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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

JUL - 2 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WC Docket No. 02-148  
Qwest Communications International Inc.  
Consolidated Application for Authority to Provide  
In-Region, InterLATA Services in Colorado, Idaho, Iowa,  
Nebraska and North Dakota

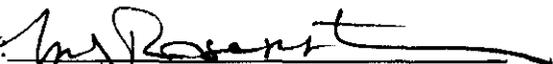
Dear Ms. Dortch:

Submitted herewith on behalf of Qwest Communications International Inc. is a redacted version of the Errata, filed as a confidential submission on June 28, 2002, to the above-referenced application. In the attached submission, confidential documents have been redacted for public inspection.

We also have enclosed an additional copy of this letter to be stamped as received and returned *via* our courier. Please direct questions concerning this submission to the undersigned.

Respectfully submitted,  
Hogan & Hartson L.L.P.

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By: 

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International Inc.

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HOGAN & HARTSON L.L.P.

Marlene H. Dortch, Secretary

June 28, 2002

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Enclosures

cc: Janice Myles

Nancy Goodman

Qualex International

Colorado Public Utilities Commission

Idaho Public Utilities Commission

Iowa Utilities Board

Nebraska Public Service Commission

North Dakota Public Service Commission

**ATTACHMENT 1**

**Revised Exhibit LN-OSS-22 (Qwest Manual Order Entry Performance Indicator Description Adequacy Study) for inclusion in the Notarianni/Doherty OSS Declaration, Application Attachment 5, Appendix A**

**Qwest Manual Order Entry  
Performance Indicator Description  
Adequacy Study**



June 11, 2002

## Background

During the ROC OSS test, Hewlett-Packard (HP) Consulting, acting as the Pseudo-CLEC (P-CLEC), submitted a variety of orders that resulted in manual handling by reps in Qwest's Service Centers. These manually handled orders can be grouped into three general categories: orders entered manually that are designed to be processed manually; orders entered electronically that are designed to be processed manually (non-flow through); and, orders entered electronically that are designed to flow through, but that actually fell out for manual handling.

HP Consulting noted through Observations and Exceptions that many of these manually handled orders were not correctly processed by Qwest reps. Qwest researched the orders questioned in the Observations and Exceptions, and, in many cases, represented that the rep had made an error.

The number of instances in which Qwest asserted rep error caused KPMG Consulting to write an Observation questioning whether Qwest's training of reps is effective. Qwest responded by enhancing its training materials, programs and processes, and by proposing additional performance measures that might help monitor certain aspects of manual order handling.

KPMG Consulting conducted a review of Qwest's enhanced rep training, and became satisfied that, if properly executed, the revised training regime could operate to reduce the likelihood of rep error. However, due to a decision taken by the ROC Steering Committee, no transaction retesting was performed of the changes and improvements made by Qwest. Therefore KPMG Consulting was not able to determine if the changes made by Qwest were effective in actually reducing the number of rep errors.

The ROC Steering Committee expressed a strong desire to see that adequate performance measures are in place to monitor manual order handling on a going-forward basis. Accordingly, the Steering Committee sponsored an MTP Change Request that directed KPMG Consulting to conduct this study of the adequacy of existing and proposed performance measures related to manual order handling.

## Objective

The primary objective of this study is for KPMG Consulting to express a professional opinion on the adequacy of existing and proposed performance measures to monitor the effectiveness of manual order handling by Qwest. In addition, we are to propose any revisions to existing performance measures, or additional performance measures, that would strengthen the tools for monitoring manual order processing performance.

KPMG Consulting is on record as stating that, in our professional opinion, definition of performance measures is best conducted in a public forum using due process. However, we have agreed to express our professional opinion on the adequacy of performance measures in this area in order to satisfy the express

wishes of the Steering Committee. The opinions expressed herein do not constitute statements of fact, and do not carry the weight of findings such as those contained in our Final Report on the ROC OSS test.

## Approach

KPMG Consulting used the following approach to accomplish the objectives of this study

- Identify the interactions and communications between Qwest and the CLEC for manually handled orders;
- Identify the aspects of those interactions and communications that would be impacted by rep errors;
- Determine what types of performance measures would reflect the impact on CLECs of errors made by reps;
- Determine whether or not existing or proposed measures cover these potential measures; and
- Determine what changes to existing measures, or additional measures, if any, might be appropriate.

In thinking about our approach, KPMG Consulting also made the determination that the primary focus of this review should be on the manual order entry aspects of the manual order process, to the exclusion of downstream activities such as provisioning that are not unique to manually handled orders.

## Opinion

Below we present our professional opinion by discussing the timeliness and accuracy aspects of manual order handling. By timeliness we mean either the timely transmission of the response to the CLEC, or the timely performance of activities by Qwest. By accuracy we mean either that the response is well formed, per the business rules, with no fields or field values missing, incorrect or superfluous, or that the activity performed by Qwest was done according to specifications.

In some cases, we also comment on the minimum level of disaggregation in reporting that we deem appropriate.

Because KPMG Consulting did not conduct the Metrics Audit for the ROC OSS test, we express no opinion on whether or not existing measures, as implemented, actually accomplish their objective as stated in the PID.

## Functional Acknowledgements

There are currently no performance measures for timeliness or accuracy of Functional Acknowledgements of manually submitted orders. In our opinion, it is important that a CLEC receive positive acknowledgement from Qwest of the receipt of all orders so that there is no question as to whether or not Qwest is

working the order. Important time can be lost if the order is not being processed by Qwest, and neither party is aware of that fact.

#### *Timeliness*

KPMG Consulting proposes that a benchmark standard be established that articulates the target timeframe for sending Functional Acknowledgements for manually submitted orders, and defines a percentage of manually submitted orders that must be acknowledged within the timeframe. KPMG Consulting has no specific recommendations on levels of disaggregation for the proposed measure.

#### *Accuracy*

KPMG Consulting proposes that a benchmark accuracy standard be established for Functional Acknowledgements of manually submitted orders that defines the percentage of manually submitted orders that must receive an accurate Functional Acknowledgement. KPMG Consulting has no specific recommendations on levels of disaggregation for the proposed measure.

#### Errors

It is important that a CLEC receive prompt notification of any errors that exist in submitted orders. It is also important that a CLEC not be told that an order is in error if it is, in fact, correct because of the potential waste of resources in erroneously investigating a non-problem, and the potential for delay that may be introduced in processing the order.

#### *Timeliness*

The existing PO3 measure seems to address the intervals associated with LSR Rejection Notices, and calls for disaggregation in reporting that includes both LSRs received manually, and those received electronically but handled manually.

KPMG Consulting has no suggested changes to either the timeliness aspects of this measure, or its levels of disaggregation.

#### *Accuracy*

There are currently no performance measures that address the accuracy of LSR Rejection Notices. KPMG Consulting proposes that a benchmark standard be established that sets forth the percentage of LSR Rejection Notices that must be accurate. We would further suggest that reporting for this measure be disaggregated to reflect the levels of performance of both manually submitted orders, and electronically submitted orders that fall out for manual handling.

#### FOCs

FOCs provide a CLEC with an indication that the order contains no errors, and that the order will be processed.

### *Timeliness*

The current performance measure PO5 seems to address timeliness of FOCs. KPMG Consulting has no additional suggestions for this measure, or its levels of disaggregation.

### *Accuracy*

Other than the fields required to match the FOC with the LSR (e.g., PON), FOCs do not contain any information of significance except for the committed due date. Therefore, KPMG Consulting does not believe that any measures for FOC accuracy are required. See our opinion below for our comments on due date issues.

### Due Dates

CLECs request due dates on orders submitted to Qwest. Qwest communicates committed due dates back to CLECs in the body of FOCs, and subsequently amends those expectations, when required, through subsequent notifiers.

It is KPMG Consulting's opinion that errors made by reps in entering order information can result in orders not being fulfilled on time. At the same time, KPMG Consulting recognizes that other Qwest personnel can make errors, and that these errors may also result in the order not being fulfilled on time. Indeed, both types of errors can compound one another.

KPMG Consulting also recognizes that it is not possible for a CLEC or regulator to determine the root cause of Qwest's failure to meet the due date committed to in the FOC. Neither is it possible for a CLEC or regulator to determine, for manually handled orders, whether or not some or all of the reason for a delay was caused by a rep error.

Nevertheless, KPMG Consulting believes that monitoring due date performance by Qwest, with levels of disaggregation that reflect the previously discussed three alternative paths to manual order handling, is of utmost importance. Accordingly KPMG Consulting makes the following recommendations with respect to due dates:

### *Timeliness*

CLECs set customer expectations for due dates based upon the dates returned by Qwest in the FOC. The timeliness of service delivery is very important if CLECs are to maintain satisfactory relationships with their customers.

OP3 (Installation Commitments Met) and OP4 (Average Installation Interval) currently measure different aspects of the timeliness of service delivery. The measures disaggregate by "product," and by dispatches within/without MSA and no dispatch. KPMG Consulting recommends that additional levels of disaggregation be reported for these two measures that reflect the following three categories: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

### *Accuracy*

Qwest publishes a Standard Interval Guide (SIG) that helps set CLEC expectations for the intervals associated with different service delivery scenarios. In addition, CLECs can request, through pre-order queries, more specific due date availability information on a per-order basis.

However, events can transpire in the normal course of business such that Qwest cannot perform at a level that is consistent with either the SIG, or the information provided in the pre-order response. In these cases, the due date returned to the CLEC may differ from both the SIG, and the pre-order query.

CLECs rely on the SIG and/or the pre-order queries to plan their business activities, and to help establish the requested due dates submitted in orders. KPMG Consulting is aware that Qwest offers these two tools only as guidelines, and further represents that the date returned in the FOC is the date that should be used by CLECs to set customer expectations.

However, KPMG Consulting is of the opinion that the relationship between the SIG/query intervals, and the actual committed-to interval implied by the FOC due date, is important to monitor so that a material divergence between the two does not exist for an extended period of time.

Accordingly, KPMG Consulting proposes that a new diagnostic performance measure be established that measures the percent of FOC due dates that fall within the interval published in the SIG. KPMG Consulting recommends that the three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Another issue associated with the FOC due date is the number of times that a due date is changed by Qwest after the FOC is issued. OP15 (Number of Due Date Changes per Order) is designed to measure this, but does not include any levels of disaggregation. KPMG Consulting recommends that three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

### Service Order Accuracy

Many of the errors a rep can make will result in differences between what was ordered by the CLEC, and what was contained in Qwest's internal Service Orders. Therefore, KPMG Consulting recommends that a benchmark standard be established that reports the percent of Qwest Service Orders that are completely consistent with the LSR received from the CLEC, and establishes the percentage of Services Orders that must be consistent with their related LSRs.

KPMG Consulting also recommends that three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

## Summary

In summary, KPMG Consulting proposes the following:

- Change PIDS OP-3, OP-4 and OP-15 to add disaggregations for:
  - Manually submitted orders;
  - Electronically submitted orders that fall out; and
  - Electronic submitted orders that flow through.
- Define new PIDS for:
  - Functional Acknowledgements of manually submitted orders;
  - Accuracy of LSR Rejection Notices;
  - Conformance of FOC due dates with the SIG; and
  - Service Order Accuracy.

**ATTACHMENT 2**

**Revised CLEC Participation Document and Associated Spreadsheet for inclusion in Application Attachment 5, Appendix G**

In light of the investigations underway in several states into Qwest's disclosure of agreements signed with Eschelon Telecom Inc., Covad Communications Inc., and McLeod USA (the CLECs), KPMG Consulting conducted a review of the Draft Final Report in order to identify specific test sections that contain conclusions that were based, in whole or in part, on representations, information, or data obtained from, or provided by the CLECs.

The results of that analysis were discussed with the ROC Steering Committee on Monday May 6, 2002, and with the ROC TAG on Thursday May 9, 2002. On the TAG call AT&T requested that KPMG Consulting revise its documents to reflect the participation of an expanded list of CLECs. KPMG Consulting agreed to do so.

Ms. Mary Tribby of AT&T provided KPMG Consulting with that expanded list via email on Friday, May 10, 2002. The additional CLECs include: Arch Communications Group; e.spire; GST Telecom; Nextel; US Link/Info Tel; VoiceStream; Western Wireless; and, WorldCom.

WorldCom requested that KPMG Consulting answer certain written questions about our CLEC Participation review. KPMG Consulting submitted its written answers to WorldCom's questions on May 22, 2002. During the hearings held in Washington during the week of June 3, 2002, WorldCom further requested that KPMG Consulting revise its written answers to the WorldCom's questions to reflect the participation of the additional CLECs. KPMG Consulting agreed to do so.

KPMG Consulting has revised its original Word document to reflect the history of this issue, and has also revised the companion Excel Workbook to reflect the additional information required to describe the participation of the additional CLECs.

In our original Word document, KPMG Consulting made no assertion as to the accuracy or completeness of the information provided to us by the participating CLECs. We affirm that statement. KPMG Consulting did not audit information provided to us by the participating CLECs, except to compare the information provided with corresponding information available from Qwest, when appropriate.

In addition, in our original Word document KPMG Consulting made no assertion as to whether or not the information received from the CLECs is representative of the "typical" CLEC experience. We also affirm that statement. KPMG Consulting made no attempt to investigate whether or not the information provided by one of the participating CLECs was consistent with information held by other CLECs.

KPMG Consulting is not aware of any evidence that suggests that Qwest has given preferential treatment to any of the participating CLECs in a manner that would undermine the credibility of the information relied upon by KPMG Consulting.

Upon review, the evaluation criteria presented in the Final Report fall into three categories with regard to reliance on information obtained from the CLECs:

- “No Reliance.” -- no CLEC participation was required, or utilized, as a data point for drawing conclusions in the Final Report. This category represents the vast majority of the evaluation criteria contained in the Final Report.
- “Partial Reliance.” -- CLEC representations, information or data was used as one data point among many. For example, in evaluating the ISC help desk, KPMG Consulting interviewed several CLECs, monitored HPC’s observations and exceptions, interviewed the P-CLEC, conducted on-site inspections of the ISC and reviewed relevant documentation. In these cases, the representations made by any individual CLEC were simply one of several inputs used by KPMG Consulting to draw its conclusions. Attached is a list of evaluation criteria, by number, that qualify for this category.
- “Substantial Reliance.” – CLEC representations, information or data was used as the primary source used by KPMG Consulting in drawing its conclusions. Attached is a list of evaluation criteria, by number, that fall into this category.

In addition, in the attached we describe seven other uses of CLEC information during the tests.

**CLEC Participation  
Qwest 271 OSS Evaluation**

Test Number	Criterion	Evaluation Criteria	Comments
12	12-5-1	Qwest systems or representatives provide required order transaction functionality.	Information on functionality of submission of UDIT orders were one of many inputs considered in KPMG Consulting's analysis
12	12-11-2	Product and feature offerings are comparable for both retail and wholesale services.	KPMG Consulting considered CLEC input in the evaluation of this criterion. However, CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation.
12	12-11-3	Pre-Order and Order capabilities are functionally equivalent for both retail and wholesale services.	same as 12-11-2
12.7	12.7-1-1	The end-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders.	KPMG Consulting considered CLEC input in the evaluation of this criterion. However, CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation.
12.7	12.7-1-2	The loop qualification query process is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-3	Processes and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments.	same as 12.7-1-1
12.7	12.7-1-4	The internal process flow used for loop qualification is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-5	Qwest contact information is readily available for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-6	The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications.	same as 12.7-1-1
12.7	12.7-1-7	Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address.	same as 12.7-1-1
12.7	12.7-1-8	Loop qualification response types that are provided are consistent between retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-9	The escalation process for loop qualifications is consistent for retail and wholesale customers.	same as 12.7-1-1

**CLEC Participation  
Qwest 271 OSS Evaluation**

12.7	12.7-1-11	Loop qualification performance measurement processes are consistent for retail and wholesale operations.	same as 12.7-1-1
14	14-1-6	Qwest provisions High Capacity circuits by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and that the loop characteristics met the technical specifications for the intended service. One CLEC participated in this test.
14	14-1-7	Qwest provisions Loop Migrations (Hot Cuts) by adhering to documented method and procedure tasks.	KPMG testers independently verified that the Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. One CLEC participated in this test.
14	14-1-15	Qwest provisions Analog Loops by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. Two CLECs participated in this test.
14	14-1-18	Qwest meets the performance benchmark for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two CLECs.
14	14-1-22	Qwest meets the performance benchmark for PID OP- 8B – Number Portability Timeliness for LNP Loops with Coordination.	KPMG testers independently verified that LNP Loops with Coordination were installed on committed due date/time. One CLEC provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.
14	14-1-23	Qwest meets the performance benchmark for PID OP- 8C – Number Portability Timeliness for LNP Loops without Coordination.	KPMG testers independently verified that LNP Loops without Coordination were installed on committed due date/time; several CLECs provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.
14	14-1-24	Qwest meets the performance benchmark for PID OP-13A – Coordinated Cuts on Time – Unbundled Loop.	KPMG testers independently verified that Coordinated Cuts of Unbundled Loops were installed on the committed due date/time. One CLEC provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.

**CLEC Participation  
Qwest 271 OSS Evaluation**

14	14-1-26	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for DS1 Loops.	KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One CLEC participated in this evaluation. The PID calculation included commercial observations and test bed accounts.
14	14-1-28	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for DS1 Loops	KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One CLEC participated in this evaluation. The PID calculation included commercial observations and test bed accounts.
14	14-1-29	Qwest meets the parity performance requirements for PID OP-5 – New Service Installation Quality All Products.	KPMG Consulting used data from Qwest on trouble history logs for several participating CLECs.
17	17-1-1	The user is able to enter a trouble report into EB-TA and receive a satisfactory response for at least 95% of transactions.	KPMG Consulting examined a participating CLEC's JIA and EBTA interface to evaluate the system's functionality and performance. KPMG Consulting designed the test cases, directed the CLEC as the test instances were entered, and based its evaluation on direct observation of the performance of the EBTA interface.
17	17-1-2	The user is able to request trouble report status from EB-TA and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-3	The user is able to add trouble information to an EB-TA trouble report and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-4	The user is able to modify trouble administration information on an EB-TA trouble report and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-5	The user is able to cancel a trouble report in EB-TA and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-6	The user is able to respond to trouble repair completion notifications and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-7	The user is able to conduct a Mechanized Loop Test (MLT) and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1

**CLEC Participation  
Qwest 271 OSS Evaluation**

17	17-1-8	The functionality of the wholesale trouble reporting system is comparable to the functionality of the retail trouble reporting system.	same as 17-1-1
18	18-1-1	Out-of-service trouble reports on wholesale services specified in PID MR-3 that require the dispatch of a technician are cleared within 24 hours.	KPMG observed employees from one CLEC initiate trouble reports and examined the corresponding Qwest trouble ticket. Results were incorporated into the calculation of this PID.
18	18-1-2	Out-of-Service trouble reports on wholesale services specified in PID MR-3 that do not require the dispatch of a technician are cleared within the defined interval.	same as 18-1-2
18	18-2-1	Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that require the dispatch of a technician are cleared within 48 hours.	same as 18-1-2
18	18-2-2	Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that do not require the dispatch of a technician are cleared within 48 hours.	same as 18-1-2
18	18-4-1	The mean time to restore wholesale services specified in PID MR-6 that require the dispatch of a technician is equal to or less than retail services.	same as 18-1-2
18	18-4-2	The mean time to restore wholesale services specified in PID MR-6 that do not require the dispatch of a technician is equal to or less than retail services.	same as 18-1-2
18	18-5-1	Repair of wholesale services specified in PID MR-9 that require the dispatch of a technician are made by the appointment date and time.	same as 18-1-2
18	18-5-2	Repair of wholesale services specified in PID MR-9 that do not require the dispatch of a technician are made by the appointment date and time.	same as 18-1-2
19.6	19.6-1-13	Procedures for CLEC retransmission requests are documented.	CLEC input was used to corroborate KPMG Consulting's findings.
19.6	19.6-1-14	CLECs can readily check the status of retransmission requests.	same as 19.6-1-13
20	20-2-2	Recurring rates on UNE bills are consistent with applicable tariffs and/or contract rates.	Data from UDIT orders billed to participating CLEC represented a very small subset of charges that were validated.

CLEC Participation  
Qwest 271 OSS Evaluation

20	20-2-5	Non-recurring rates on UNE bills are consistent with applicable tariffs and/or contract rates.	same as 20-2-2
20	20-2-14	Calculations on UNE bills correspond with tariff and/or published definitions.	same as 20-2-2
20	20-3-1	Wholesale bill completeness as defined by PID BI-4A, is in parity with retail bill completeness.	same as 20-2-2
20	20-3-3	Wholesale bill accuracy as defined by PID BI-3A, is in parity with retail bill accuracy.	same as 20-2-2
24.6	24.6-2-4	Interface specifications that define applicable business rules, data formats/definitions and transmission protocols are made available to customers.	KPMG Consulting conducted interviews with one CLEC to understand any issues and concerns with Qwest's MEDIACC EB-TA interface development processes. Information obtained during interviews was just one of several data points used in the analysis and determination of results.
24.6	24.6-2-5	On-call customer support for interface specifications is provided.	same as 24.6-2-4
24.6	24.6-2-7	Qwest has a documented methodology for conducting carrier-to-carrier testing with customers seeking to interconnect.	same as 24.6-2-4
24.6	24.6-2-8	A functional test environment is made available to customers for all supported interfaces.	same as 24.6-2-4
24.6	24.6-2-9	Carrier-to-carrier test environments are available and segregated from Qwest production and development environments.	same as 24.6-2-4
24.6	24.6-2-10	On-call customer support for interface testing is provided.	same as 24.6-2-4
24.6	24.6-2-11	Carriers are provided with documented specifications for active test environments.	same as 24.6-2-4
24.6	24.6-2-12	Active test environments are managed to version control. Carriers are notified before changes are made to active test environments.	same as 24.6-2-4
24.6	24.6-2-13	Procedures are defined to log software "bugs," errors, and omissions in specifications and other issues discovered during carrier-to-carrier testing.	same as 24.6-2-4
24.6	24.6-2-16	Business rules and software change tracking tools exist, are updated, and are shared with customers.	same as 24.6-2-4
24.6	24.6-2-20	Defects and required changes are identified and tracked during pre-production testing.	same as 24.6-2-4

### Substantial Reliance

Test Number	Criterion	Evaluation Criteria	Comments
14	14-1-9	Qwest provisions ADSL Line Sharing circuits by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. KPMG testers observed circuits from one CLEC.
14	14-1-21	Qwest meets the performance benchmark for PID OP-4A, B, D, & E – Installation Interval for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one CLEC. Data for other products was gathered from several participating CLECs.
14	14-1-25	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.	same as 14-1-21
14	14-1-27	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for All Products.	same as 14-1-21

**Other Reliance**

<b>Test Number</b>	<b>Criterion</b>	<b>Evaluation Criteria</b>	<b>Comments</b>
18.7	N/A	None	KPMG Consulting conducted interviews with one CLEC to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
18.8	N/A	None	same as 18.7
23	N/A	None	KPMG Consulting conducted interviews with CLECs to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
24.3	N/A	None	same as 23
24.4	N/A	None	same as 23
24.5	N/A	None	KPMG Consulting conducted interviews with one CLEC to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
24.7	N/A	None	same as 23

## Substantial Reliance

Test Number	Criterion	Evaluation Criteria
14	14-1-9	Qwest provisions ADSL Line Sharing circuits by adhering to documented method and procedure tasks.
14	14-1-21	Qwest meets the performance benchmark for PID OP-4A, B, D, & E – Installation Interval for All Products.
14	14-1-25	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.
14	14-1-27	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for All Products.

Comments
KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. KPMG testers primarily observed circuits from one of the three CLECs.
Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two of the three as well as other participating CLECs.
Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two of the three as well as other participating CLECs.
Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from all three CLECs as well as other participating CLECs.

In light of the investigations currently underway in Minnesota, Arizona, Oregon, New Mexico, Iowa and Utah into Qwest's disclosure of agreements signed with Eschelon Telecom Inc., Covad Communications Inc., and McLeod USA (the three CLECs), KPMG Consulting conducted a review of the Draft Final Report in order to identify specific test sections that contain conclusions that are based, in whole or in part, on representations, information, or data obtained from, or provided by the three CLECs. The following document describes the results of that review.

First, KPMG Consulting makes no assertion as to the accuracy or completeness of the information provided by the three CLECs. Second, KPMG Consulting makes no assertion as to whether or not the information received from the three CLECs is representative of the "typical" CLEC experience, given the preferential treatment the three CLECs may have received from Qwest.

Upon review, the evaluation criteria presented in the Draft Final Report fall into three categories with regard to reliance on information obtained from the three CLECs:

- "No Reliance." -- no CLEC participation was required, or utilized, as a data point for drawing conclusions in the Draft Final Report. This category represents the vast majority of the evaluation criteria contained in the Draft Final Report.
- "Partial Reliance." -- CLEC representations, information or data was used as one data point among many. For example, in evaluating the ISC help desk, KPMG Consulting interviewed several CLECs, monitored HPC's observations and exceptions, interviewed the P-CLEC, conducted on-site inspections of the ISC and reviewed relevant documentation. In these cases, the representations made by any individual CLEC were simply one of several inputs used by KPMG Consulting to draw its conclusions. Attached is a list of evaluation criteria, by number, that qualify for this category.
- "Substantial Reliance." -- CLEC representations, information or data was used as the primary data point used by KPMG Consulting in drawing its conclusions. Attached is a list of evaluation criteria, by number, that fall into this category.

In addition, in the attached we describe four other uses of CLEC information during the tests. KPMG Consulting would be happy to discuss this situation, and to provide further information about the potential impact of this disclosure on the test as required.

**Other Reliance**

<b>Test Number</b>	<b>Criterion</b>	<b>Evaluation Criteria</b>
18.7	N/A	None
18.8	N/A	None
23	N/A	None
24.5	N/A	None

**Comments**

KPMG Consulting conducted interviews with one of the three CLECs as well as two others to gather feedback pertaining to Qwest M&R work center interactions and experiences. KPMG Consulting used the information learned to place appropriate focus on those M&R work center process areas for which CLECs reported negative experiences

same as 18.7

KPMG Consulting conducted interviews with one of the three CLECs to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.

KPMG Consulting conducted interviews with one of the three CLECs to understand CLEC training issues and concerns. None of the information obtained during the interviews was used to support conclusions reflected in the final report.