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BEFORE THE ARIZONA CORPORATION COMMISSION

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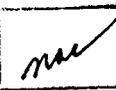
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MAR 10 2003

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

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S COMMENTS REGARDING  
STAFF'S REPORT ON THE JULY 30-31 WORKSHOP (REPORT ONE  
OPERATIONAL SUPPORT SYSTEMS RELATED ISSUES)**

Qwest Corporation ("Qwest") hereby submits its comments regarding the Arizona Corporation Commission (the "ACC" or "Commission") Staff's Report on the July 30-31 Workshop (Report One -Operations Support Systems Related Issues), dated February 25, 2003 (the "Report").

**I. Introduction**

In its Report, Staff recommends that the Commission require Qwest to undertake certain actions to address issues raised in the July 30-31, 2002 workshop. Qwest has already taken action that satisfies many of Staff's recommendations. In most of those instances where Staff's recommendations have not yet been satisfied, Qwest agrees to take the actions Staff recommends, as set forth below.

Of the twenty-five issues addressed in Staff's Report, Qwest disagrees with Staff's recommendations in only two instances. These two issues relate to (1) whether Qwest should be required to report issues as negative performance before Qwest's internal processes have a chance to identify and correct the issue and before the issues have any negative customer impacts (*see* section II(A)(6) below) and (2) whether Qwest should be required to institute a labor-intensive manual monitoring process to identify situations where a rare condition -- one that occurs in only one out of a thousand conversion orders -- may occur (*see* section II(C)(1) below). As more fully discussed below, Qwest believes that it is premature to report issues before Qwest has the opportunity to correct them -- particularly when PO-20 and OP-5 will capture the error if it is not corrected. Qwest further believes that it can more effectively address the conversion condition by focusing on process adherence and process improvements that will further reduce the already low risk that the condition will occur, rather than implementing a costly manual process to identify specific situations where the condition may occur.

Qwest's comments regarding Staff's recommendations are set forth below.

## **II. Qwest's Comments regarding Staff Recommendations**

### **A. Service Affecting Performance & Reporting**

Qwest disagrees with Staff's characterization that there are "many errors and omissions in Qwest's reported OP-5 results." Report at ¶139. To the contrary, while there were some omissions related to legacy system limitations, as well as some human errors (a small percentage), the true "bottom line" is that the overall effect of what was found on the results was very small, as Qwest pointed out in its Response to the Qwest/Eschelon OP-5 Data Reconciliation Report prepared by Cap Gemini Ernst & Young (CGE&Y) ("Qwest's Data Reconciliation Comments"), at pp. 29-30.

- 1. Qwest should “be required to verify through a filing with the Commission within 90 days from the effective date of the Commission’s Order approving this Report that its new calculation process corrects the high incidence of coding problems uncovered in the CGE&Y report.” (Report at ¶154a)**

As fully explained below, Attachment 1 establishes that Qwest’s new calculation process eliminates the specified coding problems mentioned in CGE&Y’s report. However, Qwest disagrees with the characterization of these coding problems as representing a “high incidence.” In its response to the CGE&Y report, Qwest demonstrated, point-by-point, how CGE&Y’s characterizations represented anything but a “high incidence.” Moreover, the coding problems had only a minor impact on results, as Qwest pointed out in Qwest's Data Reconciliation Comments at pp. 26-28.

As promised, Qwest made the improvements to OP-5 to eliminate its reliance on the system aspects that created the limitations referenced in CGE&Y’s report. These improvements were first reported in OP-5 results through December 2002, with a re-run of November 2002 results. Accordingly, both pre- and post-improvement results for OP-5 are available for the month of November 2002. These are provided in Attachment 1, which consists of a spreadsheet showing “Old” wholesale and retail results and “New” wholesale and retail results, side by side, including the details of numerators, denominators, results, Z-scores, and whether there was a change in parity from old to new. The comparisons consist of Arizona results displayed by product. Also provided are two columns that display the percentage point differences between old and new results, respectively, for wholesale and retail.

Several points can be drawn from this comparative data. First, the impacts of the limitations resolved by this improvement were very minor, as Qwest asserted they would be in Qwest’s Data Reconciliation Comments at pp.26-28. Indeed, the actual results comparison

shows that 98 percent of the wholesale orders and 88 percent of the retail orders were in product categories with OP-5 changes (positive or negative) of less than 5 percent. Second, the net effect of the changes demonstrates that Qwest's performance was actually better than reported under the old results for both wholesale and retail. Specifically, the net change of wholesale OP-5 results was +0.3%, and the net change of retail OP-5 results was +5.5%. Finally, and most importantly, parity determinations were not affected by the changes from old to new results.

Qwest described the planned OP-5 improvements in its Data Reconciliation Comments at pp. 6-7. Qwest has copied those responses below, followed by information establishing how Qwest actually implemented the specified improvements:

- Qwest's Previous Response: "Instead of reporting I-Reports as a percentage of average monthly new service installation volume, OP-5 will now tie trouble reports with specific orders in the denominator, such that OP-5 will become a more direct measurement (rather than just an estimator) of new service installation quality."

Actual Implementation: The new OP-5 code directly relates tickets to the service order via the TN for non-design products and via the circuit (CAC code) on design products.

- Qwest's Previous Response: "In conjunction with the above linking of trouble reports and orders, OP-5 measurement programming will determine the installation-related nature of the trouble, based on criteria consistent with the PID, without being dependent on LMOS logic."

Actual Implementation: The determination of the installation-related nature of repair tickets with orders is done without dependency on LMOS logic by using Qwest's SAS/Oracle based Regulatory Reporting System to make the linkage, which derives the new installation relationship rather than relying on an LMOS flag.

- Qwest's Previous Response: "The new OP-5 process will identify those orders with an associated, valid Qwest trouble ticket. Once an order is so identified, that trouble ticket will be reported in the numerator of the OP-5 calculation in accordance with the PID."

Actual Implementation: The new code reports in the numerator the first (in terms of received date, rather than LMOS flagging) valid trouble ticket associated with an order.

- Qwest's Previous Response: "The programming will count only a single occurrence of valid trouble, eliminating the observed problem with repeat repair reports being counted."

Actual Implementation: Newly-installed orders are identified as having new service problems by capturing the first valid trouble ticket, independent of whether LMOS flags the ticket as a repeat, which process makes it possible to eliminate the observed problem with repeat repair reports being counted in addition to first valid tickets.

- Qwest's Previous Response: "The programming will also evaluate the sequence of trouble tickets, looking for and evaluating all instances of valid Qwest trouble, while passing over (not counting) intervening non-Qwest troubles and counting subsequent valid Qwest caused troubles."

Actual Implementation: The new code counts Qwest-caused troubles, independent of whether LMOS has flagged the ticket as an I-report.

- Qwest's Previous Response: "The new OP-5 programming will execute in a reporting mode (after-the-fact, as opposed to near real-time) and will be doing the match between the order and related trouble tickets. As a result, the issue of delays in the completion of an order in the legacy systems will be eliminated."

Actual Implementation: The new OP-5 code captures all valid troubles on the completed orders contained in the denominator. This is due to the fact that denominator contains two months of orders for consideration allowing all troubles received within thirty days to be considered. In addition, in the unlikely event that a trouble report is received within thirty days of order completion but does not close in time for reporting in conjunction with the order, Qwest's new code will still report the ticket the month it closes.

- Qwest's Previous Response: "The OP-5 reporting process will use the completed order as the starting point in the trouble ticket/order matching process. As a result, those tickets impacted by the interval to update LMOS will use the carrier information of the order to avoid problems in correctly identifying tickets/orders as wholesale or retail."

Actual Implementation: The new code does use the carrier information on the order as the basis for reporting. This allows trouble tickets that are received prior to LMOS carrier information updates to be properly associated with the most recent order and therefore appropriately categorized as wholesale or retail.

**2. Repeat reports should “continue to be included in OP-5, since the parties and Qwest agreed to inclusion at the time of PID development.” (Report at ¶154b)**

Qwest agrees to address repeat reports in OP-5. However, at the time of PID development, Qwest did not have the capability to exclude repeat reports. This was a weakness in OP-5 and, while it did not prevent OP-5 from being a reasonable indicator of Qwest’s new service installation performance, it is not totally consistent with the intent of the PID. The accepted OP-5 PID purpose statement and description both emphasize that it measures the percentage of new installations that are “free of trouble reports.” Hence, if repeats are to be addressed in OP-5, it should be done in a manner that does not detract from an accurate representation of the new installations that are “free of trouble reports.” The former limitations as regards repeat reports did not accomplish this. For repeat reports to be properly addressed in OP-5, it must be recognized that repeat reports affect only those new installations that had problems within 30 days of installation, not those that were trouble free. Moreover, such repeat reports should be measured as a percentage of the activity being evaluated – in this case, Qwest’s responses to reports of problems. Hence, Qwest supports a way of addressing new service repeat or multiple reports that preserves the accuracy of measuring installations that are free of trouble reports and also measures them as a percentage of problem reports involving newly-installed services. The sub-measurement, OP-5R, shown in Attachment 2 (OP-5 draft PID revision) represents an appropriate way for repeat reports to be measured in OP-5.<sup>1</sup>

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<sup>1</sup> Qwest also notes other RBOCs exclude repeat reports from their installation quality measurements. Specifically, Bell South’s measurement P-9, % Provisioning Troubles within 30 days of Service Order Completion, states in the business rules: “Measures the quality and accuracy of completed orders. The first trouble from a service order after completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate.” <http://pmap.bellsouth.com/content/documentation.aspx>

3. **OP-5 should “measure the total percentage of new installations without a trouble or customer-affecting condition experienced with[in] the first 30 days of installation.” Further, cases that were referred to another department should “be considered by the TAG and/or Long-Term PID Administration for inclusion in service installation quality calculations.” (Report at ¶154c)**

Qwest agrees to include in OP-5 both the repair reports from its maintenance and repair tracking systems (as the CGE&Y report confirmed are presently captured in OP-5), and also reports of service-affecting problems captured from calls to Qwest’s interconnect service centers (referred to as call center data).<sup>2</sup> This accomplishes what the Staff is recommending. Qwest has attached its proposed draft OP-5 including these revisions. In further discussions with CLECs and state commission staffs, including the ACC Staff, Qwest will continue to propose this level of coverage of customer trouble reports, as a minimum.

Qwest also agrees that, by having OP-5 capture both repair reports and call center data, it will capture not only CLEC reports of service-affecting problems relating to LSR/Service Order mismatches and outages on the date of installation, but also other service-affecting problems, both on the date of installation and afterward, that are valid and Qwest-caused.

Thus, Attachment 2 reflects that Qwest supports a definition for OP-5 that captures all new service installations and reports the total percentage (via OP-5T) that were free of service-affecting problems within 30 days of installation. Regarding cases “referred to another department,” the proposed OP-5 definition captures all such situations that represent valid, Qwest-caused, service-affecting problems reported by CLECs/customers.

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<sup>2</sup> Such call center data would include day of conversion outage reports, as well as post completion reports attributed to service order errors, that Qwest originally proposed to be reported in PO-20, but Qwest is now willing to move to OP-5.

4. **PO-20 should be modified (as set forth in the Report at ¶153) “to include measurement of whether all the service/features ordered on the LSR were correctly transferred to the Qwest service order.” Further, “calls to the service center because of a service order errors also be reported in PO-20 (calls resulting from customer trouble reports should be disaggregated from calls for errors identified by the CLEC through its own actions).”<sup>3</sup> At the same time, “trouble reports from end user customers because of Qwest errors in writing the services/features portion of the service order should be included in OP-5 as customer trouble reports.” (Report ¶154d)**

Qwest agrees to include in PO-20 whether the service/features ordered on the LSR were correctly transferred to the service order, via the measurement method upon which PO-20 is based (i.e., comparisons of LSR fields with corresponding service order fields). Where this measurement method cannot feasibly address certain aspects of order accuracy, Qwest accepts a “safety net” concept that is based on call center data. This safety net will capture situations that cannot be captured under PO-20. In the Arizona TAG meeting of February 27, 2003, CLECs requested, with Staff concurrence, that this “safety net” be moved to OP-5. Qwest agrees with this approach, which is also reflected in OP-5B in the draft PID of Attachment 2. Thus, a portion of this recommendation for inclusion in PO-20 is now accepted, subject to further discussions of detail, to be in OP-5B. This also preserves the concept that issues resulting in CLEC/customer reports of problems should be captured in OP-5.

Staff recommended that Qwest’s proposals regarding PO-20 and OP-5 should be submitted to the Arizona TAG for CLEC input and final resolution by February 27, 2003, and that Qwest should be required to finalize its proposal by March 14, 2003. Report at ¶153. On February 27, 2003, in the Arizona TAG call, Qwest provided information concerning the proposals offered and discussed, to date, in the Long-Term PID Administration forum. In that

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<sup>3</sup> Qwest has addressed the parenthetical in Staff’s recommendation regarding “calls for errors identified by the CLEC through its own actions” in section II(A)(6) below.

call, Qwest also accepted some action items relating to PO-20 and OP-5 to respond to CLEC requests made in the call. With these comments, Qwest is providing in Attachment 2 the draft PIDs representing its current proposal, including the action items from the TAG call. In addition to satisfying the Staff's recommendations as set forth in these comments, this proposal accommodates the CLECs' requests to (1) measure OP-5 on the basis of counting orders, rather than lines; (2) moves the PO-20 "safety net" based on call center data into OP-5B; (3) proposes to measure new service repeat reports in OP-5R. While Qwest remains open to further discussion, it has, in effect, complied with the March 14, 2003 deadline by providing a proposal that can be considered final, in terms of Qwest's willingness to implement what is contained therein and in terms of these proposals satisfying – even going beyond satisfying – the FCC's requirements for section 271 approval.<sup>4</sup>

Because Qwest's proposals in Attachment 2 satisfy Staff's recommendations, the Commission should accept them in full satisfaction of Qwest's section 271 showing. At the same time, both OP-5 and PO-20 are currently being discussed in the Long-Term PID Administration forum, as noted above. The Commission could enjoy the benefits from the additional efforts to refine the PIDs undertaken in that forum either by determining now that it will adopt the agreements reached in that forum, or by deciding now that it will revisit OP-5 and PO-20 after the Long-Term PID Administration forum completes its work.

**5. "Trouble reports that are caused by Qwest service order errors" should be captured in OP-5. (Report at ¶167)**

As stated in section II (A)(3) above, Qwest agrees that customer reports of service-

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<sup>4</sup> Qwest notes that OP-5 is currently included in the Arizona Performance Assurance Plan ("PAP"). Qwest has proposed a substantial revision to OP-5, under which the current measurement would become submeasure OP-5A. If its proposal is accepted, Qwest expects that OP-5A will continue to be subject to the PAP, but that the new disaggregations of the measure would be diagnostic and, therefore, not subject to the PAP.

affecting problems attributable to service order errors should be captured in OP-5. Originally, this was primarily suggested as the "safety net" for PO-20, as pointed out previously. Presently, as demonstrated in Attachment 2, Qwest proposes that such situations be captured in OP-5B, along with other service-affecting problems identified in call center data.

**6. Qwest should "submit a proposal for PO-20 to the Arizona TAG" that will include "service order errors [that] occur but are corrected by CLECs (such as through the use of PSONs) . . . ." (Report at ¶177)**

Service order errors that "occur but are corrected by CLECs" should not be measured against Qwest. CLEC calls to Qwest about such situations do not represent reports of trouble. In fact, they instead represent only potential matters that may or may not translate into a customer-affecting problem (as addressed elsewhere in the Staff report).

By way of background, Qwest provides a notice called a Pending Service Order Notification ("PSON") to CLECs. The PSON allows a CLEC to see, while an order is still pending, that its LSR has in fact been translated to internal Qwest service orders that accurately reflect what the CLEC has requested. Thus, the PSON allows a CLEC to determine that what the CLEC asked for has been included on the Qwest service order and to insure that nothing is placed on the order that the CLEC does not believe it asked for. If a CLEC finds an error, it can then report the error to Qwest for correction prior to the provisioning of the order.

However, it is important to note that, if a service order does contain an error, Qwest's processes may identify and correct that error, regardless of whether it receives a report from the CLEC. It is premature to extrapolate what the effect of a service order issue may be before Qwest's processes have a chance to identify and correct the issue -- particularly when the issue may never affect the timely and successful provisioning of service to the customer. Moreover, Qwest completed an analysis of call center data for January 2003 that demonstrated that service

order errors identified by CLECs (through PSON inquiries) represented less than one-tenth of one percent of manually handled orders in January.<sup>5</sup>

In any event, service order issues that are not identified and corrected will be captured under Qwest's proposals. Specifically, field mismatch errors on service orders will be captured in PO-20 and customer-affecting problems reported by CLECs will be captured in OP-5. Otherwise, Qwest should be given the opportunity to identify and correct service order errors any time prior to implementation and to be judged on the actual results of its efforts, not on potentialities that may be identified before work has even started on orders and that have been shown to be very, very few in number.

**B. Time Consuming and Cumbersome Ordering Process**

- 1. Staff believes that the impasse issue relating to migrations as specified and migrate by telephone number capability has been satisfactorily resolved through the CMP process. The changes that Eschelon is requesting have been committed to in IMA 12.0 release, which is scheduled for April 2003. (Report at ¶183)**

Qwest confirms the change requests associated with this recommendation will be included in the IMA 12.0 release, which is still scheduled for April 2003. Staff suggests that Qwest should file in this docket verification that IMA 12.0 implemented these change requests. Qwest agrees to file in this docket verification that IMA 12.0 implemented these change requests, once the 12.0 release has been implemented.

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<sup>5</sup> In January 2003, Qwest received 15 CLEC calls reporting an LSR/service order mismatch based on a PSON review out of 39,318 manually handled LSRs, resulting in a relative error rate of only 0.04%.

C. OSS – Lack of Flow Through

1. **Staff recommends that for CLEC orders that require both a Disconnect order and a New Connect order that a process be implemented that requires Qwest to monitor on a proactive basis to insure that when the connect order falls out for manual handling that there is an immediate response to restore service. The process should be monitored in the same fashion as a coordinated cut. This new proactive process should prevent extended service disruptions to new CLEC customers. (Report at ¶201)**

Staff addresses an out-of-service condition that can occur during a conversion process such as conversion from Centrex to UNE-P POTS. The majority of conversions can be accomplished by the issuance of a single change order. However, in certain circumstances, a conversion requires Qwest to issue two orders -- a Disconnect and New Connect service order. These two orders are usually worked together so that the customer experiences only a very short disruption in service. The out-of-service condition Staff refers to occurs in a subset of situations where two orders are required. Basically, if a problem with one of the two orders occurs, the customer may experience a longer outage than it otherwise would.

However, Qwest's analysis indicates that the percentage of wholesale orders impacted with these day-of-conversion outages is *de minimis* in nature. Importantly, 99.9%<sup>6</sup> of all Disconnect-New orders are consistently provisioned through the systems without any significant outage time. This superior rate indicates that Qwest's current processes are not only stable, but are extremely effective.

Even though the current processes produce consistently excellent results, Qwest continues to look for ways to improve its performance. Staff suggests that Qwest monitor

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<sup>6</sup> In January 2003, for example, Qwest received 11 CLEC calls reporting an OoS condition out of 8,479 completed LSRs associated with multiple orders (i.e., conversion related) resulting in a relative error rate of 0.12%. In February 2003, Qwest received 7 calls from CLECs out of 6,433 conversion LSRs and a corresponding 0.11% error rate.

Disconnect-New orders in a proactive manner similar to that used for coordinated cuts. Such an approach would essentially require Qwest to employ an additional manual process to identify the very few that may involve significant outage time. It would not be reasonable to impose such an inefficiently broad requirement to address orders that comprise only a small fraction of the total number of Disconnect-New orders. Instead, Qwest believes that focusing on process adherence and process improvements provides a more effective solution to reducing the risk of outage time. To the extent that Qwest identifies specific process improvements that fall within the scope of the Change Management Process, Qwest will comply with the Change Management Process requirements for implementing and notifying CLECs of such changes.

In order to reduce the number of orders where outages occur, Qwest has focused on clarifying Service Order writing processes and adherence to the process. To that end, the centers monitor service order quality on an ongoing basis, focusing on issues causing day of conversion outages. In this way, Qwest is proactively identifying the underlying issues that cause related orders to be worked separately. Qwest then addresses these issues by streamlining processes, making clear information readily available, and through training. For example, Qwest provided extensive training and process clarification has occurred during fourth quarter of 2002 and into the first quarter 2003 focusing on the appropriate use of the CRO/RO field identifiers ("FIDs"), which are used to relate two or more orders to one another so that they are provisioned together. Increasing the proper use of the CRO/RO FIDs will reduce the number of orders that are not properly related to one another and, therefore, will improve the customer experience and reduce the amount of time an order is out of service. This work is ongoing and will continue as gaps are identified.

Qwest will continue to identify and address the underlying issues in this manner. It is important to note that Qwest's proposed modifications to OP-5 will now capture these occurrences, which will ensure continued focus and visibility to the issue.

- 2. Staff recommends that this new process be implemented within 90 days and that Qwest should advise the Commission upon implementation. Qwest should post this process on its PCAT web site and notify CLECs. The revised process and its effectiveness will be reviewed in the first six-month PAP review. (Report at ¶202)**

As described above, Qwest does not agree that implementation of a new process monitoring Disconnect and New connect orders to reduce the amount of time for Out of Service conditions would be an effective method of dealing with the problem. Instead, Qwest proposes that continual process improvement to reduce the number of orders with the potential to have a day of conversion outage.

**D. Maintenance and Repair – Authorization and Accuracy for Closing Tickets**

- 1. Staff recommends that the Commission request that Qwest provide through a filing in this docket the findings of its review and its plans to improve Disposition Code Reporting. Staff further recommends that this filing should be prior to the six month PAP review. (Report at ¶209)**

Qwest agrees to provide its planned implementation efforts to improve disposition coding accuracy prior to the six month Arizona QPAP review.

**E. Billing Accuracy**

- 1. Until the issue with embedded accounts is resolved, Qwest should be required to count these as an error or an inaccurate bill for purposes of calculating its billing measurements. (Report at ¶216)**

As an initial matter, Qwest does not believe that a billing inaccuracy exists in this situation. The billing methodology for UNE-E accounts must continue until the migration of the embedded base accounts is completed. Moreover, Qwest has taken all reasonable actions to

resolve this issue. Qwest has made several attempts to resolve this issue with Eschelon, with the last attempt being made on November 14, 2002. Qwest in its last attempt again outlined its solution for Qwest to generate service orders to convert the embedded base, as well as making an offer of training to Eschelon and to project manage the conversion to minimize service interruption. Eschelon has to date not agreed to the conversion or to meet to further discuss. Qwest has expressed willingness to convert the embedded base as outlined and to meet with Eschelon to implement the process. It is Eschelon's continued refusal to resolve the dispute over the embedded base that causes the billing accuracy issue to persist. Where a CLEC's own intransigence causes an issue to be left unresolved, as is the case here with Eschelon, Qwest should not be penalized; therefore Qwest should not be charged with an error for purposes of calculating billing measurements.

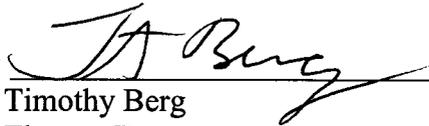
2. **Qwest and Eschelon should also be required to provide the Commission Staff with additional information regarding the issues involved with converting Eschelon's embedded accounts and provide a mutually agreed upon resolution within 90 days. (Report at ¶216)**

Qwest is agreeable to meeting with Eschelon to further discuss this issue.

### **III. Conclusion**

Qwest agrees to take the actions Staff recommends in most instances. However, Qwest believes that service order errors that "occur but are corrected by CLECs" should not be measured against Qwest because Qwest should be judged on actual results, not on potentialities. Finally, Qwest believes it would be unreasonable to impose a broad monitoring requirement to attempt to address issues raised in only one in a thousand orders -- especially when Qwest is already identifying and addressing the root causes of the issues Staff seeks to remedy.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of March, 2003.

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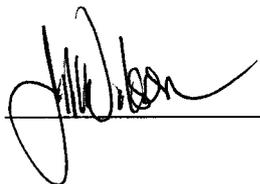
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Comparison of Arizona OP-5 Results  
 Nov02 Results as Reported on the Nov02 Report (Old) versus Nov02 Results Reported on the Jan03 Report (New)

Product	Wholesale Num	Wholesale Den	Wholesale Res	Old Retail Num	Old Retail Den	Old Retail Res	Old Z-Score	Old Party Score	New Wholesale Num	New Wholesale Den	New Wholesale Res	New Retail Num	New Retail Den	New Retail Res	New Z-Score	New Party Score	Party Change	Delta Wholesale Result	Delta Retail Result
BUS	22	26	84.5%	4000	4678	85.5%	0.179	-0.891	24	26	92.3%	4195	4678	89.7%	-0.440	-1.267	NONE	7.7%	4.2%
CTX 21	2	2	100.0%	483	642	75.2%	-0.810	-1.493	2	2	100.0%	553	642	86.1%	-0.566	-1.344	NONE	0.0%	10.9%
DS0	2	2	100.0%	0	38	0.0%			2	2	100.0%	31	38	81.6%	-0.655	-1.388	NONE	0.0%	81.6%
E911	1	1	100.0%						1	1	100.0%						N/A	0.0%	N/A
EEL	17	20	85.0%						19	20	95.0%						N/A	10.0%	N/A
LINE SHARE	221	238	92.9%	44381	52712	84.2%	-3.655	-3.222	217	238	91.2%	46906	52712	89.0%	-1.077	-1.655	NONE	-1.7%	4.8%
LIS	55	55	100.0%	32	32	100.0%			55	55	100.0%	32	32	100.0%			N/A	0.0%	0.0%
MBIT	11	11	100.0%	3624	3635	99.7%	-0.182	-1.111	11	11	100.0%	3633	3635	99.9%	-0.078	-1.047	NONE	0.0%	0.2%
PBX	2	2	100.0%	82	89	92.1%	-0.409	-1.248	2	2	100.0%	84	89	94.4%	-0.341	-1.207	NONE	0.0%	2.2%
RES	492	534	92.1%	40381	48034	84.1%	-5.066	-4.080	493	534	92.3%	42711	48034	88.9%	-2.492	-2.515	NONE	0.2%	4.9%
UBL 2W_NL	111	114	97.4%	215	240	89.6%	-2.240	-2.362	109	114	96.6%	202	240	84.2%	-2.757	-2.676	NONE	-1.8%	-5.4%
UBL ANALOG	1073	1120	95.8%	14349	22680	63.3%	-22.049	-14.405	1079	1120	96.3%	16874	22680	74.4%	-16.423	-10.984	NONE	0.5%	11.1%
UBL DST	123	147	83.1%	1092	1195	91.4%	2.801	0.703	124	147	84.4%	1121	1195	93.8%	3.719	1.281	NONE	0.7%	2.4%
UBL ISDN	89	98	90.8%	215	240	89.6%	-0.337	-1.205	89	98	90.8%	202	240	84.2%	-1.520	-1.924	NONE	0.0%	-5.4%
UDF IOF	6	6	100.0%						6	6	100.0%						N/A	0.0%	N/A
UDF LOOP	1	1	100.0%						1	1	100.0%						N/A	0.0%	N/A
UDIT ABV_DS1	7	7	100.0%	49	53	92.5%	-0.710	-1.432	7	7	100.0%	52	53	98.1%	-0.345	-1.210	NONE	0.0%	5.7%
UDIT DS1	15	15	100.0%	1092	1195	91.4%	-1.182	-1.719	15	15	100.0%	1121	1195	93.8%	-0.989	-1.601	NONE	0.0%	2.4%
UNE_P CTX21	9	9	100.0%	483	642	75.2%	-1.709	-2.039	8	9	88.9%	553	642	86.1%	-0.237	-1.144	NONE	-1.1%	10.9%
UNE_P POTS	977	1043	93.7%	44381	52712	84.2%	-8.308	-6.051	982	1043	94.2%	46906	52712	89.0%	-5.277	-4.208	NONE	0.5%	4.8%
Totals	3236	3451	93.8%	154859	188817	82.0%			3246	3451	94.1%	165176	188817	87.5%				0.3%	5.5%

**PO-20 (Expanded) – Manual Service Order Accuracy – 07 Mar 03 Qwest Offer****Purpose:**

Evaluates the degree to which Qwest accurately processes CLECs' Local Service Requests (LSRs), which are electronically-submitted and manually processed by Qwest, into Qwest Service Orders, based on mechanized comparisons of specified LSR-Service Order fields and focusing on the percentage of manually-processed orders that are accurate/error-free.

**Description:**

Measures the percentage of manually-processed Qwest service orders that are populated correctly, in specified data fields, with information obtained from CLEC LSRs.

- Includes only service orders created from CLEC LSRs that Qwest receives electronically (via IMA-GUI or IMA-EDI) and manually processes in the creation of service orders, regardless of flow through eligibility, subject to exclusions specified below.
- Includes only service orders, from the product reporting categories specified below, that request inward line or feature activity (Change, New, and Transfer order types), are assigned a due date by Qwest, and are completed/closed in the reporting period. Change order types included in this measurement consist of all C orders with "I" and "T" action-coded line or feature USOCs.
- All service orders satisfying the above criteria and as specified in the Availability section below are evaluated in this measurement.
- A service order will be classified as "accurate" and thus counted in the numerator in the formula below when the mechanized comparisons of this measurement determine that the fields specified in the Service Order Fields Evaluated section below (when the source fields have been properly populated on the LSR) are all accurate on the service order.
  - Orders will be counted as being accurate if the contents of the relevant fields, as recorded in the completed service orders involved in provisioning the service, properly match or correspond to the information from the specified fields as provided in the latest version of associated LSRs.
  - Orders will not be considered to be inaccurate if they are also the subject of call center tickets counted in OP-5B and OP-5T as having new service problems attributed to service order errors.
  - Orders generated from LSRs receiving CFLAGs (Change Flags) will not be counted as inaccurate solely on the basis of LSR/service order mismatches that involve LSR fields for which Qwest's processes use CFLAGs to explain such mismatches.

**Reporting Period:** One month

**Unit of Measure:** Percent

**Reporting Comparisons:**  
CLEC Aggregate

**Disaggregation Reporting:**  
Regionwide

**Formula:**

$$\left[ \frac{\text{Number of accurate service orders}}{\text{Number of evaluated service orders completed in the reporting period}} \right] \times 100$$

**Exclusions:**

- Cancelled service orders.
- Orders generated from LSRs with non-fatal errors.
- Orders that cannot be matched to a corresponding LSR.

**Product Reporting:**

- Resale/UNE-P (POTS and Centrex 21)
- Unbundled Loops (Analog and Non-Loaded 2/4-wire, DS1 Capable, DS3 Capable, Ocn Capable, ADSL Compatible, XDSL-I Capable, ISDN-BRI Capable)

**Standard:**

95% Benchmark (only while both OP-5B and OP-5T are diagnostic; if not, the standard is diagnostic)

**Availability:**

- Phase 0 – PO-20(Old) (the first version using sampling of limited fields). (Available now)
- Phase 1 – PO-20(Expanded) Mechanized version (as defined herein). All qualifying orders

**Notes:**

1. Phase 1: Consists of all manually-processed, qualifying orders per product reporting category specified above, from throughout Qwest's 14-state local service region.

<p>completed during reporting period. (End of 2Q03, based on acceptance by end of Mar 03)</p> <ul style="list-style-type: none"> <li>• Phase 2 – Additional fields added. (End of 3Q03, based on acceptance by end of Mar 03)</li> <li>• Phase 3 – Additional fields added. (Date TBD, per feasibility assessments)</li> </ul>	<p>2. If feasible, Phases 2 and 3 may be combined and implemented together.</p>
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<b>LSR-Service Order Fields Evaluated</b>			
<b>Phase 1 – Date TBD – End of 2Q03</b>			
<b>Mechanized comparison of the fields from the Service Order to the LSR:</b>			
<b>Form</b>	<b>LSR Field Code</b>	<b>LSR Field Name</b>	<b>Remarks/Service Order Field:</b>
<b>LSR</b>	CCNA	Customer Carrier Name Abbreviation	CCNA field of LSR form compared to the RSID/ZCID field identifier in the Extended ID section of the Service Order.
	PON	Purchase Order Number	PON field of LSR form compared to the PON field in Bill Section of the Service Order.
	D/TSENT	Date and time sent	The D/TSENT field of LSR form from the Firm Order Manager, using applied business day cut-off rules and business typing rules, and compare to the APP (Application Date) used on the Service Order.
	CHC	Coordinated Hot Cut Requested	Applies only to Unbundled Loop. Validate that the installation USOC used on the Service Order matches the Coordinated Cut request. (Evaluated in conjunction with the TEST field to determine correct USOC.)
	TEST	Testing required	Applies only to Unbundled Loop. Validate that the installation USOC used on the Service Order matches the TEST request. (Evaluated in conjunction with the CHC field to determine correct USOC.)
	NC	Network Channel Code	Applies only to Unbundled Loop. NC field on the LSR form compared to provisioning USOC for CKL1 on the Service Order.
	NCI	Network Channel Interface Code	Applies only to Unbundled Loop. NCI field on the LSR form compared to provisioning USOC for CKL1 on the Service Order.
	SECNCI	Secondary Network Channel Interface Code	Applies only to Unbundled Loop orders. SECNCI field on the LSR form compared to the provisioning USOC for CKL2 on the Service Order.
<b>LSRC (FOC)</b>	DD	Due Date	DD field on LSRC (FOC) form compared to the original or subsequent due date in the Extended ID section on the Service Order based on the most recent version of the LSR.
<b>Resale or Centrex</b>	PIC	InterLATA Pre-subscription Indicator Code	PIC field on Resale or Centrex form compared to PIC populated on the "I" or "T" action lines in the Service and Equipment section of the Service Order. <i>Note:</i> LSR PIC = None; S.O. PIC = None
	LPIC	IntraLATA Pre-subscription Indicator Code	LPIC field on Resale or Centrex form compared to LPIC populated on the "I" or "T" action lines in the Service and Equipment section of the Service Order. <i>Note:</i> LSR LPIC = None; S.O. LPIC = 9199 LSR LPIC = DFLT; S.O. LPIC = 5123

<b>LSR-Service Order Fields Evaluated</b>			
<b>Phase 1 – Date TBD – End of 2Q03</b>			
<b>Mechanized comparison of the fields from the Service Order to the LSR:</b>			
<b>Form</b>	<b>LSR Field Code</b>	<b>LSR Field Name</b>	<b>Remarks/Service Order Field:</b>
<b>Resale or Centrex</b>	TNS	Telephone Numbers	Validate that all telephone numbers in the TNS fields in the Service Details section on the Resale or Centrex form requiring inward activity are addressed on the Service Order.
	FA/ FEATURE	Feature Activity/Feature Codes	When the FA = N, T, V Validate line and feature USOCs provided in the FEATURE field on the Resale or Centrex form are addressed with "I" and/or "T" action lines on the Service Order. Note: Comparison will be based on the USOCs associated with line and feature activity listed in the PO-20 USOC List posted on Qwest's public website, on the web page containing the current PID ( <a href="http://www.qwest.com/wholesale/results">www.qwest.com/wholesale/results</a> ). Qwest may add USOCs to the list, delete grand-fathered/ discontinued or obsolete USOCs, or update USOCs assigned to listed descriptions via providing notice in the monthly Summary of Notes and updating the list.
<b>LS</b>	ECCKT	Exchange Company Circuit ID	Applies to LSRs with ACT = C, M, or T. ECCKT field on the LS form compared to the CLS field in the Service and Equipment section of the Service Order.
<b>LS/ LSNP</b>	CFA	Connecting Facility Assignment	CFA field on the LS or LSNP forms compared to the CFA field used in CKL1 of the Service Order. (Verbal acceptance of CFA changes will be FOC'd and CFLAG'd, which will remove them from Service Order quality PID review eligibility.)
<b>DL – Directory Listings form (Evaluated only for Local Main Listings)</b>	LTY	Listing Type	LTY = 1 (Listed – appears in DA and the directory.) Validate that there is a LN in the List section of the Service Order. LTY = 2 (Non Listed – appears only in DA.) Validate that there is non listing instructions in the LN field in the List section of the Service Order. <b>Central/Western Region:</b> Validate that the left handed field is NLST and (NON-LIST) is contained in the NLST data field in the List section of the Service order. <b>Eastern Region:</b> Validate that the left handed field is NL and (NON LIST) is contained in the NL data field in the List section of the Service Order. LTY = 3 (Non Pub - does not appear in the directory and telephone number does not appear in DA.) Validate that there is non published instructions in the LN field in the List section of the Service Order. <b>Central/Western Regions:</b> Validate that the left handed field is NP and (NON-PUB) is contained in the NP data field in the List section of the Service Order. <b>Eastern Region:</b> Validate that the left handed field is NP and (NP LODA) or (NP NODA) is contained in the NP data field in the List section of the Service Order.

<b>LSR-Service Order Fields Evaluated</b>			
<b>Phase 1 – Date TBD – End of 2Q03</b>			
<b>Mechanized comparison of the fields from the Service Order to the LSR:</b>			
<b>Form</b>	<b>LSR Field Code</b>	<b>LSR Field Name</b>	<b>Remarks/Service Order Field:</b>
<b>DL – Directory Listings form (Evaluated only for Local Main Listings)</b>	TOA	Type of Account	Validate TOA entries: <ul style="list-style-type: none"> <li>• TOA valid entries are B or BP Validate that there is a semi colon (;) within the LN in the List section of the Service Order.</li> <li>• TOA valid entries are R or RP Validate that there is a comma (,) within the LN in the List section of the Service Order.</li> </ul> <b>Exception:</b> When LSR-TOS = 3, TOA review is Not Applicable. Handled by Complex Listing Group. Requires separate Service Order.
	DML	Direct Mail List	DML field = O on DL form; Service Order LN contains (OCLS).
	NOSL	No Solicitation Indicator	<b>Arizona Only</b> NOSL field = Y on DL form; Service Order LN contains (NSOL) (OCLS).
	TMKT	Telemarketing	<b>Colorado Only</b> TMKT field = O on DL form; Service Order LN contains (OATD). When both the DML and the TMKT fields are populated, DML validation applies.
	LNLN and LNFN	Listed Name	LNLN and LNFN fields on DL form compared to the LN field in the List section of the Service Order.
	ADI	Address Indicator	ADI = O on DL form; Service Order LA contains (OAD).
	LAPR	Listed Address Number Prefix	LAPR field of the Listing form compared to LA in the List section of the Service Order.
	LANO	Listed Address Number	LANO field of the Listing form compared to LA in the List section of the Service Order.
	LASF	Listed Address Number Suffix	LASF field of the Listing form compared to LA in the List section of the Service Order.
	LASD	Listed Address Street Directional	LASD field of the Listing form compared to LA in the List section of the Service Order.
	LASN	Listed Address Street Name	LASN field of the Listing form compared to LA in the List section of the Service Order.
	LATH	Listed Address Street Type	LATH field of the Listing form compared to LA in the List section of the Service Order.
	LASS	Listed Address Street Directional Suffix	LASS field of the Listing form compared to LA in the List section of the Service Order.
	LALOC	Listed Address Locality	LALOC field of the Listing form compared to LA in the List section of the Service Order.
Centrex	COS	Class of Service – Qwest Specific	Only applies to Resale and UNE-P (POTS and Centrex 21). COS field of the Centrex form compared to the CS field in the ID section of the Service Order.

<b>Phase 2 – Date TBD (Current estimate – End of 3Q03)</b>			
<b>LSR-Service Order Fields Evaluated</b>			
<b>Mechanized comparison of the fields from the Service Order to the LSR:</b>			
<b>Form</b>	<b>LSR Field Code</b>	<b>LSR Field Name</b>	<b>Remarks/Service Order Field:</b>
<b>LSR</b>	<b>DSPTCH</b>	<b>Dispatch</b>	Limited to Unbundled Loops where ACT = Z or V only. If DSPTCH field on the LSR form = Y, validate dispatch USOC in the Service and Equipment section of the Service Order.
	<b>DFDT</b>	<b>Desired Frame Due Time</b>	Applicable only to orders for Resale and UNE-P (POTS and Centrex 21) DFDT field on the LSR form compared to the FDT field in the Extended ID section of the Service Order.
<b>Centrex</b>	<b>LTC</b>	<b>Line Treatment Code</b>	Applies only to Centrex 21 LTC field numeric value on the Centrex form compared to the data following the CAT field for the Line USOC on the Service Order.

<b>Phase 3 – Date TBD (subject to establishing feasibility of implementation)</b>			
<b>LSR-Service Order Fields Evaluated</b>			
<b>Mechanized comparison of the fields from the Service Order to the LSR:</b>			
<b>Form</b>	<b>LSR Field Code</b>	<b>LSR Field Name</b>	<b>Remarks/Service Order Field:</b>
<b>DL – Directory Listings (Evaluated only for Local Main Listings)</b>	<b>DIRNAME</b>	<b>Directory Name</b>	DIRNAME field on the Listing form compared to the FDN field in the List section of the Service Order.
	<b>LTN</b>	<b>Listed Telephone Number</b>	For Resale and UNE-P (POTS and Centrex 21): LTN field on the Listing form compared to the Main Account Number of the Service Order.  For Unbundled Loop: LTN field on the Listing form compared to the TN floated after the LN in the Listing section of the Service Order.
	<b>LNPL</b>	<b>Letter Name Placement</b>	LNPL field on the Listing form = L, validate that LN on the Service Order follows letter placement versus word placement.
<b>Resale or Centrex</b>	<b>FEATURE DETAILS</b>	<b>Feature Details</b>	TBD, as proven feasible. Comparison would be based on the fields associated with the USOC list referenced under Feature Activity in Phase 1 above.

## **OP-5 (Expanded) – New Service Quality – 07 Mar 03 Qwest Offer**

***(The following proposed language is subject to final refinements identified during the implementation process. Such refinements will be cleared with the parties in Long-Term PID Administration before finalizing implementation.)***

### **Purpose:**

Evaluate the quality of ordering and installing new services, focusing on the percentage of newly-installed orders that are free of CLEC/customer reports of service-affecting problems within 30 calendar days following installation and focusing on the quality of Qwest's resolution of such problems.

### **Description:**

Measures two components of new service provisioning quality (OP-5A and -5B) and also reports a combined result (OP-5T), as described below, each as a percentage of all orders for new lines or circuits installed pursuant to service orders completed in the reporting period that are free of CLEC/customer reports of service-affecting problems as defined below. Also measures the percentage of all Qwest-caused, service-affecting problem reports that constitute multiple reports (i.e., additional Qwest-caused reports received following the first report) for the affected orders.

- Orders for new services considered in calculating all components of this performance indicator are all orders for inward lines/circuits for service-types specified herein that are installed pursuant to orders completed in the reporting period, including Change (C-type) orders for additional lines/circuits, subject to exclusions shown below. Change order types considered in these measurements consist of all C orders representing inward activity (with "I" and "T" action coded line/circuit USOCs).
- Orders for new service installations include conversions (Retail to CLEC, CLEC to CLEC, and same CLEC converting between products).
- Qwest-caused repair reports or call center tickets, as defined herein, do not include repair reports or call center tickets for lines/circuits that are validated as not having service problems both at time the reports are closed and by confirming no additional service problem for the same lines/circuits within 30 days following.

### **OP-5A: Installation Quality**

- Measures the percentage of orders for new service installations (lines/circuits) that are free of Qwest-caused repair reports<sup>NOTE 4</sup> within 30 calendar days of initial installation, subject to exclusions below.
- Repair reports are defined as maintenance tickets opened in Qwest's maintenance and repair management and tracking systems<sup>NOTE 1</sup> that are closed in the reporting period or the following month,<sup>NOTE 2</sup> subject to exclusions shown below.<sup>NOTE 3</sup>
- An order for new service is considered to be free of repair reports under OP-5A if there are no CLEC/customer-reported, Qwest-caused repair reports within 30 calendar days following the date of installation, including all reports received after the order is completed in Qwest's systems, such that repair reports can be generated in Qwest's maintenance and repair management and tracking systems.<sup>NOTE 1</sup>

### **OP-5B: Conversion and Day of Installation Quality**

- Measures the percentage of qualifying orders for new service installations (lines/circuits) that, during conversion or after conversion/installation up to the point at which repair reports covered under OP-5A are generated (typically, but not limited to, on the day of installation or soon thereafter, up to 30 days following installation), are free of valid CLEC reports of service-affecting problems, subject to exclusions shown below.
  - OP-5B considers service-affecting problems that are reported by the CLEC to the proper Qwest call center (as specified in Qwest's published procedures for reporting such problems) for which no valid repair report considered under OP-5A is generated in Qwest's maintenance and repair management and tracking systems.<sup>NOTE 1</sup>
  - Calls to centers are recorded by Qwest in the Call Center Database and are referred to herein as call center tickets.<sup>NOTE 3</sup>
- Qualifying orders for new line/circuit conversions are limited to those that, in addition to satisfying other criteria set forth herein, are requested in volumes that fit within the following criteria:<sup>NOTE 5</sup>
  - Conversions pursuant to orders for 25 or fewer lines/circuits per customer location on the same date of conversion; and
  - Conversions pursuant to orders for 100 or fewer lines/circuits per same CLEC per central office on the same date of conversion.
- An order for newly-installed or converted lines/circuits measured under OP-5B is considered to be

**OP-5 (Expanded) – New Service Quality (Continued)**

<p>free of valid reports of service-affecting problems if there are no CLEC-reported, Qwest-caused service-affecting problems that are reported to the proper Qwest call center (as specified in Qwest's published procedures for reporting such problems). <sup>NOTE 3</sup></p>	
<p><b>OP-5T: New Service Installation Quality Total</b></p> <ul style="list-style-type: none"> <li>Measures the percentage of orders for new service installations (lines/circuits) that are free of repair reports and day-of-installation/conversion outages or service-affecting problems reported to the call center.</li> <li>An order for new lines/circuits is considered to be problem-free in OP-5T, if there are no Qwest-caused, CLEC/customer-reported (1) repair reports within 30 days of installation, as defined under OP-5A or (2) service-affecting problem reports as defined under OP-5B.</li> </ul>	
<p><b>OP-5R: New Service Quality Multiple Report Rate</b></p> <ul style="list-style-type: none"> <li>Evaluates the quality of Qwest's responses to reports of problems for new service installations. This measurement reports, for those orders that were <i>not</i> free of call center tickets or repair reports in OP-5A or OP-5B, the percentage of problems affecting the same orders that were followed by additional reports of problems, as specified below. Such problems, as defined herein, are counted on a per-line or per-circuit basis.</li> <li>Measures the percentage of all repair reports and call center tickets considered in OP-5A and OP-5B that are additional repair reports or call center tickets received by Qwest for the same orders within 30 days of installation.</li> <li>Additional repair reports or call center tickets are defined as all such reports that are received following the first report (whether the first report is represented by a call center ticket or a repair report/ticket) of service-affecting problems relating to the same order within specified periods (per OP-5A and OP-5B) following the date of installation. In all cases, the reports/tickets counted are those that are Qwest-caused and CLEC-reported as defined for OP-5A and OP-5B above.</li> </ul>	
<p><b>Reporting Period:</b> One month, reported in arrears (i.e., results first appear in reports one month later than results for measurements that are not reported in arrears), in order to cover the 30-day period following installation.</p>	<p><b>Unit of Measure:</b> Percent</p>
<p><b>Reporting Comparisons:</b> CLEC aggregate, individual CLEC and Qwest Retail results</p>	<p><b>Disaggregation Reporting:</b> Statewide level</p>
<p><b>Formulas:</b></p> <p><b>OP-5A</b> = (Number of orders for new lines/circuits completed in the reporting period – Number of orders for new lines/circuits with any <u>repair reports</u> as specified above) ÷ (Number of orders for new lines/circuits completed in the reporting period) x 100</p> <p><b>OP-5B</b> = (Number of orders for new line/circuits completed in the reporting period – Number of orders for new line/circuits with any <u>service-affecting problems reported to call centers during conversion or following installation</u> as specified above) ÷ (Number of orders for new lines/circuits completed in the reporting period) x 100</p> <p><b>OP-5T</b> = ([Number of orders for new lines/circuits completed in the reporting period] – Number of orders for newly installed/converted lines/circuits with <u>repair reports or service-affecting problems as defined above under OP-5A or OP-5B, as applicable</u>) ÷ (Number of orders for new lines/circuits completed in the reporting period) x 100</p> <p><b>OP-5R</b> = (Number of all service-affecting problems covered by repair reports and call center tickets closed in the reporting period, as defined above under OP-5A or OP-5B, that constitute multiple repair reports or call center tickets, as defined herein, within 30 days of the installation date ÷ Number of all service-affecting problems covered by repair reports and call center tickets closed in the reporting period, as defined above under OP-5A or OP-5B) x 100</p>	
<p><b>Exclusions:</b> Applicable to OP-5A, OP-5B, OP-5T and OP-5R:</p> <ul style="list-style-type: none"> <li>Repair reports coded as follows: For products measured from MTAS data, repair reports coded to disposition codes for: Customer Action; Non-Telco Plant; Trouble Beyond the Network Interface; and</li> </ul>	

**OP-5 (Expanded) – New Service Quality (Continued)**

<p>Miscellaneous – Non-Dispatch, non-Qwest (includes CPE, Customer Instruction, Carrier, Alternate Provider;</p> <ul style="list-style-type: none"> <li>– For products measured from WFA (Workforce Administration) data, repair reports coded to codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).</li> <li>– For OP-5A only: repair reports coded to disposition codes for referral to another department (i.e., for non-repair ticket resolutions of non-installation-related problems, except cable cuts, which are not excluded).</li> </ul> <ul style="list-style-type: none"> <li>• Reports of problems attributable to CLEC or non-Qwest causes.</li> <li>• Repair reports or call center tickets related to orders captured as misses under measurements OP-13 (Coordinated Cuts Timeliness) or OP-17 (LNP Timeliness).</li> <li>• Subsequent repair reports of any trouble on the installed service before the original repair or service-affecting problem report is closed.</li> <li>• Orders closed in the reporting period with App Dates earlier than eight months prior to the beginning of the reporting period.</li> <li>• Information tickets generated for internal Qwest system/network monitoring purposes.</li> <li>• Disconnect, From (another form of disconnect) and Record order types.</li> <li>• Records involving official company services.</li> <li>• Records missing data essential to the calculation of the measurement as defined herein.</li> </ul> <p><u>Applicable to OP-5B, OP-5T and OP-5R:</u></p> <ul style="list-style-type: none"> <li>• Calls to call centers regarding service-affecting problems that occur as part of the normal process of conversion (i.e., while Qwest is actively and properly engaged in process of converting or installing the service). Calls regarding service-affecting problems involving orders that, at the time of the calls, have fallen out of the order flow or orders for which the D and the N order, as applicable, have become separated, will be considered as not in the normal process of conversion and will not be excluded.</li> </ul>	
<p><b>Product Reporting Categories:</b></p> <ul style="list-style-type: none"> <li>• As specified below – one percentage result reported for each bulleted category under the sub-measurements shown.</li> </ul>	<p><b>Standards:</b></p> <p><b>OP-5A:</b> <u>Parity with retail service</u> as specified below, until the month in which OP-5T begins to have a standard (see below); following which, "Diagnostic."</p> <p><b>OP-5B:</b> <u>Diagnostic</u></p> <p><b>OP-5T:</b> <u>Diagnostic for six months</u> following first reporting month.</p> <p><b>OP-5R:</b> Diagnostic for six months following first reporting month. After six months, the OP-5R standard will be diagnostic if the OP-5T standard is met.</p> <p>(Where parity comparisons involve multiple service varieties in a product category, weighting based on the retail analogue volumes may be used if necessary to create a comparison that is not affected by different proportions of wholesale and retail analogue volumes in the same reporting category.)</p>

**OP-5 (Expanded) – New Service Quality (Continued)**

<b>Product Reporting:</b>		<b>Standards:</b>
<b>Reported under OP-5A, OP-5B, OP-5T and OP-5R:</b>		
(Product categories may be combined as agreed upon by the parties in Long-Term PID Administration.)		
• Resale		
Residential single line service		Parity with retail service
Business single line service		Parity with retail service
Centrex		Parity with retail service
Centrex 21		Parity with retail service
PBX Trunks		Parity with retail service
Basic ISDN		Parity with retail service
Qwest DSL		Parity with retail service
Primary ISDN		Parity with retail service
DS0		Parity with retail service
DS1		Parity with retail service
DS3 and higher bit-rate services (aggregate)		Parity with retail service
Frame Relay		Parity with retail service
• Unbundled Network Element – Platform (UNE-P) (POTS)		Parity with like retail service
• Unbundled Network Element – Platform (UNE-P) (Centrex 21 )		Parity with retail Centrex 21
• Unbundled Network Element – Platform (UNE-P) (Centrex)		Parity with retail Centrex
• Shared Loop/Line Sharing		Parity with retail RES & BUS POTS
• Sub-Loop Unbundling		Diagnostic
• Unbundled Loops:		
Analog Loop		Parity with retail Res & Bus POTS with dispatch
Non-loaded Loop (2-wire)		Parity with retail ISDN BRI
Non-loaded Loop (4-wire)		Parity with retail DS1
DS1-capable Loop		Parity with retail DS1
ISDN-capable Loop		Parity with retail ISDN BRI
ADSL-qualified Loop		Parity with retail Qwest DSL with dispatch
Loop types of DS3 and higher bit-rates (aggregate)		Parity with retail DS3 and higher bit-rate services (aggregate)
<b>Reported under only OP-5T and OP-5R (per OP-5A specifications):</b>		
• LIS Trunks		• Parity with Feature Group D (aggregate)
• UDIT (DS1 Level & Above DS1 Level)		• Parity with Retail Private Lines (DS1 and Above)
• E911/911 Trunks		• Parity with Retail E911/911 Trunks
<b>Availability:</b> Available OP-5A Under Development: OP-5B: beginning with Jul 03 data on the Aug 03 report; OP-5T: beginning with Jul 03 data on the Aug 03 report.	<b>Notes:</b> 1. Qwest's repair management and tracking systems consist of WFA (Work Force Administration), MTAS (Maintenance Tracking and Administration System), and other repair systems, if any, as applicable to obtain the repair report data for this measurement. Not included are Call Center Database systems supporting call centers in logging calls from customers regarding problems or other inquiries (see OP-5B and OP-5T). 2. The "following month" includes also the period of a few business days (typically four or five) afterward, up to the time when Qwest pulls the repair data to begin processing results for this measurement. 3. Where valid reports of new service problems are reported on or after the day of installation after work completion is recorded in Qwest's systems (and, for conversions, after the conversion process is reported as complete), and repair reports are thus not generated in Qwest's repair management and tracking	

	<p>systems (see Note 1 above), call center tickets documenting the CLEC report of trouble will be used to capture these situations and reported under OP-5B.</p> <ol style="list-style-type: none"><li data-bbox="459 310 1463 464">4. Including consideration of repeat repair reports (i.e., additional reports of trouble related to the same newly-installed line/circuit that are received after the preceding repair report is closed and within 30 days following the preceding repair report) to complete the determination of whether the newly-installed line/circuit was trouble free within 30 days of installation.</li><li data-bbox="459 468 1471 590">5. Conversions of any volume (such as mass migrations involving the same CLEC), for which Qwest and CLEC agree, in advance, to longer-than-standard due date intervals that provide sufficient notification for Qwest to successfully manage conversion outage intervals, will not be subject to this limitation.</li></ol>
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