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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
DOCUMENT CONTROL

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

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S COMMENTS REGARDING  
CGE&Y'S FINAL REPORT OF THE QWEST OSS TEST**

**AND**

**STAFF'S SUPPLEMENTAL REPORT AND STAFF RECOMMENDATION ON  
QWEST'S COMPLIANCE WITH CHECKLIST ITEM NO. 2  
OPERATIONAL SUPPORT SYSTEM REQUIREMENTS**

Arizona Corporation Commission

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Qwest Corporation ("Qwest") hereby submits its comments regarding Cap Gemini Telecom Media & Networks U.S., Inc.'s ("CGE&Y") Final Report of the Qwest OSS Test, Version 3.0, dated May 3, 2002 (the "Final Report") and the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Operational Support System Requirements, dated May 1, 2002 (Staff's "Recommendation Report"). In addition, these comments address other final reports, including the following:

- CGE&Y's Qwest Change Management Process Redesign Evaluation, Version 5.0 dated May 1, 2002 (CGE&Y's "CMP Redesign Report");
- Hewlett-Packard Consulting's ("HP") SATE Summary Evaluation Report, Version 3.0, dated December 21, 2001;
- Hewlett-Packard Consulting's SATE New Release Test Summary Report, Version 3.0, dated April 26, 2002;
- Staff's Supplemental Report on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Change Management Process and Stand-Alone Test Environment (Staff's "Supplemental CMP/SATE Report");
- Hewlett-Packard Consulting's Pre-Order to Order Integration Report, Version 5.0, dated April 15, 2002;
- CGE&Y's Final Report of the Qwest OSS Test – Section 2.4.5, revised April 24, 2002;
- CGE&Y's Functionality Test Results Comparison Report, Version 3.0, dated March 29, 2002 ("FTRC"); and
- CGE&Y's Qwest Performance Measures Audit: Final Report, Version 3.0, dated December 21, 2001.

## **I. INTRODUCTION**

The ACC commenced the Arizona third party test of Qwest's Operational Support Systems ("OSS") more than three years ago to determine whether Qwest provides competitive

local exchange carriers ("CLECs") with nondiscriminatory access to all of its OSS functions, features and capabilities in accordance with section 271(c)(2)(B)(ii) of the Telecommunications Act of 1996. The Test Advisory Group ("TAG") consisting of Staff, CLEC, and Qwest representatives was formed to discuss and resolve OSS test issues in what has become the most collaborative and comprehensive third party test conducted in any jurisdiction.

As part of the Arizona test, a number of professional consultants were retained to assist in the development and execution of the OSS test, bringing significant operational experience in telecommunications and involvement in other third party OSS tests. Staff retained Doherty and Company, Inc. ("DCI") to advise and consult with Staff regarding OSS test issues. CGE&Y was retained as the Test Administrator to manage and administer the development and execution of the Arizona test. HP was retained to act as the Pseudo-CLEC.

The CLECs, the ACC, the vendors, and Qwest have all invested significant time and effort over the past three years, including hundreds of hours in face-to-face meetings and thousands of hours reviewing and commenting on various documents. Before the Arizona test began, the Commission conducted nine workshops on test and performance measurement design. While the OSS test was proceeding, the parties participated in more than 50 TAG meetings to discuss testing issues. While the parties have had many disagreements throughout that time, all parties have made every effort to articulate their views in a constructive manner and to listen to differing points of view. As a result, the parties have reached agreement on hundreds of issues and only a handful -- approximately 18 -- were presented to Staff for resolution. Qwest applauds and commends all of the TAG participants for their significant contributions in designing and executing a rigorous and comprehensive test of Qwest's systems with an unprecedented level of openness and collaboration.

Staff has conducted every stage of this test in an open manner that allowed full public discussion on all testing issues. In order to provide for the early and efficient consideration of the parties' differing views and to avoid leaving substantive issues to be addressed at the very end of the proceeding, the TAG agreed that interim reports would be issued and a series of interim workshops would be held as those reports were issued. Accordingly, CGE&Y issued numerous draft reports regarding the test results. Prior to the workshops regarding those reports, CGE&Y responded in writing to more than a thousand written questions from the parties and provided tens of thousands of pages of supporting materials available for review.

The results of the Arizona OSS test have been the subject of ten workshops over the past nine months. During these ten workshops regarding test results, all parties were allowed to inquire into any and all areas. Sufficient time was allotted for these workshops so that all parties could raise and thoroughly discuss all issues. No party was prevented from participating or raising any issue at these workshops. The fact that nearly every workshop concluded early demonstrates that all parties were afforded as much time to address issues as they required. Indeed, the final report workshop held in January 2002 and the final workshop held in April 2002 both concluded a full day early, even though parties filed extensive comments in advance. In addition, as Staff notes in its Recommendation, the test schedule was extended numerous times to ensure that all issues were resolved.<sup>1</sup>

All of the participants in this proceeding have had the virtually unlimited ability to raise any issue at any stage of this process -- beginning with the negotiation of the Master Test Plan ("MTP") and Test Standards Document ("TSD"), continuing through the workshops held on each interim draft final report, down to the final workshop -- and all such issues have been addressed.

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<sup>1</sup> Staff's Recommendation Report, ¶ 75.

Thus, the parties have already raised virtually all substantive issues in prior workshops and filings.

The testing is now complete. As detailed in CGE&Y's and HP's reports, Staff's Recommendation Report, and Staff's Supplemental CMP/SATE Report, and discussed below, Qwest has passed every evaluation.

## **II. OSS TEST OVERVIEW AND RECOMMENDATIONS**

### **A. OSS Test Overview**

The parties developed the controlling test documents in the initial TAG meetings. DCI developed and circulated the first draft MTP, which set forth the principles and guidelines for OSS testing. The CLECs and Qwest proposed additions, deletions and modifications and discussed test design issues until agreement was reached. This iterative process included extensive negotiations over the course of many face-to-face TAG meetings and workshops and resulted in several MTP drafts until the MTP was docketed on March 23, 2000.

While the MTP was nearing completion, the TAG began developing the TSD, which is the detailed test design that provides the blueprint by which the MTP is realized. The TSD was developed through the same iterative process as that used for the MTP. CGE&Y issued an initial draft, parties proposed modifications, discussed issues until resolved and eventually produced a final version. This process required approximately six months and numerous meetings. The TSD was modified on an as-needed basis through September 2001.

In addition to developing the MTP and TSD, the TAG also sought and reached agreement on a comprehensive set of Qwest Service Performance Indicator Definitions ("PIDs"), which describe the manner in which Qwest's performance is measured in both a commercial setting and

for purposes of the test. These PIDs, which include performance standards and benchmarks, were developed by the TAG concurrent with the development of the MTP and TSD.

The five major components of the ACC's OSS test are the Performance Measure Audit, Functionality Test, Retail Parity Evaluation, Capacity Test, and the RME. Each of these major test components is described below.

Performance Measurement Audit. This evaluation was conducted to determine if reported Qwest results and data were consistent with the definitions of performance measures as described in Qwest's PIDs. The audit was intended to verify that all calculations were being performed correctly, subject to input data being accurate. CGE&Y conducted data reconciliation studies to evaluate the validity of the raw data Qwest uses to calculate and report the PID results. As part of this evaluation, CGE&Y contrasted Qwest and Pseudo-CLEC data and correlated information provided by CLECs with Qwest's reported PID results. The Liberty Consulting Group also conducted an independent data reconciliation to determine whether information provided by CLECs demonstrated that Qwest's reported performance results were accurate, in accordance with measures defined in the PID.

Functionality Test. This test was designed to test the ability of Qwest's OSS to provide operational functionality to CLECs. The test encompassed Qwest's formal processes and procedures for pre-ordering, ordering, provisioning, maintenance & repair ("M&R"), and billing services required by CLECs. The test encompassed resale, Unbundled Network Element-Platform ("UNE-P"), UNE-Loop, number portability, and UNE-Loop with number portability. Tests involved the collection of specified input data in a structured, controlled manner in accordance with specified test procedures. CGE&Y also evaluated emerging services products as prescribed by the TAG through documentation reviews, review of actual CLEC requests or

transactional tests depending upon the product. Emerging services evaluated include Enhanced Extended Loop (“EEL”), unbundled Dedicated Interoffice Transport (“UDIT”), Unbundled Sub-Loop, Unbundled Dark Fiber (“UDF”), Line Sharing and Line Splitting. PIDs provided the evaluative criteria for judging the success of the tests. The actual provisioning of service was evaluated for a statistically significant number of orders. This test was primarily conducted in a production environment, using the same systems that CLECs use. Additional testing included an analysis of the timeliness, accuracy and completeness of Daily Usage File ("DUF") processes.

Retail Parity Evaluation. This test is unique to the ACC's OSS test. The evaluation was designed to provide qualitative, as well as quantitative, information needed to evaluate the parity of Qwest’s OSS with respect to wholesale versus retail operations. This test compared the ability of a CLEC representative using Qwest-provided OSS interfaces to achieve an overall comparable level of service and experience as compared to the level of service and experience that a Qwest representative could provide using Qwest’s standard internal systems. This test incorporated a comparison of OSS responsiveness as well as a comparison of the quality of the data accessed by the CLEC and Qwest representatives. This was primarily a qualitative analysis test to compare the experience of a CLEC representative with that of a Qwest retail representative.

Capacity Test. This test was designed to test the capability of Qwest’s OSS to handle loads equal to or greater than those for forecasted volumes one year beyond the OSS Test date. CGE&Y established total capacity test volumes based upon forecasted loads that were provided by both Qwest and the CLECs and were agreed upon by the TAG. The Capacity Test included a Scalability Analysis, a review of procedures associated with both computer systems scalability and staff scalability, to determine the degree to which Qwest systems, operations and processes would be capable of handling both projected and unexpected CLEC loads in the future. In

addition, a Stress Test was performed using a stress load of 150% of the demand forecasted for twelve months into the future. The Stress Test had no pass or fail criteria, but was performed to determine the volume level at which Qwest's OSS performance began to degrade.

Relationship Management Evaluation. The test evaluated whether the methods, procedures and information that Qwest employed to communicate with the CLECs were efficient and effective. The evaluation examined processes and procedures used by Qwest for CLEC account establishment, account management, training, CLEC/Qwest interface development, and Qwest's Change Management Process ("CMP"). HP conducted an independent evaluation of Qwest's Stand Alone Test Environment ("SATE") and issued a separate report regarding the results. Similarly, CGE&Y separately evaluated Qwest's CMP and issued a separate report regarding the results. Staff addressed the CMP and SATE evaluations in its Supplemental CMP/SATE Report.

As Staff noted in its Recommendation Report, through these tests, CGE&Y performed a thorough and comprehensive test of Qwest's wholesale processes and procedures, in addition to an exhaustive examination of Qwest's performance as measured by the PIDs.<sup>2</sup> CGE&Y and HP conducted a broad examination of all stages of the business relationship between Qwest and competing carriers, including establishing the initial relationship, conducting daily operations, and maintaining the relationship. Every aspect of the Qwest/CLEC relationship was explored and evaluated, including interface establishment.

The test methodology employed "military style" testing, which is based on a "test until you pass" philosophy. As applied to the OSS test, this methodology required CGE&Y to issue Incident Work Orders ("IWOs") to resolve test exceptions when an interface, system or process

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<sup>2</sup> Staff's Recommendation Report, ¶ 31.

under evaluation did not meet objective criteria, standards or expectations established in the MTP or TSD. Qwest responded in writing to every IWO with an explanation of the incident and a proposal for resolving it. During the course of testing, a total of 360 IWOs (including IWOs arising from the PMA) were issued. All of these IWOs were closed.<sup>3</sup>

**B. Qwest Provides Non-Discriminatory Access to its OSS.**

**1. CGE&Y found that Qwest passed the Arizona test.**

**a. Functionality Test**

CGE&Y concludes that Qwest provides sufficient electronic functions and manual interfaces to allow competing carriers access to all of the necessary OSS functions. This conclusion is supported by test activities, observations, performance results, and system, procedural and metric improvements that Qwest made in response to IWOs generated during the Functionality Test.<sup>4</sup> CGE&Y also concluded the following regarding the generation of DUF records: Usage records were generated to the new co-provider beginning with usage occurring the day after the conversion date, as expected.<sup>5</sup>

**b. Retail Parity Evaluation**

CGE&Y concludes that the experience of a CLEC service representative using the various available OSS interfaces is substantially the same as that of a Qwest service representative performing similar activities using internal OSS interfaces. More specifically, CGE&Y concludes that Qwest provides CLECs with substantially the same access to its OSS for the purposes of initiating service requests and M&R trouble transactions.

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<sup>3</sup> CGE&Y either withdrew or determined that no action was required on 48 of the IWOs.

<sup>4</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Functionality.

<sup>5</sup> CGE&Y Final Report, section 2.4.5.

CGE&Y further concludes that the OSS access that Qwest provides to CLECs for the purposes of retrieving pre-order information, initiating service requests and M&R trouble transactions does not negatively impact the customer experience as any time differences observed between retail and wholesale would be transparent to a customer while communicating with the representative. These conclusions were based on a combination of qualitative, quantitative, and timeliness results, as well as observations and statistical analysis to determine the overall experiences of CLEC and Qwest service representatives.<sup>6</sup>

**c. Capacity Test**

CGE&Y concludes that Qwest's OSS are capable of processing forecasted volumes up to 12 months in the future while maintaining a level of performance well within the established benchmarks.<sup>7</sup> CGE&Y also concludes that for System Scalability, Qwest has well documented processes and procedures in place to maintain system capacity sufficient to meet projected future loads. Finally, CGE&Y concludes that for Staff Scalability, Qwest maintains adequate forecasting procedures to identify the need for additional work force within a sufficient time frame that allows for appropriate training and placement.<sup>8</sup>

**d. Relationship Management Evaluation**

CGE&Y concludes that Qwest has sufficient processes and procedures for CLEC account establishment, account management, training, interface development and change management. During the course of the Relationship Management Evaluation ("RME"), Qwest made significant improvements in its account establishment and account management processes.<sup>9</sup> CGE&Y was

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<sup>6</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Retail Parity Evaluation.

<sup>7</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Capacity Test.

<sup>8</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Capacity Test.

<sup>9</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Relationship Management Evaluation.

able to specifically track many of these processes.<sup>10</sup> At the end of the evaluation, CGE&Y found that Qwest satisfied the requirements for both areas of account establishment and account management.

CGE&Y also concludes that Qwest's interface development process is sufficient. CLEC feedback was positive regarding the knowledge of the interface development staff and efficiency of the project management processes used to manage development efforts.<sup>11</sup> CGE&Y acknowledges that the online documentation available to CLECs is sufficient and has been vastly improved over the course of the Arizona §271 Test. CGE&Y finds that sufficient content exists, in a well-organized manner, for a CLEC to find all information required to conduct business activities with Qwest.<sup>12</sup>

In its separate report on CMP, CGE&Y concluded that Qwest's CMP is a collaborative process with both sides provided ample opportunity to present ideas, encompasses changes to products and processes, and that the Qwest CMP exceeds the objectives set forth by the Arizona MTP and TSD, the various State Orders, and the FCC requirements for Change Management.<sup>13</sup>

HP in its report on pre-order-to-order integration concluded that CLECs can utilize Qwest's EDI pre-order transactions to submit an order without data manipulation.<sup>14</sup>

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<sup>10</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Relationship Management Evaluation..

<sup>11</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Relationship Management Evaluation.

<sup>12</sup> CGE&Y Final Report, Executive Summary, Summary of Test Results, Relationship Management Evaluation.

<sup>13</sup> CGE&Y CMP Redesign Report, p. 42.

<sup>14</sup> HP Pre-Order to Order Integration Report, section 7.0.

e. SATE

HP found that the SATE is adequate to support Qwest CLEC testing in the State of Arizona, given current levels of CLEC usage,<sup>15</sup> and further determined that the Qwest SATE is adequate to support New Release Testing by a CLEC.<sup>16</sup>

2. Qwest meets the FCC's section 271 standards.

Section 271(c)(2)(B)(ii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, Pub. L. No. 104-104, § 151(a), 110 Stat. 89 (the "Act") requires that Qwest provide "[n]ondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1)."<sup>17</sup>

The FCC has consistently found that a BOC must provide nondiscriminatory access to OSS functions required to formulate and place orders for network elements or resale services (pre-ordering and ordering functions), to install service to their customers (provisioning functions), to maintain and repair network facilities, and to bill customers.<sup>18</sup>

For OSS functions that are analogous to those that a BOC provides to itself, its customers or its affiliates, a BOC must provide access that permits competing carriers to perform these functions in "substantially the same time and manner" as the BOC.<sup>19</sup> It is important to note that the FCC has recognized in prior orders that there may be situations in which a BOC contends that, although equivalent access has not been achieved for an analogous function, the access that

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<sup>15</sup> HP SATE Summary Evaluation Report, section 2.1.

<sup>16</sup> HP SATE New Release Test Summary Report, section 2.1.

<sup>17</sup> 47 U.S.C. § 271(c)(2)(B)(ii).

<sup>18</sup> *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Georgia and Louisiana*, CC Docket No. 02-35, Memorandum Opinion and Order, FCC 02-147 (rel. May 15, 2002) ("*BellSouth Georgia/Louisiana 271 Order*"), Appendix D, ¶ 25.

<sup>19</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 27.

it provides is nonetheless nondiscriminatory within the meaning of the statute.<sup>20</sup> For OSS functions that have no retail analogue, the BOC must offer access “sufficient to allow an efficient competitor a meaningful opportunity to compete.”<sup>21</sup>

In analyzing whether a BOC has met the nondiscrimination standard for each OSS function, the FCC also determines “whether the BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and whether the BOC is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.”<sup>22</sup> Finally, the FCC determines whether the OSS functions a BOC has deployed are operationally ready, as a practical matter.<sup>23</sup> As summarized below, the results of the Arizona test demonstrate that Qwest meets these standards.

- a. **The Arizona test results establish that Qwest provides CLEC access to OSS functions in substantially same time and manner and provides CLECs with a meaningful opportunity to compete.**

Specifically, for each of the IMA-GUI and IMA-EDI interfaces, CGE&Y found that the quality and quantity of information obtained by a CLEC through pre-ordering queries was substantially the same as that obtained by Qwest's own Retail operations.<sup>24</sup> These findings also formed a basis for CGE&Y's conclusion that the CLEC representative has an experience that is substantially the same in time and manner as that of a Qwest representative and that these timing differences do not negatively impact the customer experience.<sup>25</sup>

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<sup>20</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 27.

<sup>21</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 28.

<sup>22</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 29.

<sup>23</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 29.

<sup>24</sup> See CGE&Y Final Report, section 3, pp. 238, 258; see also *id.*, section 7.2, p. 461.

<sup>25</sup> See *id.*, section 3.1.4, p. 215. See *BellSouth Georgia/Louisiana 271 Order*, App. D, ¶ 27; *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the*

In addition, the results of the Functionality Test show that Qwest provides CLECs with access to ordering functions in substantially the same time and manner as it provides them to itself.<sup>26</sup> CGE&Y evaluated Qwest's pre-ordering, ordering, and provisioning processes primarily through the Functionality Test. CGE&Y found that Qwest met most ordering-related PID measures in the course of the Functionality Test in providing service to the Pseudo-CLEC.<sup>27</sup> Further, the results of the Retail Parity Evaluation led CGE&Y to conclude that the experience of a CLEC service representative using the various available OSS interfaces is substantially the same to that of a Qwest service representative performing similar activities using internal OSS interfaces.<sup>28</sup> CGE&Y also concluded that Qwest provides CLECs with substantially the same access to its OSS for the purpose of initiating service requests and M&R trouble transactions.<sup>29</sup>

CGE&Y also found that Qwest met most provisioning-related PID measures in the course of the Functionality Test.<sup>30</sup> The Functionality Test also evaluated whether CLECs could order – and Qwest could provision – a number of "Emerging Services," including Enhanced Extended Loops, Line Sharing, Line Splitting, Unbundled Dark Fiber, Unbundled Inter-Office Transport, and Unbundled Subloops.<sup>31</sup> Overall, CGE&Y found that Qwest provides CLECs with the ability to order and obtain such services as required.

Moreover, the results of the Arizona test show that Qwest provides CLECs with access to M&R functions in substantially the same time and manner as it provides M&R functionality to

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*Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri*, CC Docket No. 01-194, Memorandum Opinion and Order, FCC 01-338 (rel. Nov. 16, 2001) ("*Arkansas/Missouri 271 Order*"), Appendix D, ¶ 34.

<sup>26</sup> CGE&Y Final Report, section 7.1.

<sup>27</sup> *See id.*, section 7.1. CGE&Y's Final Report describes these PIDs under "Pre-Order."

<sup>28</sup> CGE&Y Final Report, Executive Summary, Retail Parity Evaluation Conclusions.

<sup>29</sup> CGE&Y Final Report, Executive Summary, Retail Parity Evaluation Conclusions.

<sup>30</sup> *Id.*, section 7.1.

<sup>31</sup> *See id.*, section 2.2.4.

itself, and that Qwest offers an efficient competitor a meaningful opportunity to compete in the market for local service. CGE&Y evaluated Qwest's M&R processes in the Functionality Test (including Performance Measures) and the Retail Parity Evaluation.

Overall, CGE&Y concluded in the Functionality Test that the CEMR and EB-TA interfaces performed satisfactorily and provided CLECs with nondiscriminatory access to Qwest's M&R systems and processes. A complete analysis of CGE&Y's M&R testing can be found in Section 2.3 of the Final Report.<sup>32</sup> The Retail Parity Evaluation included evaluation of M&R transactions. In its Final Report, CGE&Y concluded that Qwest provided M&R functionality to CLECs through IMA-GUI and EB-TA in substantially the same manner as it provides to its own Retail operations.<sup>33</sup>

The performance results from the Capacity Test also indicate that Qwest provides CLECs with a meaningful opportunity to compete. Specifically, the PO-1 results<sup>34</sup> during the Capacity Test and PO-1A (IMA-GUI) results<sup>35</sup> during the Stress Test were within the benchmarks prescribed.

**b. The Arizona test results establish that Qwest has deployed the necessary systems and personnel and adequately assists CLECs in using the OSS functions available to them.**

As set forth above, the FCC also determines “whether the BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and whether the BOC is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.”<sup>36</sup> Specifically, a BOC must demonstrate that: (1)

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<sup>32</sup> See *id.*, section 2.3, p. 89.

<sup>33</sup> See *id.*, section 7.2, p. 462-463.

<sup>34</sup> See CGE&Y Final Report, section 7.3.

<sup>35</sup> See *id.*

<sup>36</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 29.

it provides competing carriers with the specifications necessary for carriers to design or modify their systems in a manner that will enable them to communicate with the BOC's systems and any relevant interfaces;<sup>37</sup> (2) it discloses to competing carriers any internal business rules and other formatting information necessary to ensure that a carrier's requests and orders are processed efficiently;<sup>38</sup> and (3) its OSS is designed to accommodate both current demand and projected demand for competing carriers' access to OSS functions.<sup>39</sup>

The Arizona test results establish that Qwest has deployed the necessary systems and personnel to provide sufficient access to its OSS functions and is adequately assisting CLECs to understand how to implement and use all of the OSS functions available to them. Indeed, CGE&Y concluded that:

Qwest provides sufficient electronic functions and manual interfaces to allow competing carriers access to all of the necessary OSS functions in Arizona. This conclusion is supported by test activity; observations; performance results; and system, procedural and metric improvements that Qwest has made in response to IWOs generated during the Functionality Test.<sup>40</sup>

The Arizona test results also establish that Qwest meets each of the three specific criteria.

First, Qwest provides competing carriers with the specifications necessary for carriers to design or modify their systems in a manner that will enable them to communicate with the BOC's systems and any relevant interfaces.<sup>41</sup> In the RME, CGE&Y concluded that Qwest's CLEC account establishment and management process are sufficient, and that Qwest's interface development process is sufficient, and that the online documentation available to CLECs is

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<sup>37</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 30.

<sup>38</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 30.

<sup>39</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 30.

<sup>40</sup> See CGE&Y Final Report, Executive Summary, Functionality Test Conclusions; see also CGE&Y Final Report, Section 7.1.

<sup>41</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 30.

sufficient.<sup>42</sup> Indeed, CGE&Y found that CLECs can obtain documentation relating to building an interface and/or configuring service to the Qwest EDI, EB-TA, Billing, and IMA-GUI interfaces that is clear, accurate, and sufficient to build the interface.<sup>43</sup> Further, CGE&Y concluded in its Final Report that Qwest's interface development processes meet the needs of the CLEC community.<sup>44</sup> Further details on the results of the interface development portion of the RME can be found in Section 5.4.4 of the Final Report.

Second, Qwest discloses to competing carriers any internal business rules and other formatting information necessary to ensure that a carrier's requests and orders are processed efficiently.<sup>45</sup> The results of the Third Party Test conducted by CGE&Y show that Qwest adequately informs and assists CLECs in understanding how to implement and use OSS functions. In addition to reviewing the process by which a CLEC establishes the necessary systems and processes to order various Qwest products and services using Qwest's OSS as part of the RME,<sup>46</sup> CGE&Y also evaluated the technical assistance Qwest provides to CLECs. This evaluation included all facets of Qwest's business processes, procedures, and communication methods that involve interaction with CLECs or were created for their use.<sup>47</sup> In its Final Report, CGE&Y concluded that Qwest satisfied all the requirements of the MTP regarding Technical Assistance.<sup>48</sup>

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<sup>42</sup> CGE&Y Final Report, Executive Summary, Relationship Management Evaluation Conclusions.

<sup>43</sup> CGE&Y Final Report, section 5.4.4.

<sup>44</sup> See CGE&Y Final Report, Section 5.4.3 ("No major problems were noted with Qwest's EDI-related documentation since the re-design of the web site during the summer of 2000."); see also *id.*, section 7.4.

<sup>45</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 30.

<sup>46</sup> See CGE&Y Final Report, Section 5.0. A complete analysis of CGE&Y's Relationship Management testing can be found in Section 5 of the Final Report.

<sup>47</sup> See CGE&Y Final Report, Section 5.0.

<sup>48</sup> *Id.*, Section 7.4. CGE&Y's conclusions on interface development are discussed below, in connection with EDI Development and Documentation. Its conclusions on Change Management are discussed in the Change Management Declaration.

Specifically, CGE&Y concluded that Qwest's account establishment practices meet the needs of CLECs.<sup>49</sup> CGE&Y also examined the methods, procedures and actions of Qwest in managing its business relationships with CLECs,<sup>50</sup> and concluded that Qwest's account management practices meet the needs of the CLEC community.<sup>51</sup> Further, the RME included an examination of the adequacy of Qwest's Wholesale training effort, including the availability of training; the curriculum offered to CLECs; the content, structure and quality of available training; and the effectiveness of Qwest's training program, as assessed by program participants.<sup>52</sup> CGE&Y found that Qwest satisfied all test objectives.<sup>53</sup> Finally, CGE&Y evaluated Qwest's documentation and Wholesale web site.<sup>54</sup> CGE&Y concluded that "sufficient content exists, in a well organized manner, for a CLEC to find all information required to conduct business activities with Qwest."<sup>55</sup>

Third, Qwest's OSS is designed to accommodate both current demand and projected demand for competing carriers' access to OSS functions.<sup>56</sup> CGE&Y performed the Capacity Test – consisting of a System Capacity and Stress, Test, a System Scalability Reviews, and a Staff Scalability Review – to determine whether Qwest's OSS can handle both current and

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<sup>49</sup> *Id.*, section 5.1.4; section 7.4. Further details on the results of the account establishment portion of the RME can be found in Section 5.1.4 of CGE&Y's Final Report.

<sup>50</sup> See CGE&Y Final Report, section 5.2.

<sup>51</sup> See CGE&Y Final Report, section 5.2.4; section 7.4. Further details on the results of the account management portion of the RME can be found in section 5.2.4 of the Final Report.

<sup>52</sup> *Id.*, section 5.3.

<sup>53</sup> *Id.*, section 5.3.5. CGE&Y noted a minor exception in the CLEC training portion of the RME, which can be found in section 5.3.5 of the Final Report.

<sup>54</sup> CGE&Y's findings that relate to Qwest's documentation and the Wholesale web site are principally discussed within the Account Establishment portion of the RME. See CGE&Y Final Report, section 5.1.3.

<sup>55</sup> *Id.*, section 7.4.

<sup>56</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 30.

reasonably foreseeable future volumes of pre-ordering and ordering transactions.<sup>57</sup> The results of the System Capacity Test show that Qwest's OSS is designed to accommodate both current demand and projected demand.<sup>58</sup> CGE&Y concluded that Qwest passed the Capacity Test:

Qwest's OSS are capable of processing forecasted volumes up to 12 months in the future while maintaining a level of performance well within the established benchmarks. CGE&Y also concludes that for System Scalability, Qwest has well documented processes and procedures in place to maintain system capacity sufficient to meet projected future loads. Finally, CGE&Y concludes that for Staff Scalability, Qwest maintains adequate forecasting procedures to identify the need for additional work force within a sufficient time frame that allows for appropriate training and placement.<sup>59</sup>

A complete analysis of the System Capacity and Stress Tests, the System Scalability Review, and the Staff Scalability Review can be found in Sections 4.1-4.3 of the Final Report. Finally, the FCC also assesses "whether the OSS functions that the BOC has deployed are operationally ready, as a practical matter."<sup>60</sup> Under this inquiry, the FCC examines performance measurements and other evidence of commercial readiness to ascertain whether the BOC's OSS is handling current demand and will be able to handle reasonably foreseeable future volumes.<sup>61</sup> As discussed above, CGE&Y has concluded that Qwest's OSS are currently capable of accommodating current volumes and forecasted volumes up to 12 months in the future while meeting established benchmarks. Further, Qwest's system and staff scalability processes are adequate to meet additional needs within a sufficient time frame.

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<sup>57</sup> See generally CGE&Y Final Report, section 4.

<sup>58</sup> See CGE&Y Final Report, section 7.3.

<sup>59</sup> CGE&Y Final Report, Executive Summary, Capacity Test Conclusions.

<sup>60</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 29.

<sup>61</sup> *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 31.

### C. CGE&Y and Staff Recommendations

While conducting the OSS test, CGE&Y identified areas of improvements beyond current levels of performance that CGE&Y found satisfactory; accordingly, CGE&Y made nine recommendations. CGE&Y explained in its Final Report that these recommendations do not arise from existing deficiencies and do not contradict its findings that Qwest offers CLECs nondiscriminatory access to its OSS. They are simply specific areas where CGE&Y believes benefits could accrue to all parties.

Staff in its report adopts all of CGE&Y's recommendations, except for one, and made four recommendations of its own. CGE&Y's and Staff's recommendations are addressed below.

Although, Qwest agrees that the implementation of these recommendations are not required to meet the test standards set forth by the MTP and TSD, Qwest is amenable to meet those recommendations that have not already been satisfied with one exception, CGE&Y's first recommendation. For those recommendations that have already been satisfied, Qwest provides the explanation below.

- 1. CGE&Y recommends that independent audits be conducted on all measures, based on a quarterly schedule, to ensure the continued accuracy of Qwest's performance measurement reporting on existing and new products. This recommendation is supported by three IWOs created during the Performance Measurement Audit (AZIWO2056, AZIWO2072, and AZIWO3006).<sup>62</sup>**

Staff opposes this recommendation. Staff states:

This requirement borders on the onerous since it would result in almost continuous auditing. Furthermore, the Arizona Performance Assurance Plan (PAP) provides for an independent audit of Qwest performance measures at an eighteen-month interval. Staff believes the PAP plan requirement is adequate.<sup>63</sup>

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<sup>62</sup> CGE&Y Final Report, Executive Summary, Recommendations.

<sup>63</sup> Staff Recommendation Report, ¶ 281.

Qwest agrees with Staff. The recommended annual audit has been a subject of discussion and dispute in the PAP workshop. Whether to conduct future audits and the proper nature of such audits are more appropriately addressed in context of the PAP.

2. **Qwest should develop a process to seek and receive approval from a CLEC before performing any changes to a CLEC-owned account. Currently, Qwest initiated activities are shown as "Completions" on a Loss and Completion Report, but little detail is provided, causing undue confusion. Implementation of this recommendation may provide an opportunity for Qwest to improve the quality and value of the Loss and Completion Report that Qwest provides to CLECs. Notification to a CLEC indicating that Qwest-initiated changes have been made would potentially facilitate the reconciliation of the Loss and Completion Report. This recommendation was developed to address the issue of late notification of order completion on the Loss and Completion Report, and is discussed further in AZIWO2115. This issue is an appropriate candidate for review by the CMP.<sup>64</sup>**

Qwest recently made a change to the Loss and Completion Report that satisfies this recommendation. On March 16, 2002, Qwest modified the service order processors so that the purchase order number field ("PON") is automatically populated with a value that indicates Qwest initiated the order. This PON is reflected on the Loss and Completion Report, thereby facilitating CLECs to reconcile this report as CGE&Y recommends.

Qwest notified the CLEC community of the March change on February 21, 2002.

3. **CGE&Y recommends that Qwest explore the inclusion of additional edits of CLEC LSRs, within the Business Process Layer (BPL) of the gateway systems, prior to issuance of a FOC. This recommendation suggests that increased edits in Qwest gateway OSS would likely result in lowered initial LSR rejection rates, improved CLEC order processing, and the reduction of rejects after a FOC. This issue was initially discussed in AZIWO2116, and Qwest has implemented improvements.<sup>65</sup>**

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<sup>64</sup> CGE&Y Final Report, Executive Summary, Recommendations.

<sup>65</sup> CGE&Y Final Report, Executive Summary, Recommendations.

Qwest has consistently enhanced IMA including additional LSR edits that increased CLEC accuracy and LSR processing efficiency. Through continuous improvement efforts, Qwest will continue to implement edits, consistent with prioritization by CLECs in the CMP process. A CLEC may also submit requests for additional edits through CMP. Qwest's PO-7 results also validate these improvements with a steady reduction in the percentage of rejects after a FOC – February 0.850%; March 0.370%; April (MTD) 0.060%.

More specifically, Qwest is planning on implementing 14 new edits in the near future: two new edits in Release 10.0, eight in Release 11.0, and four in later releases. These edits have been processed in change requests approved through the CMP process.

4. **CGE&Y recommends that when Qwest introduces a new product or service that could impact a CLEC account, that the appropriate OSS and process changes are communicated to the appropriate Qwest departments or work centers. This recommendation suggests that Qwest implement process improvements that would result in a more efficient update of system tables and better communication to work centers, which would help, ensure efficient processing of CLEC orders. This issue is discussed in AZIWO1134, which allows CLECs to take advantage of new and revised product offerings more expeditiously. It is also discussed in AZIWO1127, which refers to software changes that were outside of a scheduled IMA release that were not communicated to the CLECs.<sup>66</sup>**

Qwest has complied with the intent of this recommendation by making substantial improvements to its communication and rate table update processes. These improvements were made as a result of findings by both the Arizona and ROC tests and by the change management redesign meetings. Concerning improvements in communications, Qwest implemented the following internal process to ensure that when a new product or service is introduced, the OSS and process changes are communicated to the appropriate Qwest organizations.

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<sup>66</sup> CGE&Y Final Report, Executive Summary, Recommendations.

A methods-and-procedure walk-through is conducted with the impacted organizations prior to the effective date that new or enhanced products or processes are introduced. The purpose of the walk-through is to rid the product or process introduction of errors. The process is detailed on Qwest's internal web site. The necessary organization and resources are included, depending upon the change being made. Examples are (1) Service Delivery Coordinators ("SDCs") who issue orders and correct errors, (2) Process Specialists who safeguard the integrity of the new or changed process, (3) Network representatives who validate that the provisioning or repair work is accurate, and (4) Product managers who safeguard the integrity of the product requirements and manage changes to the PCAT or other external documentation.

In addition to the methods and procedures walk-through process, table updates have also undergone the following process improvements to ensure the efficient processing of system table updates:

- a. A rate change sign-off that ensures Product Management, Business Development and Service Delivery approve all rate changes;
- b. A peer-to-peer review that ensures the input sheet for CLEC Product Services ("CPS") table contains correct rates;
- c. Development by the third quarter of 2002 of an automated tool that will load the CLECs' contract rates into CPS, reducing the potential for errors encountered in manual processes;
- d. A peer-to-peer review that ensures rates are correctly entered into CPS; and
- e. Development by the fourth quarter of 2002 of an automated process of adding changes and deletes from CPS to CRIS.

In addition to these internal processes, Qwest and the CLECs participating in the redesign of Qwest's CMP have agreed to a detailed process by which Qwest will notify CLECs of product and process changes. The process provides for five tiers of processes, called Level 0-Level 4,

differentiated by the expected impact of changes on CLECs. Each level includes an exclusive list of the categories of changes to which the processes for that level apply. Each level also defines a different process for changes falling within that level, with the amount of process and CLEC increasing with expected impact on CLECs. The lowest level of changes, Level 0, are changes that have no impact on CLECs. For these changes, Qwest does not provide notification, but makes these non-substantive changes and immediately posts them to the web site. In contrast, Level 4 changes, which have the most impact on CLECs, require Qwest to submit a CR describing the proposed change. The CR is then presented at the monthly product/process CMP meeting for discussion with CLECs. Together, CLECs and Qwest develop a process for Qwest to obtain CLEC input regarding the proposed change, which may include conferences or written comment cycles. After obtaining CLEC input in accordance with the process agreed at the monthly product/process CMP meeting, Qwest will modify the CR, if necessary, and design a solution. Qwest will then provide notification to CLECs of the planned change at least 31 calendar days prior to implementation. At this point, the process provides for a comment cycle that results in an implementation date of 31-45 days from the date of the notification.

5. **CGE&Y recommends that, through the CMP, Qwest improve the timeliness of record updates from Qwest's provisioning systems to the various downstream OSS in regard to customer conversions wherever such improvements have not already been put in place. Delays in downstream record updates can potentially add additional steps to CLECs' business processes. This recommendation is based on AZIWO2060, which is discussed on page 76 of this report.<sup>67</sup>**

Qwest will be cognizant of this recommendation as it continuously improves and fine-tunes its OSS in the future. Opportunities to improve timeliness of record updates will be seized.

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<sup>67</sup> CGE&Y Final Report, Executive Summary, Recommendations.

Qwest notes however that record update processes are at parity for CLECs and Qwest because the same systems are used in processing wholesale and retail orders.

Qwest also notes that procedures are in place for CLECs to issue subsequent LSRs during the time that Qwest updates its databases. This procedure is documented on Qwest's Wholesale web site related to the "Not authorized to retrieve CSR" error message. CGE&Y validated Qwest's web site in this regard and found that error messages were implemented in IMA, decreasing the time a CLEC would spend on investigating the cause of errors received when retrieving CSRs.

**6. CGE&Y recommends that the CMP consider the following process improvements:**

- **Qwest provide the CLECs with a complete listing of the services and features on any CLEC-initiated order, as entered in Qwest's Service Order Processor (SOP). This recommendation should apply for any CLEC order type, whether flow-through or non-flow-through. This recap should include information such as USOCs, FIDs, Hunting Sequence, etc. This suggestion calls for the Service and Equipment (S&E) section of the Service Order to be returned to the CLEC as entered in the Qwest SOP. This is currently under evaluation by the CMP.<sup>68</sup>**

The CMP process is indeed processing a change request that addresses this recommendation. Once implemented and at the CLECs' discretion, Qwest will return the details of the Service & Equipment section of the Service Order as it appears in the SOP. For IMA-GUI customers, Qwest will return a "Service Order Processor Pending Notice" via fax or email whichever process is designated by the CLEC in its customer profile. For IMA-EDI customers, Qwest will return a "Pending Service Order Notice" in the form of an 865 transaction.

This additional notice is in addition to an FOC and applies regardless of flow through. A notice of this new capability will be disclosed in Release 10.0 and will become functional in Release 10.1 currently scheduled for August 2002.

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<sup>68</sup> CGE&Y Final Report, Executive Summary, Recommendations.

- **Explore and develop an automated process that would allow CLECs to view the status of service orders initiated by Qwest on CLEC owned accounts. This recommendation suggests that CLECs be provided with the opportunity to view orders, determine the status of orders, and monitor the progress of those orders through the Qwest OSS so that CLECs can more effectively support the needs of their end users.**<sup>69</sup>

Qwest believes that the recent updates to the Loss and Completion Report, discussed in recommendation number two above, also satisfy this recommendation. Qwest-initiated orders on CLEC-owned accounts correct account information. Corrections are accomplished by issuing a record order. Record orders do not require manual handling and are issued as completed in the service order processor. They are then included in the next cycle of the Loss and Completion report with a type of PON indicating that Qwest initiated the order. In this way, the Loss and Completion report enhancement provides status updates on Qwest-initiated orders quickly and electronically. This PON-related enhancement to the Loss and Completion Report was a CLEC-initiated change that was processed through the change management process.

In other instances that require Qwest to make corrections, Qwest and the CLEC would be in a discussion where the need to correct an account arises. Qwest would then make the correction with the CLECs' authorization.

- **Continue to improve the Service Interval Guide (SIG) to provide clearer and more detailed information for CLECs on disconnect intervals, and to make the information easier to locate on the Qwest wholesale web site.**<sup>70</sup>

Qwest will be cognizant of this recommendation as it continues to improve ways in which information is communicated in the SIG. Qwest notes, however, that intervals, including those for discontinuing service, must be non-discriminatory. Qwest's intervals already are. Where intervals exist for equivalent retail service, Qwest has published disconnect standard

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<sup>69</sup> CGE&Y Final Report, Executive Summary, Recommendations.

<sup>70</sup> CGE&Y Final Report, Executive Summary, Recommendations.

intervals. For other services, such as POTS, no standard interval exists for either wholesale or retail because no minimum advance notice is required from the customer. This means that a customer may choose to have service disconnected on the same day he or she notifies the CLEC or Qwest depending upon whether the service is wholesale or retail. Alternatively, the customer may elect to have the service disconnected at a later date.

Page nine of Qwest's Standard Interval Guide defines which products have a disconnect standard interval as well as which products require no minimum advance notice. Significant changes have been made to page nine of the SIG, based on HP's input in Arizona. The wholesale services web site also provides a direct link to the SIG.

7. **CGE&Y recommends that Qwest provide CLECs a 45-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 Redesign Team. The 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 Redesign Evaluation, Version 3.0, page 43.<sup>71</sup>**

Qwest has already agreed to comply with this recommendation. The parties to the redesign session have agreed to a 73-calendar day interval for draft notification and a 45-calendar day interval for final documentation. Qwest has adopted these guidelines beginning with EDI documentation related to IMA Release 10.0.

8. **CGE&Y recommends that Qwest update their Wholesale web site with clear standards and business rules pertaining to CLECs use of the FOC. These standards/business rules should clearly articulate how a CLEC is to differentiate FOC, Jeopardy notice, Reject notices, and any/all other notifiers. CGE&Y also recommends that Qwest publish standard error-handling information and provide it to CLECs on the wholesale web site in a table format. This would include more detailed information on Non-Fatal and Fatal errors, making the wholesale web site a more detailed and complete reference point for CLECs. Although the Qwest White Paper “**

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<sup>71</sup> CGE&Y Final Report, Executive Summary, Recommendations.

**Firm Order Confirmation Evaluation Results,” dated August 6, 2001 provides guidance, the continued development of reference material to assist the CLECs in distinguishing and preventing errors would benefit all parties. The issue of distinguishing error messages is also discussed in Appendix R of this report, Arizona §271 Performance Indicator Definitions (PID) Data Elements Summary Reports, specifically in the HP Missing Functionality Data Elements Spreadsheet.<sup>72</sup>**

Qwest will comply with this recommendation within 45 days. This timeframe will allow Qwest to format the table from the FOC White Paper that will provide the clarity regarding FOCs and errors that CGE&Y is requesting in this recommendation. This timeframe will also allow Qwest to provide the appropriate notification through the CMP process. The table will be published in the Ordering and Overview section of the Qwest Wholesale web site located at: <http://www.qwest.com/wholesale/clecs/ordering.html>.

- 9. CGE&Y recommends that Qwest improve the process for CLECs to reserve large blocks of TNs. The reservation of large blocks of TNs is currently a manual process for CLECs. A process improvement, through mechanization or other means, would be most beneficial to CLECs when servicing business customers. The basis for this recommendation is discussed in the Retail Parity Evaluation section of this report on page 236, and in Data Request 192.<sup>73</sup>**

In January 2002, Qwest adjusted the manual process for CLECs to obtain large blocks of telephone numbers so that CLECs are assured of having options to receive the requested telephone numbers. CLECs are now given the option of holding while the ISC contacts the Numbering Services Administration Center ("NSAC"). After the ISC obtains the numbers, the CLEC is given the option of receiving the telephone numbers via fax, via email or verbally on the same call. These options surpass those available to Qwest retail representatives. Retail representatives do not have the options of facsimile or email.

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<sup>72</sup> CGE&Y Final Report, Executive Summary, Recommendations.

<sup>73</sup> CGE&Y Final Report, Executive Summary, Recommendations.

In addition to accepting eight of CGE&Y's nine recommendations, Staff makes four recommendations of its own.

1. **Qwest should assess system improvements for reducing the IMA-GUI input steps required by CLECs. This effort should be conducted in conjunction with other system changes.**

Qwest will host a meetings with CLECs before the CMP meeting in June, 2002 to explore CLECs' need to reduce the IMA-GUI input steps consistent with this recommendation. Based on CLEC input, Qwest will present CRs in the June CMP meeting. The CRs will be prioritized targeting the IMA Release 12.0 that is currently planned for April 2003.

2. **Qwest should agree to provide CLECs the ability to request ad-hoc data for performance measurement calculations for PIDs contained in the PAP. This would provide the most effective method for auditing the performance results provided by Qwest.**

Qwest is amenable to implementing this recommendation. Qwest believes that the proper forum to address issues that CLECs raise after reviewing their ad-hoc data is the PAP six-month review cycles. Qwest will define a process to satisfy this recommendation and work it through the CMP process.

3. **Qwest should test its Daily Usage File (DUF) provisioning to CLECs to ensure accurate and timely delivery of these records. This test should be conducted within 12 months and be conducted with Staff oversight.**

Qwest will conduct a DUF test, with Staff oversight, similar in design to that performed by CGE&Y. Qwest is targeting the first quarter of 2003 to conduct this test.

4. **The ACC should initiate a proceeding to develop and implement Wholesale Service Standards for Qwest.**

Qwest does not oppose this recommendation; however, Qwest preserves its right to advocate its positions in favor of or in opposition to any issue that may arise in the Wholesale Service Standards docket.

In Staff's supplemental report on CMP and SATE, Staff makes additional recommendation on those topics.<sup>74</sup> They are addressed in the section addressing CMP and SATE, respectively.

**D. CGE&Y and Staff Conclude that Qwest Passed the Arizona Test.**

As indicated by CGE&Y's and HP's reports, Qwest's processes, systems and performance results passed the test standards for each of the 271 OSS tests: Performance Measurement Audit, Functionality, Retail Parity, Capacity and Relationship Management including Change Management and SATE.

The Final Report also shows that Qwest provides CLECS with nondiscriminatory access to all of its OSS functions, features and capabilities in accordance with section 271(c)(2)(B)(ii) of the Act. Specifically, the Report shows that Qwest provides CLECs with nondiscriminatory access to its pre-ordering, ordering, provisioning, maintenance and repair, and billing functions, and that Qwest provides adequate training and assistance to CLECs to support the use of these OSS functions.

Staff largely concurs and recommends that the Commission find that Qwest is in compliance with the FCC's 271 requirements relative to the OSS test.

CGE&Y makes nine recommendations that, as CGE&Y specifically points out, do not contradict CGE&Y's findings that Qwest is providing nondiscriminatory access to its OSS; rather, CGE&Y simply believes that all parties will benefit from their enactment. Staff concurs, recommends that Qwest comply with CGE&Y's recommendations, and makes four recommendations of its own. Qwest agrees to these recommendations with one exception and

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<sup>74</sup> See Staff's Supplemental CMP/SATE Report, ¶¶ 43, 147.

will implement, on a going-forward basis, those that it has not yet implemented or otherwise complied with.

### **III. PERFORMANCE MEASURES AUDIT**

#### **A. Introduction**

##### **1. Performance Measures Overview**

Based on collaborative work with the CLECs and the ACC, Qwest has established a set of performance measures and standards ('benchmarks' for those measures without Qwest retail analogues, and 'parity' for those measures with Qwest retail analogues). These assess whether Qwest meets its performance obligations. These measures are detailed in the PID<sup>75</sup>, and include 46 measures with approximately 700 sub-measures.

A series of state commission/consultant-directed Performance Measurement workshops began in 1999 with the Arizona TAG to establish the first set of formal PIDs. The resulting PIDs have been developed and refined over the last two years by the TAG. The workshop participants fleshed out the purpose, description, reporting period, unit of measure, reporting comparisons, levels of disaggregation, formula, exclusions and products to be measured, and established the business rules for the calculation of each PID.

Qwest gathers the appropriate data, calculates the required results, and provides the related reports on these established measures monthly.

##### **2. CGE&Y's Evaluations and Findings**

As part of the Arizona OSS test, the ACC commissioned CGE&Y to perform an independent assessment of Qwest's PIDs. This PMA included evaluations against version 5.1 of the PID, dated August 28, 2000, through version 6.3 of the PID, dated May 1, 2001, which was in effect at the conclusion of the audit.

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<sup>75</sup> <http://www.qwest.com/wholesale/results/arizona.html>

The purpose of the PMA was to provide a qualitative assessment of Qwest's compliance in gathering, calculating and reporting on the measures agreed to in the PID. CGE&Y accomplished its evaluation through a review of process documentation, observing Qwest's data collection processes, conducting on-site and telephone interviews, and independently calculating the PID results utilizing Qwest's raw data, business rules, and exclusions, and then comparing those results against those reported by Qwest. Results were calculated using three or more months of data.

The PMA was not concluded (and the Functionality test did not begin) until all PIDs were successfully audited. CGE&Y issued 128 IWOs during the PMA and Qwest implemented many PID improvements as a result. The overall conclusion of the audit finds "CGE&Y's audit of Qwest's performance measure systems and processes confirmed that these systems and processes were substantially in compliance with the requirements of the Arizona PID for the months included within the audit for each particular measure. Generally, Qwest's systems and processes provided for the reporting of performance measurement results as required by the PID."<sup>76</sup>

The Arizona PMA was one step in a greater process to fully evaluate Qwest's data accuracy. Following the PMA, CGE&Y also conducted a Functionality Performance Measurements Test (Section 2.5 of CGE&Y's Final Report), a Functionality Data Reconciliation, a PID Data Element Summary and a Functionality Test Results Comparison ("FTRC"). These steps combined with Liberty's equally comprehensive evaluation represents the most comprehensive evaluation of a BOC's performance measurement data collection and

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<sup>76</sup> See Attachment D, Summary of Audit Findings, Executive Summary of the QWEST PERFORMANCE MEASUREMENTS AUDIT: FINAL REPORT.

processing processes to date. Upon completion of its fourteen state audit, Liberty concluded: “the audited performance measures accurately and reliably report actual Qwest performance.”<sup>77</sup>

As set forth below, the positive results from both audits clearly demonstrate that Qwest is meeting the expectations established by the FCC for gathering, calculating, and reporting performance measurements.

**B. CGE&Y Has Completed All that It was Tasked to Do in the PMA.**

CGE&Y employed a phased approach in conducting the PMA as collaboratively defined and agreed in the MTP and TSD. The audit was conducted over a 16-month period, examining 46 measures and approximately 700 sub-measures. During this process, CGE&Y conducted over 50 interviews with Qwest personnel, submitted approximately 265 Data Requests, and issued 128 IWOs to Qwest.

The amount of effort required by CGE&Y to conduct this audit was monumental.

Specifically:

- CGE&Y developed and executed independent software programs using Qwest’s raw data and internal documentation as input, to then compare the output results to Qwest’s results, fully evaluating business rules and exclusions.
- CGE&Y reviewed Qwest’s documented methods and procedures to determine that the proper controls were in place and the data gathering, calculating, and reporting processes were accurate and to ensure it understood the information utilized by Qwest in calculating measures: business rules, exclusions, extraction criteria, etc.
- CGE&Y conducted on-site and phone conference interviews with Qwest personnel to ensure CGE&Y understood systems, data flows, and processes that impact each measure and to ensure Qwest is following the established measures processes.
- CGE&Y compared Qwest’s Master Results file to the published results to ensure the information was accurate and consistent.
- CGE&Y evaluated at least three months of data for each audited measure, and looked at up to 6 months of data for some measures.

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<sup>77</sup> See Attachment C, MGW-PERF-2, Final Report on the Audit of Qwest’s Performance Measures (Liberty Report), 2-3.

The fact that the CLECs had relatively few comments on the PMA report and posed few questions at the PMA workshops testify to the completeness of CGE&Y's performance measures audit and to the fact that CLEC concerns were not significant.

**C. Qwest's Performance Measures Gathering, Calculating and Reporting Processes are Adequate.**

Because Qwest's PIDs were recently developed at the onset of the PMA, all of Qwest's processing for gathering, calculating, and reporting performance results were newly established at the beginning of the third party audits. The observations and exceptions from Liberty's audit and the IWOs from CGE&Y's audit greatly assisted Qwest in establishing a comprehensive set of performance measurement processes. Today, these processes are fully developed, have been deemed adequate by two independent auditors and produce reliable results upon which Qwest's performance measurement results can be relied.

Staff agrees:

"Based on the work done in the Arizona three-phased OSS Test approach, and the work from the Liberty Consulting Data Reconciliation, Staff is of the opinion that Qwest Commercial reported CLEC data are accurate. These data can be relied upon in determining Qwest performance in meeting its 271 obligations."<sup>78</sup>

**1. Common exclusions are justified.**

In its audit, CGE&Y documented circumstances where Qwest applied common exclusions that were not specifically documented in the PID. Qwest provided evidence that the excluded data was invalid data and would skew results if included, evidence that CGE&Y considered as justified. CGE&Y, however, recommended that Qwest investigate these types of exclusions and then share this information appropriately so that adjustments can be made to

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<sup>78</sup> Staff Recommendation Report, ¶ 263.

reduce the errors going forward (internal Qwest system fixes if the errors are Qwest errors, and external CLEC modifications if the errors are CLEC-generated).<sup>79</sup>

As detailed in the IWO response, Qwest has undertaken this analysis and has identified three categories of exclusions that meet the 'invalid data' criteria. Qwest has committed to moving forward with this recommendation and CGE&Y was able to successfully close the IWO.

**2. Qwest has corrected all documentation deficiencies and has established quality control mechanisms for ongoing documentation management.**

CGE&Y documented 49 IWOs detailing internal documentation deficiencies for Qwest's rules, methods, and procedures for performance measures gathering and calculating. In these cases, CGE&Y noted discrepancies in how Qwest was obtaining the data and producing the results because of differences in the process documentation and the PID. As a result of these IWOs, Qwest has fully improved the technical documentation, putting appropriate controls in place for keeping the technical documentation in sync with the PID, and managing version and quality control. There is now a Quality Control section maintained in the documentation for each PID measure.

**3. Qwest monthly reporting is efficient and timely.**

At the beginning of the PMA, Qwest was providing monthly performance results to the CLECs by e-mail. Beginning with the December 2000 reports, Qwest began posting results to an Internet web site. Because of confidentiality concerns, CLEC-specific reports are distributed via e-mail and/or diskette mailing in accordance with the individual Interconnection Agreements.

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<sup>79</sup> AZIWO2014, links to which can be found at the following URL:  
<http://www.cc.state.az.us/utility/telephon/iwo-index.htm>

CGE&Y issued AZIWO1106 to address delays in receiving the monthly performance results. At that time, Qwest was subject to two concurrent audits, which were delaying report production. Recent postings indicate that Qwest is continuing to improve the timeframes:

<u>RESULTS</u>	<u>REPORT</u>	<u>POSTING</u>
<u>DATE</u>	<u>DATE</u>	
Jan 2002	Feb 20	Feb 22
Dec 2001	Jan 16	Jan 18
Nov 2001	Dec 22	Dec 27
Oct 2001	Nov 21	Nov 28
Sept 2001	Oct 25	Oct 29
Aug 2001	Oct 2	Oct 5
July 2001	Aug 28	Aug 31
June 2001	July 31	Aug 7
May 2001	June 26	July 3
Apr 2001	May 24	June 5
Mar 2001	May 07	May 14

Qwest has committed in the PAP to providing results by the last day of the month following the month for which performance results are being reported.

**D. Qwest has Implemented Quality Control Processes for the Monthly Report Production and Posting.**

In reviewing April, May, and June 2000 results, CGE&Y noted inconsistencies in results as previously published. CGE&Y issued a severity level 3 IWO, AZIWO3006, because it felt that the discrepancies called into question its audit conclusions. Qwest responded that the changes had been documented in a change matrix, but that matrix hadn't been part of the published results, which caused the overall confusion.

Qwest then implemented a new web-based change control methodology to effectively track, manage, and report all changes made due to new releases of the PID or new measure implementation. CGE&Y reviewed this new process and several subsequent month's

publication of Qwest's results and was able to close the IWO based on the new process implementation and because it saw no further recurrence of the issue.

**E. Qwest's Performance Measurements Results Meet 271 Requirements.**

It is clear from the results from both the CGE&Y and Liberty audits that Qwest accurately gathers, calculates, and reports on the measures agreed in the PID. Staff acknowledges the reliability of Qwest's performance measurements results and believes that they can be relied upon to determine whether Qwest meets its 271 obligations. Accordingly, the Staff states:

"Staff recommends that the Commission find that Qwest's commercial reported data are accurate and meet §271 requirements."<sup>80</sup>

**IV. FUNCTIONALITY PERFORMANCE MEASUREMENTS TEST, DATA RECONCILIATION, PID DATA ELEMENT SUMMARY AND FUNCTIONALITY TEST RESULTS COMPARISON**

The MTP and TSD required that CGE&Y verify the performance results from the Functionality Test by independently calculating certain measures<sup>81</sup>. The MTP requirement for Functionality Performance Measures Verification was to verify the data from the Functionality and Capacity test to validate the results derived by Qwest and the Pseudo CLEC<sup>82</sup>. Further, the TSD required that CGE&Y independently calculate measurements for a specific set of product disaggregations.<sup>83</sup>

CGE&Y produced four reports:

1. Functionality Performance Measurements Test ("Section 2.5")<sup>84</sup>
2. Data Reconciliation Report ("Appendix L")<sup>85</sup>

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<sup>80</sup> Staff Recommendation Report, ¶ 265.

<sup>81</sup> MTP Appendix C.

<sup>82</sup> MTP section 8.5.3.

<sup>83</sup> TSD section 7.3.4

<sup>84</sup> CGE&Y Final Report, section 2.5.

3. Arizona 271 Performance Indicator Definition (PID) Data Element Summary Report (“PID Matrix”)<sup>86</sup>
4. Functionality Test Results Comparison Report (“FTRC”)<sup>87</sup>

These reports altogether meet and, in fact, go well beyond the MTP and TSD requirements. CGE&Y exceeded the requirements in order to address CLEC concerns raised in the workshops.

A. **CGE&Y Satisfied the MTP and TSD Requirements in Completing a Multi-Dimensional Functionality Performance Measures Verification.**

1. **The Functionality Performance Measurements Test**

CGE&Y used Qwest’s ad hoc data provided during the Functionality Test to calculate all measures specified in Appendix C of the MTP and for all disaggregations required in section 7.3.1 of the TSD. CGE&Y issued 19 IWOs during this test that Qwest investigated and resolved. Subsequently, CGE&Y appropriately closed all IWOs. Because calculating performance results consistent with the PIDs requires more data than what is provided to CLECs, CGE&Y determined that using Qwest ad hoc data was the most appropriate data source for performing this test.

2. **Data Reconciliation Report**

In order to verify that all the data provided by Qwest matched that captured by the Pseudo-CLEC, CGE&Y undertook an extensive Data Reconciliation effort to compare Qwest and Pseudo-CLEC data. If CGE&Y encountered a discrepancy that could not be fully explained, CGE&Y assumed that the Pseudo-CLEC data was correct and updated the functionality test

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<sup>85</sup> CGE&Y Final Report, Appendix L.

<sup>86</sup> CGE&Y Final Report, Appendix R.

<sup>87</sup> Functionality Test Results Comparison Report, Version 3.0.

performance results stated in Section 2.5 of the Final Report. This was the most rigorous approach to determine if Qwest's performance was satisfactory.

As with the Functionality Performance Measurements Test, a limited number of IWOs, were issued. Nineteen IWOs in fact were issued and subsequently closed. Of the nineteen IWOs issued, only two measures in Section 2.5 had to be modified. These were measures BI-2 and BI-4.<sup>88</sup> The fact that only two measures were adjusted demonstrates the validity of relying on Qwest's ad hoc data to calculate Section 2.5. This in itself justifies the approach taken by CGE&Y in meeting the MTP and TSD requirements, by independently calculating the measures and verifying them against the data captured by the Pseudo-CLEC.

### **3. Arizona 271 Performance Indicator Definition (PID) Data Element Summary**

The PID Data Element Summary lists the data elements required to calculate the PIDs that applied to the Functionality Test. It described whether the Pseudo-CLEC captured the data element, and if not, what alternate source could be relied upon. This effort was undertaken to address CLEC concerns, primarily AT&T, that CGE&Y did not meet MTP and TSD requirements because CGE&Y used Qwest ad hoc data in calculating results in Section 2.5, rather than Pseudo-CLEC data. This report allowed the parties to develop a common understanding of what Pseudo-CLEC data could be used in PID calculations. CGE&Y did not issue any IWOs, finding no discrepancies or problems.

### **4. Functionality Test Results Comparison Report**

To erase any remaining doubts whether MTP and TSD requirements were met, CGE&Y calculated the measures included in the Functionality Performance Measurements Test using Pseudo-CLEC captured data. CGE&Y issued 8 IWOs addressing discrepancies that impacted

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<sup>88</sup> Functionality Test Results Comparison Report, Version 3.0, section 8.

the results in Section 2.5. These IWOs were resolved and closed. After the IWOs were closed, CGE&Y documented in the FTRC that the results of only one measure in Section 2.5 was impacted.

**B. CLEC Comments, Questions and Concerns have been Fully Addressed.**

**1. MTP and TSD requirements have been met.**

During the review of the draft Functionality Test Report issued on October 11<sup>th</sup> 2001, AT&T claimed that CGE&Y had not followed MTP and TSD requirements because CGE&Y used Qwest ad hoc data in calculating performance results in Section 2.5.<sup>89</sup> AT&T's claim did not actually relate to the results presented, but rather to the approach used. CGE&Y agreed to document why Pseudo-CLEC data alone could not be used to perform this test. CGE&Y's document was discussed during the workshop held on December 14<sup>th</sup> 2001. After several iterations, the final published version of this document was the Arizona 271 Performance Indicator Definition (PID) Data Element Summary Report version 6.0 (PID Matrix) described previously. Subsequently, CGE&Y agreed to recalculate the measures presented in Section 2.5 using Pseudo-CLEC data as available. The effort produced the Functionality Test Results Comparison Report.

The MTP and TSD required CGE&Y to produce nothing more than the Functionality Performance Measures Test and the Data Reconciliation. The requirement was to:

Using the raw data (before exclusions) from Qwest, the TA will perform an independent calculation of all measurements with a "Yes" indication in the MTP Appendix C and will also perform an independent calculation of the same measurements for the same orders using the Functionality Test Data provided by the Pseudo-CLEC.<sup>90</sup>

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<sup>89</sup> AT&T question number 211 on the Final Report Functionality Test, dated October 11, 2001.

<sup>90</sup> TSD section 7.3.4.

The initial portion of the requirement was met through the Functionality Test Measures Test using ad hoc data; and the second was met through the Data Reconciliation using Pseudo-CLEC data for the same orders. However, to address CLEC concerns, CGE&Y agreed to complete the PID Data Element Summary and Functionality Test Results Comparison Report. CGE&Y has gone far beyond what was required. CGE&Y has more than adequately addressed CLEC concerns.

**2. IWO closure was undisputed.**

CGE&Y generated a total of 43 IWOs in this area as a result of the multiple efforts. All have been resolved and closed. CLECs only questioned a few IWO closures, and perhaps even more importantly, CLECs drove only one of these IWOs, relating to PID OP-4, to impasse. The impasse issue did not relate to any data integrity issue; rather it related to a failure to meet a PID benchmark. Staff found Qwest to be in parity overall with respect to OP-4 and issued the impasse decision on AZIWO2100 in Qwest's favor.<sup>91</sup>

**3. Limited CLEC comments and discussion**

CLECs rigorously debated whether the requirements of the MTP and TSD were met or not. CGE&Y ultimately went far beyond what the controlling test documents contemplated to address the CLECs' concerns. After CGE&Y delivered all four reports, the CLEC questions were few and workshop discussion on these topics limited. In total, the CLECs only posed 17 questions. In reality, very little changed as a result of this report. Specifically, in response to the following question posed by AT&T in its review of the FTRC:

“Identify the measures in Section 2.5 of the Final Report of the Qwest OSS Test that have been updated as a result of the Functionality Test Results Comparison.”

CGE&Y states:

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<sup>91</sup> IWO 2100, links to which can be found at the following URL:  
<http://www.cc.state.az.us/utility/telephon/iwo-index.htm>

The only measure for which the result changed was PO-8 Unbundled Loop and Number Portability. However, this change did not affect the statistical conclusion (insufficient evidence). Therefore, there were no measures in Section 2.5 of the Final Report in which CGE&Y's conclusions changed as a result of the findings of the FTRC.<sup>92</sup>

**C. Qwest Passed the Functionality Performance Measurements Test.**

CGE&Y's Functionality Performance Measurements and Data Reconciliation reports meet the MTP and TSD requirements. In fact, CGE&Y exceeded requirements by producing the PID Matrix and FTRC. The results of these 4 reports demonstrate that CGE&Y's assessment of Qwest's performance results in the Functionality Test are accurate and reliable. CGE&Y states in the FTRC:

Therefore, CGE&Y is confident that Qwest's adhoc data is both including [sic] all CLEC transactions and the data elements associated with CLEC transactions are accurate and complete.<sup>93</sup>

Ultimately, the number of questions and concerns that CLECs raised were limited and fully addressed.

**V. FUNCTIONALITY TEST**

The Functionality Test was at the heart of the ACC's test of Qwest's OSS. The MTP provides that the purpose of the Functionality Test was to provide information that the ACC could use to assess the ability of Qwest systems to provide the requisite functionality to CLECs, including pre-ordering, ordering, provisioning, maintenance and repair, billing, and other special functions, such as 911 and directory assistance.<sup>94</sup> The TSD specifies the scope and approach for this test, along with detailed requirements for evaluating Qwest's OSS functionality. Based on

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<sup>92</sup> Staff's Supplemental CMP/SATE Report

<sup>93</sup> Functionality Test Results Comparison Report, Version 3.0, section 8.

<sup>94</sup> MTP section 4.1.

the results of the Functionality Test, CGE&Y found that Qwest provides non-discriminatory access to its OSS for CLECs to generate LSRs for wholesale services in Arizona.<sup>95</sup>

The Functionality Test was an extremely thorough and rigorous test. It was executed over a period of one year and three months, including a retest period of six months. CGE&Y issued 137 test incidents,<sup>96</sup> representing approximately 44% of all incidents raised during the overall OSS test (including the Performance Measurements Audit). CGE&Y verified these incidents were resolved, leaving no outstanding Functionality Test issues at the close of the test. Only a single Functionality Test related IWO was taken to impasse by the CLECS.<sup>97</sup> CGE&Y retested 24 IWOS. These retest areas included FOC/Jeopardy/Rejects, SOCs, CEMR, CSR update process, and CEMR.

Note that there are parts of the Functionality Test that CGE&Y or HP evaluated in separate reports, although CGE&Y also addresses them in its Final Report. These are Pre-Order to Order Integration, Billing/DUF, and the Functionality Test Results Comparison. Because they were separate reports, they are discussed in this brief as separate sections.

**A. CGE&Y Satisfied the MTP and TSD Requirements in Performing the Functionality Test.**

CGE&Y found that Qwest passed the Functionality Test. In its Final Report, CGE&Y states:<sup>98</sup>

“CGE&Y concludes that Qwest provides sufficient electronic functions and manual interfaces to allow competing carriers access to all of the necessary OSS functions in Arizona. This conclusion is supported by test activity, observations, and system, procedural and metric improvements that Qwest has made in response to IWOs generated during this Functionality Test.”

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<sup>95</sup> CGE&Y Final Report, p. 5.

<sup>96</sup> CGE&Y Final Report, section 7.1.

<sup>97</sup> IWO 2100, links to which can be found at the following URL:  
<http://www.cc.state.az.us/utility/telephon/iwo-index.htm>

<sup>98</sup> CGE&Y Final Report, section 7.1.

CGE&Y made its conclusions after a thorough and objective audit of Qwest's OSS functionality, consistent with the MTP and the TSD.

The CLECs raised a small number of issues on the Functionality Test results. Primarily, the issues allege that CGE&Y did not fully satisfy the requirements of the MTP and TSD. The interim workshops addressed the CLECs' concerns so that by the time the final workshop was held, the CLECs only posed eight questions. The CLECs' issues are addressed below.

**1. CGE&Y complied with the MTP and TSD requirements.**

CGE&Y was hired to be the Test Administrator in part because of the collective experience and judgment of its personnel. The MTP vests solely in CGE&Y, as the Test Administrator, the responsibility for supervising the day-to-day execution of the test, analyzing the test results, and reporting its evaluation of those results.<sup>99</sup> The MTP requires that CGE&Y apply that experience and judgment in fulfilling its supervisory duties. Thus, CGE&Y was required to exercise its professional judgment with regard to the myriad issues that arose each day during the execution of the test, just as it was required to do in reporting its conclusions. This is exactly what CGE&Y did.

The CLECs criticize CGE&Y for not conducting the Functionality Test in the same way they would have conducted it. This position is inconsistent with the MTP's grant of discretion in testing matters solely to CGE&Y.<sup>100</sup> Time after time, the CLECs criticisms related less to the way in which CGE&Y conducted the Functionality Test and more to the fact that the CLECs disagreed with CGE&Y's conclusions. Staff acknowledged this in its Report:

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<sup>99</sup> MTP section 9.3.

<sup>100</sup> MTP section 9.3.

“Staff believes that CGE&Y planned, implemented and reported on the FT in an appropriate manner. Staff also believes that CGE&Y’s methods for data collection and analysis were appropriate, and that data utilized and reported on were accurate.”<sup>101</sup>

As set forth below, CGE&Y conducted the Functionality Test in a reasonable manner, consistent with the MTP and TSD requirements, and appropriately exercised its professional judgment as a Test Administrator.

**2. CGE&Y complied with the MTP and TSD requirements relating to Daily Logs.**

An inordinate amount of workshop time was spent discussing "Daily Logs," which has become a shorthand term for the detailed Functionality Test transaction information that the CLECs received during the Functionality Test.

TSD 3.7.5.4 provides as follows (emphasis added):

The Pseudo-CLEC will provide the TA access to the data file containing LSR, ACK (EDI), FOC, Reject and SOC information on a daily basis. The TA will retain the data and provide statistics on the timeliness of Qwest order processing. Daily Test Status Reports will be prepared from this information and will be transmitted to the ACC, *and subsequently to the Test Advisory Group (TAG) at the ACC's discretion.*

The crux of the CLECs' complaints appears to be the form in which the information was provided -- a compilation report rather than individual daily reports.<sup>102</sup> This concern has no basis in the TSD language upon which the CLECs rely. TSD section 3.7.5.4 provides that the Daily Test Status Reports transmitted to the ACC, and subsequently to the TAG at the ACC's discretion, would be "prepared from" the information CGE&Y maintained. There was no requirement for CGE&Y to provide any particular content or format. AT&T suggested that it may have a concern that CGE&Y did not actually maintain the daily information required by the

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<sup>101</sup> Staff Recommendation Report, ¶ 112.

<sup>102</sup> Functionality Test Workshop Transcript Vol. III, 429:20-430:5.

TSD. That concern has no basis because CGE&Y unequivocally testified that it received daily reports from the Pseudo-CLEC and updated its electronic database with that information on a daily basis.<sup>103</sup>

CGE&Y fully complied with the daily tracking requirements of the TSD. Moreover, CGE&Y provided the CLECs with all of the information it used to accomplish that tracking. There is no basis for any remaining dispute regarding the so-called Daily Logs. The process is described in greater detail in the Functionality Test Brief submitted by Qwest immediately following the workshop.

**3. CGE&Y complied with the MTP and TSD requirements relating to tracking order status.**

As part of the Functionality Test, CGE&Y was required to track the status of test orders through their lifecycle. TSD section 3.7.5.4 provides, in pertinent part:

Each Test Script will be monitored by use of a tracking number assigned by the TA during the Pre-Order phase. The Tracking Number will be used by the Pseudo-CLEC to report order status back to the TA. The TA will use the Tracking Number to monitor the progress of each test script throughout its lifecycle. The Pseudo-CLEC will provide the TA access to the data file containing LSR, ACK (EDI), FOC, Reject and SOC information on a daily basis.

This section dictates that the Pseudo-CLEC would receive status notifiers transmitted by Qwest. Indeed, CGE&Y testified that the status of all test orders was tracked through the receipt of the notifiers transmitted by Qwest.<sup>104</sup> These notifiers provide a history of the state of an LSR from end-to-end. Thus, CGE&Y conducted its tracking activities as described in TSD section 3.7.5.4.<sup>105</sup>

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<sup>103</sup> Functionality Test Workshop Transcript Vol. III, 380:3-16.

<sup>104</sup> Functionality Test Workshop Transcript Vol. I 34:22-35:3, 36:19-21.

<sup>105</sup> Functionality Test Workshop Transcript Vol. I, 47:5-22.

In addition to tracking test order status through the notifiers, the Pseudo-CLEC received auto-pushed messages regarding the status of test orders. Moreover, Qwest's ability to proactively push status messages to CLECs was the subject of an IWO.<sup>106</sup> Qwest expended significant effort to implement the capability to provide proactively pushed messages. The Pseudo-CLEC received those messages both through EDI and the GUI. This enabled the Pseudo-CLEC to receive status messages regarding its LSRs and to verify that the statuses were received and could be processed.<sup>107</sup>

The CLECs claim, however, that CGE&Y should also have tracked the status of LSRs through issuance of post-order queries. Such queries would have constituted a third layer of tracking information that would have returned the same information as the notifiers and auto-pushed status messages. CGE&Y reasonably exercised its professional judgment in tracking the status of LSRs through the notifiers and auto-pushed messages. The fact that it may not have issued post-order queries did not prevent CGE&Y from verifying that order status can be tracked from end-to-end.

**4. CGE&Y validated both of Qwest's methods for SOC delivery.**

There was an extended discussion in an interim workshop that generated some confusion regarding service order level completions ("SOCs").<sup>108</sup> Qwest provides SOC information in two ways -- through status and/or proactive electronic messages and on the Loss and Completion Report. While the discussion at the workshop resulted in substantial confusion, CGE&Y clearly stated in its Performance Acceptance Certificate for AZIWO1045 that it validated both of these delivery methods (emphasis added):

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<sup>106</sup> Functionality Test Workshop Transcript Vol. I, 43:12-23.

<sup>107</sup> Functionality Test Workshop Transcript Vol. I, 45:9-13.

<sup>108</sup> *See generally* Functionality Test Workshop Transcript Vol. I, 129-137.

CGE&Y verified the guide and validated that an order's status can be monitored using either the LSR Status Inquiry or Status Updates functions under Pre-Order/Order/PostOrder section of IMA, *and the completion notice is validated through a process of an auto-push message.*

*Through our investigation the Loss and Completion Report constitutes a batch process used primarily to report on service requests that have been completed. Order completions for IMA/GUI and EDI are collected and transmitted to the P-CLEC using a batch file creating the report. If an order completes after the batch file has been transmitted for the day the completed order will then be included in the following days Loss and Completion Report.<sup>109</sup>*

CGE&Y has thus properly identified and validated both methods of SOC delivery.

**5. CGE&Y complied with the MTP and TSD requirements relating to validating bill adjustments.**

WorldCom raised an issue that typifies the CLECs' approach to the draft final report workshops. WorldCom suggested that there was a "gap" in CGE&Y's billing analysis because it did not validate any debit adjustments.<sup>110</sup>

WorldCom cited TSD section 3.8.3(e) to support its position. That section reads as follows:

Discounts: Verify that discounts and adjustments are applied correctly. The team will determine whether adjustments to bills carrying corrections of errors from a previous month have been correctly made, and whether discounts contracted between Qwest and the Pseudo-CLEC have been applied to the bill accurately. The adjusted amounts will also be verified against the Billing Performance Measurement regarding accuracy of carrier bills.

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<sup>109</sup> IWO 1045, links to which can be found at the following URL:  
<http://www.cc.state.az.us/utility/telephon/iwo-index.htm>

<sup>110</sup> Functionality Test Workshop Transcript Vol. II, 338:14-339:1.

This section contains no requirement that both debit and credit adjustments be verified.<sup>111</sup> As CGE&Y noted, the MTP requirement is the same: "Verify that discounts and adjustments are performed correctly."<sup>112</sup> The provisions simply require that CGE&Y verify that the adjustments that appeared on the bills were applied correctly -- nothing more. That is exactly what CGE&Y did.

Despite the plain directives in both the MTP and TSD requiring CGE&Y simply to verify that any adjustments that appeared on the bills were applied correctly, WorldCom actually suggested that CGE&Y should have "induced debit situations for auditing purposes."<sup>113</sup> Artificially inducing an under-billing situation in order to then issue a debit adjustment would have proved nothing, other than Qwest's ability to follow CGE&Y's test instructions. This position simply has no basis in the MTP or TSD. However, it does illustrate the positions the CLECs have taken to attempt to read additional requirements into the MTP and TSD and then argue that those requirements have not been met.

**6. CGE&Y complied with the MTP and TSD requirements relating to the numbers of transactions submitted.**

WorldCom raised in its comments on the Draft Final Report that CGE&Y had submitted insufficient transactions according to the MTP and TSD<sup>114</sup>.

CGE&Y was required to test the functionality according to the MTP and TSD using statistically significant sample sizes for specific sets of products.<sup>115</sup> CGE&Y presents in the

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<sup>111</sup> Functionality Test Workshop Transcript Vol. II, 339:18-24.

<sup>112</sup> MTP section 4.3.4.

<sup>113</sup> Functionality Test Workshop Transcript Vol. II, 340:4-7.

<sup>114</sup> WorldCom Brief on the Draft Final Report version 12/21/2001, page 14, received 1/18/2002.

<sup>115</sup> MTP section 7.3.1.

Final Report<sup>116</sup> the breakdown of transactions required by product to meet the requirements of the MTP and TSD and comply with it accordingly. In total, CGEY executed over 1700 orders<sup>117</sup> during the Functionality Test, which is significantly larger than the 1267 required and well within the range suggested by WorldCom of 1620 - 1890.

In its Report, Staff underscores that including transactions from the retest places the number of transactions at 1,790, towards the high end of the target range.<sup>118</sup> The CLECs' concern over number of transactions has been resolved.

**7. CGE&Y complied with the MTP and TSD requirements relating to audit controls.**

WorldCom raised in its comments on the Draft Final Report that CGE&Y had employed a lack of audit controls and validation. There is no merit in this allegation. First, CGE&Y completed an extensive data verification exercise. CGE&Y's verification is discussed in section IV of these comments and clearly establishes that the controls were complete and accurate. For example, only two measures required amendments to Section 2.5 (Functionality Performance Measures) based on the reconciliation of Pseudo-CLEC data with the Qwest ad hoc data.<sup>119</sup> Only one measure required an amendment to the Section 2.5 due to a recalculation using Pseudo-CLEC data. The closeness of the calculations indicates that CGE&Y ensured the process was controlled and suitably validated. Secondly, as Staff details in its Recommendation Report, CGE&Y entered information on the Return Order Log spreadsheet, which provided cradle-to-grave tracking for all LSRs.<sup>120</sup> Staff was fully satisfied with the audit controls employed.

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<sup>116</sup> CGE&Y Final Report, section 2.

<sup>117</sup> CGE&Y Final Report, Executive Summary, Functionality Test, Test Activities.

<sup>118</sup> Staff Recommendation Report, ¶¶ 110, 1.

<sup>119</sup> Functionality Test Results Comparison Report, Version 3.0, section 8.

<sup>120</sup> Staff Recommendation Report, ¶¶ 110, 1.

**8. CGE&Y complied with the MTP and TSD requirements relating to the provisioning process.**

In AT&T's brief on the Draft Final Report, concern is raised with potential under-reporting of provisioning errors made by Qwest in the implementation of Pseudo-CLEC LSRs<sup>121</sup>. This concern was raised prior to the completion of the Functionality Test data reconciliation effort that ultimately satisfied Staff of the accuracy of Qwest's provisioning reporting.<sup>122</sup> AT&T's concern extended into the reporting of service provisioning failures. Staff accepts CGE&Y's use of Friendlies in validating provisioning accuracy, and the fact that this is further supported by the test process and the DUF re-test.<sup>123</sup>

**9. CGE&Y complied with the MTP and TSD requirements relating to the CSR update process.**

AT&T spent considerable time debating the timeliness of the update process to Customer Service Records in their brief submitted on the Draft Final Report.<sup>124</sup> The concerns it had related directly to two IWOs that CGE&Y issued.<sup>125</sup> While AT&T's desired approach to verification of these IWOs differed from that of CGE&Y, it is undisputed that CGE&Y did in fact retest and verify Qwest's resolutions. This is supported by the uncontested closure of both IWOs with no other comment from AT&T on AZIWO2101 than that CGE&Y should explain its retest approach, which it did.

**B. The DUF Test**

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<sup>121</sup> AT&T Brief on Draft Final Report, section IV.A.4.

<sup>122</sup> Staff Recommendation Report, ¶ 110 d.

<sup>123</sup> Staff Recommendation Report, ¶ 110 e.

<sup>124</sup> AT&T Brief on Draft Final Report, section IV.B.

<sup>125</sup> IWO 2060 and IWO 2101, links to which can be found at the following URL:  
<http://www.cc.state.az.us/utility/telephon/iwo-index.htm>

CGE&Y performed a test of Daily Usage Files ("DUF") per the requirements of Section 4.2.3 of the MTP and Section 3.8 of the TSD. The scope of testing included an analysis of the timeliness, accuracy and completeness of DUF processes.

In total, CGE&Y conducted three DUF tests. The first test was conducted during the Functionality Test. This test uncovered errors that required Qwest to implement system fixes. CGE&Y then validated these fixes in the second and third DUF retests. CGE&Y incorporated additional tasks during the retests to comply with recommendations made by the CLECs in the DUF workshop. The second test uncovered an additional limited situation that CGE&Y determined should be retested. After performing this 3<sup>rd</sup> test, CGE&Y documented Qwest returned 100% of the expected DUF messages.

**1. The DUF test was extensive and rigorous.**

**a. CGE&Y conducted an extensive test.**

Consistent with Section 3.8.3 of the TSD, CGE&Y instructed Friendlies to make certain types of calls and keep a log of the call details. CGE&Y then compared these call logs to the daily DUF files that Qwest provided to the pseudo-CLEC to ensure that all of the expected types and number of DUF records were received. Where discrepancies were found, CGE&Y issued IWOs. Qwest either explained the perceived discrepancy or identified root causes and took corrective action. CGE&Y retested these fixes. This process was run several times until Qwest's performance was satisfactory.

CGE&Y tested a large number of types of calls as specified in the TSD:<sup>126</sup>

- InterLATA
- IntraLATA toll
- 900/976 calls
- 8XX (WATS)

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<sup>126</sup> CGE&Y Final Report, section 2.4.5.

- Local Directory Assistance
- Local Directory Assistance Connect
- Toll Directory Assistance
- Toll Credit Request
- Usage sensitive CLASS features
- Terminating InterLATA
- Terminating IntraLATA toll
- Local Measured Service
- Verify InterLATA carrier
- Verify IntraLATA carrier

Some of these types of calls generated Originating Daily Usage Files ("ODUF"), some generated Access Daily Usage Files ("ADUF"), and still others generated both ODUF and ADUF. ODUF records are those that a CLEC bills to its end-users. ADUF records are those that a CLEC charges to Interexchange Carriers ("IXCs"). During the initial DUF test and subsequent retests, CGE&Y generated 478 ODUF and 656 ADUF transactions. The broad representation of call types and large number of actual calls were designed to fully test Qwest's DUF processes. CGE&Y's test, as required by the TSD, was extensive.

**b. Issues were narrowly focused.**

CGE&Y discovered various issues that for the most part were narrowly focused.

WATS calls in the central region only that were attempted but not completed were not being included in the DUF. Typically, call details are not provided for call attempts; however, WATS requires this. Consequently, Qwest modified its process to provide ADUF WATS records for call attempts.

Usage belonging to accounts that were converting from Qwest to a CLEC and whose conversion service order posted to the billing system on Fridays needed to be held one more day to ensure that the usage was guided to the new provider. A coding change corrected this

problem. In certain switches, certain UNE-P classes of service generated flat rate billing instead of usage-based UNE-P billing. Table updates corrected this problem.

Lastly, coin calls that were sent-paid (not alternately billed) intraLATA calls with Qwest as the carrier and terminating to an unbundled line did not generate ADUF records. A coding change corrected this problem.

The narrow focus of the problems that the DUF test discovered demonstrates that Qwest had minor fixes to implement; otherwise, Qwest's DUF processes were sound.

**c. CLEC concerns were addressed.**

CLEC concerns were addressed in two ways. First, design of retesting was adjusted to accommodate CLEC requests. For the second retest, the CLECs suggested that all calls at a Friendly's location be logged regardless of whether the call pertained to the DUF test. CGE&Y modified its methodology accordingly. Second, CLECs had specific concerns. The CLECs claimed that CGE&Y should have notified CLECs of two systems changes that were implemented as a result of investigating AZIWO2127 and AZIWO2128. In a TAG, Qwest clarified its prior response. Qwest explained that notification of the problem was made within the IWO process, a test process, and not in the normal course of business. In the normal course, a CLEC would have notified the Qwest Help Desk, causing a trouble ticket to be created. When the issue was resolved, the trouble ticket would be closed, generating a notification. Failure to notify in this instance was an artifact of the test. With this explanation, CLECs requested that Qwest update its IWO response. Qwest complied.

The CLECs also argued that Qwest should have delivered more DUF records. However, for each category where no DUF was delivered, Qwest either communicated the problems and resolved them, or provided support for why no DUF record should have been received. The

TAG thoroughly discussed these topics. Ultimately, CGE&Y supported Qwest's position. The situation was discussed in great detail in AZIWO2129.

The test results sufficiently address CLEC concerns about Qwest's ability to provide accurate DUF records. In fact, no valid CLEC argument remains. During the Final Workshop in April, AT&T stated the following:

Mr. Connolly: "We raised the bill issue and the gap issue, and we came, I think, to the conclusion that if 100 percent of the records are on the DUF, there may not be a billing problem."<sup>127</sup>

**2. Qwest's performance is satisfactory.**

**a. Qwest passed the DUF test.**

After extensive testing and re-testing, CGE&Y concluded that Qwest processes DUF as required and that the system fixes implemented by Qwest were successful. As discussed above, problems discovered in one test were resolved and retested in the next test to determine Qwest's fixes were successful. In each successive test, Qwest's performance steadily improved. In fact, Qwest's performance improved until 100% return of expected results was achieved.

Emphasizing this point, CGE&Y states:

"The accuracy of the Indicator 4 value improved from 73% in the initial test to 93% in Retest 1 and to 100% in Retest 2. Qwest implemented system fixes to resolve processing errors that prevented switched access call records from being reported on the ADUFs. After Retest 2, CGE&Y received 100% of ADUF records for which Qwest had received an access record from the Inter-Exchange carrier and 100% of expected ODUF records."<sup>128</sup>

There is simply no question that Qwest passed the DUF test.

**b. Qwest's commercial results**

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<sup>127</sup> OSS Final Report Workshop 10 Transcript, April 17, 2002, 77:8-11.

<sup>128</sup> CGE&Y Final Report, section 2.4.5.

Qwest's reported commercial results related to DUF demonstrate that Qwest's performance is satisfactory. BI-1A measures the timeliness with which Qwest provides recorded daily usage records for UNEs and Resale. The BI-1A results for the last twelve months show that Qwest provided parity service for ten out of twelve months. BI-1B measures the percent of recorded daily usage for jointly provided switched access provided within four days. The BI-1B results for the same twelve month period shows that Qwest has actually surpassed the 95% benchmark every month.

Qwest's commercial results are clearly satisfactory.

**c. ACC findings**

The ACC concluded in its Final Report that the DUF test satisfies TSD requirements and that Qwest passed.<sup>129</sup> To ensure that Qwest's ability to provide timely DUF records is sustained, the Staff recommends that Qwest perform a DUF test with Staff oversight within 12 months. Qwest will comply. See the discussion of Staff's recommendations in Section II above.

**3. Qwest passed the DUF Test.**

Qwest passed the DUF test ultimately achieving final results of 100%. This perfect score was reached after rigorous, extensive testing and retesting was completed. Both CGE&Y and Staff concluded in their final reports that Qwest passed the DUF test. CLEC concerns have been addressed either by CGE&Y's modifying the scope of retests or by Qwest's answers to IWOs and TAG discussions.

In conclusion, CGE&Y has complied with the requirements of the MTP and the TSD in conducting and reporting on its evaluation for the Functionality Test. The results presented in the Final Report and the limited number of concerns and issues raised by the CLECS are testament

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<sup>129</sup> Staff Recommendation Report, ¶¶ 289, 110.

to the compliance of Qwest's OSS to the requirements and the completeness of the test by CGE&Y. Areas that had outstanding issues as a result of the initial execution of the test have been addressed fully as part of the retest and have been closed as a result.

## **VI. RETAIL PARITY EVALUATION**

### **A. Test Overview**

The Retail Parity Evaluation ("RPE") is a test unique to Arizona. No other OSS test in the country that has been approved by the FCC, including New York and Texas, has included a comparison like the RPE. In the RPE, CGE&Y compared the interfaces Qwest provides to CLECs to the interfaces used by Qwest's retail representatives. This new evaluation was intended to be conducted at a higher level than the detailed algorithmic and statistical tests that are part of the Arizona OSS test and similar tests in other jurisdictions. From its inception, the RPE was intended to be an order of magnitude comparison to determine whether the necessary and acknowledged differences between Qwest's internal systems and the interfaces by which it provides CLECs access to those interfaces result in any practical difference to a customer calling in for service.

The purpose of the RPE "was to determine whether a CLEC representative, using Qwest OSS interfaces, can provide a level of service and experience that is substantially the same in time and manner as that which a Qwest representative can provide using internal Qwest OSS interfaces."<sup>130</sup> The RPE accomplished this objective through qualitative and quantitative analyses, with an emphasis on the qualitative aspects.<sup>131</sup>

CGE&Y concluded that the experience of a CLEC service representative using the various available OSS interfaces is substantially the same to that of a Qwest service

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<sup>130</sup> CGE&Y Final Report, section 3.

<sup>131</sup> See Staff Recommendation Report, ¶¶ 43, 45.

representative performing similar activities (pre-order, order, M&R) using internal OSS interfaces.<sup>132</sup> Staff agrees with CGE&Y's findings and conclusions regarding Retail Parity and recommends that the ACC support them and find Qwest to be Section 271 compliant in this regard.<sup>133</sup>

**B. MTP and TSD Requirements**

The MTP and the TSD specify the information CGE&Y was required to obtain, the factors CGE&Y was required to consider, and the questions CGE&Y was required to answer. Based on the totality of the circumstances before it, CGE&Y was required to reach a conclusion.

The Master Test Plan ("MTP") states the overarching objective as follows:

The focus of the Retail Parity Evaluation is on the experience which the customer has while on the line with a CLEC representative, in comparison to the experience of a customer while on the line with a Qwest representative<sup>134</sup>

The MTP states the purpose of the RPE as follows:

The Retail Parity Evaluation is a type of functionality test that evaluates whether a CLEC representative, using a Qwest OSS interface, is able to provide a level of service and experience to customers in substantially the same time and manner as the level of service and experience that a Qwest representative can provide using the equivalent internal Qwest OSS interface.<sup>135</sup>

The MTP further describes the RPE as both quantitative and qualitative.<sup>136</sup> The TSD explains that the quantitative aspects of the evaluation include gathering information regarding "apples to apples" comparisons of countable data elements, where possible, and timeliness

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<sup>132</sup> CGE&Y Final Report, section 7.2, p. 458.

<sup>133</sup> Staff Recommendation Report, ¶ 163.

<sup>134</sup> MTP section 5.2.

<sup>135</sup> MTP section 5.1.

<sup>136</sup> MTP section 5.2.

measures where measurable elapsed timeframes are possible.<sup>137</sup> These quantitative measures were to be used only "where possible" because the parties recognized at the outset that there are differences between Qwest's retail systems and the CLEC interfaces. Therefore, the parties agreed that "[q]ualitative test measures will be used where an exact means of comparison is not possible."<sup>138</sup>

As noted above, the overarching focus of the RPE is "on the experience which the customer has while on the line with a CLEC representative, in comparison to the experience of a customer while on the line with a Qwest representative."<sup>139</sup> After collecting quantitative data where possible and qualitative data for all other factors, CGE&Y was required to answer specific questions posed in the TSD and arrive at an overall conclusion. The MTP vests solely in CGE&Y, as the Test Administrator, the responsibility for analyzing the test results and reporting its evaluation of those results.<sup>140</sup> As Staff noted in its report, sound judgment and intuition are often the best measure for this type of analysis.<sup>141</sup> Indeed, CGE&Y was hired to be the Test Administrator in part because of the collective experience and judgment of its personnel.<sup>142</sup> The MTP requires CGE&Y to apply that experience and judgment in reporting its conclusions. As set forth below, that is exactly what CGE&Y did.

The RPE was always intended to be a high level comparison, as contrasted with the very detailed mathematical and statistical methodology employed in other portions of the OSS Test,

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<sup>137</sup> TSD section 5.2.

<sup>138</sup> TSD section 5.2.

<sup>139</sup> MTP section 5.2.

<sup>140</sup> MTP section 9.3.

<sup>141</sup> Staff Recommendation Report, ¶ 128.

<sup>142</sup> CGE&Y personnel have extensive experience in areas of particular relevance to the RPE, including gateway use, construction and design, service center representative and management, and service order experience. RPE Workshop Transcript Vol. II, August 8, 2001,, 348:17-22.

such as the functionality test and performance measures audit. The premise for the RPE is that there are necessary and acknowledged differences between Qwest's retail systems and the interfaces it provides to CLECs to allow them to access its OSS.

As Staff notes in its Report, The RPE was included in the MTP because of the differences between the CLEC systems performance and the Qwest systems performance. It was never expected that response times or order entries for IMA-GUI would be in parity with retail systems. As stated in the MTP: "Specifically, the purpose of this test is to determine whether a CLEC representative, using a Qwest OSS interface, can provide service in substantially (not identically) the same time and manner as the service that a Qwest representative provides".<sup>143</sup> Indeed, as Staff also notes, the first proposed benchmarks the IMA-GUI response times were expressed as retail response time + x seconds; Qwest and the CLECs later agreed to use a fixed benchmark for this PID.<sup>144</sup> This difference is also acknowledged in the MTP: "The Retail Parity Evaluation is . . . quantitative in that it evaluates, to the extent possible and appropriate, OSS response times on a comparative basis, *recognizing a difference in processes*."<sup>145</sup> Therefore, recognizing that the CLEC interfaces do not provide exactly the same access as the systems Qwest's retail representatives use, the parties agreed to perform a high level analysis to determine whether the differences have a practical impact on a customer's experience when ordering from a CLEC, as opposed to ordering from Qwest. As Staff notes in its Report, Parity performance of these systems is not expected.<sup>146</sup>

**C. CGE&Y Complied with the MTP and TSD Requirements.**

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<sup>143</sup> Staff Recommendation Report, ¶160.

<sup>144</sup> Staff Recommendation Report, ¶159a.

<sup>145</sup> MTP section 5.2 (emphasis added).

<sup>146</sup> Staff Recommendation Report, ¶159a.

CGE&Y's Final Report details the processes CGE&Y employed in accordance with the MTP and TSD in executing the RPE. With the concurrence of Staff and DCI, CGE&Y modified the approach for the RPE from the methodology outlined in the MTP and TSD to conduct the RPE in two phases.<sup>147</sup> Even with this modified approach, CGE&Y ensured that the entrance and exit criteria for the RPE set forth in the MTP and TSD were met and answered the specific questions set forth in the TSD.<sup>148</sup> Indeed, AT&T admitted at the RPE workshop that "it looks like [CGE&Y] did a fairly good job in identifying the facts, how many steps were involved in creating a transaction, how much time did it occur, how many fields were required in order to do that."<sup>149</sup>

Having conducted the RPE in accordance with the MTP and TSD, as modified with the concurrence of Staff and DCI, CGE&Y made the evaluation required by the MTP:

In analyzing the results of Phase 1 and 2 of the RPE as well as the results of the re-evaluation, CGE&Y concludes that the experience of a CLEC service representative using the various available OSS interfaces is substantially the same to that of a Qwest service representative performing similar activities using internal OSS interfaces. CGE&Y also concludes that Qwest provides CLECs with substantially the same access to its OSS for the purposes of initiating service requests and M&R trouble transactions.<sup>150</sup>

CLECs contend that there is insufficient evidence to reach conclusions as to retail parity, and to the contrary, evidence shows that Qwest is not providing CLECs with nondiscriminatory access to its OSS. Staff reviewed the CLEC comments and the TA's findings on these issues in CGE&Y's Final OSS Test Report. Staff believes that the TA has addressed the CLECs' issues

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<sup>147</sup> CGE&Y Final Report, section 3, p. 192.

<sup>148</sup> CGE&Y Final Report, 3.1.3, 3.1.4.3, 3.2.3, 3.2.4, 3.3.3, 3.3.4, and 3.4.3.

<sup>149</sup> RPE Workshop Transcript Vol. I, August 7, 2001,, 44:18-22.

<sup>150</sup> CGE&Y Final Report, Executive Summary, Retail Parity Evaluation, Conclusions.

listed above. CLEC concerns appear to be more “disagreement with the findings and conclusions of the TA” rather than as to whether the TA completed the activities.<sup>151</sup>

**D. The CLECs’ Concerns Have Been Addressed.**

During the interim workshop regarding retail parity, the CLECs raised several concerns regarding the RPE. As a result, CGE&Y undertook a re-evaluation to address those issues. The major issues addressed in the re-evaluation included the number of fields and steps required to enter an order, pre-order response times, pre-order-to-order integration, reservation of vanity telephone numbers, reservation of large blocks of telephone numbers, edit and error checking and status query capabilities, and ability to expedite due dates.<sup>152</sup>

CLEC issues were brought up in a workshop related to the initial RPE test performed by the TA. Following the Workshop, Staff concluded that the TA needed to address these issues and the TA concurred that retesting should be performed for the RPE test. The Final Report reflects the results of the retest and includes findings for the issues cited above.<sup>153</sup>

The CLECs' concerns, along with information demonstrating how those concerns were addressed in the RPE, are summarized below.

**1. Auto-populated or selectable field were counted.**

**The cumulative number of auto populated or selectable fields (previously auto-populated from a query) will be counted for each retail parity test order and compared between resale and retail.<sup>154</sup>**

The CLECs believe CGE&Y failed to count the cumulative number of auto-populated or selectable fields.<sup>155</sup>

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<sup>151</sup> Staff Recommendation Report, ¶153.

<sup>152</sup> CGE&Y Final Report section 3.1.4.3, 236-243.

<sup>153</sup> Staff Recommendation Report, ¶154.

<sup>154</sup> TSD section 4.2.

CGE&Y used scripts executed during the RPE re-evaluation to build the worksheets and recorded the fields that were pre-populated, pull down or entered manually for the retail and resale representatives. Once the count for the fields had been recorded, the columns were totaled and the percentages were calculated. CGE&Y found that for resale POTS service types data entry required an average of 15% manual entry and CENTREX required 35% manual entry.

CGE&Y also found that for retail POTS service types data entry required an average of 85% manual entry and CENTREX required 84% manual entry. Per the findings above, the percent of entries that must be performed manually is significantly higher for retail representatives than it is for CLEC representatives. Therefore, although the CLEC representative has an experience that is different than that of a Qwest representative these differences do not discriminate against the CLEC nor do they negatively impact the customer experience. Thus, CGE&Y concluded that "the OSS access that Qwest provides to CLECs for the purposes of initiating service requests and M&R trouble transactions does not negatively impact the customer experience as any time differences observed between retail and wholesale would be transparent to a customer while communicating with the representative."<sup>156</sup>

## **2. Edit and error checking capabilities are substantially the same.**

**Are the edit and error checking capabilities available to CLECs using the IMA-GUI and EDI interfaces to create orders substantially the same to the capabilities of a Qwest customer service representative using the retail interfaces?<sup>157</sup>**

The CLECs maintain CGE&Y failed to compare the capabilities of edit and error checking available to CLECs using the IMA-GUI and IMA-EDI interfaces to those of Qwest retail representatives using retail interfaces.<sup>158</sup>

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<sup>155</sup> AT&T Comments on Draft Final Report, II.A.1.

<sup>156</sup> CGE&Y Final Report, Executive Summary, Retail Parity Evaluation, Conclusions.

<sup>157</sup> TSD section 4.1.

The Retail Parity re-evaluation test scripts contain screen prints from the Retail Parity re-evaluation of the edit or error messages received in the IMA-GUI. The functionality scripts that were evaluated as part of the re-test and in support of the RPE contain screen prints of the edit or error messages received in IMA. These documents were used by CGE&Y to conclude that the edit and error checking capabilities of IMA-GUI are sufficient for the resale representative to identify and correct any errors on a LSR.

Both resale and retail systems provide error checking and responses to indicate the errors. During the Retail Parity re-evaluation, CGE&Y evaluated the error messages generated in IMA-GUI when there was an error on an LSR. The error messages were captured in screen prints and are clear and concise. The error messages tell the resale representative what section (LSR, EU, Resale, etc. form) and field (APTCO, TOA, AGAUTH, etc.) on the LSR the error is contained in. It is CGE&Y's opinion that the edit and error checking capabilities of IMA-GUI are sufficient for the resale representative to identify and correct any errors on a LSR.<sup>159</sup>

**3. Ability to request large blocks of telephone numbers is substantially the same.**

**Is the procedure used to reserve large blocks of TNs substantially the same for both a Pseudo-CLEC Service Representative and a Qwest Service Representative?<sup>160</sup>**

The CLECs contend CGE&Y failed to compare and evaluate the abilities to request large blocks of telephone numbers.<sup>161</sup>

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<sup>158</sup> AT&T Comments on Draft Final Report, II.A.2.

<sup>159</sup> CGE&Y Final Report, section 3.1.4.3.

<sup>160</sup> TSD section 4.1.

<sup>161</sup> AT&T Comments on Draft Final Report, II.A.3.

As stated by CGE&Y in its report, the procedure to reserve large blocks of TNs required a manual process for both resale and retail for the same geographic area. Although the procedures for both retail and resale are manual, the manual procedures exhibit differences:

During the Retail Parity re-evaluation, CGE&Y determined the resale representatives do not call the same telephone number to reserve large blocks of TNs as the retail representatives. The resale representatives receive the requested TNs via FAX, while the retail representatives receive the TNs during the call. The times ranged from 23 minutes to 1 hour and 10 minutes from the time the call was placed to the ISC until the fax was received.<sup>162</sup>

CGE&Y also recommended in its report that Qwest improve the process for CLECs to reserve large blocks of TNs. The reservation of large blocks of TNs is currently a manual process for CLECs. CGE&Y believes that a process improvement, through mechanization or other means, would be beneficial to CLECs when serving business customers. The basis for this recommendation is discussed in the Retail Parity Evaluation section of this report on page 236, and in Data Request 192.<sup>163</sup>

In January 2002, as a result of CGE&Y's evaluation, Qwest improved the CLEC process for obtaining large blocks of telephone numbers. The CLEC is now given the option of holding while the Qwest Wholesale Interconnection Service Center (ISC) contacts the Qwest Network Software Assignment Center (NSAC) to obtain the telephone numbers. After the numbers have been obtained from the NSAC, the CLEC is then given the option of receiving the telephone numbers via fax, via email or verbally on the same call. These options surpass those available to Qwest retail representatives. Retail representatives do not have the options of facsimile or email.

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<sup>162</sup> CGE&Y Final Report section 3.1.4.3.

<sup>163</sup> CGE&Y Final Report, Executive Summary, Recommendations.

Qwest believes the improved process addresses the concerns of the CLECs, CGE&Y and Staff.

**4. Ability to query the status of a pending service order is substantially the same.**

**Is substantially the same ability provided to both the Pseudo-CLEC service representative and the Qwest service representative to query status of a pending service order?<sup>164</sup>**

The CLECs assert CGE&Y failed to determine if substantially the same ability is provided to the Pseudo-CLEC and Qwest service representatives to query the status of a pending service order.<sup>165</sup>

The Retail Parity re-evaluation test scripts contained detailed instructions, results and screen prints from the Retail Parity re-evaluation. The RPE test scripts contain a description of the events supporting the query to status a pending order. As a result of the Functionality re-test and the Retail Parity re-evaluation, CGE&Y found that the statuses returned were clear concise messages to inform the Pseudo-CLEC what stage the order was in.

It is CGE&Y's finding that both the resale and retail representatives have substantially the same ability to status a pending order, but the quality of information returned to the resale representative is more clear and concise than that which is returned to the retail representative. Both the resale and retail systems provide the ability to check the status of an order at any time through order completion.<sup>166</sup>

**5. Ability to expedite due dates is substantially the same.**

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<sup>164</sup> TSD section 4.1.

<sup>165</sup> AT&T Comments on Draft Final Report, II.A.4.

<sup>166</sup> CGE&Y Final Report section 3.1.4.3.

**Is substantially the same opportunity provided to the Pseudo-CLEC Service Representative and the Qwest Service Representative to expedite due dates?<sup>167</sup>**

The CLECs claim CGE&Y failed to determine if CLEC and Qwest Customer Service Representatives have substantially the same ability to expedite due dates and a more detailed evaluation should have been done.<sup>168</sup>

In certain situations, both Qwest retail representatives and wholesale customers have the ability to expedite due dates on orders that are shorter than the standard interval. The standards for valid expedites are the same for retail and wholesale customers. Valid expedite situations are detailed on the Qwest website and include; fire, flood, National emergency, disconnect in error by Qwest, conditions where the end-user is completely out of service, delayed orders with a future Request for Service date that meet any of the above-described conditions.

CGE&Y evaluated the ability to expedite due dates in the Retail Parity re-evaluation. The Retail Parity re-evaluation test scripts contain detailed instructions, results and screen prints. Again, the test scripts contain a description of the events supporting the process to expedite due dates. An Expedite field is available on the LSR form for the resale representative to use to indicate that an order needs to be expedited, but this must be accompanied by a telephone call to the Interconnection Service Center (ISC). The retail representative must also make an internal phone call to expedite an order.<sup>169</sup> As a result of the Functionality re-test and the Retail Parity re-evaluation, CGE&Y rightly concluded that the process to request an expedited due date is substantially the same for the resale representative and the retail representative.

Staff agrees with the TA that such an evaluation was not required. Staff's underlying considerations for not conducting a test in the manner prescribed by the CLECs are that:

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<sup>167</sup> TSD section 4.1.

<sup>168</sup> AT&T Comments on Draft Final Report, II.A.5, Dated January 17, 2002.

<sup>169</sup> CGE&Y Final Report, section 3.1.4.3.

- Determination of statistical parity for this process would have taken a large sample of requests over an extended period.
- Staff believes that a better method of determining whether Qwest is expediting Due Dates is through commercial data for the PID that measures installation interval (OP-4 Installation Interval).

Staff states if Qwest expedites Due Dates for its own end customers and not for CLECs this PID will not be in parity and a penalty under the PAP would be paid to the CLECs.<sup>170</sup>

**6. Pre-order query response times are in parity.**

**Is the time and effort to perform preorder queries substantially the same for Pseudo-CLEC and Qwest Service Representatives?<sup>171</sup>**

The CLECs argue that the total pre-order query response times across the scenarios show that resale response times were substantially, and statistically significantly longer than for retail.<sup>172</sup>

During the Retail Parity re-evaluation, CGE&Y captured pre-order response times mechanically and manually. The mechanically captured response times included the time taken for pre-order queries to be sent to Qwest and returned to the Pseudo-CLEC. Manually captured timings included internal Pseudo-CLEC HTTP routing. For the purposes of AZIWO1110, and to make a fair comparison of the pre-order responses between resale and retail, CGE&Y relied heavily upon the mechanically collected response times as shown in the following figures. These figures indicate that the experience of a resale representative performing pre-order query transactions were similar to that of a retail representative performing similar activities using the internal OSS interfaces of Qwest. These results led to the closure of AZIWO1110.<sup>173</sup>

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<sup>170</sup> Staff Recommendation Report, ¶155b.

<sup>171</sup> MTP section 5.8.

<sup>172</sup> AT&T Comments on Draft Final Report, II,B.

<sup>173</sup> CGE&Y Final Report, section 3.1.4.3.

CGE&Y appropriately looked at the entire experience of a customer when concluding that the experience of a CLEC service representative using the various available OSS interfaces is substantially the same to that of a Qwest service representative performing similar activities using internal OSS interfaces.<sup>174</sup>

The standard set in the TSD and MTP for the Retail Parity Evaluation is whether a service representative using the interfaces Qwest provides to CLECs can provide substantially the same experience to end users as a Qwest retail representative. “The purpose of this test is to determine whether a CLEC representative, using a Qwest OSS interface, can provide service in substantially the same time and manner as the service a Qwest representative provides.”<sup>175</sup> CGE&Y did that very analysis, considering the totality of the circumstances.

Additionally, the FCC looks at the benchmarks established for the response times. Pre-order response times are governed by the negotiated benchmarks in PO-1. Qwest is meeting those benchmarks and have even met them under heavy volumes in the Capacity Test.

Finally, Staff does not believe that CGE&Y’s findings on the quantitative evaluation portion of the Retail Parity Evaluation point towards a conclusion of disparity.<sup>176</sup> The evaluative criteria in the RPE were not parity of system response times or order entry requirements. “CGE&Y has gone far beyond the analysis that was anticipated by the MTP. It has provided detailed statistical analysis of response times.”<sup>177</sup> Most importantly, in Staff’s opinion, as required by the MTP, CGE&Y compared the experience of a CLEC representative using the IMA-GUI interface with a Qwest representative using Qwest’s systems. It found that the CLEC representative could provide service in substantially the same time and manner as that which the

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<sup>174</sup> CGE&Y Final Report, section 7.2.

<sup>175</sup> MTP section 5.1.

<sup>176</sup> Staff Recommendation Report, ¶158.

<sup>177</sup> Staff Recommendation Report, ¶160a.

Qwest representative provides. "The average service order negotiation takes twenty to twenty-five minutes or longer. This makes the nominal IMA-GUI system benchmark response times of only a few seconds, even though more than Qwest retail time, irrelevant."<sup>178</sup>

**7. Quantitative findings indicate a conclusion of parity.**

**Is the time and effort to perform pre-order queries substantially the same for Pseudo-CLEC and Qwest Service Representatives?<sup>179</sup>**

The CLECs argue that CGE&Y's findings on the quantitative evaluation portion of the Retail Parity Evaluation point toward a conclusion of disparity.<sup>180</sup>

CGE&Y found that for resale POTS service types data entry required an average of 15% manual entry and CENTREX required 35% manual entry.<sup>181</sup> CGE&Y found that for retail POTS service types data entry required an average of 80% manual entry and CENTREX required 84% manual entry.<sup>182</sup> The percent of entries that must be performed manually is significantly higher for retail representatives than it is for CLEC representatives. Therefore, CGE&Y supports the conclusion that the CLEC representative has an experience that is substantially the same in time and manner as that of a Qwest representative. These findings were used to close AZIWO1111.<sup>183</sup>

Regarding pre-order response times, CGE&Y found there were substantial differences between wholesale and retail operations.<sup>184</sup> However, differences are explainable because of the

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<sup>178</sup> Staff Recommendation Report, ¶160.

<sup>179</sup> MTP section 5.8.

<sup>180</sup> AT&T Comments on Draft Final Report, II.D, Dated January 17, 2002.

<sup>181</sup> CGE&Y Final Report, section 3.1.4.2.

<sup>182</sup> CGE&Y Final Report, section 3.1.4.3.

<sup>183</sup> CGE&Y Final Report, section 3.1.4.2.

<sup>184</sup> CGE&Y Final Report, section 3.1.4.3.

additional processing time that is necessary in order to preserve the integrity and security of Qwest systems. CGE&Y states:

Moreover, the architecture was found to be sound and reasonably consistent with other models used in the business-to-business and third party trading partner software industry.<sup>185</sup>

CGE&Y also recognized that the timing differences that existed do not imply that CLECs do not have a meaningful opportunity to complete.<sup>186</sup> Staff in its Final Report concludes that the timing differences are nominal and are not significantly greater than those of retail.<sup>187</sup>

In sum, “Staff does not believe that CGE&Y’s findings on the quantitative evaluation portion of the Retail Parity Evaluation point towards a conclusion of disparity.<sup>188</sup> Staff also concurs with the TA findings and conclusions in the RPE.”<sup>189</sup> Staff recommends, however, that “Qwest should assess system improvements for reducing the IMA-GUI input steps required by CLECs. This effort should be conducted in conjunction with other system changes.”<sup>190</sup>

Qwest is investigating opportunities to reduce the IMA-GUI input steps consistent with this recommendation. Qwest will work with the CLECs in the CMP to identify changes consistent with Staff’s recommendation.

#### **8. Maintenance & Repair functionality is substantially the same.**

The CLECs assert that CGE&Y’s sample size during the evaluation of the timeliness of maintenance and repair transactions was too small to reach any meaningful conclusions.<sup>191</sup>

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<sup>185</sup> CGE&Y Final Report, section 3.1.4.

<sup>186</sup> Id.

<sup>187</sup> Staff Recommendation Report, ¶160.

<sup>188</sup> Staff Recommendation Report, ¶158.

<sup>189</sup> Staff Recommendation Report, ¶159.

<sup>190</sup> Staff Recommendation Report, ¶283a.

<sup>191</sup> AT&T Comments on Draft Final Report, II,C, Dated January 17, 2002.

The IMA-GUI Maintenance and Repair evaluation was structured to evaluate the mechanized M&R capability available to a CLEC representative (resale) using Qwest OSS interfaces and that available to a Qwest representative (retail) using the equivalent internal Qwest OSS interfaces when performing similar activity. The evaluation compared a CLEC's ability to perform the M&R transactions on an end-user's line or circuit with the Qwest retail equivalent transactions.

CGE&Y was able to verify that the functionality provided to both resale and retail was substantially the same. For example, the functions necessary for resale to open a trouble ticket were the same for retail. Comparable MLT results were received for both resale and retail. Upon request, trouble history was available to both resale and retail along with trouble ticket status. The timeliness data gathered directionally supports parity for the queries of issuing a ticket and obtaining its status.<sup>192</sup>

CEMR replaced the IMA-GUI maintenance and repair system in December 2000, more than sixteen months ago. At that time, the TAG -- including AT&T -- fully discussed how to incorporate CEMR into the OSS Test. The TAG agreed that CEMR would be tested as part of the functionality test, but would not be evaluated as part of the RPE.<sup>193</sup>

CEMR was successfully tested by CGE&Y in Functionality. The Pseudo-CLEC was able to access M&R systems using Customer Electronic Maintenance & Repair (CEMR) with test cases supplied by CGE&Y. This included the ability to issue, track and close a trouble ticket. Overall, CGE&Y found that it was able to Create, Modify, Status, and Close a trouble ticket. In addition, CGE&Y was able to successfully execute the MLT tool on the trouble tickets in the test. MLTs were successfully performed on selected test lines. Additionally, the functionality for

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<sup>192</sup> CGE&Y Final Report, section 3.2.4.

<sup>193</sup> RPE Workshop Transcript Vol. I, August 7, 2001,, 57:22-58:19

electronically requesting the status of an open trouble ticket was successfully tested.<sup>194</sup> CGE&Y concluded that Qwest met the “substantially the same” access requirement for the purposes of initiating service requests and M&R trouble transactions. “These conclusions were based on a combination of qualitative, quantitative, and timeliness results, as well as observations and statistical analysis to determine the overall experience of a CLEC service representative as compared to a Qwest service representative performing similar activities. CGE&Y further concludes that the OSS access that Qwest provides CLECs for the purposes of initiating service requests and M&R trouble transactions does not negatively impact the customer experience.”<sup>195</sup>

According to Staff, the CLECs’ arguments that CGE&Y’s sample size during the evaluation of the timeliness of maintenance and repair was too small to reach any meaningful conclusions is a moot point.<sup>196</sup> The facts support this conclusion. Staff acknowledges that “[T]he CEMR system was designed by Qwest specifically to handle CLEC M&R and to overcome problems that existed with the old IMA-GUI M&R system. The system provides access to Qwest M&R basically in the same manner as for Qwest Retail systems and therefore is “almost parity” by design both in functionality and timeliness. Testing of CEMR in the Functionality Test confirms that this is the case.”<sup>197</sup>

Finally, the Staff reasons appropriately that M&R systems do not share the same timeliness issues as ordering systems because M&R requires only a small number of

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<sup>194</sup> CGE&Y Final Report, section 2.3.4.1.

<sup>195</sup> CGE&Y Final Report, section 7.2.

<sup>196</sup> Staff Recommendation Report, ¶ 156.

<sup>197</sup> Staff Recommendation Report, ¶156.

transactions.<sup>198</sup> Staff believes that because of the design of the CEMR system and the verification testing in the Functionality Test that this issue is closed.”<sup>199</sup>

**E. The Experience of a CLEC Service Representative is Substantially the Same as a Qwest Service Representative.**

After performing its evaluation in accordance with the requirements of the MTP and the TSD, CGE&Y has concluded that the experience of a CLEC service representative using the various available OSS interfaces is substantially the same to that of a Qwest service representative performing similar activities (pre-order, order, M&R) using internal OSS interfaces. CGE&Y also concluded that Qwest provides CLECs with substantially the same access to its OSS for the purposes of initiating service requests and M&R trouble transactions. These conclusions were based on a combination of qualitative, quantitative, and timeliness results, as well as observations and statistical analysis to determine the overall experience of a CLEC service representative as compared to a Qwest service representative performing similar activities. CGE&Y further concludes that the OSS access that Qwest provides CLECs for the purposes of initiating service requests and M&R trouble transactions does not negatively impact the customer experience.<sup>200</sup>

Staff agrees with CGE&Y's findings and conclusions regarding Retail Parity and recommends that the ACC support them and find Qwest to be Section 271 compliant in this regard.<sup>201</sup>

**VII. CAPACITY TEST**

**A. Introduction**

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<sup>198</sup> Staff Recommendation Report, ¶ 157.

<sup>199</sup> Id.

<sup>200</sup> CGE&Y Final Report, section 7.2.

<sup>201</sup> Staff Recommendation Report, ¶163.

The purpose of the Capacity Test was to validate that Qwest's operational support systems ("OSS") and processes for pre-ordering and ordering transactions can handle estimated volumes projected one year from the date the Capacity Test was run.

CGE&Y executed the Capacity Test in two phases. In the first phase, CGE&Y instructed the Pseudo-CLEC to submit pre-ordering and ordering transactions to Qwest's OSS in the volumes that were expected to occur twelve months in the future (the "Twelve Month Test"). The success criteria for this test required Qwest to meet certain performance metrics at volumes projected to occur six months from the date the test was run.<sup>202</sup> For volumes projected to occur nine and twelve months from the date of the Capacity Test, Qwest could pass even if it did not meet those performance metrics so long as CGE&Y determined that Qwest's procedures for scaling its systems and staff were capable of handling projected future volumes. Thus, meeting performance benchmarks was a requirement only at the sixth month level. The projected pre-order and order volumes that were used in the 12-month test were based on expected usage in August 2002. The actual volumes that are being processed today are showing a significantly lower volume trend. Thus, Qwest systems were actually proven to be more robust in terms of the volumes they can process than even was necessary.

In the second phase of the Capacity Test, CGE&Y instructed the Pseudo-CLEC to submit pre-ordering and ordering transactions to Qwest's OSS in increments up to 150% of the volume projected for the busiest hour twelve months in the future (the "Stress Test").<sup>203</sup> There were no stated success criteria for the Stress Test. This was a diagnostic test intended to describe how Qwest's interfaces behaved under extreme volumes.

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<sup>202</sup> Capacity Test Detailed Plan, Volume 2.01, June 6, 2001, section 5.

<sup>203</sup> TSD section 5.2.2.4.

Qwest clearly passed both phases of the Capacity Test. Indeed, Qwest met the benchmarks in the Twelve Month Test, despite the fact that CGE&Y actually submitted more transactions than were planned. This obviated the need to run the 6 month and 9 month capacity tests. Rather than run these lower volume tests, CGE&Y proceeded to the Stress Test. Here too, Qwest handily passed. In fact, not required to do so, Qwest actually met the benchmarks during the Stress Test except for a sixteen minute period during which CGE&Y bombarded Qwest's OSS with a full 70% more pre-order transactions than planned or dictated by the testing documentation -- a colossal 220% of the volume that was not expected to materialize for a full year into the future.<sup>204</sup> Even during the sixteen-minute period when Qwest did not meet the benchmarks, Qwest's systems continued to successfully process transactions.

The Capacity Test also included CGE&Y's analysis of Qwest's procedures for scaling its systems and staff.<sup>205</sup> Again, Qwest clearly passed these evaluations, without CGE&Y having to issue a single IWO.<sup>206</sup>

Despite Qwest's stellar performance, the CLECs have continued to raise a handful of issues regarding the results of the Capacity Test, implying that the results are not valid. The CLECs have failed to produce any competent evidence to call into question the Capacity Test results.

**B. CGE&Y Satisfied the MTP and TSD Requirements in Performing the Capacity Test.**

**1. MTP and TSD requirements for the Capacity Test**

The MTP and the more detailed TSD set forth requirements for the Capacity Test.

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<sup>204</sup> Capacity Test Workshop Transcript Vol. I 154:16-155:1. *Also compare* planned pre-order transaction volumes in Detailed Test Plan section 5.2.1 with actual pre-order transaction volumes set forth in the CGE&Y Final Report section 4.1.3.1.

<sup>205</sup> MTP sections 6.10 and 6.11.

<sup>206</sup> CGE&Y Final Report, Executive Summary.

The MTP describes the purpose of the Capacity Test as follows:

The Capacity Test will validate that Qwest's OSS Systems and processes for pre-order and ordering transactions can predictably handle loads equal to or greater than those projected by the various CLEC participants for estimated volumes projected one year from the date of the running of the Capacity Test.<sup>207</sup>

The MTP further provides that CGE&Y, as Test Administrator, was required to determine the parameters involved in conducting the capacity tests of the Qwest systems with CLEC and Qwest input.<sup>208</sup> These parameters included the transaction volumes, which CGE&Y was required to determine using projected volumes provided by both Qwest and the CLECs.<sup>209</sup> CGE&Y was also required to determine the specific hour-by-hour volume requirements.<sup>210</sup>

The TSD requires that a detailed plan specifying the scope, approach, entrance, exit, and execution requirements for the Capacity Test be provided and reviewed with the CLECs, Qwest, and the Pseudo-CLEC.<sup>211</sup> The TAG created a Capacity Test Subcommittee comprised of CLEC, Qwest, Pseudo-CLEC representatives, Staff, and DCI to discuss and decide the technical details relating to the Capacity Test. "Subcommittee" is something of a misnomer as applied to the group that engaged in extensive discussions to work through the details of how the Capacity Test would be run because the CLEC, Qwest, Pseudo-CLEC representatives, Staff, and DCI representatives that participated in the Capacity Subcommittee were essentially the same representatives that participated in TAG meetings; the primary difference was that CLEC, Qwest, and Pseudo-CLEC also designated technical personnel to participate in the Capacity Subcommittee meetings.

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<sup>207</sup> MTP section 6.1.

<sup>208</sup> MTP section 6.2.

<sup>209</sup> MTP sections 1 and 6.1.

<sup>210</sup> MTP section 6.4.

<sup>211</sup> TSD section 5.2.4, 5.2.2.4(a).

The Capacity Subcommittee engaged in many hours of discussion over the course of approximately 30 meetings beginning in April 2000 and continuing through July 2001 to determine the details for the execution of the Capacity Test. These details were memorialized in the System Capacity Test Detailed Plan ("Detailed Test Plan"), which is appended to CGE&Y's Final Report. The TSD further tasked CGE&Y with amending and finalizing the Detailed Test Plan as needed.<sup>212</sup> The TSD does not require TAG approval of the Detailed Test Plan, but provides only that the plan be reviewed with the CLECs, the Pseudo-CLEC, and Qwest prior to conducting the Capacity Test.<sup>213</sup> This requirement was met because all versions of the Detailed Test Plan not only were reviewed by the CLECs, the Pseudo-CLEC, and Qwest, but the CLECs, the Pseudo-CLEC, and Qwest actually discussed and developed the Detailed Test Plan in the Capacity Subcommittee meetings.

CGE&Y has conducted the Capacity Test in compliance with all of those requirements.

- 2. The Capacity Test Subcommittee recommended, and CGE&Y carried out a phase of Operational Readiness Testing (ORT) to ensure a valid Capacity Test.**
  - a. The ORTs were designed to detect and fix problems with LSRs and pre-order queries.**

One of the CLECs' primary Capacity Test arguments is that there is an unexplained difference between the results of the ORT that occurred on July 16, 2001 and the Twelve Month Test. This argument is based on a faulty comparison of the data, and the flawed assumption by the CLECs that erroneous data would produce valid results that could be compared to actual testing results.

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<sup>212</sup> TSD section 5.2.4.

<sup>213</sup> TSD section 5.2.2.

As an initial matter, the purpose of the ORT was different than the purpose of the Capacity Test.<sup>214</sup> The Capacity Test's primary purpose was to validate the capacity of Qwest's OSS to process typical commercial LSRs, not to evaluate the functionality across extensive LSR types.<sup>215</sup> Accordingly, the MTP mandated that the Capacity Test should be run primarily with "clean (error-free) LSRs to ensure that the focus is on transaction volumes and not functionality."<sup>216</sup> While not required by either the MTP or TSD, the Capacity Subcommittee determined that the ORT was appropriate to verify that all of the components for the Capacity Test were in place and working sufficiently to enable the test to proceed.<sup>217</sup> In particular, the ORTs were designed to eliminate test account and script errors.<sup>218</sup>

The ORTs proved to be very valuable in ensuring that the test accounts were properly established so that the planned volumes could be achieved.<sup>219</sup> Indeed, while CGE&Y had planned to conduct three ORTs, it actually conducted five to attain the desired results.<sup>220</sup> CGE&Y learned from each execution of the ORT.<sup>221</sup> Errors were identified and fixed, and the ORT process was repeated until CGE&Y determined that the Capacity Test could be run.<sup>222</sup> The ORTs and the actual run of the Capacity Test differed in the sense that during each ORT run, erroneous processing in one or more realms of the test were encountered, and subsequently remedied. AT&T alleged that the ORT data should have been analyzed and should be

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<sup>214</sup> Capacity Test Workshop Transcript Vol. I 195:21-22.

<sup>215</sup> MTP section 6.3.

<sup>216</sup> MTP section 6.5.

<sup>217</sup> Detailed Test Plan section 7.2.

<sup>218</sup> Capacity Test Workshop Transcript Vol. I 84:14-18.

<sup>219</sup> Capacity Test Workshop Transcript Vol. I 180:16-25.

<sup>220</sup> Capacity Test Workshop Transcript Vol. I 81:17-25.

<sup>221</sup> Capacity Test Workshop Transcript Vol. I 195:4-8.

<sup>222</sup> Capacity Test Workshop Transcript Vol. I 84:18-24.

comparable to actual test results. As the ORTs were only carried out to find and fix problems, the data collected was polluted due to these problems. In response to an AT&T question during the final ORT workshop, CGE&Y representative Jerry Stroud testified that while the test transaction generator did not change, the scripts that drove it, the transaction set used and report logic were corrected.<sup>223</sup> The test data that was collected during the actual capacity tests is the only data that should be looked at to determine whether Qwest passed the capacity test or not.

This issue is important because, after the 12 Month Test was run, AT&T attempted to compare the results from that test with the results that had been obtained in the July 16, 2001 ORT. At the Capacity workshop, AT&T produced graphs purporting to compare data from the July 16, 2001 ORT to data from the August 10, 2001 12 Month Test for EDI<sup>224</sup> and GUI<sup>225</sup> response times and FOC intervals.<sup>226</sup> This analysis, however, is flawed due to the pollution of ORT data cited above.

As an example, for the ORT results, CGE&Y rounded all results up or down to the nearest minute for both GUI and EDI, except when such rounding would produce a zero or negative interval. If the calculation would result in such an interval, the time was indicated as one minute.

AT&T failed to account for this rounding in its analysis. Using its flawed comparison, AT&T claimed that the data from the ORT showed 374 FOCs returned at the one-minute mark and none returned in less than a minute. However, if the FOC intervals from the ORT are calculated using the same methodology CGE&Y used for the 12 Month Test, the results are much more comparable, showing that 248 FOCs were returned in less than one minute, and 145 FOCs

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<sup>223</sup> OSS Report Workshop 10 Transcript Vol. I 89:19-23

<sup>224</sup> Capacity Test Workshop Transcript Vol. I 197:23-199:14; *see also* AT&T Exhibit 3-6.

<sup>225</sup> Capacity Test Workshop Transcript Vol. I 200:22-23; *see also* AT&T Exhibit 3-7.

<sup>226</sup> Capacity Test Workshop Transcript Vol. II 215:7-8; *see also* AT&T Exhibit 3-8.

returned in one minute, respectively. This is just one example that shows the pitfalls in comparing the ORT with the Capacity Test.

Staff fully concurs with Qwest on this matter. In the Staff report it state:

“In Staff’s opinion, the CLECs are misconstruing the ORT. The purpose of the ORT was to “set up” the test -- and in due course to monitor the activities of the Pseudo-CLEC to ensure successful test completion. There was never an intention to track results, nor was there a defined need.”<sup>227</sup>

**b. The CLECs' complaint regarding the three-week interval between the ORT and 12 Month Test is a red herring.**

Finally, the CLECs complain that CGE&Y did not wait three weeks between the ORT and the Twelve Month Test, as provided in the Detailed Test Plan.<sup>228</sup> This argument has no merit.

The Detailed Test Plan states as follows (emphasis added):

The System Capacity Test shall not be executed until at least three weeks after the start of the Operational Readiness Test. *This is necessary to give all involved parties sufficient time to conduct root cause analysis of any anomalies that may be discovered that are related to the test components and to rectify any flaws in test design, test tools or testing methodology.*<sup>229</sup>

As the provision plainly states, the three week period was intended to provide the parties with sufficient time to conduct root cause analysis for issues discovered during the ORT before the Capacity Test itself was run. This provision was included in the Detailed Test Plan at the Pseudo-CLEC's request because it believed it might need three weeks between the ORT and the actual Capacity Test.<sup>230</sup> However, this concern was no longer applicable because, as discussed

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<sup>227</sup> Staff Recommendation Report, ¶ 200.

<sup>228</sup> Capacity Test Workshop Transcript Vol. I 104:23-105:15.

<sup>229</sup> Detailed Test Plan section 7.4 (emphasis added).

<sup>230</sup> Capacity Test Workshop Transcript Vol. I 105:24-106:12.

above, extensive root cause analysis had been performed throughout the five ORTs that were conducted. Thus, the three-week interval was no longer necessary.

Nonetheless, AT&T claimed at the workshop that the three-week period was needed because it was somehow intended to maintain blindness.<sup>231</sup> The TSD provides that fairness and blindness concerns would best be served if neither the CLECs nor Qwest knew in advance the actual dates on which the Capacity Test would be performed.<sup>232</sup> As Qwest aptly noted at the workshop, running the test within the three-week period despite the provision in the Detailed Test Plan actually added an element of blindness because neither Qwest nor the CLECs expected it.<sup>233</sup> AT&T provides no additional rationale for why a shortened interval between the ORT and the Capacity test might be harmful. AT&T's curious claim should be rejected.

C. **CGE&Y's Conclusion that IRTM is an Adequate Tool for Gauging Pre-Order Response Times is Supported by the Evidence Presented during the Analysis of the Capacity Test.**

In the Report, CGE&Y concludes as follows:

Data from the 12-month Capacity Test reflect that IRTM is an adequate tool for gauging pre-order response time intervals Qwest's OSS are providing to the CLECs. Once the timeout exclusion is applied to EDI results from the Stress Test, Stress Test results also support this conclusion.<sup>234</sup>

CGE&Y's conclusion is based on its comparison of IRTM results to Pseudo-CLEC results during the Twelve Month and Stress Tests.<sup>235</sup> Despite this conclusion, the CLECs complained, for various reasons, that Qwest should be forced to replace IRTM with a system that captures EDI response time information at the Qwest facing Interactive Agent.

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<sup>231</sup> Capacity Test Workshop Transcript Vol. I 106:13-22.

<sup>232</sup> TSD section 5.2.2.

<sup>233</sup> Capacity Test Workshop Transcript Vol. I 106:23-25.

<sup>234</sup> CGE&Y Final Report, Executive Summary.

<sup>235</sup> See CGE&Y Final Report, section 4.1.3.1.

Staff ultimately ruled that, in line with industry trends, Qwest should be required to capture results at the Interactive Agent. Its ruling did not impugn the use of IRTM as the current data source for regulatory reporting purposes, but rather set up an interim system of dual reporting for a period of 18 months. During this time, both IRTM and IA data will be collected and published for comparison. At the end of the 18-month period, the differences between these sources of data will be examined, and a decision will be made at that time regarding which data will be used going forward.

**D. Qwest's Handling of Time-Out Transactions is Consistent with the PO-1 PID.**

AT&T contends that the fact that Qwest treats transactions that exceed 200 seconds as “time-outs” invalidates the calculation of the PO-1 PID. During the stress test in particular, a small number of EDI transactions returned valid responses in more than 200 seconds. Had these transactions occurred as part of PID calculation, the IRTM logic would have excluded them from the calculation. In fact, in the production environment (outside of the times when capacity testing was taking place), Qwest has found no evidence of such protracted transactions. Their occurrence in the Stress Test was a factor of excessive volume. Thus, the argument that the CLECs put forward that the exclusion of these transactions would invalidate the PID is without merit. Staff concurred with CGE&Y’s handling of these timed-out transactions and rejected AT&T’s claims.<sup>236</sup>

**E. The results from the Stress Test indicate Success and provide No Justification for Re-Execution.**

The CLECs contend that the instances of slow response times during the stress test meant that Qwest did not succeed in passing the Stress Test and imply that it should have been re-

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<sup>236</sup> Staff Recommendation Report, ¶ 202.

executed. Qwest argues that since there were no stated success criteria for the Stress Test (it was conducted as a diagnostic test intended to describe how Qwest's interfaces behaved under extreme volumes), there was also no criteria stated that prescribed any reason that the test would need to be re-executed. CGE&Y's analysis showed how Qwest's systems performed within the benchmark performance for the entire test except for a 16-minute period where the input rate of the EDI transactions greatly exceeded the planned volumes.<sup>237</sup> Staff agrees with CGE&Y's analysis of this issue: "Staff concurs that Qwest's OSS and interfaces have the capacity to meet current and forecast demand. Staff also concurs that they performed satisfactorily under the increased "stress" load."<sup>238</sup>

**F. The CLECs' Remaining Arguments provide No Basis upon which to Question CGE&Y's Findings.**

Finally, the CLECs attempted to undermine CGE&Y's findings that Qwest successfully passed the Capacity Test by raising a variety of issues based on isolated circumstances and occasionally bizarre positions. Two examples of such arguments are set forth below.

AT&T kicked off the Capacity Test workshop by insisting that CGE&Y agree to modify its Report "to say that Cap calculated a response time and it did *not* calculate PO-1."<sup>239</sup> Yet, the purpose of PO-1 is to measure response times. The basis for AT&T's position was that the PO-1 measurement is calculated using the IRTM model and CGE&Y did not use a model.<sup>240</sup> Thus, while CGE&Y properly complied with the MTP, TSD, and Detailed Test Plan provisions by collecting data and calculated pre-order response times pursuant to PO-1, "technically, they were

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<sup>237</sup> Capacity Test Workshop Transcript Vol. I 154:16-155:1. *Also compare* planned pre-order transaction volumes in Detailed Test Plan section 5.2.1 with actual pre-order transaction volumes set forth in the Report, section 4.1.3.1.

<sup>238</sup> Staff Recommendation Report, ¶ 205.

<sup>239</sup> Capacity Test Workshop Transcript Vol. I 22:5-27:6 (emphasis added).

<sup>240</sup> Capacity Test Workshop Transcript Vol. I 23:10-14.

not calculating and collecting PO-1 results."<sup>241</sup> Never in any Capacity Subcommittee or TAG meeting over the course of the past two years did AT&T ever make this hypertechnical distinction. This new position represents another instance where AT&T has conjured up a baseless eleventh hour argument, despite AT&T's admission in the Retail Parity workshop that it had a responsibility to raise any such issues during the testing process.<sup>242</sup>

Similarly, WorldCom questioned CGE&Y about a Fetch-n-Stuff configuration change Qwest made. CGE&Y explained that 79 orders -- representing only 1.6% of all LSRs processed during the test -- that were expected to receive an FOC did not receive an FOC because of a problem with Fetch-n-Stuff.<sup>243</sup> CGE&Y issued AZIWO1143 and Qwest described the change it made in its response. WorldCom and AT&T pressed CGE&Y to explain how it verified that Qwest's Fetch-n-Stuff configuration change remedied the problem, implying that CGE&Y is required to independently verify each component of Qwest's IWO response.<sup>244</sup> CGE&Y explained that a flow-through eligible order may fall to manual handling for many reasons; so long as one of those reasons caused the fall out, the mere fact that orders fell out for manual handling does not indicate that there was a systemic software or configuration problem.<sup>245</sup> This particular change related to a tuning change in the UNIX operating system that did not constitute

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<sup>241</sup> Capacity Test Workshop Transcript Vol. I 23:3-6.

<sup>242</sup> Retail Parity Evaluation Workshop Transcript Vol. I 44:9-14 (AT&T witness admits that "if any of the parties have a complaint with how the test is being run or the results of the test, we've had an obligation to share those complaints so that at the end of the process, we'll have gone through it and tempered the results to make them as defensible as possible").

<sup>243</sup> Capacity Test Workshop Vol. I 116:21-117:2.

<sup>244</sup> Capacity Test Workshop Vol. I 116:14-17, 117:3-4.

<sup>245</sup> Capacity Test Workshop Vol. 119:3-15.

a software error.<sup>246</sup> Thus, CGE&Y exercised its professional judgment in evaluating and accepting Qwest's explanation of the problem and resolution.<sup>247</sup>

Moreover, CGE&Y stated that it monitored the retesting efforts in the Functionality Test and determined that the issue had not recurred.<sup>248</sup> If the issue had recurred, or if any other unexplained fallout had occurred during retesting, CGE&Y would have issued an IWO.<sup>249</sup> Finally, even if the Fetch-n-Stuff problem had not been fixed, the fall out of 80 orders does not indicate a Capacity Test volume-related problem because Qwest's ISC can easily process 80 orders that have fallen out for manual handling with existing resources.<sup>250</sup> Again, this argument provides no valid basis upon which to question the Capacity Test results.

**G. The CLECs did not Challenge CGE&Y's Conclusion that Qwest Passed the System and Staff Scalability Analyses.**

As part of the Capacity Test, CGE&Y was charged with reviewing and evaluating Qwest's processes, procedures, and planning tools for managing its ability to scale its OSS to accommodate larger workloads and its ability to adjust its workforce to meet future CLEC order volumes requiring manual handling.<sup>251</sup> CGE&Y concluded that Qwest has adequate, well-documented processes and procedures in place to maintain its system capacity and adequate forecasting procedures to identify the need for additional work force within a sufficient time frame to allow for training and placement.<sup>252</sup> The CLECs did not raise any substantial concerns regarding CGE&Y's findings. Qwest clearly passed the scalability analyses.

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<sup>246</sup> Capacity Test Workshop Vol. I 122:4-14.

<sup>247</sup> Capacity Test Workshop Vol. I 118:11-14, 122:10-14.

<sup>248</sup> Capacity Test Workshop Vol. I 117:5-11.

<sup>249</sup> Capacity Test Workshop Vol. I 123:19-24.

<sup>250</sup> Capacity Test Workshop Vol. I 118:17-19.

<sup>251</sup> CGE&Y Final Report, sections 4.2, 4.3.

<sup>252</sup> CGE&Y Final Report, section 7.3.

## **H. Qwest Passed the Capacity Test**

In conclusion, Qwest successfully passed the Capacity test. Although only obligated to meet the benchmarks at the six-month volume level, Qwest in fact passed the benchmarks at the 12-month volume level. Furthermore, it nearly passed the benchmarks during the Stress Test. Considering the magnitude of the testing, relatively few problems were identified and IWOs issued, and of those identified, all were closed.

The scalability processes were also clearly passed and did not require a single IWO to be issued. CLEC criticisms of the Capacity Test are baseless and should be rejected.

## **VIII. RELATIONSHIP MANAGEMENT**

### **A. Evaluation Overview**

The Master Test Plan ("MTP") states that the RME:

is a "process test" to ensure that Qwest's system and/or process change control methods are appropriately handled and effectively communicated to CLECs, based on the defined change control procedures. *This test focuses on the procedures Qwest uses to interact with CLECs.*<sup>253</sup>

The MTP requires CGE&Y to obtain information regarding CLEC, Pseudo-CLEC, and Qwest experiences relating to their business relationships, review and evaluate documents on Qwest's web site, and document its findings. Based on that information, CGE&Y was required to reach conclusions. CGE&Y has conducted the RME in compliance with all of those requirements.

CGE&Y has conducted a very thorough examination of all RME areas. As a result of this examination, 32 IWOs were written and all IWOs are closed.<sup>254</sup> Due to CGE&Y's extensive

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<sup>253</sup> MTP section 3.3.4, (emphasis added).

<sup>254</sup> CGE&Y Final Report, section 7.4.

inquiry into Relationship Management topics, numerous changes have been made to Qwest methods and procedures. In its Final Report, CGE&Y indicates that all areas of RME now are deemed to be 'satisfactory' or 'sufficient'.<sup>255</sup> The Staff Recommendation Report also indicates that Qwest meets Section 271 requirements for the RME.<sup>256</sup>

The CLECs, and AT&T in particular, nevertheless complain that CGE&Y should have conducted the RME differently, in accordance with AT&T's own interpretation of the MTP's requirements. As set forth below, the MTP does not support these complaints.

**B. CGE&Y Satisfied the MTP Requirements in Performing the RME.**

The MTP describes the scope of the five RME component evaluations in section 7.2 (emphasis added):

**CLEC Account Establishment**

This evaluation will examine methods and procedures provided by Qwest for establishing a new CLEC customer. The evaluation will focus on the *available documentation accessible to a CLEC business* and on consultative assistance that Qwest provides to a CLEC in getting additional documentation.

**CLEC Account Management**

The CLEC Account Management evaluation will examine the methods, procedures and actions *provided by Qwest* for managing their business relationship with the CLECs. The evaluation will examine Responses to Account inquiries, Help Desk Call Processing, Help Desk call closures, Help Desk Status Tracking, Problem Escalation, Forecasting, and Communications.

**CLEC Training Evaluation**

The scope of the CLEC Training Evaluation is to evaluate the availability of training schedules, the frequency of training on the various areas where training is offered, the detail of the training curriculum and the effectiveness of the training content.

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<sup>255</sup> CGE&Y Final Report, Executive Summary, Relationship Management Evaluation, Key Results and Findings.

<sup>256</sup> Staff Recommendation Report, ¶ 237.

## **Interface Development**

This evaluation examined the documentation, specification and consultative assistance *provided by Qwest to CLECs* for use in building an EDI interface or installing IMA. This test also included an evaluation of the test environment Qwest provides CLECs for pre-testing their EDI interfaces.

Essentially, CGE&Y was tasked with collecting information and documenting its results. The MTP vests solely in CGE&Y, as the Test Administrator, the responsibility for analyzing the test results, applying the collective experience and judgment of its personnel, and reporting its evaluation of those results.<sup>257</sup> As set forth below, that is exactly what CGE&Y did.

### **1. CGE&Y complied with the MTP's requirement to document CLEC experiences by obtaining CLEC input through questionnaires.**

The MTP provides that CGE&Y was to interview CLEC, Qwest, and/or Pseudo-CLEC representatives for the various components of the RME. For example, representatives from CLECs, Qwest, and the Pseudo-CLEC were to be interviewed for the CLEC Account Establishment Evaluation, but only Pseudo-CLEC representatives were to be interviewed for the CLEC Training Evaluation.<sup>258</sup> Regardless of which representatives were to be interviewed, the entrance criteria for all of the evaluations specified that interview questionnaires were required and the exit criteria specified that those questionnaires be completed.<sup>259</sup>

These entrance and exit criteria demonstrate that the purpose of the interviews was simply to document CLEC experiences. Indeed, the MTP expressly states that interviews are to be performed "to document the experiences" of the interviewees.<sup>260</sup> CGE&Y followed the MTP's mandate by performing interviews via written questionnaires to document the CLECs'

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<sup>257</sup> MTP section 9.3.

<sup>258</sup> MTP sections 7.2.1 and 7.2.3.

<sup>259</sup> MTP sections 7.2.1.1, 7.2.1.2, 7.2.2.1, 7.2.2.2, 7.2.3.1, 7.2.3.2, 7.2.4.1, 7.2.4.2, 7.2.5.1, and 7.2.5.2.

<sup>260</sup> See, e.g., MTP section 7.2.1 and 7.2.2.

experiences.<sup>261</sup> AT&T claims that additional oral interviews were required to supplement the information provided in CLEC responses to questionnaires.

As stated above, CGE&Y's use of written questionnaires to solicit CLEC input is consistent with the MTP's mandate to document CLEC experiences. In some cases, these questionnaires took the place of in-person interviews.<sup>262</sup> CGE&Y diligently followed up with CLECs to encourage them to respond to these questionnaires. CGE&Y sent two rounds of follow up emails encouraging CLECs to respond to the questionnaires.<sup>263</sup> Moreover, both CGE&Y and Staff proactively contacted CLECs to encourage them to provide input.<sup>264</sup>

However, CLEC input was by no means limited to written responses to these questionnaires. In addition to the opportunity to provide written input, CLECs were invited to call CGE&Y to provide further comment.<sup>265</sup> CGE&Y also contacted CLECs to conduct informal interviews.<sup>266</sup> In some instances, CGE&Y conferred with CLECs to clarify specific answers on questionnaires.<sup>267</sup> In other instances, CLECs approached CGE&Y requesting to discuss specific issues.<sup>268</sup> Staff concludes that CLEC input 'was sufficient for the findings of the RME' and that the Pseudo-CLEC 'lived the experience' of a CLEC and was interviewed by CGE&Y.<sup>269</sup> Staff also indicated in its report that CGE&Y did conduct formal interviews and they also obtained information through informal conversations with CLECs at Change Management Process and

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<sup>261</sup> The questionnaires "took the place of in-person interviews in instances where in-person or telephone interviews were either impractical or impossible." CGE&Y Final Report, section 5.

<sup>262</sup> Staff Recommendation Report, ¶ 224.

<sup>263</sup> Staff Recommendation Report, ¶ 224.

<sup>264</sup> Staff Recommendation Report, ¶ 224.

<sup>265</sup> Staff Recommendation Report, ¶ 224.

<sup>266</sup> Staff Recommendation Report, ¶ 224.

<sup>267</sup> Staff Recommendation Report, ¶ 224.

<sup>268</sup> Staff Recommendation Report, ¶ 224.

<sup>269</sup> Staff Recommendation Report, ¶ 228.

other meetings.<sup>270</sup> CGE&Y also visited CLECs to discuss operational concerns. While these visits were not specifically identified as 'formal interviews' in the final report, CGE&Y nonetheless included its findings from these meetings in its Final Report. Most importantly, the Staff has indicated the following:

CLECs were active participants in the test from the beginning and had every opportunity to communicate with the TA any concern they had. The CLECs took advantage of this opportunity.<sup>271</sup>

The testimony at the RME workshop reflects that CGE&Y expended significant effort to solicit input from CLECs, including making offers on a regular basis to all CLECs to "talk to us about any and all issues."<sup>272</sup> Some of the information provided by CLECs pursuant to these offers resulted in the issuance of IWOs.<sup>273</sup>

Indeed, AT&T admitted that CGE&Y did "everything it could" to get CLECs to respond to the questionnaires.<sup>274</sup> AT&T further concedes that Test Advisory Group ("TAG") discussions and meeting minutes "certainly reflect an attempt to get the questionnaires filled out."<sup>275</sup> The bottom line, as AT&T admits, is that "[n]o [CLEC] was precluded from giving any input on any subject."<sup>276</sup>

CGE&Y reasonably exercised its professional judgment in deciding to use written questionnaires as a primary means of satisfying the MTP's mandate to document CLEC experiences. Given AT&T's admission that CGE&Y did everything it could do to obtain full

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<sup>270</sup> Staff Recommendation Report, ¶ 228(b).

<sup>271</sup> Staff Recommendation Report, ¶ 228(a).

<sup>272</sup> RME Workshop Transcript Vol. II 382:16-383:7.

<sup>273</sup> Staff Recommendation Report, ¶ 224.

<sup>274</sup> RME Workshop Transcript Vol. I 107:25-108:2.

<sup>275</sup> RME Workshop Transcript Vol. I 108:10-12.

<sup>276</sup> RME Workshop Transcript Vol. II 382:22-23.

responses to those questionnaires, AT&T's claim that additional oral interviews were required to supplement the written responses to questionnaires should be rejected.

**2. CGE&Y complied with the MTP's mandate to focus on Qwest's interaction with CLECs rather than Qwest's internal processes.**

The MTP directs CGE&Y to evaluate Qwest's interaction with CLECs: "This test focuses on the procedures Qwest uses to interact with CLECs."<sup>277</sup> Accordingly, the MTP requires CGE&Y to evaluate the documentation Qwest provides to CLECs as part of that interaction. The MTP provides as follows:

The CLEC Account Establishment Evaluation will examine *published methods and procedures*.<sup>278</sup>

The CLEC Account Management Evaluation will evaluate the methods, procedures, and actions *provided by Qwest* for managing business relationships with CLECs.<sup>279</sup>

The CLEC Training Evaluation is based on documentation that is *readily available to CLECs*.<sup>280</sup>

The Interface Development Evaluation document review and evaluation focuses on *information Qwest makes available to CLECs*.<sup>281</sup>

The Change Management Process Evaluation monitors Qwest's adherence to *published methods and procedures*.<sup>282</sup>

In detailing each of these evaluations, the MTP describes the documentation to be reviewed and evaluated in precisely the same way: documentation to be retrieved from Qwest's web site or otherwise provided by Qwest.<sup>283</sup>

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<sup>277</sup> MTP section 3.3.4.

<sup>278</sup> MTP section 7.2.1 (emphasis added).

<sup>279</sup> MTP section 7.2.2 (emphasis added).

<sup>280</sup> MTP section 7.2.3 (emphasis added).

<sup>281</sup> MTP section 7.2.4 (emphasis added).

<sup>282</sup> MTP section 7.2.5 (emphasis added).

<sup>283</sup> MTP sections 7.2.1, 7.2.2, 7.2.3, 7.2.4, and 7.2.5.

These provisions leave no question that the documentation CGE&Y was tasked with reviewing was the external documentation Qwest provides to CLECs. Nonetheless, AT&T repeatedly asked CGE&Y why it had not reviewed Qwest's internal documentation. In response, CGE&Y repeatedly stated that it had complied with the MTP mandate by: (1) examining Qwest's business processes, procedures, communications, and communications methods "that involve direct contact with" CLECs;<sup>284</sup> (2) "look[ing] at . . . the end result of [Qwest's internal] process";<sup>285</sup> (3) "evaluat[ing] the experience at the contact point" between CLECs and Qwest.<sup>286</sup> In its Recommendation Report, Staff indicates that the RME was a "process assessment" that focused on documentation that Qwest uses in interacting with CLECs.<sup>287</sup>

In its comments to the Draft Final Report, AT&T indicated that CGE&Y did not reach a firm conclusion on Qwest's Account Management processes. AT&T specifically states that CGE&Y should have reviewed Qwest's internal processes and procedures for this area.<sup>288</sup> However, CGE&Y's review was not limited to external documentation. Through data requests, CGE&Y also obtained and reviewed specific information regarding Qwest's internal processes, procedures, or flowcharts during the course of performing root cause analysis in processing IWOs.<sup>289</sup> In the Executive Summary of the Final Report, in reference to Account Management, CGE&Y indicates:

CGE&Y concludes that Qwest's current account management processes are sufficient. Throughout the course of the evaluation, CGE&Y was able to track improvements to many of these processes.<sup>290</sup>

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<sup>284</sup> RME Workshop Transcript Vol. II 263:7-15.

<sup>285</sup> RME Workshop Transcript Vol. II 282:12-21.

<sup>286</sup> RME Workshop Transcript Vol. II 286:3-14.

<sup>287</sup> Staff Recommendation Report, ¶ 206.

<sup>288</sup> See AT&T Comments on Draft Final Report, dated January 17, 2002.

<sup>289</sup> Staff Recommendation Report, ¶ 225.

<sup>290</sup> CGE&Y Final Report, Executive Summary.

Thus, CGE&Y accurately described the MTP's mandate as requiring CGE&Y to evaluate how Qwest does business with the CLECs based on publicly available information, the CLECs' perspective, and CGE&Y's professional opinion.<sup>291</sup> The RME involved external methods and procedures, Qwest's internal methods and procedures were reviewed in other phases of the test. In Staff's opinion, the CLECs' criticisms have largely been resolved by retesting, as reflected in CGE&Y's Final Report.<sup>292</sup> Staff indicates that CLEC input was sufficient for CGE&Y to rely upon in its RME findings of adequacy and that the totality of all the documentation that CGE&Y relied on in all of the tests was sufficient.

**3. CGE&Y satisfied the MTP's requirement to evaluate Qwest's CLEC training program.**

A substantial amount of RME workshop time was devoted to CGE&Y's evaluation of Qwest's CLEC training. As WorldCom noted, "Qwest's CLEC training efforts progressed from unsatisfactory to satisfactory" during the course of the RME.<sup>293</sup> Indeed, CGE&Y found that Qwest's training was vastly improved:

Qwest's new CLEC training catalog, rolled out in February 2001, is a vast improvement from what preceded it and has been found to satisfy nearly all objectives set forth in the Arizona 271 MTP and TSD. Qwest has begun offering a full catalog of products, systems and business process training that covers most needs of the CLEC community.<sup>294</sup>

CGE&Y's findings reflect the tremendous progress Qwest has made in improving its CLEC training program. Because all of the initial input CGE&Y received related to the old program, after the roll out of Qwest's new CLEC training program, CGE&Y requested additional

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<sup>291</sup> RME Workshop Transcript Vol. I 137:24-38:7.

<sup>292</sup> Staff Recommendation Report, ¶ 230.

<sup>293</sup> Staff Recommendation Report, ¶ 226.

<sup>294</sup> CGE&Y Final Report, section 5.3.5.

input from CLECs regarding the new training program.<sup>295</sup> CGE&Y also received positive feedback on Qwest's new IMA hands-on class from people who attended the class, including CGE&Y personnel.<sup>296</sup> In addition, CGE&Y reviewed completed course assessment sheets reflecting positive feedback.<sup>297</sup> Moreover, The "TSD Objective" table in the Training section of the Final Report reflects that all TSD objectives were satisfied with only one minor exception, which relates to a training class that was attended by the Pseudo-CLEC prior to improvements made to the Qwest training program.<sup>298</sup> This overwhelmingly positive evidence regarding Qwest's training program should allay any remaining CLEC concerns.

The CLECs also point to what they believe is inadequate training of Qwest's operational organizations directly involved in serving CLECs in ordering, provisioning and maintenance and repair. CLECs assert that the number of IWOs whose resolution included coaching of employees indicate an overall weakness in Qwest's internal training program. This is not true. The 271 OSS test required the Pseudo-CLEC to enter the Arizona market with a scope that no real CLEC takes on in an initial market entry. The Pseudo-CLEC used virtually all of Qwest's electronic and manual interfaces with a nearly complete product scope. This required Qwest to support the full breadth of its product and service offerings, some of which were new and very complex. This necessarily resulted in some employees needing training assistance; however, as CGE&Y aptly notes the frequency of this situation constituted less than 10% of the total number of IWOs including PMA.<sup>299</sup> Ten percent does not indicate a training problem.

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<sup>295</sup> RME Workshop Transcript Vol. II 323:18-24.

<sup>296</sup> RME Workshop Transcript Vol. II 310:10-18.

<sup>297</sup> Staff Recommendation Report, ¶ 226.

<sup>298</sup> CGE&Y Final Report, section 5.3.5.

<sup>299</sup> CGE&Y Final Report, Executive Summary, p. 14.

Qwest's internal training program has been established for a long time and has been kept current to meet changing operational demands. Recently, quality review processes in the ISCs have been improved to ensure service order accuracy. These enhancements include sampling ISC orders to identify employees needing additional coaching. CGE&Y also conducted on-site visits at two operational centers specifically to review Qwest's quality controls. CGE&Y was satisfied with the processes that it observed.

**4. CGE&Y satisfied the MTP's provisions regarding analysis of Qwest's Help Desk.**

AT&T focused on AZIWO1145-1 at length during the RME workshop. Based on information contained in the Pseudo-CLEC's Help Desk Relationship Report for 271 Test Generator -- Version 4.1 ("Help Desk Report"), CGE&Y issued AZIWO1145-1 relating to the Help Desk's handling of calls. In the IWO, CGE&Y provided illustrative examples of issues related to the Help Desk's response to calls, but did not provide detail regarding all of the 549 referred to in the IWO.<sup>300</sup> Qwest responded to the specific examples cited, but could not respond to all of the issues without additional detail. For example, the information provided did not contain enough information to determine whether a two-hour, 24-hour, or 48-hour commitment for a return call or for closure of the ticket applied.<sup>301</sup>

In order to address a specific issue raised in the IWO regarding Qwest's failure to meet a two-hour commitment for closure of escalation tickets, Qwest produced three months of commercial data demonstrating that Qwest had met its two-hour commitment for 92.28 percent of calls during that period.<sup>302</sup> CGE&Y noted that its purpose in issuing the IWO was to "bring to the surface and document an experience that CLECs may encounter when trying to conduct

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<sup>300</sup> RME Workshop Transcript Vol. II 222:5-224:2.

<sup>301</sup> RME Workshop Transcript Vol. II 236:17-237:10; 238:8-14; 245:10-246:3.

<sup>302</sup> RME Workshop Transcript Vol. II 223:10-16.

business with Qwest," and closed the IWO.<sup>303</sup> AT&T complained that AZIWO1145-1 should not have been closed without more analysis.

Based on the information contained in the IWO, no additional analysis was required to justify CGE&Y's decision to close AZIWO1145-1. The vast majority of the 549 calls would not have required an escalation ticket with a commitment for a return call or closure.<sup>304</sup> The IWO stated that 82 of the 549 calls -- approximately 15% -- were escalated. These 82 escalated calls would have resulted in issuance of an escalation ticket with a commitment to resolve the problem.<sup>305</sup> Based on the data provided by the Pseudo-CLEC in its Help Desk Report, many of these calls involved standard issues that would have been resolved immediately.<sup>306</sup> Assuming that as many as half of these calls involved issues that required more than two hours to resolve, the information in the IWO is consistent with Qwest's commercial data that indicate that Qwest meets its two-hour commitment approximately 92% of the time.<sup>307</sup>

The issues AT&T raised identify a situation where the Pseudo-CLEC's experience does not match the aggregate CLEC experience. In order to resolve any lingering concerns over the closure of AZIWO1145-1, Qwest agreed at the RME workshop to provide four additional months of raw data reflecting the CLECs' actual commercial experience to allow CGE&Y to independently verify the Help Desk's performance.<sup>308</sup> CGE&Y agreed to review the data and determine how to proceed.<sup>309</sup> This process fully addressed AT&T's concerns regarding IWO 1145-1. Qwest sent CGE&Y Data Request 238 on October 19, 2001 with four months of call

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<sup>303</sup> RME Workshop Transcript Vol. II 223:22-224:2.

<sup>304</sup> RME Workshop Transcript Vol. II 246:4-15.

<sup>305</sup> RME Workshop Transcript Vol. II 246:7-10.

<sup>306</sup> RME Workshop Transcript Vol. II 246:10-15.

<sup>307</sup> Staff Recommendation Report, ¶ 227.

<sup>308</sup> RME Workshop Transcript Vol. II 245:2-9; 247:13-16.

<sup>309</sup> RME Workshop Transcript Vol. II 249:4-250:4.

center data (June-September) which substantiates Qwest's assertion that it met its two-hour commitment over 90% of the time. In its Final Report, CGE&Y indicated that Qwest provided documentation that 'clarified confusion regarding the escalation process. As a result, this IWO was closed.'<sup>310</sup>

AT&T also complained that Qwest's resolution to the possible Help Desk training deficiencies raised in AZIWO1146 should be validated through the retest process.<sup>311</sup> At the TAG meeting held October 15, 2001, the TAG determined that AZIWO1146 would be retested, thus fully addressing AT&T's concern regarding this IWO. The results of the retest effort indicated that the Qwest representative was knowledgeable and understood the acronyms (FOC, SOC) and proceeded accordingly.<sup>312</sup>

AT&T indicated in its comments to CGE&Y's Draft Final Report that:

'The twenty-two incidents recited in section 5.2.3 of the Draft Final Report show how Qwest failed to provide timely access to the Help Desk, did not properly respond to Pseudo-CLEC inquiries, or caused customer service affecting problems. Knowing that its IWO resolution was merely a response to the specific problems raised and not a systematic resolution of the problems that confront CLECs, CGE&Y elected to not provide a conclusion.'<sup>313</sup>

CGE&Y did provide conclusions in the Final Report in the format put forth in the TSD Section 6.3.2.2. CGE&Y added a table in the Final Report, Section 5.2.4, that indicates positive Help Desk findings with wording such as 'satisfactory and sufficiently detailed.'<sup>314</sup>

##### **5. CGE&Y complied with the MTP's requirement to evaluate HP's reports for EB-TA and Billing**

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<sup>310</sup> CGE&Y Final Report, section 5.2.3.

<sup>311</sup> RME Workshop Transcript Vol. II 252:24-254:2.

<sup>312</sup> CGE&Y Final Report, section 5.2.3.

<sup>313</sup> AT&T'S Comments on Draft Final Report, Section IV.B, dated January 17, 2002.

<sup>314</sup> CGE&Y Final Report, section 5.2.4.

In its comments on the draft Final Report, AT&T mentioned that CGE&Y had made no conclusions regarding HP's reports for EB-TA Specifications or Billing Supplement. It also made assumptions that CGE&Y did not find Qwest's EDI process adequate because it "failed to follow the complete set of evaluation activities prescribed in the TSD and had not completed analyses of two out of the three interfaces."<sup>315</sup> CGE&Y did comply with TSD requirements and they did include evaluation information and analyses in its Final Report on HP's reports for EB-TA Interface Development<sup>316</sup> and Billing Interface Development.<sup>317</sup> Ultimately, CGE&Y determined that Qwest's Interface Development process is sufficient,<sup>318</sup> which includes EB-TA and Billing.

**C. Preorder to Order Integration Evaluation**

Generally speaking, pre-order-to-order integration is a term describing the ability for CLECs to transfer electronically information returned on pre-order responses onto the order without manipulation. The IMA-GUI interface integrates pre-order-to-order so that CLECs who use the IMA-GUI automatically enjoy the benefits of such integration. The IMA-EDI interface supports integration; however, the degree to which a CLEC chooses to take advantage of pre-order-to-order integration is up to the CLEC itself.

To assist CLECs who choose to integrate pre-order-to-order information in their EDI interfaces, Qwest provides certain necessary information and makes the appropriate resources available. Qwest provides Interconnect Charts (I-Charts) to EDI users which detail whether order data elements are required, conditional, optional, prohibited, or not required. The I-Charts

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<sup>315</sup> AT&T'S Comments on Draft Final Report, Section IV.B, dated January 17, 2002..

<sup>316</sup> CGE&Y Final Report, section 5.4.

<sup>317</sup> CGE&Y Final Report, section 5.4.

<sup>318</sup> CGE&Y Final Report, section 7.4.

also include data dictionary elements which detail order field names and sizes, data types, business rules, valid values and cross-references between two or more fields.

Additionally, Qwest provides LSOG information, which identifies OBF industry guidelines for the pre-ordering and ordering of local service products and services. Qwest also provides Qwest-specific requirements, additional fields required by Qwest's OSS, and identification of fields not currently utilized by Qwest. Additionally, Qwest makes available its EDI implementation team who is knowledgeable and ready to respond to CLECs' questions.

With access to Qwest's documentation and knowledgeable resources CLECs can accomplish a high degree of integration. This conclusion is consistent with the findings of HP.

**1. HP performed two integration evaluations.**

As part of the EDI Interface Development evaluation, the MTP and TSD call for an evaluation to determine if CLECs are able to effectively integrate Qwest pre-order transactions with their order transactions.

Following a discussion of this requirement in the RME workshop, Staff charged HP with conducting a pre-order-to-order integration evaluation. The purpose of this evaluation was to determine if CLECs are able to integrate Qwest pre-order information and order information with a minimal amount of translation.<sup>319</sup> Staff requested that HP evaluate IMA Release 7.0 and LSOG 3. Essentially, HP reviewed Qwest's I-Charts and the OBF's Local Service Ordering Guidelines, and documented its results.

Later, Staff also requested that HP evaluate IMA Release 9.0 and LSOG 5. Staff requested that HP broaden the scope of this second evaluation to include the degree to which Qwest provides for a parsed CSR. HP defines the parsing of a CSR response transaction as

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<sup>319</sup> RME Workshop Transcript Vol. II 412:1-418:12.

being able to ‘translate the Qwest CSR response transactions (based on Qwest documentation), and use the specified data elements to automatically populate the appropriate Order (LSR) forms.’<sup>320</sup> In total, this analysis covered a combination of five products and three activities across two major IMA releases.<sup>321</sup>

**2. CGE&Y also evaluated preorder-to-order integration in the RPE.**

As part of the RPE, CGE&Y answered whether the TSD objective regarding pre-order-to-order integration was achieved. The objective determined whether integration for both wholesale and retail was substantially the same. CGE&Y determined that this objective was satisfied.<sup>322</sup>

**3. HP’s findings**

Qwest passed both evaluations. After its evaluation of IMA Release 7.0 and LSOG version 3.0, HP concluded CLECs could integrate Qwest’s EDI pre-order transactions to automatically populate their orders, realizing that data manipulation was minor,<sup>323</sup> as discussed below. These minor modifications did not cause HP to alter its findings with regard to Qwest providing sufficient pre-order-to-order integration. After its evaluation of IMA Release 9.0 and LSOG version 5.0, HP again observed that integration was possible:

‘HP determined that for software IMA Release 7.0 CLECs could utilize Qwest’s EDI preorder transactions to automatically populate an order with some data manipulation. HP observed that Qwest is meeting the LSOG 3 industry standard for orders. HP observed the same findings for IMA Release 9.0.’<sup>324</sup>

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<sup>320</sup> HP answers to WorldCom Questions on the Pre-order to Order Integration Report, dated April 12, 2002.

<sup>321</sup> Pre-order to Order Integration Report, Version 5, Introduction.

<sup>322</sup> CGE&Y Final Report, section 3.1.4.3.

<sup>323</sup> Pre-order to Order Integration Report, Version 5, section 1.1.

<sup>324</sup> Staff Recommendation Report, ¶ 110(b).

Addressing the question of CSR parsing, HP found that a CSR can be parsed and automatically populate an LSR.<sup>325</sup>

4. **Qwest has met the FCC requirements for preorder to order integration.**

The FCC requires that a BOC's application-to-application interface must allow CLECs to:

integrate pre-ordering information into the BOC's ordering interface and the carriers' back office systems, a finding that is fundamental to a BOC's showing of nondiscriminatory access to OSS. The FCC has also indicated that a BOC with integrated pre-ordering and ordering functions must provide competing carriers with access to the same capability. In this regard, the BOC must enable competing carriers to transfer pre-ordering information electronically to the BOC's ordering interface or to the carriers' own back office systems, which may require "parsing" pre-ordering information into identifiable fields.<sup>326</sup>

Qwest follows these FCC requirements by allowing CLECs to integrate pre-order information effectively with the CLEC's own order information with a minimal amount of manipulation. HP finds that Qwest provides the opportunity for effective integration in both of its reports.<sup>327</sup>

In its Final Report, CGE&Y indicates that Qwest is meeting the FCC requirement for RBOCs to offer the same pre-order-to-order integration capabilities as their retail operations.<sup>328</sup> Staff indicated in its report that Qwest is 271 section compliant with regard to the Retail Parity Evaluation.<sup>329</sup>

The FCC also defines successful integration if CLECs:

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<sup>325</sup> Staff Recommendation Report, ¶ 110(b).

<sup>326</sup> *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295, Memorandum Opinion and Order, FCC 99-404 (rel. Dec. 22, 1999) ("*BANY New York 271 Order*"), ¶ 137

<sup>327</sup> HP's Pre-Order to Order Integration Report, Version 5.0, section 1.1.

<sup>328</sup> CGE&Y Final Report, section 3.1.4.3.

<sup>329</sup> Staff Recommendation Report, ¶ 162.

may, or have been able to, automatically populate information supplied by the BOC's pre-ordering systems onto an order form (the "local service request" or "LSR") that will not be rejected by the BOC's OSS systems.<sup>330</sup>

HP determined which pre-order transactions are required for each order scenario based on Qwest business rules and job aids.<sup>331</sup> Adherence to Qwest business rules ensures that LSRs are clean and not rejected.

**5. HP satisfied the TSD requirements in performing the preorder-to-order integration evaluation.**

HP completed the pre-order-to-order evaluations in compliance with the TSD and Staff's requests. HP also provided a document outlining the scope of the second evaluation (IMA release 9.0, LSOG 5) to the parties before commencing the evaluations.<sup>332</sup> All this, and still HP came under criticism by CLECs for not completing the evaluations in the way in which CLECs would have completed them.

**a. HP complied with the TSD requirements.**

The TSD provides that the documentation for the EDI Interface Development Process be evaluated. HP focused its assessment on the clarity, completeness, and sufficiency of external information made available to CLECs in order to evaluate the extent to which Qwest pre-order information can be integrated into CLEC order transactions.<sup>333</sup>

The entrance criterion for the Electronic Interface Development evaluation reads:

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<sup>330</sup> See *Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas*, CC Docket No. 00-65, Memorandum and Opinion Order, FCC 00-238 (rel. June 30, 2000) ("*SWBT Texas 271 Order*"), ¶ 152.

<sup>331</sup> Pre-order to Order Integration Report, Version 5, Section 4.2.2.

<sup>332</sup> HP Proposed Scope For Review Qwest LSOG 5 & EDI Pre-Order-to-Order Integration Analysis, dated 3-11-02.

<sup>333</sup> TSD section 6.5.2.2.

Qwest's documented Development processes and Technical Documentation for EDI, EB-TA and Billing development and IMA-GUI Installation/Configuration.<sup>334</sup>

This entrance criterion demonstrates that HP's evaluation was to be a documentation review. The MTP indicates that the Interface Development Test will examine the documentation, specification and consultative assistance provided by Qwest to CLECs for use in building an EDI interface or installing IMA.<sup>335</sup> Nevertheless, the CLECs complained that HP should have conducted the pre-order-to-order integration differently, in accordance with their own interpretation of the TSD requirements.

WorldCom claims in its comments on the Draft Final Report that 'a full evaluation of Qwest's EDI interface must be performed to determine if pre-order-to-order integration is sufficient to allow competing carriers a meaningful opportunity to compete as required by both the MTP and TSD and FCC requirements.'<sup>336</sup> Furthermore, in its pre-filed questions to HP, WorldCom asked, "Please verify, [HP] only reviewed Qwest documented business rules surrounding pre-order-to-order integration, that no transactional tests were executed for either evaluation."<sup>337</sup>

WorldCom's claim is erroneous. HP did follow the MTP and TSD mandates by performing a multi-step detailed analysis of the appropriate documentation for the evaluation. First, HP identified the order data elements for the product/activity combinations that were within the scope of the evaluation. Based on this mapping, HP determined the appropriate I-Chart and identified the pre-order transactions for each product/activity combination. Second, HP determined whether the data order elements are provided by Qwest or CLECs and whether

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<sup>334</sup> TSD section 6.5.3 (a).

<sup>335</sup> MTP section 7.2.

<sup>336</sup> WorldCom, Inc.'s Comments on (draft) Final Reports of Qwest's OSS Tests.

<sup>337</sup> WorldCom, Inc.'s Questions on HP's Pre-order to Order Integration Report.

those elements are required, conditional, optional, prohibited or not required. Lastly, HP “mapped preorder data elements to order data elements and noted any data definition issues.”<sup>338</sup>

b. **HP verified that CLECs can use Qwest documentation and personnel to effectively build an EDI interface that integrates preorder and order.**

At the Final Workshop, AT&T argued that CLECs are unable to effectively integrate preorder and order because there are several pre-order fields that have size requirements that exceed the number of characters that would fit into an order document.<sup>339</sup> However, in its report, HP indicates: “[HP] has not observed any instance where the length of a preorder data element’s value exceeds the length of the Order data element.”<sup>340</sup> In the cases indicated in HP’s report of ‘inconsistent data type,’<sup>341</sup> where the Qwest pre-order field length is larger than the order field length, Qwest has determined that these inconsistencies do not affect the ability of CLECs to parse the pre-order fields into their own order fields. HP also indicated, in its professional opinion, “the exceptions noted above will not hinder the integration of PreOrder data elements into Orders.”<sup>342</sup>

AT&T also argued that in the case of two fields, CFA and billing address, parsing is required to populate the order field. AT&T also argued that Qwest does not provide parsing rules for these fields.<sup>343</sup> HP’s own experience as a CLEC refutes AT&T’s argument. HP testified in the Final Workshop that CLECs can build an effective EDI interface by using Qwest-provided developer worksheets and by having meetings with Qwest Subject Matter

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<sup>338</sup> Pre-order to Order Integration Report, Version 5, Section 1.1.

<sup>339</sup> OSS Final Workshop 10 Transcript Vol. I 17:7-9.

<sup>340</sup> Pre-order to Order Integration Report, Version 5, Section 1.1.

<sup>341</sup> Pre-order to Order Integration Report, Version 5, Section 4.2.1.

<sup>342</sup> Pre-order to Order Integration Report, Version 5, Section 1.1.

<sup>343</sup> OSS Final Workshop 10 Transcript Vol. 1 18:20-22 and 26:15-16.

Experts. In these meetings, Qwest assists the CLECs in building the interface and determining any necessary parsing rules.<sup>344</sup>

c. **HP complied with the scope document requirement to review only preorder-to-order transactions.**

AT&T questioned HP during the Final Workshop on whether it analyzed and compared the I-charts to the order developer worksheets in its evaluation of Release 9.0, LSOG 5.<sup>345</sup> This task was beyond the scope of the evaluation and was clearly outlined in the scope document provided to all parties well in advance of the start of HP's evaluation.

According to HP's scope document, HP was tasked to review the "relationship between EDI data elements contained in specific pre-order responses received from, and order transactions submitted to, Qwest's OSS."<sup>346</sup> Staff supports this, concluding in its report that "Staff believes that this HP report adequately addresses the CLECs concerns."<sup>347</sup> The CLECs' concerns were addressed by (1) HP completing the report, and (2) HP indicating that CLECs can effectively integrate Qwest pre-order elements into their own order elements.

Thus, HP accurately only reviewed pre-order-to-order transactions for integration ability.

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<sup>344</sup> OSS Final Workshop 10 Transcript Vol. 1 30:11-19.

<sup>345</sup> OSS Final Workshop 10 Transcript Vol. 1 27: 11-15.

<sup>346</sup> HP Proposed Scope for Review of Qwest LSOG 5 and EDI Pre-order to Order Integration Analysis, Section 1.3.

<sup>347</sup> Staff Recommendation Report, ¶ 110(b).

d. **HP established that Qwest CLEC documentation is sufficient and Qwest personnel are sufficiently trained.**

WorldCom inquired in the Final Workshop whether Qwest has internal documentation available to EDI implementation team members that indicates the ‘same detailed information as far as low level specification on how the interface should be developed?’<sup>348</sup> Qwest explained in the workshop that it does have internal documentation, which is very similar to OBF documentation, that assists the EDI implementation team members and that this information is available to all team members.<sup>349</sup> Qwest also explained that if CLECs have questions about the external documentation available to them, the Qwest implementation team members will answer those questions in their weekly team meetings.<sup>350</sup>

WorldCom’s questioning of documentation led to a discussion in the workshop that clearly indicated Qwest does have external documentation that is sufficient to support pre-order-to-order integration.

e. **Qwest passed all evaluations.**

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<sup>348</sup> OSS Final Workshop 10 Transcript Vol. 1 32:2-4.

<sup>349</sup> OSS Final Workshop 10 Transcript Vol. 1 32:5-18.

<sup>350</sup> OSS Final Workshop 10 Transcript Vol. 1 34:7-15.

HP conducted two pre-order-to-order integration evaluations and, each time, HP determined that Qwest passed. In both evaluations, HP determined that CLECs are able to use Qwest pre-order transaction to effectively populate their own order transactions, with a minimal amount of manipulation. HP has also proven that Qwest provides appropriate documentation to help the CLECs and makes available an EDI implementation team to assist CLECs with building EDI interfaces that integrate pre-order and order transactions. In addition, CGE&Y found that there was substantially the same pre-order-to-order integration with the IMA-GUI as compared to Qwest's retail interfaces.

Although the CLECs have argued repeatedly that HP did not satisfy the TSD requirements, HP has proven that it did what it was tasked to do, particularly in regards to the scope document written for the second evaluation. HP has complied with the TSD in performing and reporting on its evaluation for the pre-order-to-order integration. It reviewed Qwest documentation available to CLECs for building an EDI interface and relied on its own experience as a pseudo-CLEC to reach its conclusions. Therefore, the CLECs' criticisms are baseless and HP has concluded correctly that Qwest does provide the necessary information and staff for CLECs to effectively integrate pre-order and order elements into its EDI interfaces.

**D. Qwest's Redesigned Change Management Process Satisfies All MTP, TSD, and FCC Criteria.**

After more than ten months of extensive collaboration, Qwest and the CLEC community have reached agreement on all material aspects of Qwest's CMP. Qwest has implemented the redesigned process as agreements were reached. The core provisions of Qwest's redesigned CMP have now been in place for six months.

Qwest's redesigned CMP clearly meets the standards set by the FCC for change management.<sup>351</sup> Indeed, Qwest's redesigned CMP provides CLECs more opportunity for input, participation, and control than any other ILEC's change management process, including the ability to prioritize Qwest-originated systems change requests. Further, the scope of Qwest's CMP is broader than that of any other ILEC – Qwest's CMP includes all aspects of the business relationship between CLECs and Qwest.

**1. Qwest's redesigned CMP satisfies the test criteria.**

In its CMP Redesign Report, CGE&Y noted that the CLECs are attempting to hold Qwest to an unattainable standard: "CGE&Y has found that the standard being used [by CLECs] to judge both the redesign process and the finished product is the totality of what the CLEC community wants from the process."<sup>352</sup> CGE&Y rejected the CLECs' unreasonable position, choosing instead to apply reasonable standards that have been approved and tested in other jurisdictions.<sup>353</sup> Evaluating Qwest against these reasonable standards, CGE&Y found that Qwest's redesigned CMP "is a collaborative process with both sides provided ample opportunity to present ideas." CGE&Y further found that the issues raised during testing in IWOs relating to Qwest's CMP have addressed the identified deficiencies. CGE&Y concluded that Qwest's redesigned CMP "exceeds the objectives set forth by the MTP and TSD, the various State Orders, and the FCC requirements for Change Management."<sup>354</sup>

**2. Qwest's redesigned CMP satisfies the FCC's criteria.**

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<sup>351</sup> Qwest has described its Wholesale CMP in detail in the previous filings, including: (1) Qwest's Report Regarding Change Management Issues, dated February 8, 2002; (2) Qwest's Brief Regarding Change Management, dated April 8, 2002; (3) periodic status reports regarding the redesign effort, and (4) Qwest's Verification of Compliance with Its Change Management Process, dated May 10, 2002. Qwest will not repeat those discussions in this filing, but incorporates them by reference as if fully set forth herein.

<sup>352</sup> CMP Redesign Report, section 6, p. 43.

<sup>353</sup> CMP Redesign Report, section 6, p. 43.

<sup>354</sup> CGE&Y CMP Redesign Report, section 7, p. 44.

In evaluating RBOC change management plans under Checklist Item 2 of Section 271, the FCC has relied on the following factors: (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the documentation the RBOC makes available for the purpose of building an electronic gateway.<sup>355</sup> The FCC has also examined two additional factors: whether an RBOC has demonstrated a "pattern of compliance" with its own change management plan and whether it has provided adequate technical assistance to CLECs in using the RBOC's OSS.<sup>356</sup>

Qwest's CMP<sup>357</sup> clearly meets the standards set by the FCC for change management. In its Recommendation Report, Staff stated that "[t]here is also 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."<sup>358</sup> The sole exception Staff refers to relates to whether Qwest has an established pattern of compliance with its CMP. In response to Staff's recommendation to file evidence establishing such a pattern of compliance, Qwest submitted its Verification of Compliance with its Change Management Process, which, as discussed below, establishes a five month pattern of strict adherence for the core provisions of the process. Recognizing that Qwest has made great strides in addressing CLEC concerns regarding its CMP, Staff stated:

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<sup>355</sup> *Arkansas/Missouri 271 Order*, Appendix D, ¶ 42, citing *BANY New York 271 Order*, 15 FCC Rcd at 4002-004 (footnotes omitted).

<sup>356</sup> *Arkansas/Missouri 271 Order*, Appendix D, ¶ 40.

<sup>357</sup> Qwest's Wholesale Change Management Process Document can be found at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.

<sup>358</sup> Staff Recommendation Report, ¶ 82.

There is no question, in Staff's opinion, . . . 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.

As demonstrated below, Qwest's current change management process satisfies each of these factors. It therefore meets the requirements of Section 271 because it provides nondiscriminatory access to OSS and provides competitors with a meaningful opportunity to compete.<sup>359</sup>

**a. Information relating to Qwest's CMP is clearly organized and readily accessible.**

As fully discussed in its prior filings, Qwest provides easily accessible and well-organized information regarding its change management process on its wholesale web site.<sup>360</sup> Qwest's web site sets forth the current change management process,<sup>361</sup> including the method for proposing and processing CLEC-originated and Qwest-originated OSS interface change requests ("CRs") and product and process changes.

**b. CLECs have substantial input in the design and continued operation of Qwest's CMP.**

There can be no legitimate question that CLECs have had -- and will continue to have -- substantial opportunities for meaningful input into the design and operation of Qwest's change management process. As set forth in Qwest's prior filings, Qwest and the CLECs have met

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<sup>359</sup> See *Arkansas/Missouri 271 Order*, Appendix D, ¶ 40.

<sup>360</sup> The Qwest change management web site can be found at the following URL:  
<http://www.qwest.com/wholesale/cmp/index.html>.

<sup>361</sup> See *Wholesale CMP*, which can be found at the following URL:  
<http://www.qwest.com/wholesale/cmp/whatiscmp.html>

regularly, for more than 40 days since July 2001, to collaboratively redesign Qwest's change management procedures. Further, the CMP provides CLECs with substantial opportunities for input into the continued operation of the change management process. Qwest and CLECs jointly participate in the CMP forum for managing changes related to Qwest's OSS interfaces, products, and processes throughout the lifecycle of a CLEC- or Qwest-initiated change. Finally, the CMP provides a process by which the CMP itself can be changed. A CLEC or Qwest can initiate such a change.

**c. Qwest's CMP defines a procedure for the timely resolution of change management disputes.**

Another factor the FCC examines in its 271 evaluation is an RBOC's procedures for escalation and resolution of disputes between the CLEC and the RBOC regarding OSS issues. As noted in its prior filings, Qwest has implemented the escalation and dispute resolution procedures Qwest and the CLECs jointly developed through the redesign process. The procedures are set forth in the Wholesale CMP.<sup>362</sup> To date, the escalation procedures have been invoked on one occasion with regard to systems changes, and on five occasions with regard to product and process changes. The dispute resolution procedures have not yet been invoked.

Further, as noted in prior filings, Qwest and the CLECs have also agreed to procedures for impasse resolution that apply to the redesign effort. Because the parties have enjoyed much success in negotiating solutions in the framework of the redesign sessions, only one issue reached impasse in the redesign process. That issue was resolved by the Colorado Commission and Qwest has committed to abiding by that resolution in all states. Further, as previously reported, the redesign team has already identified, discussed, and resolved the most important and most contentious issues for the express purpose of determining whether any additional

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<sup>362</sup> Wholesale CMP, Sections 14 and 15.

impasse issues are likely. No impasse issues were identified; indeed, the parties reached agreement in principle on all of the most contentious issues.

Nonetheless, the parties have agreed to dispute resolution options that will apply if an issue reaches impasse in the redesign effort. Thus, even though the parties have already identified and resolved the most contentious issues, the procedures already in place ensure that the redesign process will conclude successfully and with a collaborative result, rather than one dictated by Qwest.

**d. Qwest offers of a stable testing environment that mirrors production.**

The evaluation of Qwest's SATE is fully discussed in section IX below.

**e. Qwest offers efficacious documentation to CLECs for the purpose of building an electronic gateway.**

Qwest's EDI documentation was fully evaluated during the RME, discussed in sections VIII.A. and B. above.

**f. Qwest offers adequate technical assistance to CLECs using Qwest's OSS.**

CGE&Y's findings regarding the technical assistance Qwest offers to CLECs using its OSS were made as part of the RME, discussed in sections VIII.A and B above.

**g. Qwest has established a more than adequate pattern of compliance with the redesigned CMP.**

Pursuant to Staff's recommendation, discussed below, Qwest filed its Verification of Compliance with its Change Management Process on Friday, May 10. In that filing, Qwest described the CMP process milestones for which it tracks its compliance. To date, Qwest has amassed an impressive compliance rate with the CMP, with an average compliance rate that exceeds 98%.

- In processing CRs, Qwest has met more than 99% of its commitments.
- In introducing a new GUI, Qwest has met 100% of the milestones.
- In changing an application-to-application interface, Qwest has met 100% of the milestones reached thus far.
- In changing a graphical user interface ("GUI"), Qwest has met 100% of the milestones.
- In processing escalations, Qwest has met 98% percent of its commitments.

3. **All of the CLECs' concerns regarding CMP have been resolved.**

In its comments on CGE&Y's draft final report, AT&T raised several concerns regarding the CMP evaluation. All of those concerns have been resolved.

AT&T first complained that CGE&Y's report did not reach any conclusions regarding Qwest's CMP process. As described above, CGE&Y's subsequent CMP Redesign Report contained a more extensive analysis of the redesigned CMP and concludes that it is more than adequate.

AT&T next complained that CGE&Y prematurely closed AZIWO1075 and AZIWO1078 because it only speculated that the redesign team would reach agreement regarding the types of change requests permitted, the prioritization process for such requests, and the timeline for draft and final EDI design documentation. As reported in prior status reports, the redesign team has in fact reached agreement regarding all of these issues, thus rendering this concern moot.

AT&T next pointed to test exceptions raised in the Regional Oversight Committee's ("ROC") OSS test. Several of these issues have been satisfactorily resolved through the ROC test process. Qwest has explained the status of each of the issues that were closed in an unresolved status in Qwest's Verification of Compliance with its Change Management Process.

None of these issues prevents Qwest from establishing that its redesigned CMP meets the FCC's evaluation criteria.

Finally, AT&T complained that the redesigned CMP was still in draft form and that Qwest could not provide any evidence that it had adhered to the process over time. As Qwest has reported in numerous prior filings, even though the redesigned CMP document remains in draft form, Qwest has already implemented and is conducting business in accordance with the redesigned process. As established in Qwest's Verification of Compliance with its Change Management Process, the core provisions of the redesigned process have been in effect for more than five months and Qwest has established that it has compiled an impressive 98% adherence rate during that period. There is thus no basis for this complaint.

In addition, the CLECs opposed CGE&Y's closure of three IWOs relating to CMP.

AZIWO1075-1, AZIWO1076-1, and AZIWO1078 raised three discrete issues:

- AZIWO1075-1: The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.
- AZIWO1076-1: The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.
- AZIWO1078: "Final" EDI design documents are only released to the CLECs three weeks prior to a new EDI release.

Because each of these issues was remedied -- and CGE&Y confirmed those resolutions its Verifications of Resolution and recommendations -- these IWOs were properly closed.

The issue raised in AZIWO1075-1 (the CICMP process was not a "true collaborative effort") focused on the CLECs' ability to prioritize systems change requests. Under the old process, CLECs only prioritized CLEC-initiated systems change requests. That is no longer the case. Qwest agreed to and has already implemented a process that allows the CLECs to

prioritize both CLEC-initiated and Qwest-initiated systems change requests. Further, Qwest has agreed that CLECs can also prioritize regulatory and industry guideline changes so long as they are assigned to a release that will be implemented before the required implementation date for such changes. In terms of collaboration with CLECs, this process allows for CLEC input that far exceeds what any other ILEC provides. Moreover, the issue raised in this IWO is addressed by the very existence of the redesign process. Qwest and CLECs have collaboratively reached agreement on every substantive aspect of the process by which changes are made to the CLEC-specific pre-order, order, and repair interfaces. Qwest has implemented those agreements. Thus, CGE&Y's Verification of Resolution appropriately concluded that the unparalleled collaboration occurring through the redesign process addresses the issue raised in this IWO.

Similarly, CGE&Y specifically confirmed that the issues raised in AZIWO1076-1 (CRs must be processed more timely) and AZIWO1078 (EDI documentation released only three weeks before new EDI releases) have been remedied. CGE&Y's Verification of Resolution for AZIWO1076-1 lists changes that have already been implemented by Qwest and concludes that, as a result of those changes, "CRs are now processed by Qwest and presented to the CLEC community in a much more timely manner than before." The Verification of Resolution for AZIWO1078 indicates that the OBF timeframes for EDI documentation, which were proposed at the time the Performance Acceptance Certificate was issued, were reasonable and would satisfy the issue raised in this IWO. As CGE&Y expected, the redesign team agreed to the OBF timeframes and Qwest has implemented that agreement. Thus, the issues raised by all three IWOs have been remedied.

AT&T initially sought to delay closure of these IWOs only until the December 17 and 18, 2001 workshop had been held. After that workshop was held, AT&T then sought further delay

in the closure of the IWOs, claiming that "[t]he IWOs should remain open until Qwest has implemented its Change Management Process and CGE&Y has evaluated whether the issues raised in the IWOs are remedied in the new process." Qwest has implemented its CMP and, as set forth above, CGE&Y has determined that the issues raised in the IWOs have been remedied. Accordingly, CGE&Y appropriately closed these IWOs.

4. **Qwest accepts CGE&Y's and Staff's CMP recommendations.**

As discussed in section II above, CGE&Y recommended that Qwest provide 45 calendar day advance notice of final EDI design documentation to CLECs. In its Recommendation Report, Staff supports CGE&Y's recommendation and made five additional recommendations. As noted above, Qwest and the CLECs have already agreed to EDI design documentation timelines that incorporate a 45 day advance notice of final EDI design documentation. Qwest also agrees to Staff's recommendations as follows:

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

Qwest will continue to submit monthly status reports until the redesign process is complete.

- b. **Staff Recommendation: 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.**

Qwest will develop and submit quarterly reports consistent with this recommendation.

Qwest anticipates that such reports will be filed no later than 30 days after the end of each calendar quarter, *i.e.*, March, June, September, and December.

- c. **Staff Recommendation: 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.**

Qwest complied with this recommendation by filing its Qwest's Verification of Compliance with its Change Management Process on May 10, 2002.

- d. **Staff Recommendation: 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.**

Qwest complied with this recommendation by filing its Qwest's Verification of Compliance with its Change Management Process on May 10, 2002.

- e. **Staff Recommendation: 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.**

Qwest will comply with this recommendation by raising this issue at the CMP redesign meetings for discussion and incorporation in Qwest's CMP as agreed to by the redesign team.

## **IX. SATE EVALUATION**

**A. Introduction**

**1. SATE Overview**

Qwest's SATE was developed in May 2001, and implemented on July 31, 2001, as an alternative test environment to the interoperability environment. CLECs now have a choice between testing in the interoperability environment, which uses production legacy systems, and testing in SATE, which is a stand-alone test environment that mirrors the production environment.

SATE provides a CLEC with the ability to learn how Qwest's IMA-EDI functions work and the ability to test its interface in a test environment that returns pre-defined test scenarios that mimic production responses. Qwest provides the account data and scenario information ("test decks") to users through the IMA-EDI Data Document for SATE.<sup>363</sup> Scenario submissions do not leave SATE during testing. By providing CLECs with a self-contained, production-like environment for sending transactions, CLECs have the opportunity to experience an environment that acts like production IMA-EDI without interfacing with the actual production environment. SATE uses test account data and requests that are subjected to the same IMA-EDI edits as those used in production.<sup>364</sup> SATE also permits CLECs to perform "regression testing," in which a CLEC determines whether systems changes on its side of the EDI interface will affect its ability to execute transactions with Qwest.

Qwest 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'

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<sup>363</sup> CLECs may also request additions or changes to the test decks. Qwest generally is able to meet such requests within two weeks of approval.

<sup>364</sup> IMA (GUI and EDI) edits ensure that LSRs are populated in accordance with Qwest business rules as well as with the correct data characteristics and field length.

Group meets regularly under the aegis of CMP to discuss SATE-related issues and to recommend changes as appropriate. Qwest also provides CLECs with the IMA-EDI Implementation Guide and other documentation to aid in the utilization of SATE.<sup>365</sup>

Qwest built SATE to provide products and transactions that were 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. In addition, to ensure that CLECs have the functionality available in SATE that they require, CLECs may request through CMP that Qwest include additional products and functionality in its suite of SATE transactions.<sup>366</sup> SATE CRs are managed by CMP in the same manner that IMA-EDI CRs are managed.

As a further enhancement to SATE, Qwest has provided automated post-order responses in SATE since Release 9.0 (January 26, 2002), 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.<sup>367</sup> It also ensures that CLECs receive automated responses consistent with those received in production.<sup>368</sup>

CLECs are successfully using SATE today. Still, Qwest will continue to enhance SATE in the coming months. For instance, even though FCC does not require a BOC's test

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<sup>365</sup> See <http://www.qwest.com/wholesale/ima/edi/document.html>.

<sup>366</sup> See EDI Implementation Guide, Exhibit H, available at <http://www.qwest.com/wholesale/ima/edi/document.html/wholesale/ima/edi/document.html>. The process states that "additional functionality can be agreed upon and added in later releases. Requests for transactions not currently supported may be requested via CMP." See *id.*

<sup>367</sup> VICKI is a tool that Qwest provides in the SATE environment to automatically generate valid production order and post-order responses to CLEC-generated test transactions. This further strengthens the CLEC's ability to test their EDI interface in a stand-alone fashion, with reduced requirements for CLEC/Qwest interaction.

<sup>368</sup> Those post-order transactions that currently are done manually by an Interconnect Service Center ("ISC") representative in production are not automated in SATE. Those transactions are completed manually in SATE, as they are in production by ISC representatives.

environment to test flow-through,<sup>369</sup> Qwest is in the process of implementing flow-through for all products in SATE that are flow-through eligible. Adding flow-through provides the capability of testing whether a particular local service request ("LSR") would flow through if it were sent to production. Flow-through components for POTS and UNE-P were added to the Western Region (Oregon and Washington) on February 25, 2002. The implementation of flow-through should be completed throughout the entire Qwest territory by mid-May 2002. Once the implementation of flow-through is complete, a CLEC will have the option of (1) sending its SATE transaction to a copy of the production service order processor, where only flow-through eligible LSRs will successfully flow, or (2) receiving a specified test scenario response.<sup>370</sup>

## 2. HP's evaluations and findings

Staff requested that HP conduct two separate evaluations of SATE to determine if SATE provides an adequate means of testing and support to CLECs, and if SATE is adequate for full release testing. HP found that SATE is adequate on both scores. HP's evaluations of SATE were not conducted pursuant to the MTP or TSD; rather, HP conducted the separate evaluations at the direction of Staff and pursuant to separate testing plans approved by Staff.

To satisfy its requirements of the evaluations, HP conducted transactional testing against four SATE releases, evaluated all available documentation related to SATE, evaluated the processes employed for CLEC testing in SATE, and distributed and evaluated CLEC questionnaires. HP assessed:

1. whether the documentation provides accurate, sufficient, and effective information for supporting CLECs testing efforts;

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<sup>369</sup> See *SWBT Texas 271 Order*, ¶ 138.

<sup>370</sup> *Id.* Unlike BellSouth's CLEC Application Verification Environment, SATE will utilize distinct service order processors for SATE to avoid confusing test and production data. See *Evaluation of the Department of Justice Comments on BellSouth Georgia/Louisiana 271 Application*, CC Docket No. 01-277, filed Nov. 6, 2001, 34.

2. whether the processes work sufficiently and are adequately documented; whether SATE consistently and accurately returns valid responses;
3. the extent to which Qwest seeks CLEC input; and
4. the extent to which SATE mirrors production, accommodates new release testing, and provides an environment that meets CLECs' needs.

The purpose of the initial evaluation was to “determine whether SATE provides an adequate means of testing and support to CLECs seeking to compete in the Arizona Marketplace.”<sup>371</sup> HP evaluated SATE releases 7.0, 8.0, and 8.01. After completing this comprehensive evaluation in December 2001, HP concluded that “SATE is adequate to support Qwest CLEC Testing in the State of Arizona, given the current level of CLEC usage.”<sup>372</sup>

The second evaluation was based on HP's recommendation #7 in the initial evaluation: “To ensure that the SATE is adequate for full release testing, [HP] recommends that IMA SATE release 9.0 be tested.”<sup>373</sup> Qwest's SATE Release 9.0 was the first release when the new release of SATE was made available approximately 30 days prior to the production release. After completing this second evaluation in March 2002, HP concluded, “the Qwest SATE is adequate to support New Release Testing by a CLEC.”<sup>374</sup>

**B. Qwest's SATE Meets the Requirements Set Forth by the FCC.**

**1. SATE mirrors production.**

The FCC requires that a test environment mirror production but not that it exactly replicate the production environment. In the *SWBT Texas 271 Order*, the FCC specifically

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<sup>371</sup> Hewlett-Packard Company's SATE Summary Evaluation Report for Qwest IMA-EDI SATE, Final Release Version 2.0, dated December 21, 2001 (“HP SATE Summary Report”), section 1.1.

<sup>372</sup> HP SATE Summary Report, section 2.1.

<sup>373</sup> HP SATE Summary Report, section 2.2.

<sup>374</sup> Hewlett-Packard Company's SATE New Release Test Summary Report – 9.0 Transaction Test for Qwest IMA EDI SATE, Version 2.0, dated March 29, 2002 (“HP SATE New Release Test Summary Report”), § 2.1.

rejected AT&T's argument that, in order to obtain relief pursuant to section 271, a BOC must provide a testing environment that is identical to its production environment.<sup>375</sup> Instead, the FCC determined that a test environment must be adequate to allow CLECs "to test adequately OSS changes prior to their implementation as long as the testing and production environments perform the same key functions."<sup>376</sup> The FCC describes this as a requirement that the test environment must "adequately mirror" the production environment.<sup>377</sup>

The FCC eliminated any question on this issue by expressly acknowledging that, although differences existed between SWBT's testing and production environments, the testing environment was nonetheless sufficient: "Thus, despite any differences between the testing and production environments, the totality of the evidence indicates that SWBT's testing environment is adequate."<sup>378</sup>

Based on the above evidence, Qwest's SATE mirrors production because it allows CLECs to run transactions that generate the same responses as in production without actually using production data or production systems. Qwest provides CLECs with test decks of predefined responses to test in SATE, and those responses mirror production. Transactions submitted by CLECs through SATE use the same IMA-EDI software that is used in production. All known differences between production and SATE are documented and will continue to be documented going forward. If the implementation of IMA-EDI functionality into SATE causes the system behavior to differ from production, Qwest will likewise document this information.<sup>379</sup>

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<sup>375</sup> *SWBT Texas 271 Order*, ¶ 138.

<sup>376</sup> *SWBT Texas 271 Order*, ¶ 138.

<sup>377</sup> *BANY New York 271 Order*, ¶ 119; *SWBT Texas Order*, ¶ 134.

<sup>378</sup> *SWBT Texas 271 Order*, ¶ 138.

<sup>379</sup> While SATE mirrors production, it is not a complete replica of the production environment. Because of the nature of the test environment, some differences arise. For details on the differences between SATE and

For example, because of real-time data manipulation in production, an appointment availability query transaction in SATE will not return the same list of available appointments as in production. Available appointments in production are fully dependent on real-time activities that occur there, whereas available appointments in SATE are based on a pre-defined list that is representative of production.

SATE transactions therefore operate almost identically to those submitted through the production pre-ordering, ordering and post-ordering processes.<sup>380</sup> This enables CLECs to run transactions with Qwest without using their own account data. CLECs also can use SATE to evaluate products they are considering offering to determine whether they can do so effectively through their IMA-EDI interfaces.

## **2. The FCC evaluates commercial usage.**

The FCC has held that commercial usage demonstrating that CLECs are able to achieve production status and test new releases indicates that a testing environment is adequate.<sup>381</sup>

To date, five individual CLECs, as well as five others through a service bureau,<sup>382</sup> have successfully completed testing using SATE and have been certified in production for pre-ordering and ordering capabilities. In approving SBC's 271 application in Texas, the FCC found it compelling that three carriers achieved production status in SBC's new test environment and

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production, see the Overview section of the IMA-EDI SATE Data Document, which can be found on the Qwest Wholesale web site at <http://www.qwest.com/wholesale/ima/edi/document.html>.

<sup>380</sup> The structure of data in SATE mirrors the structure of production data, but the actual content of SATE data is not identical to the content of any instance of production data. SATE does not contain production data so that a CLEC can easily test any production scenario without concern for any privacy issues. While the responses may occasionally differ between production and SATE, the test environment utilizes the same processing logic as the production system. As a result, the structure of the response should mirror production.

<sup>381</sup> *SWBT Texas 271 Order*, ¶ 138.

<sup>382</sup> Several CLECs interested in testing their EDI interfaces are represented by service bureaus. A service bureau is a company that provides a variety of outsourced services to CLECs, including, but not limited to, establishing and maintaining connectivity between BOCs and CLECs, administering databases and managing associated hardware, as well as producing and transmitting EDI transactions.

two carriers used it for a new release.<sup>383</sup> Here, the commercial data is even stronger: a total of ten carriers have achieved production status after testing through SATE (individually or through a service bureau).

**3. The FCC does not require a third party evaluation.**

The FCC does not require that a BOC's test environment undergo third party testing as a prerequisite for section 271 relief. Indeed, in the *SWBT Texas 271 Order*,<sup>384</sup> the FCC specifically rejected AT&T's assertions that the absence of third party test of SWBT's test environment was a basis for concluding that SWBT's section 271 application was deficient.

SWBT's testing environment was evaluated only through the use of commercial data; no third party evaluation was conducted.<sup>385</sup> The FCC has also granted SWBT's section 271 applications in Kansas, and Oklahoma without requiring a third party test of the test environment.

**C. HP Has Completed Two Thorough SATE Evaluations.**

HP conducted two thorough and comprehensive evaluations of Qwest's SATE, providing the most extensive evaluation undertaken by a third party to date. HP conducted transactional testing against four SATE releases, evaluated Qwest documentation for completeness and usability, and evaluated Qwest's SATE processes against the documentation and transactional testing. The purpose of these evaluations was to determine, among other things, whether SATE adequately mirrors the production environment, whether SATE provides a stable environment for full release testing, and whether CLECs are appropriately notified of changes.

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<sup>383</sup> See *SWBT Texas 271 Order*, ¶ 134.

<sup>384</sup> *SWBT Texas 271 Order*, ¶ 135.

<sup>385</sup> *SWBT Texas 271 Order*, ¶ 135.

Regardless, AT&T and WorldCom still argue that testing was not complete and not comprehensive enough.

**1. Open and closed-unresolved issues in the reports have no bearing on overall conclusion of adequacy.**

After the HP SATE Summary Report was distributed in December 2001, AT&T argued that testing was not complete and was “artificially concluded to meet Staff’s deadlines for submission to the Arizona Commission”.<sup>386</sup> This argument was based on the fact that the test concluded and the report was issued with three formal issues in ‘Closed-Unresolved’ status, and one formal issue in ‘Open’ status.

However, HP testified in the workshop that the status of these issues had no negative impact on the overall adequacy conclusion. In the January 31, 2002 workshop, Bill Koerner of HP stated “All the issues that we had left as closed unresolved were tied to a particular recommendation.”<sup>387</sup> He also testified: “The adequacy stands based on the results of the work that we did. The recommendations are there to make sure that Qwest continued to offer the same level of support to other CLECs going forward.”<sup>388</sup>

HP continued reviewing and re-testing the closed-unresolved issues after the issuance of its SATE Summary Report. Consequently, HP has been able to resolve and close two of the three remaining issues. One issue remains closed-unresolved, HPSATEEV2032. HPC discovered an issue with an error message returned for a Facility Availability Query. The error message returned did not match the expected error as defined in the data document. Qwest modified SATE to correct this, but after HP's re-testing was complete. Consequently, HPC believes this issue should remain closed-unresolved, but it indicates in the issue response that it

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<sup>386</sup> AT&T’s Comments on SATE Summary Evaluation Report, Version 3.0.

<sup>387</sup> OSS Final Workshop 8 Transcript. January 31, 2002, p. 593.

<sup>388</sup> OSS Final Workshop 8 Transcript. January 31, 2002, p. 583.

"doesn't feel that the resolution of this issue will significantly impact the findings of the transactional test results."<sup>389</sup> SATE has been corrected and there is no longer a mismatch between the data document and the actual error message returned. Qwest considers this issue closed.

Similarly, HP's SATE New Release Test Summary Report was released on March 29, 2002, with eight closed-unresolved issues. Once again, the status of these issues has no bearing on the final conclusion that SATE is adequate for new release testing, and HP continued to evaluate, retest, and update these issues. HP produced version 3.0 of this report on April 26, 2002, and all of these issues have subsequently been resolved and closed.<sup>390</sup>

**2. The military-style testing approach does not apply to SATE.**

WorldCom stated at the workshop that it expected the SATE evaluation to be conducted in accordance with the military-style testing approach used for the OSS test set forth in the MTP and TSD. There is no basis for this expectation because the SATE evaluation was not conducted pursuant to the MTP or TSD. The guidelines controlling the SATE evaluation are set forth in a separate document, HP's SATE Evaluation Plan, which was separately approved by Staff.

Section 2.2 of this document clearly states:

HP's testing method will be a pass-fail snapshot of pre-defined criteria for SATE adequacy to support CLEC interoperability and a new release testing at the time of the evaluation rather than a military style test that iteratively pursues defects to correct.

**3. Production likeness testing was not a requirement of HP's new release testing evaluation.**

AT&T contends that it was not given ample opportunity to comment on and contribute to HP's draft scope for the New Release Testing evaluation, and HP subsequently inappropriately

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<sup>389</sup> HPSATEEV2032.

<sup>390</sup> HP SATE New Release Test Summary Report, sections 3.7.2.1 – 3.7.2.3.

'de-scoped' its evaluation, removing the proposed Phase IV, Production Likeness Testing. All parties were given opportunities to comment, both in writing and orally, to HP's draft scope document. After both written and oral comments, HP used its professional judgment to determine that Phase IV was not necessary to meet the requirements of the New Release Testing, as the express intent of the evaluation was to ensure that Qwest's SATE was adequate for full release testing – stable and available for testing approximately 30 days prior to the IMA release. HP conducted this evaluation pursuant to this objective.

**4. It is not necessary to evaluate all new functionality such as VICKI and flow through to conclude that SATE is adequate.**

Both WorldCom and AT&T argued that HP's New Release Testing evaluation must test additional functionality that Qwest implemented after HP's December 2001 report. Qwest implemented VICKI in January 2002 for automation of post-order processing. Flow-through components for POTS and UNE-P were added to the Western Region (Oregon and Washington) in February 2002. The full implementation of flow-through should be completed by mid-May 2002.

Qwest argued that HP's purpose in New Release Testing was to ensure Qwest's SATE is adequate for full release testing – stable and available approximately 30 days prior to the IMA release. Testing new capabilities, which are constantly added, goes far beyond the scope of HP's recommendation. The CLEC also drove this issue to impasse.<sup>391</sup>

Staff ruled that it is not necessary for HP to evaluate VICKI and flow through, recognizing that VICKI and flow through are critical pieces of SATE but that it is not necessary

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<sup>391</sup> Arizona Corporation Commission Impasse Issue: SATE (Master Issue #942).

“to postpone an evaluation until new releases become available or to test every new release that is implemented.”<sup>392</sup>

**5. HP’s recommendations are geared toward ensuring Qwest continues to provide an adequate SATE to CLECs in the future and do not require further third party analysis.**

AT&T argues that Qwest must implement all of HP’s recommendations and these must be “verified by a 3<sup>rd</sup> party before SATE can be deemed satisfactory”.<sup>393</sup> As defined in subsection A above, HP included the recommendations in its final report to ensure that Qwest continues to offer the same level of support in SATE moving forward. HP stands by its adequacy rating, which is not contingent on any evaluation of Qwest’s implementation of the recommendations.<sup>394</sup>

Qwest is committed to fully addressing HP’s recommendations in both the initial and the subsequent SATE evaluations. Further detail concerning the recommendations is discussed in subsection F below.

**6. HP’s SATE evaluations are more comprehensive than evaluations of SWBT’s or Bell Atlantic’s test environments.**

The FCC does not require third party evaluations of test environments. In fact, SWBT’s testing environment was evaluated only through the use of commercial data; no third party evaluation was conducted.<sup>395</sup> Nonetheless, the FCC has granted SWBT’s section 271 applications in Texas, Kansas, and Oklahoma.

Bell Atlantic’s testing environment was evaluated by KPMG. That evaluation consisted of a transactional test that validated the test environment adequately resembled the production

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<sup>392</sup> Master Issue #942.

<sup>393</sup> AT&T’s Comments on SATE Summary Evaluation Report, Version 3.0.

<sup>394</sup> OSS Final Workshop 8 Transcript. January 31, 2002, p. 593.

<sup>395</sup> *SWBT Texas 271 Order*, ¶ 135.

environment, and verified CLECs were notified of changes to the test environment. In contrast, HP's evaluation of Qwest's SATE is much more extensive. Like KPMG, HP conducted transactional testing, evaluated whether SATE adequately mirrors production, evaluated whether SATE is stable for full release testing, and verified that CLECs are notified of changes to SATE. However, those evaluations are only a part of HP's comprehensive evaluation. HP also addressed the following issues:<sup>396</sup>

- ✓ Does the documentation, published and made available to Co-Providers via the Qwest Interconnection web site for IMA EDI interface development, provide information that is accurate, sufficient to Co-Providers' needs, and effective in supporting the Co-Providers' efforts when preparing an OSS interconnection with Qwest and when testing enhancements to the Co-Providers existing interconnection
- ✓ Do the processes that Co-Providers are expected to use when establishing connection with the SATE and obtaining the required EDI Interoperability certification work sufficiently well and are they adequately documented for use
- ✓ Once EDI connection is established and tested, does the SATE consistently and accurately return valid responses to correctly and incorrectly entered transactions
- ✓ To what extent and in what manner does Qwest seek Co-Provider input on SATE functional specifications and design requirements, and to what extent is this input used in Qwest's development of the SATE
- ✓ To what extent does Qwest's SATE adequately mirror the production IMA-EDI environment
- ✓ To what extent does the Qwest SATE meet the principles HP identifies as adequate for automated testing environments. Those principles include:
  - Mirror image of production – HP will evaluate the extent to which the SATE mirrors the production environment and determine if that functionality provided is adequate to support Co-Provider testing in the state of Arizona.
  - Accommodation of new release testing – HP will evaluate Qwest's documentation and observe Qwest's compliance to their stated expectation to provide Co-Providers with an updated SATE at least one month prior to the corresponding production release of IMA.

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<sup>396</sup> Hewlett-Packard Company's Draft Proposal to Qwest for Evaluation of IMA-EDI SATE Processes and Documentation, Version 10, which is the final version approved by the ACC ("HP's SATE Evaluation Plan"), section 2.1.

- Substantial level of Co-Provider Acceptance – HP will solicit Co-Providers for input into the usefulness of the SATE and for written statements regarding their input to the SATE.
- Environment capacities meet Co-Provider needs – HP will evaluate the transactional data provided by the SATE in order to determine whether the data provided supports the testing requirements of the Co-Providers conducting business in the state of Arizona.

Thus, the test plan HP executed in evaluating SATE is more comprehensive than those conducted on test environments that the FCC has found to be sufficient for section 271 purposes.

It is important to note that HP's evaluation of SATE actually went beyond the test plan. HP testified that the testing plan detailed the full extent of the evaluation HP believed was necessary to test the stated objectives, and yet it exceeded the testing plan's requirements in most cases.<sup>397</sup> For example, HP's transactional testing included a broad suite of products, rather than a set limited to those products that CLECs are currently ordering from Qwest in Arizona.

Significantly, AT&T admitted that HP performed a thorough analysis of SATE. At the workshop, AT&T's witness, Ken Wilson, stated: "I think that the details in the HP document are good in identifying issues and problem areas."<sup>398</sup> As it has done so many times before, immediately after acknowledging the sufficiency of the evaluation at issue, AT&T revealed the crux of its complaints -- it simply disagrees with the vendor's conclusions. After the statement quoted above, Mr. Wilson complained: "I still disagree with their conclusions."<sup>399</sup>

HP was hired as an independent third party to evaluate SATE. After performing what AT&T admits was a thorough initial evaluation and a subsequent evaluation, HP concluded that

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<sup>397</sup> SATE Workshop Transcript, 84:8-20, 86:22-25.

<sup>398</sup> SATE Workshop Transcript, 129:23-130:1.

<sup>399</sup> *Id.*

SATE is adequate. The Commission should reject the CLECs' unfounded assertions to the contrary.

**D. Qwest's SATE Provides An Adequate Means of Testing and Support to CLECs.**

**1. SATE adequately mirrors Qwest's production environment.**

As detailed in subsection B above, the FCC does not require that a test environment exactly replicate the production environment, but instead allows CLECs "to test adequately OSS changes prior to their implementation as long as the testing and production environments perform the same key functions."<sup>400</sup> HP has found that Qwest's SATE is adequate to support CLEC testing in Arizona,<sup>401</sup> specifically stating that the accuracy and consistency of SATE test responses was adequate to support certification.<sup>402</sup> Nothing more is required.

**2. SATE is production ready.**

SATE was deployed July 31, 2001 and CLECs have successfully used SATE to achieve production status. Nonetheless, AT&T insists that SATE is "not yet production ready."<sup>403</sup> There is simply no factual basis for this curious claim. Moreover, the FCC has clearly held that commercial usage demonstrating that CLECs are able to achieve production status and test new releases indicates that a testing environment is adequate.<sup>404</sup>

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<sup>400</sup> *SWBT Texas 271 Order*, ¶ 138.

<sup>401</sup> HP SATE Summary Report, section 2.1.

<sup>402</sup> HP SATE Summary Report, section 2.1.3.

<sup>403</sup> SATE Workshop Transcript, 20:8-9.

<sup>404</sup> *SWBT Texas 271 Order*, ¶ 138.

To date, five individual CLECs, as well as five others through a service bureau,<sup>405</sup> have successfully completed testing using SATE and have achieved production status for EDI implementation of pre-ordering capabilities.

PID PO-19 is relevant to SATE. This SATE PID "evaluates Qwest's ability to provide accurate production-like tests for testing both new releases and between releases in the SATE environment."<sup>406</sup> Specifically, PO-19 measures the percentage of SATE test transactions that are successfully completed for a software release or mid-release performance test based upon the transactions reported in the Qwest SATE Document. A 95% benchmark applies to PO-19. As reflected in the commercial performance results, Qwest met the 95% standard.<sup>407</sup> For the three months prior to March, Qwest also met or came close to meeting this 95 percent standard. For the four-month period between December 2001 and March 2002, Qwest successfully executed 98.73%, 94.57%, 95.38%, and 97.10% of test transactions within SATE.<sup>408</sup>

This clearly establishes that SATE is not only "production ready," but has been implemented and successfully used -- in addition to successfully passing HP's rigorous evaluation.

**E. Qwest's SATE Is Adequate for Full Release Testing**

**1. SATE provides a stable testing environment.**

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<sup>405</sup> Several CLECs interested in testing their EDI interfaces are represented by service bureaus. A service bureau is a company that provides a variety of outsourced services to CLECs, including, but not limited to, establishing and maintaining connectivity between BOCs and CLECs, administering databases and managing associated hardware, as well as producing and transmitting EDI transactions.

<sup>406</sup> PID Version 4.0, 26 (PO-19), available at <http://www.qwest.com/wholesale/results/arizona.html>

<sup>407</sup> See Commercial Performance Results, 67 (PO-19), which can be found at [www.qwest.com/wholesale/results/arizona.html](http://www.qwest.com/wholesale/results/arizona.html).

<sup>408</sup> See Commercial Performance Results, 67 (PO-19), which can be found at [www.qwest.com/wholesale/results/arizona.html](http://www.qwest.com/wholesale/results/arizona.html).

Qwest's SATE satisfies the FCC's requirements that BOCs make available a "stable testing environment that mirrors production."<sup>409</sup>

The FCC has defined a "stable testing environment" as "one in which the BOC makes no changes to the proposed release during the test period."<sup>410</sup> First, SATE is stable because Qwest has undertaken to make no changes (other than bug fixes) during the 30-day period prior to implementation of a major release, effective with the release of IMA-EDI 9.0 in February 2002. This requirement was incorporated into Qwest's Wholesale CMP in the section titled "Change to Existing OSS Interfaces."<sup>411</sup> If a serious code problem is found during the 30-day window, however, Qwest will implement the bug (emergency) fix. The implementation of bug fixes allows CLECs to test with the fixed code prior to the production deployment and therefore increases the stability of the test environment.

In HP's New Release Testing evaluation, one aspect was to determine whether 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 production."<sup>412</sup>

To perform this evaluation, HP exercised PO-19 in Phase I of its New Release testing just after the implementation of SATE 9.0, and then exercised PO-19 again five days prior to the 9.0 production release. HP then compared the test results for each scenario from Phase I to the outcome of the same scenario when executed in Phase III. The results of Phase I were 93%, and the subsequent results for Phase III were 95%. HP concluded:

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<sup>409</sup> See *BellSouth Georgia/Louisiana 271 Order*, Appendix D, ¶ 42.

<sup>410</sup> See *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, Memorandum Opinion and Order, FCC 01-130 (rel. Apr. 16, 2001) ("*Verizon Massachusetts 271 Order*"), ¶ 109.

<sup>411</sup> See Wholesale CMP, section 5.1.8.

<sup>412</sup> HP SATE New Release Test Summary Report, section 3.1.

HP has observed a positive result when evaluating the stability and the consistency of results for the period of approximately 30 days. The Phase III testing found a 95% accuracy rate overall which meets the diagnostic benchmark established by HP for the purpose of evaluating this phase of the new release test.<sup>413</sup>

**2. SATE allows for new release testing approximately 30 days in advance of the new IMA-EDI Release.**

HP concludes "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."<sup>414</sup>

Qwest makes SATE available to CLECs for an extended testing period. It is available to CLECs approximately 30 days prior to and six months after each major IMA-EDI release. This practice, known as "versioning," allows CLECs to continue to use a prior release even after implementation of a new release, to give them time to decide when to migrate to the new release. Thus, beginning with the release of EDI 9.0 in February 2002, CLECs were able to test in SATE for any one of three releases (7.0, 8.0, and 9.0) at the same time.<sup>415</sup>

The FCC has approved of versioning because it "ensures that system changes and enhancements do not adversely affect a carrier's ability to access the BOC's OSS."<sup>416</sup>

**F. Qwest Continues to Respond to Requests and Recommendations**

**1. PO-19 proposal and subsequent SATE evaluation of production likeness.**

Although Qwest has negotiated the current PO-19 PID with the CLECs, Qwest is currently proposing a modification to PO-19 based on feedback from AT&T in the workshop on April 17-18, 2002. This modification includes a sub-measure to execute the same transactions in

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<sup>413</sup> HP SATE New Release Test Summary Report, section 2.1.

<sup>414</sup> HP SATE New Release Test Summary Report, section 2.1.

<sup>415</sup> See OSS Calendar, which can be found on the Qwest Wholesale web site, available at <http://www.qwest.com/wholesale/cmp/oss/calendar.html>.

<sup>416</sup> Verizon Massachusetts 271 Order, ¶ 107, quoting SWBT Texas 271 Order, ¶ 115.

production and in SATE, to further measure the extent to which SATE mirrors production. Once Qwest has provided initial results for this updated PID, AT&T has requested that HP evaluate the execution and the results. Staff has indicated that this update and subsequent evaluation would be outside of the Arizona 271 proceeding,<sup>417</sup> and Qwest is amenable to having this evaluation performed on this basis.

## **2. SATE Users' Group/CR prioritization**

As further indication that Qwest is committed to the long-term success of SATE, a SATE Users' Group was formed in November 2001 as part of the CMP. The purpose of this forum is to give Qwest and CLECs an opportunity to communicate their current plans and needs, respectively, as well as to jointly present a list of change requests to CMP that ensures future SATE enhancements meet the needs of CLECs.<sup>418</sup> This forum continues to meet on a monthly basis, and gives SATE users the opportunity to provide regular feedback to Qwest and to work jointly with Qwest to develop new SATE CRs.

Pursuant to the CMP process, Qwest submitted CRs in December 2001 to add the resale products and UNEs that are not currently supported by SATE. (At the time SATE was implemented, CLECs ordered these products through IMA-GUI interfaces, if they were ordered at all.) Also pursuant to the agreed-upon CMP prioritization process, Qwest and CLECs jointly prioritized these CRs. As described in the CMP prioritization rules, Qwest participated on an equal footing with each CLEC in voting on prioritization of these CRs.<sup>419</sup> The timing of introducing new products to SATE is not entirely within Qwest's control, since CLECs

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<sup>417</sup> See Arizona OSS Workshop transcript from April 18, 2002,, section 240.

<sup>418</sup> See SATE Users' Group Meeting Minutes, November 13, 2001, which can be found at the following URL: <http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,66,00.html>. The Users' Group has within its scope all EDI interface testing issues. In addition to the SATE Users' Group, Qwest and individual CLECs can request changes to test environments.

<sup>419</sup> Wholesale CMP, section 10.

participate in the prioritization of SATE CRs. The outcome of the prioritization process was that all but two of the CRs to add additional products to SATE were prioritized toward the bottom of the list of CRs.<sup>420</sup> Qwest will use the prioritized list to determine what functionality future SATE releases should include.

### 3. Initial HP recommendations

In its initial SATE evaluation, HP provided nine recommendations to Qwest “to make sure that Qwest continued to offer the same level of support to other CLECs going forward.”<sup>421</sup> Qwest responded to these recommendations, and HP was then asked to comment on Qwest’s responses.<sup>422</sup> Although Qwest and HP may differ on the implementation of these recommendations, Qwest is committed to successfully implementing and maintaining the recommendations. These recommendations and Qwest’s related current status are as follows:

**Recommendation 1: HP recommends that Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.**

Qwest currently has forums and processes in place to address this recommendation. As a starting point, SATE has implemented supporting all products and associated transactions for which CLECs were certified to use in Qwest IMA EDI.<sup>423</sup>

To address CLEC’s future needs, Qwest implemented a process by which CLECs can request the addition of products to SATE. This process states “...additional functionality can be agreed upon and added in later releases. Requests for transactions not currently supported may

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<sup>420</sup> *Id.*

<sup>421</sup> OSS Final Workshop 8 Transcript, January 31, 2002, p, 593.

<sup>422</sup> See HP Response to Qwest Recommendations Version 1.0, dated February 14, 2002

<sup>423</sup> The list of products can be found in the EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

be requested via CMP”.<sup>424</sup> Based on the process described above, Qwest is utilizing the CMP CR prioritization process to add new products to SATE.

In addition to the CLEC process, Qwest continues to monitor the products that CLECs express interest in and has proactively added products or created CMP CRs to add products to SATE. Qwest agreed to add Unbundled Distribution Loop and Unbundled Distribution Loop with Number Portability as the products to be added to SATE for HP’s new product evaluation, because Qwest anticipated future EDI implementations of these products. Also, Facility Based Directory Listings was added as an IMA product with the 9.0 release. As a result, Qwest created a CR to add Facility Based Directory Listings to SATE.

Also, on March 25, 2002, Qwest distributed a CR prioritization form to the CLECs through CMP to prioritize all IMA products that SATE does not currently support. On March 28, 2002, the CLECs returned the completed forms, and on April 1, 2002, Qwest published the prioritization results. Two products, Facility Based Directory Listing and EEL, were prioritized at third and fifth respectively, and are now candidates for release 11.0. The CLECs prioritized all remaining products near the bottom of the list. Consequently, these will be prioritized for future releases.

Qwest’s published process is being used to identify and prioritize SATE additions SATE meets the needs of the CLEC community, and Qwest is committed to continue meeting CLECs’ needs.

**Recommendation 2: HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.**

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<sup>424</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

Qwest follows documentation quality and versioning control processes for all externally published documentation, including SATE. During HP's SATE evaluation, Qwest chose to go outside the standard documentation-publishing schedule and processes in an effort to be responsive to HP's issues. Qwest believes this observation is a result of HP's evaluation requests and not indicative of Qwest's standard processes.

However, on January 15, 2002, Qwest externally published the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents. These guidelines are available on the Qwest Wholesale web site.<sup>425</sup> Qwest's current documentation processes support the production of documents that enable CLECs to properly utilize SATE.

**Recommendation 3: To ensure continued adequacy of the SATE, HP recommends:**

- ❑ 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

In response to the first two bullet points, Qwest developed a staffing plan that details Qwest's CLEC testing organizational structure and the roles and responsibilities of all resources that directly support the organization. Additionally, this documentation includes objectives of

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<sup>425</sup> <http://www.uswest.com/wholesale/ima/edi/document.html>

the organization and the processes in place to ensure accountability. This plan is maintained as part of Qwest's IMA EDI Implementation Guidelines,<sup>426</sup> and was initially published with version 9.0 of the guide, released on January 21, 2002.

To address the third bullet point, Qwest developed the process flow documentation as recommended by HP. This information is maintained as part of Qwest's IMA EDI Implementation Guidelines document,<sup>427</sup> and was initially published with version 9.0 of the guide, released on January 21, 2002.

**Recommendation 4: HP recommends that Qwest publish a list of variances between SATE 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 become a permanent part of the SATE documentation library.**

The Qwest IMA EDI Errors List contains all errors generated by the IMA system. The Business Processing Layer ("BPL") used by SATE is the same as the BPL used by IMA. Thus, the IMA Errors List for SATE is the same as the IMA Errors List for IMA. However, this list does not contain errors generated by Qwest's legacy systems. When an error message is produced by a legacy system, the IMA BPL simply passes the error message to the CLEC. This requires no processing to be performed by IMA. SATE includes all errors generated by IMA, as well as commonly triggered legacy system errors.

Because only the common legacy system errors are found in SATE, Qwest established a list of all legacy system error messages coded into SATE to allow a CLEC to understand which error messages are available through SATE. A note was included in this document that explains

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<sup>426</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

<sup>427</sup> EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

that additional legacy system errors can be coded into SATE if requested. Such a request can be made using the data request process.

Additionally, Qwest provided a list of legacy system errors that were returned through Qwest's 8.0 production EDI interface during the six-month period prior to the creation of the list. Qwest compared this list to the errors currently contained in SATE and has published that list. Since the IMA EDI Errors list is generated from a system query, errors from sections of code that are no longer executable are included in the list. Beginning with IMA EDI release 9.1, Qwest now ensures that these error messages are removed from the code. As a result, these non-executable errors no longer appear on the IMA EDI Errors list.

With IMA EDI release 9.0, the IMA EDI Errors List is now generated twice per IMA EDI release. The first generation coincides with the availability of the new release in SATE. The second generation is distributed when the production release is deployed. These documents are published to the CLEC community through the Qwest Release Notification process.

**Recommendation 5: HP recommends that 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.**

SATE is formally incorporated into the CMP process. Qwest began the CLEC SATE Users' Group in early November 2001, as part of the CMP process. Its mission statement best defines the purpose of the Users Group<sup>428</sup>:

1. Give Qwest the opportunity to communicate current plans for its testing environments.

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<sup>428</sup> SATE Users' Group Meeting Minutes, November 13, 2001, which can be found at the following URL: <http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,66,00.html>

2. Give the CLECs the opportunity to communicate their current and future testing needs.
3. Jointly present a list of CRs to CMP to ensure that future enhancements of Qwest environments meet those stated CLECs' needs.

This user group has met nine times thus far, beginning with the November 6, 2001, kickoff meeting. To further incorporate SATE into CMP, Qwest's monthly CMP agenda includes a standing entry for SATE discussion. This agenda entry includes discussions on the status of SATE enhancements, SATE CRs, and CLEC feedback. The inclusion of this agenda item began with the January 17, 2002 CMP meeting.

The proactive incorporation of SATE into the CMP process is consistent with the support of IMA, which will ensure that SATE remains adequate to meet the needs of Arizona CLECs and their future testing requirements.

**Recommendation 6: HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.**

Qwest has a formal process by which the SATE will be available for new release testing on an ongoing basis. This process states: "Beginning with release 9.0, new releases of IMA are planned for release on the IMA EDI Stand-Alone Test Environment approximately thirty calendar days prior to their release in production unless that release is deemed to be in 'red testing status'. Red Testing Status indicates that the IMA release's system testing effort has discovered significant issues that place the release in jeopardy".<sup>429</sup>

Based on the process stated above, IMA EDI Release 9.0 was implemented in SATE on January 27, 2002, and in production on February 25, 2002. Qwest also notes that on October 22, 2001, IMA EDI Release 8.01 was released in SATE 27 days prior to the associated IMA production release. With the deployment of a new release into SATE approximately 30 days

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<sup>429</sup> EDI Implementation Guidelines -- for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - <http://www.uswest.com/wholesale/ima/edi/document.html>

prior to production, Qwest has demonstrated that it has an existing formal process by which SATE is available to CLECs for new release testing going forward.<sup>430</sup>

Continuing Qwest's commitment to make SATE available for new release testing, IMA EDI Release 10.0 will be available in SATE on May 20, 2002 and in production on June 17, 2002.

**Recommendation 7: To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.**

Based on this recommendation, HP was asked by the ACC to perform full release testing against SATE 9.0. After completing this second evaluation in March 2002, HP concluded, "the Qwest SATE is adequate to support New Release Testing by a CLEC."<sup>431</sup>

**Recommendation 8: HP recommends that 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.**

At the time this recommendation was made, Qwest had already proposed a measurement that subsequently has been agreed by the Arizona TAG, satisfying this recommendation.

Qwest developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy.<sup>432</sup> The language of this measure has been agreed and its purpose is to "evaluate Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment."<sup>433</sup>

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<sup>430</sup> IMA EDI Implementation Guide, p. 25, which can be found at the following URL:  
<http://www.uswest.com/wholesale/ima/edi/document.html>

<sup>431</sup> HP SATE New Release Test Summary Report, section 2.1.

<sup>432</sup> Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

<sup>433</sup> Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

The Arizona SATE PID was developed by consensus with the CLEC's. However, the standard for this measure was not agreed until later, and was set at 95%. Qwest began reporting on this measure with November 2001 results in the December 2001 reports.

Additionally, based on further CLEC input, Qwest has proposed a modification to PO-19, which includes a new sub-measure to execute the same transactions in production and in SATE, to further measure the extent to which SATE mirrors production. This modification is currently under discussion in Arizona.

**Recommendation 9: HP recommends that 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.**

Qwest filed an implementation plan on December 28, 2001, in response to this recommendation to address the eight prior recommendations as presented by HP. As the above responses to the recommendations indicate, Qwest has addressed or is addressing all of the recommendations presented by HP.

#### **4. Subsequent HP recommendations**

In its subsequent SATE analysis, HP made four recommendations specific to ensuring SATE remains adequate for full release testing.<sup>434</sup> These recommendations and the related current status are summarized as follows:

**Recommendation #1: All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of this document be incorporated into the SATE User Group and CMP process.**

HP has successfully closed all SATE issues. Only one issue remains in 'closed-unresolved' status, HPSATEEV2032. HP discovered an issue with an error message returned for a Facility Availability Query. The error message returned did not match the expected error as

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<sup>434</sup> HP SATE New Release Test Summary Report, section 2.2.

defined in the data document. Qwest modified SATE to correct this after HP's re-testing was complete. Consequently, HP believes this issue should remain closed-unresolved, but it indicates in the Issue response that it "doesn't feel that the resolution of this issue will significantly impact the findings of the transactional test results."<sup>435</sup> SATE has been corrected and there is no longer a mismatch between the data document and the actual error message returned. Qwest considers this issue closed.

Qwest does not believe that this is a candidate for discussion at the SATE Users' Forum and/or in the monthly CMP meeting, as it relates to a specific error message that has been corrected in 9.0 and forward.

**Recommendation #2: Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.**

With the proposed updates to PO-19 to include a sub-measure to further measure production likeness, Qwest has submitted a revised PID to the Arizona TAG. As is standard with all proposed PID changes, the TAG members will collaboratively review and approve the proposed language, which will include the agreed-upon level of detail concerning the calculations and measurement process.

**Recommendation #3: 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.**

SATE was established to allow CLECs an alternative environment to develop and test their EDI interfaces. Because of the purpose and nature of certification testing, CLECs do not typically perform negative testing to elicit error messages and specific edits; rather, CLECs perform testing as defined in the data document to successful develop their EDI interfaces.

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<sup>435</sup> HPSATEEV2032.

Qwest believes that negative testing was a valid exercise for a test vendor to perform to assess the overall adequacy of SATE, but not an exercise that would generally be performed by a CLEC. Nonetheless, Qwest will add this topic to the next SATE Users' Group agenda to solicit feedback from the CLECs concerning their interest in negative testing of BPL edits. The next SATE Users' Group meeting is scheduled for May 21, 2002. Based on CLEC input, Qwest will subsequently provide a plan for including negative scenarios and BPL edits for key transactions in the data document.

Additionally, HP recommended that Qwest provide a clearly defined process for production mirror issues encountered by CLECs after SATE certification. Qwest already has the process in place. It is the CMP production support process.<sup>436</sup> Section 12 of the CMP redlined document states: "Problems encountered by the CLEC should be reported to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest."<sup>437</sup> This process applies to both production releases and SATE.

**Recommendation #4: Qwest include scenarios in data document reflecting all business rule changes identified in the New Release change summary documentation.**

Qwest proposes to implement this recommendation based upon the candidates for a release, instead of each individual change in the change summary. The candidates for a release encompass all of the major changes. Once the release candidate list is available for the upcoming release, Qwest will provide this list to the CLECs through CMP. In the Data Document for the new release, Qwest will identify which associated existing test scenario will appropriately test each SATE release candidate. In the cases where a new candidate does not yet

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<sup>436</sup> <http://www.qwest.com/wholesale/cmp/redesign.html>

<sup>437</sup> Wholesale CMP, section 12.0, which can be found at the following URL:  
<http://www.qwest.com/wholesale/cmp/whatiscmp.html>

have an associated SATE test transaction, Qwest will create a new transaction and provide that information to the CLECs as well. Any new transaction will be included in the new section of the data document. CLECs can elect to run these transactions to complete their re-certification testing requirements. If they do not plan to use the new functionality provided by a candidate, CLECs can use the existing transaction for the product and activity. The candidate review section of the data document will be specific to a release of the document.

This proposal will allow CLECs to test the major changes in a release without the burden of processing through the many individual changes that each candidate causes. The appropriate associated SATE transaction(s), new or existing, will be identified to test the changes for a release, referenced in the Data Document, and made available for re-certification testing.

To ensure that this proposal will provide the CLECs the greatest value in providing test scenarios for a new release, Qwest will present the proposal in the next SATE Users' Group scheduled for May 21, 2002.

## **5. Staff recommendations**

Staff accepts HP's recommendations from both evaluations, and proposes three additional recommendations:

**Recommendation #1: Qwest should be required to immediately enhance the range of capabilities available in SATE to provide for negative testing by CLECs.**

As detailed in Qwest's response to HP's Recommendation #1 above, Qwest will add this topic to the next SATE Users' Group agenda to solicit feedback from the CLECs concerning their needs for negative testing of BPL edits. The next SATE Users' Group meeting is scheduled for May 21, 2002. Based on the CLEC input, Qwest will subsequently provide a plan for including negative scenarios and BPL edits for key transactions in the data document.

**Recommendation #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)**

Qwest implemented HP's associated recommendation through SATE Release 9.0 and sent the errors list to the CLECs via email using the EDI distribution list. Qwest initially published four errors lists for IMA and SATE. These documents include:

- IMA BPL Errors List: a list of all IMA system generated errors. This has been published per release dating back to at least the 5.0 release.
- IMA Legacy System Errors List: This list was generated in January 2002 by querying the production logs for all legacy system error messages seen for the prior six months.
- SATE Legacy System Errors List: This list was published in January 2002 to include all legacy system errors that have been coded into SATE.
- IMA and SATE Legacy System Variance List: This list was published in January 2002 to provide the variance between the legacy system error messages coded into production and those coded into SATE.

In February 2002, the IMA Legacy System Errors List, the SATE Legacy System Errors List, and the IMA and SATE Legacy System Variance List were combined into a single document. The IMA BPL Errors List remained as a separate document for CLEC convenience due to the large size of the document.

Beginning with Release 10.0, with every new release of IMA, Qwest will run scripts against the production logs of the previous IMA release. The purpose of this exercise is to gather the list of legacy system error messages encountered by the CLECs from the time the previous release was implemented until the time the new release is implemented. Once this list is determined, Qwest will then evaluate it against SATE, and establish an updated list of variances.

One single variance list will then be published on the Qwest Wholesale web site and the CLECs will be noticed using the CMP notification process.

**Recommendation #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.**

Beginning on June 30, 2002, Qwest will file quarterly progress reports to the Commission detailing its progress on HP and Staff recommendations for SATE.

**G. Qwest has or is working to implement all of HP's recommendations.**

Qwest has already implemented or is working to implement all of HP's recommendations. Qwest is also currently in the process of modifying PO-19 and allowing an additional evaluation of SATE to be performed by a third party. These follow-on activities clearly demonstrate Qwest's ongoing commitment to ensuring SATE remains adequate for CLEC testing.

After performing two comprehensive evaluations, HP has determined that Qwest's SATE performs the same key functions as Qwest's production environment and, therefore, is adequate to allow CLECs to test OSS changes prior to their implementation. Staff concurs with this position. SATE thus fully satisfies the FCC's requirements.

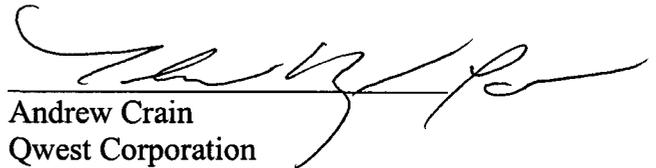
**X. CONCLUSION**

As demonstrated above, the Arizona test establishes that Qwest satisfies the FCC's OSS evaluation standards. As the Pseudo-CLEC, HP's experience demonstrates that Qwest has deployed the necessary systems and personnel to provide sufficient access to pre-ordering, ordering, provisioning, maintenance and repair, and billing OSS functions and is adequately assisting CLECs to understand how to implement and use all of the OSS functions available to them. CGE&Y's testing establishes that Qwest provides access to CLECs in substantially the same time and manner as it provides to itself and in a manner that is sufficient to allow CLECs a

meaningful opportunity to compete. There can be no question that Qwest's OSS are operationally ready.

Qwest again applauds and commends all of the TAG participants for their significant contributions in designing and executing the most rigorous and comprehensive OSS test conducted to date. The TAG's exhaustive efforts have produced a solid record upon which this Commission can confidently base its recommendation to the FCC: Qwest has passed the test.

RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of May, 2002.



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A handwritten signature in black ink, reading "R. P. McBrielle". The signature is written in a cursive style and is positioned above a horizontal line.

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