in advance to make any associated change to the CLEC systems, and a communication process for resolving any problems that arise in relation to such system upgrades.
- b. Notice of all planned changes to Qwest software, local interconnection products, business processes, and technical publications. The scope of change covered by these notifications includes additions, deletions, and other factors that affect a CLECs ability to effectively transact business.
- c. A "features list" identifying all proposed modifications -- either Qwest or CLEC initiated -- to systems interfaces that serves as the basis for discussion and prioritization in the scheduled CMP forum.
- d. Means to jointly identify, communicate and track OSS enhancements to existing interface functionality, software releases, and associated code maintenance requirements.
- e. The ability to monitor the status of change requests and Qwest release notifications.
- f. An escalation process that serves as an agreed upon framework for addressing unresolved issues among the interested parties.
- g. Certainty that release updates conform to regulatory obligations mandated by the FCC and/or State Commissions.
- h. A mechanism for any party to submit proposed specification changes to a standards subcommittee for establishing operational-ready system interfaces.

30. OBF issue 2233 is being used as the basis for the CMP Re-Design. OBF Issue 2233 is a draft guideline currently being negotiated within the OBF and covers "...processes for change management of manual and electronic interfaces relative to order and pre-order functions." See CGE&Y CMP Re-Design Evaluation , p. 10.²

31. The CMP is managed by CLEC and Qwest representatives each having distinct roles and responsibilities. The CLECs and Qwest are to hold regular meetings to exchange information about the status of existing changes, the need for new changes,

² The OBF document contains draft definitions, processes, and procedures in the following areas: a) types of change requests, b) type 1 (production support), c) type 2 (regulatory), d) type 3 (industry guideline), e) type 4 (provider originated), f) type 5 (customer originated), g) change request initiation process, h) introduction of a new interface, i) change to existing interfaces, j) retirement of existing interfaces, k) change to existing interfaces, l) retirement of existing interfaces, m) managing the change management process, n) meetings, o) requirements review, p) prioritization, q) escalation process, r) interface testing and s) training. See CGE&Y Change Management Process Re-Design Evaluation at p. 10.

what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

32. Qwest tracked the parties' agreements in a document entitled "Interim Draft Master Red-Lined CLEC-Qwest CMP Re-Design Framework", also referred to as the "Master Red-Lined Document." The agreements presented in the Master Red-Lined Document are interim agreements with the parties having agreed that Qwest can implement them as soon as practicable. In a February filing with the ACC, Qwest stated that it has implemented virtually all of the agreements reached as of February, 2002. The agreements remain in draft form because they are subject to change throughout the Re-Design process. Qwest stated that at the end of the Re-Design process, the parties will review the document as a whole and make necessary changes to ensure that the agreements reached regarding different issues fit together into a cohesive and integrated whole. The Master Red-Lined Document is to be an exhibit to the Qwest SGAT.

33. Following is the breakdown of the subjects contained in the Master Red-Lined CLEC Qwest CMP Re-Design Framework:

- a. Types of Change Requests
 - Regulatory Change
 - Industry Guideline Change
 - Qwest Originated Change
 - CLEC Originated Change
- b. Change Request Initiation Process
 - CLEC-Qwest OSS Interface Change Initiation Process
 - CLEC Product/Process Change Request Initiation Process
- c. Introduction of a New Interface
 - Introduction of a New Application-to-Application OSS Interface
 - Introduction of a New Graphical User Interface
- d. Change to Existing Interfaces
 - Application-to-Application OSS Interface
 - Graphical User Interface
- e. Retirement of Existing Interfaces
 - Application-to-Application OSS Interface
 - Graphical User Interface
- f. Managing the Change Management Process
 - Change Management Point of contact (POC)
 - Change Management POC List Creation
 - Formal Method of Communication
 - Governing Body
- g. Meetings
 - Meeting Materials for Change Management Meeting
 - Meeting Minutes for Change Management Meeting
 - Qwest Wholesale CMP Web Site

- h. Prioritization
 - Prioritization Review
 - Prioritization Process
 - Voting
- i. Application-To-Application Interface Testing
- j. Production Support
 - Newly Deployed OSS Interface Release
 - Request for a Production Support Change
 - Reporting Trouble to IT
 - Severity Levels
 - Status Notification for IT Trouble Tickets
 - Notification Intervals
- k. Training
- l. Escalation Process
 - Guidelines
 - Cycle
- m. Dispute Resolution Process

34. Qwest continues to work collaboratively with the CLECs to resolve issues. By agreement of the parties, the Re-Design effort is focusing on OSS change management before attempting to address the product/process CMP issues. See CGE&Y's Change Management Process Re-Design Evaluation, p. 13.

35. Qwest reported in its various monthly Status Reports filed with the Commission that it had reached agreements on important issues such as the following:

- a. scope of CMP;
- b. escalation and dispute resolution processes for the CMP;
- c. processes for systems change requests (CRs) submitted by CLECs;
- d. processes for product and process CRs submitted by CLECs;
- e. interim exception processing for OSS interfaces, product, and process changes;
- f. process for introduction of a new OSS interface;
- g. process for changes to existing OSS interfaces;
- h. process for retirement of an OSS interface;
- i. process for interface testing;
- j. process for CMP meetings;
- k. production support processes, including a technical escalation process;
- l. prioritization of systems CRs; and
- m. special change request process.

36. A brief overview based upon the February, 2002 Red-Lined Master Document is as follows:

- a. Qwest will track changes to OSS interfaces, products and processes. The CMP includes the identification of changes and encompass, as applicable, requirement definition, design, development, notification, testing, implementation and disposition of changes. Qwest will process any such changes in accordance with the CMP described in the Master Document.
- b. Changes are classified by the following types: 1) regulatory changes, 2) industry guideline changes, 3) Qwest originated changes, 4) CLEC originated changes.
- c. Qwest will assign a tracking number to each change request and track changes to each change request. Tracking will be accomplished via a change request log. A very detailed process for handling Change Requests is contained in the Master Red-Lined Document.
- d. If a CR is accepted, Qwest will provide the following in response:
- Determination and presentation of options of how the CR can be implemented.
 - Identification of the preliminary level of effort required to implement the CR.
 - Whether Qwest denies the request and will not implement it, including the basis for the denial and reference to substantiating material.
- e. 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. Or, the CLEC may elect to 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.
- f. 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.
- g. 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. Exempted from this process are CLEC or Qwest originated CRs for introduction of a new interface or retirement of an existing interface.
- h. Qwest will begin its development cycle which includes: 1) business and systems requirements, 2) design and 3) code and test.

i. CRs may be modified or new CRs may be generated with a request that the new or modified CRs be considered for addition to the release candidate list.

j. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release.

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

l. Special processes apply to the introduction of a new OSS interface and the retirement of an existing OSS process.

m. The Draft Master Red-Lined CLEC-Qwest CMP Re-Design Framework Document also sets forth prioritization process and rules governing the voting process. The prioritization Process allows CLECs to prioritize new change requests and re-rate existing change requests by providing specific input as to the relative importance that CLECs, as a group, assign to each such CR.

n. The document also provides for application interface testing and a SATE. The customer test environment for pre-order and order currently includes:

- SATE
- Interoperability Testing
- Controlled Production Testing

The Customer Test Environment for Maintenance and Repair currently includes:

- CMIP Interface Test Environment (MEDIACC)

o. The document sets forth production supports which includes processes for the CLECs to follow when they encounter problems (known as IT Trouble Tickets). Severity levels are assessed which include Severity Level One: which are those problems which have a critical impact; Severity Level Two which includes those problems which have a serious impact, Severity Level Three which includes those problems which have a moderate impact on the CLEC, and Severity Level Four which includes problems which have a minimal impact on the CLEC.

p. The escalation process is expected to occur only after change management procedures have occurred per the CMP. The Master Document sets forth a process for escalating issues.

q. Finally, the Master Document contains a Dispute Resolution Section. This section obligates Qwest and the CLEC to work together in good faith to resolve any issue brought before the CMP. In the event that an impasse issue develops, a party may pursue the dispute resolution process. The section provides that the parties may agree upon the use of an Alternative Dispute Resolution (ADR) process such as arbitration or mediation using the American Arbitration Association (AAA) or other rules. The parties may also agree that the results of the ADR process are binding. The process also provides that Qwest or the 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.

37. Staff was recently notified that both Qwest and the CLECs have come to agreement on all of the priority issues that were previously scheduled to go to impasse for the Commission to resolve. While other less significant issues remain outstanding, Qwest has committed to continue to work with the CLECs in a collaborative fashion to resolve them. The priority issues identified by the CLECs which were recently resolved by the parties in a collaborative fashion include: 1) the criteria used to determine the method of implementing regulatory changes; 2) provision of internal documentation re prioritization and sizing ; 3) status of change when escalation or dispute resolution is invoked and inequitable treatment of CLEC CRs; 4) the criteria for denial of a change request; 5) clear definition for the description of the output of each step of the CMP; 6) identification of changes that impact CLECs and the processes for those changes; 7) the proper meetings at which to address a CR that impacts both an OSS interface and process, 8) CMP product/process issues; reliance on SGATs; impact of PCATs, 9) process to manage changes to performance reporting calculations; overlaps between CMP Re-Design and PAP like procedures, and 10) necessity of a process for addressing a non-coding change. For a discussion of the agreements reached on these issues, see Qwest's April Report on the Status of Change Management Process Re-Design, Exhibit B entitled "Concepts Agreed Upon through the April 2-4, 2002 Re-Design Session in Response to AT&T's, Covad's and Wcom's Priority Lists. For a very detailed discussion of the issues by CGE&Y and the provisions in other RBOC CMPs relative to these issues, see CGE&Y's Change Management Process Re-Design Evaluation, pps. 30-39.

d. Summary of CGE&Y's Findings on Qwest's CMP

38. After undertaking an extensive evaluation of Qwest's CMP and reviewing the various evidence and positions offered by interested parties, CGE&Y concluded that Qwest's Re-Designed CMP exceeds the specific objectives set forth in the Arizona MTP and TSD, the various State Orders, and the FCC requirements for Change Management.

39. CGE&Y found that Qwest's Re-Designed CMP:

- a. Provides a collaborative forum where both sides are provided ample opportunity to present ideas. (CLECs contend they still cannot “vote” on prioritization.)
- b. IWOs have been addressed and suitable progress continues to be made at each Re-Design meeting.
- c. Re-Design meetings themselves are amply attended by subject matter experts from Qwest.

40. CGE&Y also concluded that when the Re-Design effort is completed Qwest’s Change Management Process will go far beyond any other such process in the local telecommunications industry. See CGE&Y Change Management Process Re-Design Evaluation at p. 13. CGE&Y stated further:

What the CLECs are attempting to achieve is an all-encompassing process whereby all of Qwest’s wholesale products and processes, the systems that drive and are driven by these products and processes, the documentation that details both the systems and products/processes, the contracts that cover these areas, and the calculations by which all of the aforementioned are measured are kept in rigid synchronization by a system of presentation and prioritization. As such, it would become a quasi-regulatory process that would have implications for state regulators.”

41. CGE&Y also recommended that:

.....Qwest provide CLECs a 45-day calendar day advance notice of final EDI design documentation. This recommendation simply suggests that Qwest conform to the timelines for issuance of EDI design documents, as presented by the CMP Re-Design Team. That basis for this recommendation can be found in the Relationship Management Evaluation section of this report on page 395, as well as in the CGE&Y report Qwest Change Management Process Re-Design Evaluation, Version 3.0, page 43. (Recommendation No. 7).

e. **Summary of Staff’s Overall Conclusions and Recommendations**

42. Staff supports the findings and conclusions reached by its Test Administrator, CGE&Y, in its Qwest CMP Re-Design Evaluation dated March 25, 2002, and recommends that the Conclusion adopt it.

43. Staff also recommends the following:

- a. Qwest should continue to submit a monthly report on the status of its change management process Re-Design;

- b. Qwest should develop a report on the effectiveness of the Re-Designed Change Management Process. This report should include but not be limited to: a listing of CRs submitted and the submitting party, a listing of Qwest v. CLEC CRs submitted; a listing of the issues escalated and those taken to dispute resolution and the resolution reached, summary of the disposition of all system, product and process changes, status report on CLEC requested changes, and the proportion of CLEC changes to ILEC changes to OSS systems, products and process ultimately reflected in each release. It will report on the effectiveness of the interim processes for each Qwest release and whether the processes are working as anticipated. This report should be furnished to the ACC on a quarterly basis.
- c. Qwest should immediately submit a verification filing which more fully demonstrates its compliance with all of the processes and procedures set forth in its Master Red-Lined CLEC-Qwest CMP Re-Design Framework since implementation of the various processes and procedures. Any variances should be accompanied with an explanation for the discrepancy.
- d. Qwest should be required to submit verification that it has updated its PCAT and Technical Publications so that they are all consistent with the Statement of Generally Available Terms and Conditions (SGAT). To the extent there is no timeframe for such updates in the SGAT, Staff recommends that Qwest include a timeframe for changes in the future.
- e. Qwest and the CLECs should incorporate into the Red-Lined Master Red-Lined Agreement express provision for participation by State Commissions in the process which gives the Commission Staffs an opportunity to offer input into the process, without any binding effect on the respective Commission should a dispute later arise which is taken to the Commission for resolution.

2. DISCUSSION

a. Evaluation Objectives and Processes

44. Key requirements of this evaluation were contained in TSD Section 6.6.2.2.2. The CMP evaluation was to answer the following questions;

- a. Does the CMP process information available to the CLECs clearly document the methodology, timing and communication of Qwest's OSS software changes and releases?

- b. Are terms and definitions utilized in the CMP process information clearly documented?
- c. How are software releases handled? Are releases periodic and predictable (i.e., appropriately noticed) or random?
- d. Does the Change Management Process information available to the CLECs clearly explain how CLECs can request changes to the OSS? Does the documentation include forms for requesting changes and clear instructions for completing, submitting and tracking progress on CLEC change requests?
- e. Does the Change Management Process provide for frequent scheduled communications regarding changes to the CLECs?
- f. Are release notes issued as part of the Change Management Process? If so, are they complete, clearly written and distributed in a timely fashion allowing CLECs time to properly prepare for change?
- g. Does the Change Management Process information available to the CLECs provide a clearly defined escalation process?
- h. If Change Management Processes, escalation processes or other Qwest processes providing information as to how CLECs communicate, track, or escalate changes are web based, are the URLs for this information communicated to CLECs via multiple avenues?
- i. Are the roles and responsibilities of each party clearly communicated in the Qwest Change Management and escalation processes?
- j. Does the documentation available to CLECs for Qwest Change Management Processes clearly identify how change requests will be evaluated and prioritized for inclusion in future releases?
- k. Does the Change Management Process information available to CLECs clearly explain how changes to the process and forms utilized by the process will be accomplished? If so, is it clear how the new process will be distributed and how new forms will be distributed/implemented and the old process and forms retired?
- l. If utilized, are release life cycles clearly described including all activities required by each segment of the lifecycle?
- m. Monitor and evaluate Qwest's ability to execute one significant software release through implementation?

n. Is there a process in place to notify CLECs in advance of planned system outages?

o. Is there a process in place to notify CLECs of unplanned system outages?

45. As indicated above, Qwest performed a comprehensive re-design of its CMP during the course of the OSS test. A core team, composed of interested CLECs and Qwest, was formed to provide the oversight for the CMP re-design. According to Qwest, nine CLEC entities consistently and actively negotiate changes to the CMP. These are Allegiance Telecom, AT&T, Covad Communications, Eschelon Telecommunications of Arizona, Integra, SBC Telecom, Sprint and WorldCom. Other CLEC participants occasionally joined the Re-Design group and participated in these meetings to the degree that the issues presented for consideration were of importance to their respective needs. Qwest convened the CMP Re-Design team on a scheduled basis over the past eight-months at two-week intervals to discuss improvements to the process.³

46. The parties kept a record of the issues and respective positions in what became known as the GAP Analysis. The Gap Analysis contained the 1) Element or Topic, 2) the party submitting the issue, and 3) a summary of the issue itself and any comments.

47. CGE&Y noted that the meetings are conducted in a professional manner. The facilitator permits all parties appropriate time to voice their views and opinions related to the issue being addressed. See CGE&Y Change Management Process Re-Design Evaluation, p. 11. The action items and issues log are updated in real time, with input from all the parties to ensure the action or issue is captured/closed to everyone's satisfaction. CGE&Y Change Management Process Re-Design Evaluation, p. 11. Also, according to CGE&Y, all documents being updated were displayed on an overhead screen to enable all participants present to view the changes as they were being made. Id. at p. 11.

48. At the request of the ACC Staff, Qwest has been filing monthly status reports with the Commission since November, 2001 apprising the Commission of the status of its Re-Design efforts.

49. Qwest recently filed comments with the ACC stating that it and CLEC representatives had met for more than 37 days over the past nine months to discuss every aspect of Qwest's CMP. As a result Qwest stated that it and the CLEC community have reached agreement on all substantive aspects of Qwest's CMP. The approach utilized the CLECs' List of Priority CMP Issues which Staff had requested at the last Arizona Workshop. Qwest stated that the Re-Design team successfully identified, discussed and

³ The Re-Design team continues to meet on a regular basis to address any unresolved – or previously unrecognized – issues that exist among the interested parties.

reached agreement in principle on virtually all of the issues that the CLECs identified as the most important. Qwest further stated that the parties agreed to language that memorializes many of these agreements in principle.

b. CGE&Y's Findings and Conclusions

50. As part of the agreed upon test process CGE&Y performed an evaluation of the Qwest change management process known as CICMP.⁴ CGE&Y noted that – at the time of its initial change management process review -- the process had a number of significant deficiencies. Those identified deficiencies prompted the issuance of several IWOs by CGE&Y, all of which have been subsequently closed by CGE&Y. The IWOs intended to address what were viewed to be “the root causes” of these deficiencies:

a. The principal IWO (AZIWO1075-1) focused on the non-collaborative nature of the process as it existed at the time. According to CGE&Y, the basis for this IWO was that CLECs *lacked the ability to request changes* to Qwest's OSS despite the fact that they had the ability to discuss, prioritize, and vote on *Qwest-originated* changes to Qwest's OSS (TSD objective 6.1.1.3 [d]). In the opinion of CGE&Y the Re-Designed process represents a major step toward addressing this deficiency. According to CGE&Y, the Re-Designed process provides CLECs an ability to discuss, prioritize and vote on CLEC-originated and Qwest-originated changes.

b. A second IWO (AZIWO1076-1) issued by CGE&Y concerned the length of time it takes change requests to make it to the prioritization stage in the change management process. According to CGE&Y, Qwest had already taken a number of steps to address this particular IWO before the formal Re-Design effort commenced. CGE&Y cited the following: a separate Product/Process change framework was created; a Director of Change Management was established and provided the requisite authority with which to direct Qwest resources related to systems or other changes;

Emphasis was placed on better attendance at meetings by Qwest subject matter experts; and the CMP web site and meeting materials were greatly improved. Furthermore, the CMP charter was dramatically expanded under the aegis of the Re-Design process and significant “change request lifecycle management” improvements were made by Qwest.

d. CGE&Y issued a third IWO (AZIWO1078) to address issues related to the time needed by Qwest to develop final EDI design documentation for new releases needed by CLECs to implement approved system changes. CGE&Y found that final documentation has been generally provided to CLECs less than a month prior to a new release -- affording insufficient time for a CLEC to program its side of the interface to match Qwest's changes before the

⁴ CGE&Y's evaluation of Qwest's Change Management Process appears at pps.399 through 434 of its Final Report and in its Process Re-Design Evaluation dated March 25, 2002.

changes become effective on Qwest's side of the interface. Based upon the collective efforts of the CMP Re-Design group new release implementation will now be "at least 45 calendar days from the date of the final release requirement (the industry norm), unless the exception process has been invoked. Implementation timeline for the release will not begin until final specifications are provided." CGE&Y determined in its investigation that Qwest would implement this upon introduction of IMA release 10.0.

51. In its later review of Qwest's Re-Designed CMP process, CGE&Y concluded that Qwest's Re-Designed change management process constitutes an effective forum for CLECs to bring OSS and product/process issues to the attention of Qwest and other CLECs. Furthermore, the Re-Designed process ensures that CLECs and Qwest have an opportunity to fully discuss proposed changes to Qwest's OSS prior to implementation. This is in conformance with, in fact exceeds, what the FCC has recognized as what it considers to be basic requirements for an RBOC's wholesale systems CMP.

52. CGE&Y's extensive evaluation meticulously documents all of the actions taken by Qwest to meet the FCC requirements regarding Change Management Processes.

53. With respect to the requirement that the CMP be clearly organized and accessible to competitors, CGE&Y found the following: 1) the methodology is available in a single document, located at Qwest's web site; 2) a comprehensive calendar of OSS interface releases and retirements is located on the Qwest web site; 3) change request history is available online including dates and details associated with each CR; 4) it is also available on-line for systems CRs and product/process CRs; 5) communications of changes is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web; and 6) instructions for users to subscribe to the automatic e-mail notification system can be found on-line.

54. With respect to the requirement that the CMP have maximum input and participation by CLECs, CGE&Y found the following: 1) the 12-month schedule is updated quarterly throughout the year to provide a rolling 12 month schedule. It includes the planned implementation and retirement dates of the various interfaces, if applicable, and can be found on-line. Qwest has long ago implemented versioning of interfaces, and it is always made clear which version of the interface is the current one; 2) Qwest supports the previous major Interconnect Mediated Access (IMA) EDI release for six months after the subsequent major IMA EDI release has been implemented; 3) Qwest makes one version of a Graphical User Interface (GUI) available at any given time and will not support any previous versions; 4) The CMP participants meet monthly to discuss Product/Process and Systems Change Requests. Monthly meetings are announced via e-mail notification, and schedules, agendas, and all meeting materials are posted on the Qwest web site; 5) The CR initiation process is defined in the Master Red-Lined CLEC-Qwest CMP Re-Design Framework document located at Qwest's web-site; 6) The prioritization review provides the forum for reviewing and prioritizing change requests; Meetings will be held monthly, or more frequently if needed, and are open to all CLECs. Current language regarding prioritization can be found in the Master Red-Lined CLEC-

Qwest CMP Re-Design document which is located at the Qwest web-site; 7) Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP. CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process. Instructions and the form for initiating an escalation are located at Qwest's web site; 8) Specific language detailing the current escalation and dispute resolution processes is contained in the Master Red-Lined CLEC-Qwest CMP Re-Design Framework document located at Qwest's web site; 9) Users can view ongoing escalations by clicking the links located at Qwest's web-site; 10) The CMP Re-Design "core team" meets twice monthly. The team is made up of representatives from several CLECs and Qwest. A separate web site has been created for the Re-Design process, and contains all working documents being discussed in the Re-Design meetings; and, 11) Documentation includes: Meeting Notices, Presentation Packages, CLEC Comments, Re-Design Documentation, Meeting Minutes; Team Members, Issues and Action Log, Guiding Documentation.

55. With respect to the independent dispute resolution requirement, Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP: 1) CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process; 2) This process does not limit any party's right to seek remedies in a regulatory or legal arena at any time; 3) In the event that a CLEC wishes to initiate an Escalation it should submit a completed Escalation form which is located on Qwest's web site; 4) Escalations may involve issues related to CMP itself, including the administration of the CMP. The expectation is that escalation should occur only after change management procedures have occurred per the CMP; and 5) In the event that an impasse issue develops, a party may pursue the Dispute Resolution Process by submitting the Dispute Resolution form located at Qwest's web site.

56. With regard to the SATE requirements, in addition to an extensive evaluation by HP, CGE&Y notes the following: 1) Qwest provides a SATE for use by CLECs in conducting new entrant testing and upgrade testing. Guidelines for the use of SATE are contained in the Qwest's EDI Implementation Guide located at Qwest's web site; 2) SATE specific technical information is located on Qwest's web site; 3) The 12-Month OSS Release Schedule is updated quarterly throughout the year to provide a rolling 12 month schedule. It includes the planned implementation and retirement dates of the various interfaces, if applicable. It can be found at Qwest's web site. Qwest has long ago implemented versioning of interfaces, and it is always made clear which version of the interface is the current one; 4) Qwest supports the previous major IMA EDI release for six (6) months after the subsequent major IMA EDI release has been implemented; 5) Qwest makes one version of a GUI available at any given time and will not support any previous versions; 6) Communication of planned outages is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on Qwest's web site; 7) Notification of unplanned outages is accomplished through automatic e-mail notification. Instructions for users to subscribe to the automatic e-mail notification system can be found at Qwest's web site.

57. With regard to the Notification and Documentation requirement, CGE&Y found that: 1) The 12-Month OSS Release Schedule is updated quarterly throughout the year to provide a rolling 12-month schedule. It includes the planned implementation and retirement dates of the various interfaces, if applicable. It can be found at Qwest's web site. Qwest has long ago implemented versioning of interfaces, and it is always made clear which version is the current one; 2) Qwest supports the previous major IMA EDI release for six (6) months after the subsequent major IMA EDI release has been implemented; 3) Communication of changes is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web; 4) Instructions for users to subscribe to the automatic e-mail notification system can be found at Qwest's web site; 5) Terms used in the CMP are contained in the Master Red-Lined CLEC-Qwest CMP Re-Design Framework document located on Qwest's web site. While the "Terms" section of this document has not been finalized and agreed to by the parties, CGE&Y found the terms that related to the CMP process to be consistent with industry standards; 6) Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP. CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process. The specific language for the Escalations and Dispute Resolution Process is located in the Master Red-Lined CLEC-Qwest CMP Re-Design Framework document located at Qwest's web site. Specific instructions for initiating an escalation or dispute resolution can be found at Qwest's web site. The process does not limit any party's right to seek remedies in a regulatory or legal arena at any time; and 7) In the event that an impasse issue develops, a party may pursue the Dispute Resolution Process by submitting the Dispute Resolution form located on Qwest's web site.

58. With regard to Training, Technical Assistance and Help Desk requirements, CGE&Y found that: 1) Help desk reporting procedures and technical escalation procedures are being discussed as part of CMP Re-Design, and language being incorporated into the Master Red-Lined CLEC-Qwest CMP Re-Design Framework document located at Qwest's web site; and, 2) Detailed findings on Qwest's Technical Training and Help Desk Support are found at CGE&Y's Final Report, Section 5.

59. Finally, with regard to the requirement that the CMP be adhered to over time, CGE&Y found that insufficient time has passed since the inauguration of the Re-Design process to determine whether Qwest has established a pattern of compliance with its Re-Designed CMP over time. CGE&Y did find that Qwest did comply with its previous process over an extended period of time.

60. CGE&Y's analysis of each of the TSD requirements is contained at pages 15 through 21 of its Change Management Process Re-Design Evaluation dated March 25, 2002.

c. Positions of the Parties

1. CLECs' Position

61. The CLECs submitted a Joint Brief on Qwest's Change Management Process on April 9, 2002.⁵ The CLECs recommended that the Commission withhold judgment on 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 Re-Design process, 2) Qwest has actually implemented and is adhering to the Re-Designed 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, SATE fully reviewed and approved by third-party testers; and 5) Qwest has updated – through- the product and process part of CMP – its PCAT and Technical Publications such that they are consistent with the Statement of Generally Accepted Terms and Conditions, upon which Qwest intends to rely, in obtaining 271 authority. CLEC Joint Brief at pps. 1-2. The Joint CLECs argue that Qwest must offer this proof of demonstrated compliance, or its findings will be based upon “mere promises to perform” by Qwest. CLEC Joint Brief at pps. 2.

62. The CLECs note that as a result of the utter failure of Qwest's original CICMP process, Qwest asked the CLECs to agree to take the CMP temporarily out of the 271 workshop investigations and place CMP in the change management process itself for Re-Design. CLEC Joint Brief at p. 3. Qwest also asked that several disputed issues be removed from discussion at the workshops and resolved in the CMP process, which included “product and process” issues. CLEC Joint Brief at p. 4. This includes ensuring that Qwest's technical publications and its PCAT are consistent with the SGAT.⁶ Id.

63. The CLECs argue that Qwest's CMP process has not been in effect long enough to judge its effectiveness. The basic process is not fully documented nor has Qwest adhered to such a process for any length of time. Joint CLEC Brief at p. 6. The CLECs also argue that Qwest never had a compliant basic document to begin with; and that it is just now putting the finishing touches on that document. Joint CLEC Brief at p. 7. The Commission should ensure that Qwest finishes the process. Id.

64. The CLECs, like Qwest, stated that after the most recent CMP Re-Design session held on April 2-4, 2002, the parties reached “consensus” on a conceptual basis on all but two of the priority issues. However, the Joint CLECs also note that reaching

⁵ The CLECs included AT&T Communications of the Mountain States, Inc., TCG Phoenix, Covad Communications Company and WorldCom, (hereinafter referred to as the “Joint CLECs”).

⁶ 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.

“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. Joint CLEC Brief at p. 9. The Joint CLECs did state that the parties were able to draft language for the Draft CMP Document on a few of these issues. Id. However, because drafting is not complete, the Joint CLECs argue that Qwest cannot demonstrate that its CMP is reflected in a single document or that information relating to the process is clearly organized and readily accessible to competing carriers. Id.

65. Further, the CLECs argue that Qwest cannot develop a pattern of compliance over time. Joint CLEC Brief at p. 10. In fact the Joint CLECs rely on AZIWOs 2127 and 2128 to argue that Qwest was not sending access records to CLECs on the daily usage feed (DUF) and Qwest was dropping WATS call records, but yet when this problem was identified by AT&T at a CMP meeting, a trouble ticket was never opened with the Qwest IT Wholesale Systems Help Desk with a severity level assigned as required by the Red-Lined Document. CLEC Joint Brief at p. 11.

66. The Joint CLECs also argue that recently Qwest made available to retail customers a preferred carrier local service freeze. Qwest’s PCAT describes the local service freeze. During the week of February 18, 2002, Qwest rejected AT&T LSRs because of its PLOC Freeze placed on retail customer accounts. AT&T submitted a change request in CMP asking Qwest to develop an effective process for lifting the freezes on residential accounts. 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. Joint CLEC Brief at p. 13. AT&T stated that this decision had an adverse impact on AT&T’s business, so AT&T requested that its CR be expedited, using the CMP process. While the problem was discussed at several CMP meetings, Qwest has not resolved the problem which calls into question the effectiveness of the overall process. Joint CLEC Brief at pps. 13 -14.

67. The CLECs also argue that Qwest fails to adhere to its Notification of Retail Changes/Retail Parity checklist process. Id. Qwest told the CLECs that it had in place a “checklist” that was always reviewed and adhered to wherever product and process changes were made on the retail side to ensure that where necessary, notice was provided to wholesale customers. Essentially Qwest committed to utilize and adhere to a “checklist” for purpose of CLEC notification of retail changes. Joint CLEC Brief at p. 15. Qwest has not adhered to this process. Joint CLEC Brief at p. 15. CLECs cite an example where 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. Joint CLEC Brief at p. 15. By happenstance, CLECs learned recently that Qwest is now able to and has been provisioning ISDN loops where IPG is present for its retail customers. However Qwest never notified its wholesale customers of this change in retail product and process as it was required to do. Joint CLEC Brief at p. 15.

68. A key issue on which conceptual agreement was reached was the timing of advance notice provided by Qwest for Qwest-initiated product and process changes,

depending on the classification as to the level of change (Level One through Level Four). Joint CLECs stated that 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 the noticed change. For Level 3 changes, a 31 day advance notice was agreed to. Joint CLEC Brief at pp. 16-17. Three days after this agreement was reached, Qwest notified CLECs that it was changing certain NC/NCI codes effective that same day.

69. The CLECs also rely upon several KPMG Exceptions which describe a lack of adherence to CMP. (Exception 3094, 3110 and 3111). KPMG in Exception 3094 noted that while the CLECs and Qwest have reached agreement in principle for an interim process to manage Qwest initiated product/process changes, the referenced process remains subject to further development, modifications and negotiations. In Exception 3110 KPMG raised concerns about Qwest adherence to advance intervals for notifying CLECs about unanticipated system fixes, patches, or unplanned outages. KPMG noted that it was not able to determine if Qwest's documented processes provide the ability to perform adequate tracking or verification for adherence to the documentation release intervals. In Exception 3111 KPMG described a lack of clarity for prioritization of CLEC requested changes. For most of these exceptions, Joint CLECs note that Qwest requested they be closed without further testing leading KPMG in many instances to make "inconclusive" findings.

2. Qwest's Position

70. In response to criticisms of the CMP, Qwest argues that its change management process meets the requirements set forth by the FCC in its prior decisions. According to Qwest, system changes are being implemented on an ongoing basis in accordance with the stated requirements of the CMP. Qwest maintains that CLECs have been accorded substantial input into the design and operation of the change management Re-Design process and Qwest has demonstrated a pattern of compliance with its CMP.

71. In its Brief regarding the Change Management Process filed on April 25, 2002, Qwest states that its Re-Designed CMP provides CLECs more opportunity for input, participation, and control than any other ILEC's Change Management Process, including the ability to prioritize Qwest-originated systems change requests. Qwest Brief at p. 1. Qwest also states that the scope of Qwest's CMP is broader than any other ILEC and includes all aspects of the business relationship between CLECs and Qwest. Qwest Brief at pps. 1-2. Qwest also argues that it has fully implemented the Re-Designed process.

72. Qwest states because it has implemented agreements arising from the Re-Design meetings as they were reached, the majority of the process has been in place for some time. Qwest Brief at p. 2.

73. Qwest also argued that the FCC has only required that change management procedures be implemented for changes to OSS interfaces, and Qwest has agreed to include changes to products and processes in its Re-Designed CMP, as well. Qwest Brief at p. 3. Qwest states that it and the CLECs have worked out processes for all aspects of the CMP, including discussing and revising the OBF language, and agreed-upon processes have been implemented. *Id.* Qwest states that it is committed to abide by the agreed upon Re-Designed CMP and that the CMP remains open to additional changes. Qwest Brief at p. 4.

74. Qwest goes on to discuss the CMP process generally and notes that the CMP provides for four different types of changes: 1) regulatory changes, 2) industry guideline changes, 3) Qwest originated changes and 4) CLEC originated changes. Qwest has implemented the process for CLECs to prioritize Qwest-originated CRs, as well as CLEC-originated CRs. Qwest Brief at p. 9. Qwest states that it has also agreed that Regulatory Changes and Industry Guideline Changes will be prioritized as long as Qwest is permitted to meet mandated implementation dates for regulatory changes and recommended implementation dates for Industry Guideline Changes. Qwest Brief at p. 9.

75. Qwest has agreed that CLECs may submit Regulatory and Industry Guideline CRs and that the same processes will apply regardless of the originator (Qwest or the CLEC). Qwest Brief at p. 9. Qwest states that the parties have also agreed that a change will only be treated as a Regulatory Change if the parties agree that a change is required to bring Qwest into compliance with a mandate. Qwest Brief at p. 10. The parties have agreed that Regulatory Changes will be implemented by mechanization unless the parties agree that an exception to that general rule applies. Qwest Brief at p. 10.

76. The OSS interface CR initiation process provides that Qwest and CLECs both submit CRs to request changes to OSS interfaces. The parties agreed to a detailed Interim Qwest-Initiated Product/Process Change Process, according to Qwest, which was implemented on April 1, 2002. The process contains four tiers of processes, called "levels," differentiated by the expected impact of changes on CLECs. Qwest Brief at p. 10. Qwest also refers to the interim process which classifies Qwest-initiated changes into four groups with notification to the CLECs describing the change varying depending upon the importance of the change. Qwest Brief at p. 11. Qwest also discussed the prioritization process in its Brief and stated that like other ILEC CMPs, Qwest's CMP allows CLECs to prioritize both Qwest-originated and CLEC-originated CRs. Qwest states that this agreement has already been implemented and CLECs have already prioritized Qwest-originated CRs along with CLEC-originated CRs for the 10.0 and 11.0 IMA releases. Qwest Brief at p. 15. Qwest states that it has gone further by allowing CLECs to prioritize all types of changes, including Regulatory Changes and Industry Guideline Changes to the extent possible. Qwest Brief at p. 15. So long as Qwest is permitted to meet mandated implementation dates for Regulatory Changes and recommended implementation dates for Industry Guideline Changes, Qwest has agreed to allow CLECs to prioritize those changes as well. Qwest Brief at p. 15.

77. The remainder of Qwest's Brief attempts to demonstrate how its CMP meets the five FCC criteria for an effective Change Management Process. First, the process is clearly organized and readily accessible to CLECs. Qwest Brief at p. 18. The governing process for change management is contained in a single document, the Wholesale CMP document that was developed collaboratively by Qwest and the CLECs. Qwest maintains a web site that sets forth the current change management process. The web site also serves as a repository of information that is useful to CLECs participating in CMP. Qwest Brief at p. 19. The web site also sets forth the schedule for systems and product/process change management meetings.

78. Second, CLECs have substantial input in the design and continued operation of the Change Management Process. Qwest Brief at p. 20. Qwest and the CLECs have met regularly for more than 37 days since July, 2001 and collaboratively Re-Designed Qwest's Change Management procedures. The parties understand that the CMP is a dynamic process that will be subject to ongoing improvements. Qwest Brief at p. 20. Qwest further stated that procedures are in place to ensure that CLECs will have substantial input into the design and operation of the CMP. *Id.* The process provides for CLEC input regarding CLEC or Qwest initiated CRs and for CLEC input regarding Qwest's proposed solutions. For changes that result in Product Catalog (PCAT) or technical publication (TechPub) changes, CLECs have the opportunity to provide written comments concerning the proposed changes via a web-based customer comment toll. Qwest Brief at p. 21. The prioritization process also provides a significant opportunity for the CLECs to have input to and control over which OSS interface changes are implemented and in which release they are implemented.

79. Third, the Change Management Process defines a procedure for the timely resolution of disputes. Qwest has both an escalation and dispute resolution procedure. As of April 8, 2002, the escalation procedures have been invoked on one occasion with regard to systems changes, and on four occasions with regard to product and process changes. Qwest Brief at p. 22. The escalation process contains specific instructions for communicating the escalated issue to Qwest, including a statement of the CLEC's desired resolution and request for interim action, if applicable. Qwest Brief at p. 23. Qwest has instituted a single point of contact for any issue and the point of contact is responsible for providing a final binding position regarding the escalated issue within 7 days for a disputed CR and within 14 days for other escalations. Qwest Brief at p. 23. A CLEC or Qwest may bypass the escalation process and immediately invoke the dispute resolution process. Qwest Brief at p. 23. If an issue goes to impasse, there are several options for dispute resolution.

80. Finally, Qwest states that it has demonstrated a pattern of compliance with its Change Management Procedures. Qwest Brief at p. 26. As of April 8, 2002, Qwest has only rejected one CR on the grounds that it was not within the scope of the CMP. Qwest Brief at p. 26. Qwest states that it has also met its obligations with regard to: 1) sending acknowledgement to the CR originator; 2) posting CRs to Qwest's CMP web site; 3) contacting customer to schedule clarification meetings; 4) conducting meetings to clarify CLEC CRs; 5) providing initial responses to CLEC CRs; 6) posting initial

responses to Qwest's CMP web site; 7) presenting CRs; 8) providing final responses to CLEC CRs (if applicable); and 9) posting final responses to Qwest's CMP web site (if applicable).

81. Between November 1, 2001 and February 2002, Qwest processed 58 new OSS interface CRs. Of a possible 347 milestones, Qwest was responsible for missing two milestones. This equates to a 99.42% compliance rate with CLEC/Qwest Initiated OSS Interface CR Process. During this same time, Qwest processed 32 new CLEC initiated product and process CRs. Of a possible 126 milestones, Qwest was responsible for missing seven milestones. This equates to a 94.44% compliance rate. Qwest has also met its obligations to: 1) track and document the status of CRs; 2) to hold regular CMP meetings; 3) to provide meeting materials in advance of the meetings; and 4) to record meeting discussion, action items and issues. In processing escalations, Qwest stated that it met its obligations with regard to the following agreed-upon process milestones: 1) acknowledging receipt of escalation; 2) posting escalation on Qwest's CMP web site; 3) issuing notice to CLECs; and 4) providing Qwest's binding response. As of February 2002, Qwest processed one OSS interface escalation and four product and process escalations. Of a possible 16 milestones, Qwest missed only one milestone which equates to a 93.75% compliance rate. Qwest also made a commitment to highlight all changes published in the PCAT and to redline all changes published in TechPubs beginning January 2, 2002. Since then Qwest has published at least 102 PCAT and ten TechPub changes. Qwest Brief at p. 28. Finally, Qwest notes that it has demonstrated compliance with the prioritization process. In August 2001, and again in October/November 2001, CLECs and Qwest jointly prioritized CLEC-originated CRs and Qwest-originated CRs for the IMA 10.0 release. In February 2002, CLECs and Qwest jointly prioritized CLEC originated CRs, Qwest-originated CRs, and Industry Guideline CRs for the IMA 11.0 Release.

d. Staff Discussion and Recommendations

82. After reviewing the results of CGE&Y's evaluation of both current and proposed change management processes Staff concurs with CGE&Y's assessment of Qwest's Change Management Process. There is no question, in Staff's opinion, after reviewing the evaluation of CGE&Y, the Change Management Status Reports and other supporting information submitted by Qwest, that Qwest has, with extensive assistance by the CLECs, developed one of the most comprehensive and effective Change Management Processes in existence in the telephone industry today. Qwest and the CLECs have together accomplished one of the most remarkable transformations witnessed by the Staff in this case. They have taken what had proven to be a very unilateral and unworkable process and turned it into one in which the CLECs are put on virtually an equal footing with Qwest with an unparalleled degree of input in the process on an ongoing basis. Staff commends the parties for their significant efforts in this regard. There also is no question, in Staff's opinion, that Qwest meets the criteria set forth by the FCC for an effective Change Management Process, with one important exception. Because all facets of Qwest's Change Management Process have not been in existence for an extended period of time, it is simply not possible to verify that Qwest has an established pattern of

compliance and has adhered to this pattern of compliance over time.⁷ This is critical because it is one thing to have a process that looks good on paper versus a process that works in practice.

83. The evidence in the record shows the following. The CLECs point to various instances of noncompliance by Qwest with aspects of the CMP. Qwest, on the other hand, submitted data (general in nature) which tended to show compliance for the most part to-date, but with instances of noncompliance. In Staff's opinion, Qwest has simply not demonstrated through its submissions to-date that it is consistently adhering to all of the processes and procedures set forth in the Master Red-Lined CLEC-Qwest CMP Re-Design Framework document, and that the instances of noncompliance raised by the CLECs are the exception rather than the rule.

84. Staff interprets the FCC requirement as applied to Qwest as requiring not that Qwest must wait a year so that a prolonged pattern of compliance can be established, but rather using the data that is available to-date for the processes implemented— that Qwest can show that it is **consistently** complying with the procedures and processes it has agreed to. Because Staff believes it is critical for Qwest to demonstrate compliance to-date, Staff recommends that Qwest be required to immediately file with the Commission a verification filing which demonstrates its compliance with each process and procedure contained in the Master Document since implementation, and an explanation for any instances of noncompliance. This should be strong evidence of whether Qwest is taking its obligations in this regard seriously and is consistently following its Change Management processes and procedures. So Staff can continue to monitor Qwest's compliance on an on-going basis after it receives 271 authority, Qwest should be required to make this verification filing on a quarterly basis (with data summarized monthly) for at least the next year.

85. Besides ensuring that the FCC's requirements were met, another primary focus of the Staff's review was to look at aspects of the CMP that might encroach upon the parties' rights under State or Federal law, or which might attempt to place limits upon the Commission's authority or attempt to bind the Commission to decisions made through the CMP process. Staff found no evidence that this was the case. Under the Dispute Resolution Process, all parties have the right or option to bring the disputed issue to the Commission for resolution. Further, "Regulatory changes" are prioritized under Qwest's CMP and subject to CLEC prioritization only to the extent that any mandatory implementation dates are not changed. Performance Indicator Definition (PID) changes and Performance Assurance Plan (PAP) changes are not considered regulatory changes subject to higher priority when initiated by Qwest or the CLEC. When required by a State Commission, they will be implemented in accordance with Commission order. Staff does recommend that the process expressly provide for participation by State Commissions which are interested in having input into the process, however, that any

⁷ CGE&Y noted that "[I]nsufficient time has passed since the inauguration of the Re-Design process to determine whether Qwest has established a pattern of compliance with its Re-Designed CMP over time. CGE&Y has previously showed that Qwest did comply with its previous process over an extended period of time.

input offered by the participating State Commission Staff would not be binding on the Commission should a dispute eventually need to be decided by that Commission.

86. Staff believes that the CLECs also raised a legitimate concern regarding PCAT and TechPub changes and the need to verify that Qwest has updated its PCAT and TechPubs to reflect agreed upon changes to the SGAT. Therefore, one of Staff's recommendations is that Qwest make a verification filing that it has made the necessary changes to eliminate any conflict between the documents. Staff also recommends that language be added to the SGAT that provides that any such changes in the future will be made in accordance within a prescribed timeframe.

87. In addition, Staff recommends that Qwest be required to file on a quarterly basis a separate report on the effectiveness of its CMP process. The report should contain the following information:

a. This report should include but not be limited to a listing of the issues taken to dispute resolution, summary of disposition of product and process changes, status report on CLEC requested changes, and the proportion of CLEC changes to ILEC changes to OSS systems. The report should demonstrate that for each release Qwest's interim processes are working as anticipated and are affording the CLECs a meaningful opportunity to compete

88. Staff also recommends that Qwest continue to file monthly status reports on the Change Management Process.

89. Finally, Staff recommends that the Commission adopt CGE&Y's Recommendation No. 7 which provides:

...Qwest provide CLECs a 45-day calendar day advance notice of final EDI design documentation. This recommendation simply suggests that Qwest conform to the timelines for issuance of EDI design documents, as presented by the CMP Re-Design Team. That basis for this recommendation can be found in the Relationship Management Evaluation section of this report on page 395, as well as in the CGE&Y report Qwest Change Management Process Re-Design Evaluation, Version e.0, page 43.

90. With Qwest's agreement to the above recommendations, Staff recommends that the Commission find that Qwest meets FCC requirements for an effective Change Management Process.

C. QWEST'S STAND-ALONE TEST ENVIRONMENT

1. BACKGROUND

a. FCC Requirements

91. A Stand-Alone Test Environment (SATE) is essentially a simulated OSS that CLECs can use to practice submitting orders and pre-order inquiries. This process allows CLECs to use independent production account data to facilitate the development of OSS and Electronic Data Interchange systems that are required for implementing new Qwest software releases, and testing the compatibility of CLEC's own new software releases with Qwest's interfaces.

92. As discussed in Subpart I(A)(1)(a) above, the FCC's Change Management criteria provide for the availability of a stable testing environment that mirrors production.

b. Overview of SATE Evaluation Process

93. HP was commissioned by the ACC to evaluate Qwest's IMA-EDI SATE.

94. In conducting its evaluation, HP performed the following general steps:

a. Met with ACC personnel to understand the regulatory objectives of its engagement.

b. Solicited feedback of both Qwest and CLEC personnel regarding their experience and opinions of the SATE for EDI development and interoperability testing. This was done using a CLEC Input Questionnaire.

c. Reviewed formal comments filed by parties in connection with the SATE.

d. Examined Qwest processes for adequacy in assisting CLECs to establish interconnection using SATE.

e. Conducted SATE functionality testing using the documentation and processes that would be available to CLECs.

f. Communicated issues and questions to Qwest, the ACC and CLECs.

- g. Conducted re-testing of corrective actions implemented by Qwest in response to issues and questions.

See HP SATE Summary Evaluation Report at p. 5

95. HP developed an Issues Management Plan to address the issues it encountered during its evaluation of Qwest's SATE.

96. "Issues" were recorded by HP when there was a discrepancy between the Qwest documented processes and applications and expected results. Once an issue was identified, the problem was analyzed and proper corrective action was determined. Each issue was recorded under one of the following four categories: 1) Documentation, 2) Co-Provider Input, 3) Process, and 3) Transaction Issues. Transaction issues were further broken down into the following categories: 1) Regression/Progression – issues related to this sub-test of the overall transaction test; 2) Negative – issues related to negative testing; 3) Production Mirroring – issues related to testing the production mirroring capability of SATE, 4) Business Rules – issues related to unexpected responses due to business rules, 5) EDI Map – issues related to unexpected errors with EDI Mapping, and , 6) Documentation – issues uncovered during transaction testing that did not match Qwest documentation. All questions or problems were recorded by HP in a Question Log. See HP SATE Summary Evaluation Report at p. 47.

97. One of three severity levels were assigned to issues: 1) low – those that did not impact the completion of a transaction test scenario, or the completion of any of the specific review or the overall evaluation; 2) medium – those that impacted the completion of a transaction test scenario, but did not impact the completion of other transaction test scenarios of the specific review or the overall evaluation; and 3) high – those that impacted the completion of the transaction test, the completion of a specific review, and the completion of the overall evaluation. See HP Summary Evaluation Report at p. 47.

c. Overview of Qwest's SATE

98. Until recently, CLECs actively participating in the Arizona local telecommunications market were reliant upon Qwest's Interoperability Testing process for production certification of their provisioning interfaces and to prepare for new Qwest software releases. The inherent design characteristics of Qwest's Interoperability Testing platform required use of production systems by CLECs to perform their testing needs. This design limitation necessitated the use of valid CLEC account data in constructing the "test deck" of accounts that would be used by the CLEC. Specifically, Qwest's Interoperability Testing platform subjected active accounts, and customers, to the possibility of being used as test subjects by CLECs, since all transactions are edited against production and legacy systems. CLECs contended that this practice was costly, time consuming, and inconvenient for both the CLEC and its customers.

99. Qwest's SATE was designed to replace Interoperability Testing with a more automated, less manually dependent nonproduction environment. SATE offers CLECs use of a "trial and error" testing environment with a predetermined set of "test accounts". This allows CLECs the means to avoid use of valid production account data and the attendant requirement for multiple manual reviews – the principal limitation of the Interoperability Testing platform

100. The SATE does not use live production systems for test transactions. Instead, "it uses a front-end, IMA-EDI that is identical to the corresponding production interfaces, and a 'stubbed' environment to simulate the back-end, legacy systems. HP Summary Evaluation Report at p. 7.⁸

101. The impact of the SATE's simulation of back-end systems, is that Qwest has an additional responsibility to ensure the synchronization of SATE test results to make certain that CLECs receive responses to transactions that are the same responses that would be received from production systems. See HP Summary Evaluation Report at p. 7.

d. Summary of HP's Findings and Recommendation

102. In its Initial Report, HP found that the SATE is adequate to support Qwest CLEC testing in the State of Arizona, given current levels of CLEC usage. HP SATE Summary Evaluation Report at p. 7. HP also found the following SATE related processes and/or materials to be adequate:

- a. SATE documentation;
- b. SATE processes;
- c. The accuracy and consistency of SATE test responses is adequate to support certification;
- d. Use of CLEC input;
- e. SATE is an effective toll for IMA EDI map testing;
- f. Accommodation of new release testing was inconclusive;

103. Because HP concluded that the evaluation of the implementation of Release 8.1 did not provide an indication of the results of an implementation of a typical major release of IMA EDI, HP was asked to evaluate Release 9.0 in SATE. In its SATE New Release Test Summary Report, HP found that SATE was adequate to support New Release Testing by a CLEC based upon the following results:

⁸ Qwest's stated reason for using this approach is that the Company has not yet developed the means to ensure that test transactions executed in interoperability will not impact live accounts.

- a. The SATE provides the CLEC with data and functionality to test its interface for all products being used by CLECs on Qwest's IMA EDI environment.
- b. The SATE provides the CLEC with the ability to test its interface up to 30 days in advance of the production release of the corresponding Qwest IMA EDI Release.
- c. Although the SATE processes and documentation continue to be enhanced through Qwest's internal process and input from the CLEC in the SATE User Group, the Qwest EDI Implementation team continues to provide the support required to aid a CLEC in developing its interface to a new IMA EDI Release.
- d. CLECs appear to be successful in using SATE and many CLECs appear to be migrating to using the SATE rather than Qwest's Interoperability environment as indicated by Qwest's March 27, 2002, response to an HP Data Request.

HP SATE New Release Test Summary Report (9.0) p. 12.

104. HP also made several recommendations in its Report to ensure the continued adequacy of SATE as a testing environment. HP's recommendations are found on pages 9-10 of its SATE Summary Evaluation Report and page 14 of its SATE New Release Test Summary Report.

e. Summary of Staff's Conclusions and Recommendations

105. Staff agrees with the conclusions and recommendations of HP on the adequacy of Qwest's SATE.

106. In addition, Staff has the following recommendations:

- 1) Qwest should be required to immediately enhance the range of capabilities available in SATE to provide for negative testing by CLECs.
- 2) Qwest should be required to demonstrate by the time the Commission rules on SATE's adequacy, that it has incorporated all error codes and variances that exist between SATE and production into a single report as originally requested by HP. (See HP Recommendation No. 4).
- 3) Qwest should be required to report to the Commission on a quarterly basis, the status of its progress in implementing the recommendations of Staff and HP.

2. DISCUSSION

a. Evaluation Objectives and Processes

107. Near the outset of the OSS test program, CGE&Y identified the inherent weaknesses presented by Qwest's Interoperability Testing platform and proposed introduction of an independent testing framework. Qwest subsequently acceded to CGE&Y's recommendation and introduced SATE in June, 2001.

108. HP was directed by the ACC to conduct an operational assessment of Qwest's SATE by conducting a series of test transactions and comparing the results of those transactions to those expected from the production system. In addition, HP was directed to critically examine the organization, processes and resource commitments made by Qwest to SATE. In contrast to the balance of the OSS Test approach, military-style testing of SATE was not prescribed nor performed by HP. Instead, HP sought to determine whether SATE was "adequate" to support a CLEC's efforts to compete in Arizona.

109. In conducting its initial evaluation, HP reviewed SATE documentation and compared it to production documentation, where appropriate and necessary to evaluate the SATE. See HP Summary Evaluation Report at p. 7. In addition, HP executed transactions that conformed to the SATE documentation, but also submitted transactions designed to be non-conforming. In addition, HP executed a suite of transactions in both SATE and in Production to test for similarity of responses. HP Summary Evaluation Report at p. 7. HP believes that the suite of transactions that it ran were representative of those that are currently used by CLECs in Arizona and will be submitted in the State of Arizona.

110. Since Qwest had recently developed its SATE, HP's evaluation constituted the most rigorous examination (over 1,000 transactions submitted), involving the most diverse testing of transactions performed to-date. HP Summary Evaluation Report at p. 7.

111. For new release testing, HP used Version 9.0 of Qwest's IMA Release as the test object. HP developed a test plan that used PID PO-19 as a guide. HP divided the SATE New Release Testing into the following four phases: 1) Phase I – Expected Results Verification; 2) Phase II – Business Rules Testing; 3) Phase III – Expected Results Verification for Stability and Regression Testing and 4) Phase IV – Production mirror Testing.

112. HP's evaluation of Qwest's SATE for a new release focused on the following key aspects:

- a. Availability of Test Environment – the testing environment has to be made available to the CLECs in advance of the new release going into production in the OSS systems. Qwest has stated that this availability is

made approximately 30 days in advance of the new release going into production.

b. Stability of the Testing Environment – Does the documentation and systems remain stable from the introduction of the new release in the testing environment to the date the new IMA release becomes available in the production IMA-EDI environment.

c. Performance of New Release – Does SATE support a New Release of IMA EDI in terms of EDI Mapping and documented Expected results, as measured by the conditions of PC-19?

b. HP's Findings and Conclusions

113. According to HP's assessment, Qwest has demonstrated that SATE provides adequate support for CLEC testing and that it continues to be enhanced in response to CLEC requests.

114. HP did find noteworthy discrepancies related to business rule consistency between the SATE and production systems. See HP SATE Summary Evaluation Report at p. 7. HP also found issues associated with documentation, test account data and the overall STATE testing process. See SATE Summary Evaluation Report at p. 8. However, HP concluded that the problems identified were due in large part to the SATE's newness and small amount of use prior to HP's evaluation. *Id.* at p. 8. Also, the problems identified by HP were found to have only a minor to moderate impact on the overall usability of the SATE. Further Qwest has identified corrective actions for most of the issues that were identified. See *Id.* at p. 8.

115. With regard to documentation, HP found that because of the newness of Qwest's SATE, most of the documentation was also newly developed and required support from Qwest SATE personnel to allow HP to properly use the SATE environment. See HP SATE Summary Evaluation Report at p. 8. HP found numerous minor inaccuracies which Qwest corrected.

116. HP found that the SATE processes were generally adequate to support CLEC testing. However, HP noted that the support of Qwest's EDI Implementation Team is an important factor in ensuring successful use of SATE by CLECs. See HP SATE Summary Evaluation Report at p. 8.

117. Based upon its testing, HP found that the accuracy and consistency of SATE test responses was adequate to support certification. At the time of its report, 100% of SATE Release 7.0 and 8.0 transactions have passed either the initial test or the re-test. The only areas not at 100% were SATE Release 7.0 Regression Testing and SATE Positive Production Mirror testing. HP believed that the level of errors observed was reasonable given the relative newness of the SATE and that the errors are manageable. See SATE Summary Evaluation Report at p. 8.

118. During the initial design of SATE Qwest's use of CLEC input was informal. HP noted that Qwest has since begun a series of SATE Enhancement Meetings, aimed at obtaining CLEC input. HP SATE Summary Evaluation Report at pps. 8-9. HP observed that Qwest is now making use of CLEC input to improve the SATE. SATE Summary Evaluation Report at p. 9.

119. HP deemed its initial evaluation of New Release to be inconclusive because it was based upon an evaluation of pre-release testing for IMA 8.01, a point release. Consequently, after reviewing the results of HP's initial assessment, the ACC Staff directed HP to conduct an additional examination of the impending IMA 9.0 SATE Release as the test object. HP used PO 19 (Draft Version October 5, 2001) as a guide in its evaluations. In its subsequent SATE New Release Test Summary Report (9.0), HP found that Qwest SATE is adequate to support New Release Testing by a CLEC. See SATE New Release Test Summary Report (9.0) at p. 12.

120. HP verified Release 9.0 was available in SATE on January 30, 2002, or 28 days before the production release of IMA EDI 9.0 was deployed. HP validated this availability by performing a connectivity test.

121. In Phase I, HP submitted a total of 96 regression scenarios and 158 progression scenarios for a total of 254 scenarios. Eighteen scenarios returned unexpected responses which produced an accuracy ratio of approximately 93%. HP subsequently retested 17 scenarios, which resulted in a final accuracy ratio of 99.61%.

122. For Phase II New Release Testing, HP submitted a total of 60 regression scenarios and 62 progression scenarios for a total of 122 scenarios. Seventeen scenarios returned unexpected responses when compared to the results that HP expected. This equated to an accuracy ratio of approximately 86% when compared to the total number of scenarios executed. HP retested one scenario which resulted in an accuracy ratio of 86.89% but it submitted 12 formal issues as a result, and all the issues were closed.

123. For Phase III New Release Testing, HP submitted 96 regression scenarios and 164 progression scenarios for a total of 268 scenarios. Fourteen scenarios were returned with unexpected responses. This corresponded to an accuracy ratio of approximately 95%. HP was able to retest a total of 13 scenarios, which resulted in a final accuracy ratio of 99.62%.

c. Parties' Positions

1. CLEC's Position

124. In this proceeding CLECs have asserted that Qwest does not make available to them a stable test environment that mirrors production. Specifically, CLECs maintain that:

- a. SATE is not yet "production ready." According to their submissions there are too many outstanding problems that need to be fixed, as evidenced by HP's recommendations. According to the CLECs, HP implicitly concluded that Qwest's SATE process support is inadequate. They contend that further testing of SATE release 9.0 should be performed, inferring that new release testing has only been conducted in deference to the concerns implied within HP's initial assessment.
- b. Legacy system error codes and edits are not yet available for testing, and that testing should be finished before SATE is considered for Commission endorsement. CLECs maintain that because SATE uses a simulation technique to substitute for access to Qwest's legacy systems, it is necessary to test "what a CLEC's system would see coming from the legacy systems," and that has not been tested to date.
- c. The range of functionality afforded by SATE is not adequate. CLECs cite to the fact that post order responses are done only manually via telephone calls to Qwest. CLECs point to an augmentation to SATE termed "VICKI" that will provide additional abilities to evaluate post-order responses, which will also need to be tested.
- d. There is no flow-through capability currently offered by SATE. CLECs contend that although Qwest is planning that capability, it is not yet available and, moreover, would need to be tested when it is made available.
- e. SATE should not be approved until Qwest cures all "medium-severity" errors. CLECs concur that "low-severity" errors can be handled with some threshold and PID arrangements; but reiterate those medium-severity errors should be fully resolved.

125. In their Joint Brief, the CLECs argue that recent testing in Arizona by HP indicates that Qwest fails to meet the minimum acceptable standard of 95% currently adopted by ROC and Arizona. CLEC Joint Brief at p. 22. Further, investigations by AT&T indicate that HP failed to record all the errors that it uncovered during the testing to obtain the results. CLEC Joint Brief at p. 22.

126. The CLECs claim that SATE does not offer sufficient testing capabilities. The Joint CLECs rely upon Exception 3077 issued by KPMG which noted that Qwest did not offer VICKI and flow through capabilities for POTS and UNE-P POTS for Western region LSRs in SATE 9.0. The Joint CLECs also argue that the SATE does not generate post-order responses in the same manner in which they are created in the production environment. Joint CLEC Brief at p. 23. The CLECs rely upon several KPMG observations contained in Exception 3077: 1) VICKI response times may not match production response times; 2) VICKI response detail may not match production response detail, 3) VICKI does not support 'real world scenario testing'; 4) Flow through orders

are not supported in SATE; 5) The volume of order responses supported in SATE is restricted due to manual response handling; and, 6) The data contained within the order responses is not consistent, and may not mirror the data that would be found in production responses.

127. The CLECs also rely on Exception 3095 which states that SATE does not offer CLECs testing capabilities for all products. Joint CLEC Brief at p. 30.

128. The CLECs also raised several additional concerns regarding HP's evaluation. AT&T notes in its January 18, 2002 Comments that it was not able to complete testing with respect to New Releases. AT&T recommended that to ensure that SATE is adequate for full release testing, IMA SATE release 9.0 be tested. AT&T Comments at p. 4. AT&T also noted that one of the testing modules conducted by HP was "Negative Testing" to assess the reaction of SATE to incorrect inputs and responses. AT&T argues that HP's Negative Testing was designed to test SATE for a limited number of Business Process Layer (BPL) error codes. AT&T further states that the Final Report shows that HP conducted a set of 65 negative test scenarios. Unexpected results were initially discovered with 12 of the 65 scenarios, which AT&T claims is a very high error rate of over 18%. AT&T Comments at page 4.

129. AT&T also argued that HP was unable to initiate testing for legacy system error codes because Qwest failed to produce the list of error codes as requested by HP. AT&T Comments at p. 5.

130. AT&T also states that eighteen percent of the capabilities currently used by CLECs in Arizona are not in SATE and have not been tested by HP. AT&T states that "Report 7 - Products offered in AZ," modified by HP on December 12, 2001, reflects that the current count of functionality in the IMA EDI Disclosure document is 80 products. The total count of capabilities in SATE is only 34. According to HP, this means that 46 capabilities, fully 57.5% are not in SATE. AT&T Comments at p. 7. AT&T cites the following six capabilities that are in use but not included in SATE: a) Customer Service Record via FTP or Email, b) TN/Appointment Cancellation, c) Design Layout Request, d) Facility Availability ISDN Capable Loop, e) Non-Fatal Error Response Transaction, and f) Non-Fatal Response. AT&T Comments at p. 8. AT&T notes that HP recommended that "Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies. Id.

131. AT&T also noted that SATE used manual processing for post-order activity such as FOC, Completion and other functions. AT&T pointed out that the current manual process was unlike that which is experienced in the production environment. AT&T Comments at p. 9. AT&T also noted that SATE did not flow through orders in the way that the production system does, and that flow through is a very important part of the OSS interface. Without flow through, CLECs have no idea of how many of its orders would flow through or if the CLEC OSS will facilitate or inhibit flow through.

132. AT&T also had concerns with the 1) high error rates for the initial versions that were tested, 2) inadequate processes and support, 3) no process flow documentation, 4) no process for SATE use in new release testing, 5) no process objectives or measurements, 6) ongoing technical support for SATE cannot be verified, and 7) SATE documentation is new and incomplete, requiring Qwest support.

133. The CLECs also took three SATE issues to impasse for the Staff's resolution. The first impasse issue related to the benchmark for PO-19. The second impasse issue related to the need to do a full scale test of VICKI and flow-through, enhancements made by Qwest to its SATE after HP's evaluation. The third impasse issue related to the need for Qwest to do Phase IV or production mirroring testing.

2. Qwest's Position

134. Qwest counters that HP's SATE test is the most thorough test that any RBOC has undertaken of a "test environment." Qwest emphasizes that HP's overall conclusion is that SATE is adequate to support Qwest's CLEC testing in the state of Arizona given current levels of CLEC usage – although Qwest questions whether all of HP's recommendations need to be acted upon. Qwest emphasizes that HP's overall conclusion is "right now, this test environment is adequate." To support this conclusion:

- a. Qwest observes that SATE is not a state-specific system, but is being deployed for use throughout its 14-State region and four CLECs are already using the SATE.
- b. Qwest maintains that any additional testing initiative required goes well beyond what is required and Qwest has "already done way more than is required." Qwest argues that there has already been substantially more testing in Arizona than other states that have previously received Section 271 approval. Qwest further maintains that there are precedents where no SATE-type testing was done at all by a 271 applicant and where a final test environment was implemented by an ILEC prior to being evaluated.
- c. Qwest points to the fact that HP satisfactorily tested release 9.0 in advance of implementation in addition to completely and fully testing two prior releases (7.0 and 8.0) and, furthermore, tested a substantial "point" release (8.1) in advance of the first scheduled implementation.
- d. Qwest observes that it will be producing the results of testing of SATE on a monthly basis going forward through the PID, which, in and of itself, requires testing, running transactions and reporting the results.

135. Qwest stated that it makes available in SATE the same support teams to CLECs to assist in testing and certifying CLEC interface software as it does in the Interoperability environment. Qwest's IMA-EDI Implementation Team works directly

with CLECs using SATE. In addition, a SATE Users' Group meets regularly under the aegis of the Change Management Forum to discuss SATE-related issues and to recommend changes to SATE as appropriate. Qwest also provides CLECs with the IMA-EDI Implementation Guide and other documentation to aid in the utilization of SATE. Beginning with version 9.0, the IMA-EDI Implementation Guide has included a staffing plan which details Qwest's CLEC testing organizational structure and the roles and responsibilities of all resources that directly support SATE, as well as diagrams that describe the process flows of SATE. Qwest's April 26, 2002 Comments at p. 60.

136. Qwest further stated that it built SATE to provide products and transactions that were currently being ordered by CLECs through IMA-EDI. Qwest continues to monitor the products that CLECs express interest in and has created CMP CRs to add products to SATE. Qwest April 26, 2002 Comments at p. 60. In addition, to ensure that CLECs have the functionality available in SATE that they require, CLECs may request through the Change Management Process that Qwest include additional products and functionality in its suite of SATE transactions. *Id.*

137. To meet the CLECs' concerns and as a further enhancement to SATE, Qwest has provided automated post-order responses in SATE since Release 9.0 through the Virtual Interconnect Center Knowledge Initiator (VICKI). This new functionality provides CLECs with the ability to experience the behavior of IMA-EDI consistent with production timing of post-order transactions. It also ensures that CLECs receive automated responses consistent with those received in production. Qwest Comments at p. 61. Qwest also stated that it is in the process of implementing flow-through for all products in SATE that are flow-through eligible. Qwest Comments at p. 61. Qwest stated that implementation of flow-through should be completed throughout the entire Qwest territory by mid-May 2002. *Id.*

138. Qwest states that the FCC has defined the stability of a test environment as one in which the BOC makes no changes to the proposed release during the test period. Both the Interoperability environment and SATE are stable because Qwest has undertaken to make no changes during the 30-day period prior to implementation of a major release. Qwest Comments at p. 63. Qwest also stated that it makes both the Interoperability environment and SATE available to CLECs for an extended testing period. They are available to CLECs approximately 30 days prior to and six months after each major IMA-EDI release. This practice is known as "versioning" and allows CLECs to remain using a prior release even after implementation of a new release, to give them time to decide when to migrate to the new release. Qwest Comments at p. 64.

139. Qwest stated in its April Comments that to-date five individual CLECs, as well as five others through a service bureau, have successfully completed testing using SATE and have achieved production status for EDI implementation of pre-ordering capabilities. Qwest further stated that in Texas, the FCC found it compelling evidence of the adequacy of SBC's new test environment that three carriers had used it to achieve production status, with two carriers using it for a new release. Qwest Comments at p. 66.

In Arizona, Qwest stated that a total of 10 carriers have achieved production status after testing through STATE. Id.

d. Staff Discussion and Recommendation

140. In the evaluation of SATE, HP concluded that capabilities currently in place were adequate to support OSS Test program requirements. Staff concurs with the assessment of its technical consultant and accepts its principal conclusions. Staff is of the opinion that SATE, as it is currently structured, meets the FCC's requirements as to the availability of a stable testing environment provided by Qwest that affords the CLECs an adequate opportunity to test changes. Staff considers that the incorporation of SATE within the framework of the OSS Test fills a major void that existed at the inception of the OSS Test.

141. Staff believes that the majority of the CLEC's concerns have already been resolved. First, Staff required HP to test a New SATE Release utilizing Version 9.0 of Qwest's IMA Release as the test object. HP conducted this evaluation and issued a separate report entitled "SATE New Release Test Summary Report (9.0)." which found that Qwest's SATE is adequate to support New Release testing by a CLEC.

142. Staff resolved an issue brought to impasse by AT&T regarding the need to do a comprehensive test of VICKI and flow-through, two important enhancements made by Qwest to its SATE. Staff determined that since these enhancements were implemented after HP had done its primary evaluation of SATE and since they were "enhancements" to the test environment, HP was not required to do a comprehensive test of them. HP did do some testing of VICKI in its New Release Test, but not the comprehensive test desired by the CLECs.

143. Staff recently resolved another issue brought to impasse by AT&T which should go a long way in addressing many of their other concerns. While HP had done production mirror testing as part of its initial evaluation, by issuing 28 transactions in both SATE and production systems and compared results,⁹ Staff was concerned that SATE will in the future continue to mirror the production environment. AT&T's impasse brought to light the inadequacy of the PO-19 PID in measuring SATE against production for future releases. Because of the testing of SATE to date, HP has found that SATE adequately matches the production environment. However, as future releases are implemented, Staff is concerned that there will not be way to determine that SATE continues to match the production environment. In the Final Follow-Up Workshop, AT&T recommended that PO-19 PID be changed to include a requirement that SATE New Releases be mirror tested and evaluated against the productions systems. In its impasse resolution, Staff concurred with AT&T's recommendation. Staff directed Qwest to develop a new PO-19 that incorporates the requirement that new SATE Releases will be tested and evaluated against production systems. Mirror testing will be a requirement for new SATE releases. Qwest will execute transactions and evaluate Release 9.0

⁹ HP found that there was a match between SATE and production systems on fields and formats. However, HP found that there were differences in message content.

utilizing the new PID. HP will provide a third party evaluation of the PID calculation and provide a report on its evaluation. Staff also determined that in addition to incorporating new release testing into the new PO-19, Qwest should also retain the existing PO-19 testing requirements with a modification to report the disaggregated testing results for each supported release. Appropriate benchmarks will be reviewed in the May 21, 2002 TAG meeting.

144. Staff is also of the opinion that certain enhancements to SATE proposed by HP in its Final Report would be inherently beneficial to the development of competition, and facilitate still greater effectiveness of the Stand Alone Test Environment for use by the CLEC community and still others were recommended to ensure its SATE's continued effectiveness and adequacy. Accordingly, Staff is of the opinion that Qwest should be required to actively pursue implementation of HP's recommendations. Accordingly, Staff proposes that a quarterly report from Qwest be provided that outlines implementation progress regarding the specific HP recommendations cited in its Final Report. This requirement will enable Staff to effectively monitor SATE enhancement in the future. Staff recommends that the Commission find that Qwest satisfies §271 requirements relative to SATE, so long as Qwest agrees to implement HP's and Staff's recommendations to the extent they have not already done so.

145. HP's recommendations from its initial SATE Summary Evaluation Report are as follows:

- a. Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.
- b. Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation. At a minimum, this should specifically address the Data Documents and the Production Errors Lists.
- c. To ensure continued adequacy of the SATE, HP recommended:
 - That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined.
 - That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish these goals and objectives.
 - That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE.

- d. Qwest publish a list of variances between STATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this 'simulated' environment. This list should be concentrated into a single document, and become a permanent part of the SATE documentation library.
- e. Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECs to determine the full suite of products that shall be included in the SATE.
- f. Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.
- g. To ensure that the SATE is adequate for full release testing, HP recommends that IMA SATE release 9.0 be tested. This release is expected to take place February 2002.
- h. A SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production. HP did submit a recommendation for PO-19 to the TAG for consideration on 12/18/2001.
- i. Qwest file with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.

146. HP's recommendations from the SATE New Release Test Summary Report (9.0) are as follows:

- a. All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of HP's Report are incorporated into the SATE User Group and CMP process.
- b. Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.
- c. Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions. Qwest provide a clearly defined process to ensure timely resolution of production mirror issues encountered by CLECs during post SATE certification.
- d. Qwest include scenarios in data document reflecting all business rule changes identified in the New Release change summary documentation.

147: Staff's additional recommendations are as follows:

- a. Qwest should immediately enhance the range of capabilities available in SATE to provide for negative testing by CLECs.
- b. Qwest should file a report on a quarterly basis which indicates the extent of progress made on implementing HP's and Staff's recommendations.
- c. Qwest should immediately implement HP's recommendation that it publish a single document that is maintained throughout the life of SATE as the IMA-EDI production and SATE environments are updated. HP recommended that this single document be inclusive of SATE Legacy and BPL Error Codes and Production vs. SATE differences. This document will provide a CLEC with a single location to review the details regarding all error codes and variances that exist between STATE according to the schedule suggested by Qwest of twice per EDI Release at a minimum.

C. VERIFICATION OF COMPLIANCE

148. The FCC reviews the adequacy of a BOC's Change Management Process and SATE against the following criteria to ensure that a CLEC is afforded a meaningful opportunity to compete:

- a. Information relating to the Change Management Process is clearly organized and readily accessible to competing carriers;
- b. Competing carriers had substantial input in the design and continued operation of the Change Management Process;
- c. The Change Management Plan defines a procedure for the timely resolution of Change Management disputes;
- d. The availability of a stable testing environment that mirrors production; and
- e. Provide for timely, complete, and accurate notification and documentation of upcoming changes in a reasonable manner such that the efficient competitor has a meaningful opportunity to compete; and
- f. The efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.

155. Based upon the proceedings and record herein, and the evaluation, findings and conclusions of Staff's Test Administrator, CGE&Y on Qwest's Re-Designed CMP and the evaluation, findings and conclusions of HP on the adequacy of Qwest's SATE, and subject to Qwest's agreement to implement the recommendations set forth above, Staff recommends that the Commission find that Qwest complies with the FCC's requirements for an effective Change Management Process including a stable Stand-Alone Test Environment.

II. CONCLUSIONS OF LAW

1. 47 U.S.C. Section 271 contains the general terms and conditions for BOC entry into the interLATA market.

2. Qwest is a public service corporation within the meaning of Article XV of the Arizona Constitution and A.R.S. Sections 40-281 and 40-282 and the Arizona Corporation Commission has jurisdiction over Qwest.

3. Qwest is a Bell Operating Company as defined in 47 U.S.C. Section 153 and currently may only provide interLATA service originating in any of its in-region States (as defined in subsection (I)) if the FCC approves the application under 47 U.S.C. Section 271(d)(3).

4. The Arizona Commission is a "State Commission" as that term is defined in 47 U.S.C. Section 153(41).

5. Pursuant to 47 U.S.C. Section 271(d)(2)(B), before making any determination under this subsection, the FCC is required to consult with the State Commission of any State that is the subject of the application in order to verify the compliance of the Bell Operating Company with the requirements of Section 271.

6. In order to obtain Section 271 authorization, Qwest must, inter alia, meet the requirements of Section 271(c)(2)(B), the Competitive Checklist, and there must be a finding that Qwest's provision of interLATA service is in the public interest.

7. The FCC has identified the following criteria to determine whether the Change Management Process and SATE of a BOC are adequate:

- a. Information relating to the Change Management Process is clearly organized and readily accessible to competing carriers;
- b. Competing carriers had substantial input in the design and continued operation of the Change Management Process;
- c. The Change Management Plan defines a procedure for the timely resolution of Change Management disputes;

d. The availability of a stable testing environment that mirrors production;

e. Provide for timely, complete, and accurate notification and documentation of upcoming changes in a reasonable manner such that the efficient competitor has a meaningful opportunity to compete.

f. The efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.

8. As a result of the proceedings and record herein, and subject to Qwest's agreement to implement the recommendations contained herein, Staff recommends that the Commission find that Qwest's Change Management Process and SATE are 271 compliant.