

Arizona §271 Test



# **Qwest/Eschelon OP-5 Data Reconciliation Report**

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**Prepared For:**

*Arizona Corporation Commission*

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## Executive Summary

On July 30-31, 2002, the Arizona Corporation Commission (ACC) held a workshop to address comments and concerns raised by Eschelon Telecom, Inc. (Eschelon) on Qwest's compliance with § 271. At the workshop Eschelon provided performance measurement results it had calculated independently of the data used by Qwest with the reported results significantly lower than the result reported by the ILEC. Eschelon is a unique competitor because it is only one of two CLECs to order UNE-Star. Eschelon orders also require manual handling more frequently than other CLECS because it orders UNE-P Centrex in higher volumes than other CLECs.

The Commission Staff and its consultants, Doherty and Company, Inc (DCI), requested that CGE&Y collect trouble ticket information from Eschelon for orders completed in May 2002 and reconcile that data with the information contained in Qwest's adhoc data. The purpose of this effort was to determine if Qwest's published OP-5 result is accurately reflecting the performance observed by Eschelon.

CGE&Y identified several issues during the comparison of the Eschelon provided data and the Qwest provided adhoc data that indicated Qwest is not calculating OP-5 in strict accordance with the PID 7.0, and moreover, the OP-5 calculation as defined in the PID is not completely representative of all troubles CLECs experience in relation to a new installation. (See Sections 2-4)

CGE&Y found that Qwest is failing to include eligible repeat reports, troubles reported before LMOS has been updated with the new service order information, and troubles on lines within 30 days of an inward installation but after a subsequent invalid order type in OP-5. CGE&Y also found that Qwest inappropriately includes troubles that are not within 30 days of an inward installation because LMOS cannot differentiate between orders with or without an inward activity.

In addition, the data reconciliation uncovered inherent differences between the information captured by a CLEC and the performance data captured by Qwest that prevents the CLEC from recalculating the OP-5 PID from its own data. Specifically, trouble situations experienced by a CLEC relating to a new installation are not captured as trouble tickets readily available for inclusion into Qwest's OP-5 calculation. (See Sections 3 & 4) These situations included outages on the day of installation, incorrectly typed service orders resulting in the provision of services not per the LSR.

- In addition, CGE&Y found cases of disposition discrepancies between Eschelon's data and the Qwest adhoc data. Specifically, CGE&Y identified cases where troubles appeared to be coded to the responsibility of the wrong party.

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CGE&Y also found troubles classified as the incorrect carrier as a result of the trouble being reported before LMOS was updated.

CGE&Y's analysis of the trouble ticket information provided by Eschelon and the Qwest adhoc data indicates that result obtained from Qwest's published performance reports for the period May 1 – June 30, 2002 of 92.17% does not reflect the true service quality per PID 7.0. In fact, CGE&Y determined the true PID 7.0 result for Eschelon for this time period was between 87.37% and 88.26%, depending on whether CGE&Y's disposition determinations are used or not. CGE&Y's results are not as low as what was reported by Eschelon for April 2002, 40.7%. CGE&Y finds that this is likely due to Eschelon not being aware of the disposition of troubles in the MTAS data and whether the lines on which the troubles occurred experienced an inward installation activity.

CGE&Y's recommended OP-5A, which counts only the first Qwest-responsible installation-related trouble and adjusted disputed dispositions indicated a 91.64% installation service quality. When the measure is expanded to include service disruptions on the day of installation and order-writing inaccuracies, service installation quality would be further reduced to an estimated 87.19%, CGE&Y's proposed OP-4D. Qwest's retail results for the combined period May and June are 85.34% and adjusted to 86.84% when only service orders with inward activity are considered, as per the PID.

CGE&Y made the following recommendations to remedy the deficiencies discovered during the data reconciliation:

- 83 troubles coded as OP-5 eligible by either Qwest or CGE&Y, Qwest coded 61% (51) incorrectly. CGE&Y recommends that Qwest implement a process to correct the tickets coded in error prior to the release of their regulatory reports.
- The inclusion of repeat repair reports in OP-5, does not represent subsequent installation errors, but instead reflects Qwest's failure to clear the trouble the first time. Repeat repair reports are indicative of the quality of Qwest's maintenance and repair services, and are already reflected in the MR-7 measure, "Repair Repeat Report Rate". CGE&Y recommends that repeat Reports Should be Excluded From OP-5.
- Disaggregation of the current OP-5 measure to include the following installation related errors: Redacted current PID version of OP-5; Redactedvice disruptions – day of installation; Redactedvice order accuracy; and Redactedrall installation quality. CGE&Y recommends that OP-5D measure the total percentage of new installations without a trouble or customer affecting condition experienced within the first 30 days of installation (an aggregation of OP5-A, B, C, and D).

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- According to Qwest, it is implementing a fix to correct for various LMOS restrictions preventing the correct assigning of the installation indicator. CGE&Y recommends that this fix be implemented immediately and audited for accuracy.
- CGE&Y recommends that Qwest identify and tracks error conditions as the result of LMOS limitations and incorporate them to the OP-5 measure prior to the release of the regulatory reports.
- Qwest should not consider tickets excluded from MTAS when assigning the installation indicator to later tickets on the same line. In addition, in cases where these troubles are excluded because they were referred to another department, CGE&Y believes that such cases should be considered by the TAG for inclusion in service installation quality calculations.

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# 1 Qwest/Eschelon OP-5 Data Reconciliation Report

## 1.1 Background

On July 30-31, 2002, the Arizona Corporation Commission (ACC) held a workshop to address comments and concerns raised by Eschelon Telecom, Inc. (Eschelon) on Qwest's compliance with § 271. Eschelon had filed comments in Qwest's five state FCC application identifying several deficiencies in Qwest's OSS.<sup>1</sup> Eschelon claimed they had been denied the opportunity to bring these issues to the state proceedings because of "secret" agreements with Qwest. Based on Eschelon's claim, the ACC decided to hold a two-day workshop specifically to afford Eschelon the opportunity to bring its issues before all interested parties in the state of Arizona. At the workshop Eschelon provided performance measurement results it had calculated independently of the data used by Qwest in the calculation of its reported results.<sup>2</sup> Eschelon's result for OP-5, which measures quality of installation, was significantly different than the result reported by Qwest. In addition, Eschelon detailed many problems it was having with the installation and conversion of its end-users to the UNE-P/UNE-E product. Specifically, Eschelon presented evidence that its end-users were experiencing installation related troubles at higher rates than those reported by Qwest in its OP-5 performance measurement results. According to Eschelon, its UNE-E and UNE-P customers experienced troubles within the first 30 days after installation 60 percent of the time in April compared to 15 percent reported by Qwest in its April performance results for Eschelon.<sup>3</sup> Qwest representatives indicated that the difference in calculated results between itself and Eschelon were likely due to Eschelon not following the standards set forth in the Arizona Service Performance Indicator Definitions (PID), Version 7.0 dated November 16, 2001 as revised January 17, 2002.

Eschelon provides competitive local exchanges services in several states within Qwest's 14-state region. Eschelon provides the majority of its customers service via UNE-P or UNE-E (generically referred to as UNE-Star) products. Eschelon is only one of two CLECs that order the UNE-Star product. Eschelon also provides a large percentage of its end-users with Centrex 21 service. As a result, Eschelon's experience may not be similar to that of other CLECs. Specifically, Eschelon's orders require a higher percentage of manual handled compared to other CLECs.

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<sup>1</sup> See Comments of Eschelon Telecom, Inc., *Consolidated Application of Qwest Communications International, Inc. for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North Dakota*, WCB Dkt. No. 02-148 (FCC filed Jul. 3, 2002).

<sup>2</sup> See Ex Parte of Eschelon Telecom, Inc., *Consolidated Application of Qwest Communications International, Inc. for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North Dakota*, WCB Dkt. No. 02-148 (FCC filed July 17, 2002).

<sup>3</sup> July 30 Transcript at 47-50.

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## 1.2 Purpose

The Commission Staff and its consultants, Doherty and Company, Inc (DCI), requested that CGE&Y obtain the underlying data used by Eschelon in calculating its performance measurement results for OP-5 and the Qwest adhoc data set for the months of April, May and June in order to perform a data reconciliation. CGE&Y was requested to report on the reasons for the difference between OP-5 results reported by Eschelon and those reported by Qwest in its monthly published reports. In addition, CGE&Y was instructed to analyze data from the month of May that would be considered in Qwest's proposed supplement to the OP-5 measure in which Qwest will report on the number of errors Qwest makes in manually translating feature combinations on the Competitive Local Exchange Carrier's (CLEC's) Local Service Request (LSR) to the Qwest service order that results in incorrect provisioning requiring a supplemental order as opposed to a trouble ticket. This request consists of the following:

- ✓ Conduct an onsite visit at Eschelon headquarters to review the raw data used by Eschelon to produce the OP-5 results.
- ✓ Determine if a data reconciliation is possible given the quality and integrity of data captured by Eschelon.
- ✓ Obtain Qwest Adhoc data for April, May and June of 2002 to use to reconcile with the data obtained at Eschelon.
- ✓ Utilizing the description of the OP-5 measure as contained in the PID compare eligibility and exclusion criteria to trouble tickets contained within both data sources.
- ✓ Determine data elements contained within the Eschelon data that are missing or inappropriately excluded from the Qwest data or data elements that appear to be inappropriately included in the Qwest data.
- ✓ Prepare data request to Qwest for an explanation.
- ✓ Determine data elements contained within the Qwest data that are missing from the Eschelon data.
- ✓ Prepare data request to Eschelon for an explanation.
- ✓ Make a final determination as to the accuracy of the results Qwest reports for installation quality provided to its CLEC customers.

## 1.3 Scope

The scope of this document is to make a comparison of trouble tickets captured by Eschelon during the months of May and June 2002 to the trouble tickets contained within Qwest's adhoc dataset for the same time period. These tickets were provided to CGE&Y by Eschelon, and did not include all the troubles reflected in Eschelon's monthly report card's OP-5 equivalent measure. This data reconciliation was limited to those troubles provided by Eschelon and the trouble tickets contained in MTAS.

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CGE&Y did not validate Eschelon's monthly report card performance results for its OP-5 equivalent measure. This data reconciliation effort will compare the troubles and service affecting issues experienced by a CLEC's end-users with Qwest's reported results for its New Installation Quality Measure (OP-5) to determine if it is (1) being calculated according to version 7.0 of the Arizona PID; and (2) if it accurately reflects the percentage of end-users that experience a service outage or service affecting issues within 30 days of installation.

CGE&Y will compare data provided by Eschelon and Qwest to make findings as to whether Qwest's OP-5 measure satisfies the above criteria. CGE&Y will consider all discrepancies identified to determine the impact to the published results for OP-5 by recalculating OP-5 if CGE&Y determines any valid OP-5 eligible activity was inappropriately excluded. Furthermore, CGE&Y will quantify the extent, if any, of service affecting issues or troubles not captured by OP-5 as well as the overall percentage of new installations experiencing service affecting issues and troubles through no fault of the CLEC. Where appropriate, CGE&Y will make recommendations based on its findings if any deficiencies are uncovered.

Finally, this document provides findings on the reliability of Qwest's performance measurement reporting process for the OP-5, Installation Quality measure. These findings are presented in an objective manner supported by the results generated by the comparisons made using the two different datasets.

#### 1.4 Process

The process developed to fulfill the scope of the project will be to obtain service orders, repair tickets and historical data from Eschelon to reconcile against the Qwest data within the time frame of May 2002. The following lists the data captured on site with Eschelon Personnel:

- Eschelon historical repair data for UNE-P and UNE-E lines that experienced a trouble or other service affecting issue within 30 days of installation
- Eschelon end-user trouble history from the DLETH reporting system via the IMA-GUI
- Eschelon LSR
- Additional Eschelon comments and/or documentation detailing the troubles provided
- LSRs and Pending Service Order Notifications (PSONs) received by Eschelon for the time period of August 26-27, 2002. Additional PSONs and LSRs covering September 12-18, 2002 were obtained through the Data Request process (DR-???)

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The following lists the corresponding data obtained from Qwest through the Data Request process:

- Qwest adhoc CRM Data for April, May, and June 2002 (DR-547)
- Qwest adhoc RSOR Data for April, May, and June 2002 (DR-297)
- Qwest adhoc MTAS Data for April, May, and June 2002 (DR-297)
- Qwest paper copies of Eschelon LSRs for UNE-P and UNE-E accounts for April, May and June 2002 (DR-296)
- Qwest paper copies of Eschelon service orders for UNE-P and UNE-E accounts for April, May, and June 2002 (DR-296)
- Technical Documentation detailing new fields in the CRM, RSOR and MTAS adhoc data since CGE&Y concluded the Performance Measurement Audit (PMA) (last update provided CGE&Y was November 9, 2001)
- Responses to CGE&Y questions regarding Eschelon reported troubles (DR-299)
- Responses to CGE&Y questions regarding Qwest's handling of trouble records contained within its adhoc data set (DR-300)

Utilizing the data received from both Eschelon and Qwest CGE&Y will perform the data reconciliation through the completion of the following tasks:

1. Compare the RSOR and MTAS data and determine which trouble tickets meet the qualification for OP-5 consideration. The qualifiers will be trouble tickets generated within 30 days of the last installation order recorded in April or May from the RSOR data.
2. Compare the Qwest repair comments to the Eschelon comments and document the history of the account in question. Any questions resulting from the analysis will be forwarded to either Qwest, Eschelon or both for clarification and resolution.
3. Categorize the historical data and group findings into similar cause headings.
4. Determine if any "installation related" trouble tickets failed to be designated as such in Qwest's adhoc data and therefore was not counted in OP-5.
5. Calculate the total number of trouble tickets excluded from OP-5 in error.
6. Incorporate findings from Eschelon tickets and Qwest adhoc data and recalculate OP-5 for the month of May.
7. Document any other anomalies seen in the remainder of the data.
8. Document the finding relative to the OP-5 measure for the ACC.

Upon completion of the reconciliation effort, all report findings and recommendations will be reported to the ACC for acceptance.

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## 2 OP-5 Findings

The findings herein are based on specific trouble cases and service affecting issues identified by Eschelon as well as CGE&Y's analysis of Qwest's adhoc MTAS and RSOR data for Eschelon. Using data collected from Eschelon and Qwest, CGE&Y analyzed each case and made findings as to their cause, resolution, and eligibility for OP-5 based on input from Eschelon and Qwest's responses to CGE&Y's data request. The discussion below refers to these specific cases identified by Eschelon as well as the adhoc MTAS data for Eschelon. A complete list of CGE&Y's data requests is contained in Appendix E of this document.

### 2.1 New Service Installation Quality Measure (OP-5)

#### 2.1.1 Definition

Per the Arizona PID 7.0, performance measurement OP-5 evaluates Qwest's quality of ordering and installing service. The results are to accomplish this goal by focusing on the percentage of average monthly new order installations that are free of trouble reports for thirty (30) calendar days following installation. The measure is to include the percentage of new service installations that experience a trouble report on the installation date after the order is reported as work complete by the technician.

New installation orders used in calculating OP-5 (appearing in the numerator and the denominator of the OP-5 formula shown below) are all inward orders for the current and previous reporting periods. This includes Change (C-type) orders for additional lines. Change type orders for additional lines consist of all C orders with "I" and "T" action coded line USOCs. This includes changes to existing lines, such as conversions, number changes, PC changes and class of service changes. The average monthly number of new installation orders calculated in the denominator of the formula shown below are rounded up to the nearest integer whole number.

All trouble reports, including both out-of-service and service-affecting conditions, closed within the reporting period received within thirty (30) days of the original installation of service are included in the numerator. This should include service-affecting issues that occur on the day the order is installed, subject to specific exclusions.

The OP-5 measure is reported by CLEC aggregate, individual CLEC and Qwest retail results and is available on a statewide basis. This report is only concerned with Eschelon trouble tickets and service orders for the UNE-P and UNE-Star

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product. No distinction has been made for whether or not a dispatch was required or where the activity took place.

### 2.1.2 Specific Exclusions and Formula

Per 7.0 of the Arizona PID, trouble reports found to be related to customer equipment, customer education (instruction on how to use product or service) and inside wire are excluded from the calculation. Also excluded are subsequent trouble reports for the same trouble before the original trouble is closed and information tickets generated for internal Qwest system/network monitoring purposes. Troubles received on the day of installation before the provisioning order is closed as complete is also excluded from the OP-5 measure results.

The formula used to calculate the OP-5 measure is:

$$\left[ \left( \frac{\text{Number of New Installation Orders completed in the [prior + current months]}}{2} \right) - (\text{Total Number of New Installation-related Trouble Reports received within 30 Calendar Days of Order Completion}) \right] / \left( \frac{\text{Number of New Installation Orders completed in the [prior + current months]}}{2} \right) \times 100.$$

CGE&Y used data collected from both Eschelon and Qwest to reconcile in order to determine whether Qwest is calculating its New Service Installation Quality Measure (“OP-5”) for the UNE-P product per the PID. The following discussion identifies data discrepancies and process deficiencies identified by CGE&Y during this data reconciliation of the UNE-P product category.

### 2.1.3 RRS MTAS Adhoc Data Processing

The following fields in the Qwest MTAS adhoc data influence a trouble ticket’s eligibility for inclusion in OP-5 and are discussed throughout this report:

- The ‘I’ field indicates whether there was an installation activity on the line on which the trouble was reported within the last 30 days. A ‘1’ in this field indicates the trouble was installation related, and a ‘0’ indicates that the trouble was not installation related as determined by LMOS. An MTAS record must have a ‘1’ in this field to be considered eligible for OP-5.
- The ‘CLEC\_CT’ field indicates whether the trouble reported was the responsibility of Qwest or not. The ‘CLEC\_CT’ field is derived from the disposition code (‘DISP’) and sub-code (‘DISPS’) fields. A ‘0’ in this field indicates the trouble was Qwest’s responsibility, and a ‘1’

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indicates that it was not Qwest's responsibility. An MTAS record must have a '0' in this field to be considered eligible for OP-5.

- The 'I\_CNT' field indicates whether the trouble reported is eligible for inclusion in OP-5. If the 'I' field has a value of '1' and the 'CLEC\_CT' field has a value of '0,' then the 'I\_CNT' field will have a value of '1,' signifying the trouble is to be counted in OP-5. Otherwise, the 'I\_CNT' field will have a value of '0' and the trouble will not be counted in OP-5.

A '1' in the 'I' field with a '0' in the 'I\_CNT' field means that although there was inward activity within the last 30 days the trouble will not be counted towards OP-5 due to one of the exclusions listed above in section 2.1.2.

An additional field relevant to the discussion below is the repeat indicator field ('R'). The 'R' field indicates if there was a previous trouble reported within the last 30 days on the same line. If this field is populated with a '1' this indicates the trouble is a repeat report. In order for the 'R' field to be equal to '1,' both the trouble in question and the previous trouble can not have 'DISP' value of '12' or '13.'

## 2.2 Summary of Findings

The data reconciliation of Eschelon-captured data and Qwest MTAS data for OP-5 identified several discrepancies which CGE&Y researched and identified deficiencies in Qwest's OP-5 data processing. (See Sections 2.3-2.7) In addition, the data reconciliation uncovered inherent differences between the information captured by a CLEC and the performance data captured by Qwest that prevents the CLEC from recalculating the OP-5 PID from its own data. (See Sections 3 & 4) Table 2.2(a) reflects the issues that were identified during the reconciliation of the OP-5 measure and the frequency of each. Each issue is described fully within the different sections of the report that follows.

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<b>Table 2.2(a) Summary of Issues Identified</b>			
§	Issue	Included in Qwest's OP-5 Results for Eschelon	Eligible for OP-5 per PID 7.0
2.3	Repeat Reports	0	9
2.4	LMOS does not set installation indicator due to prior trouble.	0	9
2.5.1	Service Order not updated in LMOS	0	8
2.5.2	Intervening Ineligible Order type	0	1
2.5.3	Order without inward activity	10	0
2.6	Troubles initially coded to incorrect disposition <sup>4</sup>	1	4 <sup>5</sup>
2.7	Carrier Classification Incorrect	1	9
3	Service Disruption Day of Cut	0	11 <sup>6</sup>
4	Service Order Accuracy	0	9 <sup>7</sup>

The following table provides OP-5 results for Eschelon as determined by CGE&Y through its data reconciliation effort. The first column, “Per Qwest published report” indicates the combined OP-5 results for Eschelon as reported in the confidential monthly performance reports provided by Qwest to Eschelon. The second column

<sup>4</sup> These results are based on CGE&Y’s determination of the correct trouble disposition code for the cases examined. CGE&Y also presents OP -5 results based on the trouble disposition codes in MTAS.

<sup>5</sup> There are 4 additional troubles that CGE&Y determined to be coded to the wrong disposition code, but these are already included in earlier sections. (See section 2.6)

<sup>6</sup> These cases are not eligible for the PID calculation as there was no Eschelon trouble report in MTAS. However, CGE&Y finds that these cases represent installation errors that impacted the end-user and therefore should be reflected in Qwest’s monthly performance reports. CGE&Y recommends that service disruptions on the day of installation be represented in its proposed OP -5B measure.

<sup>7</sup> These cases are not eligible for the PID calculation as they were not resolved through the repair process. However, CGE&Y finds that these cases represent installation errors that impacted the end-user and therefore should be reflected in Qwest’s monthly performance reports. CGE&Y recommends that service accuracy issues be represented in its proposed OP -5C measure.

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indicates what CGE&Y considers would be the OP-5 results in accordance with PID 7.0. This result relies on the trouble disposition included in the Qwest MTAS data, except where Qwest indicated it had closed the trouble to an incorrect disposition code. The third column indicates the OP-5 results in accordance with CGE&Y’s OP-5A measure. This measure relied on CGE&Y’s determination of the correct disposition code for the trouble. In addition, CGE&Y’s OP-5A includes only the first Qwest-caused installation-related trouble. For a detailed explanation of CGE&Y’s OP-5A see section 6.2 of this report.

<b>Table 2.2(b) Combined OP-5 results for Eschelon UNE-P and UNE-E during May-June 2002</b>		
<b>Per Qwest published report</b>	<b>OP-5 per PID 7.0</b>	<b>CGE&amp;Y’s OP-5A</b>
92.17%	87.37%	91.64%

### 2.3 Repeat Repair Reports

As reflected in section 2.1.2, according to the PID 7.0, repeat repair reports are not excluded from OP-5. However, CGE&Y found 10 (i.e., Qwest’s responsibility) troubles flagged as repeat repair reports in MTAS, that had inward service order activity within the preceding 30 days but none of the 10 showed to have ‘I’=’1’ and therefore were not eligible for OP-5. In each of these cases, CGE&Y found that the installation related indicator (‘I’ field) and the OP-5 eligibility field (‘I\_CNT’) should have had values ‘1.’ A side-by-side comparison of these troubles as they are coded in MTAS with CGE&Y’s determination of how they should have been coded per the PID is presented in table 2.3(a).

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<b>Table 2.3 Repeat Repair Reports</b>							
Case	Trouble Incident	MTAS			CGE&Y Findings		
		Repeat "R"	Installation Indicator "I"	OP-5 Eligibility "I_CNT"	CGE&Y "R"	CGE&Y "I"	CGE&Y "I_CNT"
2	5/20/02	Yes	No	No	Yes	Yes	Yes
3	5/23/02	Yes	No	No	Yes	Yes	Yes
4	5/22/02	Yes	No	No	Yes	Yes	Yes
14	5/29/02	Yes	No	No	Yes	Yes	Yes
23	6/3/02	Yes	No	No	Yes	Yes	No
24	5/10/02	Yes	No	No	Yes	Yes	Yes
25	6/12/02	Yes	No	No	Yes	Yes	Yes
26	6/14/02	Yes	No	No	Yes	Yes	Yes
27	6/11/02	Yes	No	No	Yes	Yes	Yes
28	5/15/02	Yes	No	No	Yes	Yes	Yes

Of the cases identified in table 2.3, CGE&Y found 1 trouble was coded as Qwest responsibility incorrectly and should not have been flagged as eligible for OP-5. (See Eschelon Case 23; see also section 2.6)

CGE&Y then analyzed the entire MTAS dataset for all wholesale and retail activity. CGE&Y reviewed May 2002 MTAS data, and of the 53,823 trouble reports, 11,350 were flagged as installation related (21.5%) and 5,492 (10.4%) were flagged as repeat reports. None of the repeat repair reports were considered installation related. Results for June 2002 were similar, with no repeat repair reports considered installation related. CGE&Y issued Data Request 299 (DR-299) reporting its findings and requesting Qwest’s verification that it was excluding repeat repair reports from the OP-5 calculation. Qwest responded as follows:

“There is an inherent system/process limitation in LMOS. On the first trouble reported within 30 days of installation, LMOS sets the “I” indicator to 1. This indicates that the trouble is installation-related. On subsequent trouble tickets within the 30 day interval LMOS sets the "R" indicator to 1, indicating that the trouble is a repeat report. These two statuses are mutually-exclusive and enforced by LMOS’ programming logic.” (Qwest Data Request 549)

In addition, Qwest stated it believed the inclusion of repeat reports “is inconsistent with the measure’s intent,” and “that parties should collaborate on how to account for this, on a going forward basis, under the auspices of Long Term PID Administration.” (Qwest Data Request 549)

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### **2.3.1 Findings Impact on OP-5**

CGE&Y finds that the PID definition for OP-5 includes repeat repair reports. Therefore, Qwest is not calculating OP-5 per the PID with respect to repeat repair reports. CGE&Y finds that Qwest excluded 9 Eschelon troubles from OP-5 in error.

### **2.4 LMOS Setting of Installation Indicator Affected by Previous Trouble**

CGE&Y identified 12 cases where an Eschelon trouble report was designated as non-installation related ('I'= '0') due to a prior trouble report within the preceding 30 days. However, because either the present or the prior trouble report was not due to the ILEC none of these 12 were designated as a repeat report. This is consistent with the definition of a repeat report as described in sections 2.1.3 and 2.3. Per the PID, these troubles should be considered installation related, as they all occurred within 30 days of the most recent inward installation activity. Qwest explained that LMOS only flags the first trouble within 30 days of an inward installation activity as installation related. Any additional troubles on the same line are coded as a repeat except when the first trouble was coded to 12XX or 13XX or was not in MTAS (e.g., transferred to a non-repair related department such as voice messaging). In the opinion of CGE&Y, these 12 troubles should be flagged installation related ('I'= '1') based on the PID. A side-by-side comparison of these troubles as they are coded in MTAS with CGE&Y's determination of how they should have been coded per the PID is presented in table 2.4(a).

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Table 2.4 LMOS Setting of Installation Indicator Affected by Previous Trouble								
Case	Order Completion Date	Trouble Date	MTAS			CGE&Y Findings		
			Trouble Cause	'I'	'I_CNT'	Trouble Cause	'I'	'I_CNT'
3	5/14/02	5/22/02	Eschelon	No	No	Qwest	Yes	Yes
4	5/7/02	5/21/02	Eschelon	No	No	Qwest	Yes	Yes
10	5/24/02	6/20/02	Qwest	No	No	Qwest	Yes	Yes
14	5/15/02	5/24/02	Qwest	No	No	Qwest	Yes	Yes
15	5/7/02	5/20/02	Qwest	No	No	Qwest	Yes	Yes
17	5/1/02	5/9/02	Eschelon	No	No	Neither; Referred <sup>8</sup>	Yes	No; See OP-5C
20	5/8/02	5/23/02	Eschelon	No	No	Qwest	Yes	Yes
29	5/24/02	6/18/02	Eschelon	No	No	Eschelon	Yes	No
25	5/28/02	6/07/02	Qwest	No	No	Qwest	Yes	Yes
25	5/28/02	6/11/02	Eschelon	No	No	Qwest	Yes	Yes
30	6/14/02	6/18/02	Qwest	No	No	Qwest	Yes	Yes
31	5/24/02	6/11/02	Eschelon	No	No	Neither; Referred	Yes	No; See OP-5C

Of the 12 troubles listed in table 2.4(a), 5 are eligible, per the PID, once the installation indicator is changed to reflect the above findings ('I'= '1'). CGE&Y finds that these troubles should have been flagged as eligible for OP-5 ('I\_CNT'= '1'). (See Eschelon Cases 10, 14, 15, 25, and 30)

Of the 12 troubles listed in table 2.4(a), 1 trouble was Eschelon's responsibility. Therefore, although CGE&Y changed the installation indicator to reflect the trouble was received within 30 days of the most recent installation ('I'= '1'), the OP-5 eligibility field would remain unchanged from what MTAS indicated ('I\_CNT'= '0'). (See Eschelon Case 29)

Of the 12 troubles listed in table 2.4(a), CGE&Y disagreed with the disposition code in MTAS for 4 troubles coded as Eschelon's responsibility based on information provided by Eschelon. CGE&Y finds that these troubles should be coded Qwest's responsibility. (See Eschelon Cases 3, 4, 20, and 25) Therefore, when CGE&Y changed the installation indicator to reflect the trouble was received within 30 days of the most recent installation ('I'= '1') and changed the disposition code to reflect Eschelon's responsibility, these 4 troubles are now eligible for OP-5 ('I\_CNT'= '1'). (See Eschelon Cases 3, 4, 20, and 25)

For the remaining 2 troubles listed in Table 2.4(a), CGE&Y disagreed with the disposition code in MTAS as Eschelon's responsibility based on information

<sup>8</sup> This ticket was referred to a Qwest non-repair related department for resolution. This trouble was resolved through the issuance of an additional service order.

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provided by Eschelon. (See Eschelon Cases 17 and 31) CGE&Y found that the trouble was referred to a non-repair related department and should not be charged to either Qwest or Eschelon. Therefore, when CGE&Y changed the installation indicator to reflect the trouble was received within 30 days of the most recent installation ('I'= '1') and changed the disposition code to reflect neither Eschelon nor Qwest's responsibility, the OP-5 eligibility field would remain unchanged ('I\_CNT'= '0'). (See Eschelon Cases 17 and 31). However, CGE&Y considers that these situations are usually resolved using a service order and should therefore be included in CGE&Y's Service Order Accuracy measure, which CGE&Y proposes be termed OP-5C. See Section 4.

#### **2.4.1 Findings Impact on OP-5**

As described above, CGE&Y found that 5 troubles not previously included in Qwest's OP-5 results for Eschelon should be included because they were erroneously not flagged as installation related. In addition, CGE&Y found that 4 troubles not previously included in Qwest's OP-5 results should be included because they were erroneously not flagged as installation related and were incorrectly coded as Eschelon's responsibility. CGE&Y found that an additional 2 troubles not previously included in Qwest's OP-5 results should be included in CGE&Y's service order accuracy measure, OP-5C.

### **2.5 LMOS Failure to Properly Identify OP-5 Qualifying Service Orders**

This section discusses troubles that were not properly designated installation related due to LMOS limitations in identifying qualifying service orders. This includes troubles which occurred within 30 days of installation activity that Qwest failed to code as installation related as well as troubles where there was no installation activity within the preceding 30 days yet Qwest identified the trouble as installation related.

CGE&Y found 14 troubles that occurred within 30 days of installation but were not counted as such in the adhoc data because the service order information was not updated in the LMOS database at the time of the trouble report. In addition, CGE&Y found 3 troubles not flagged as installation related because the most recent order was not an 'N', 'C', or 'T' type order even though the line was actually installed (using an earlier qualifying 'N', 'C', or 'T' type order) within the 30 days prior to the trouble report. CGE&Y also found 11 troubles Qwest flagged as installation related and included in the numerator of OP-5 even though there was no service order within 30 days of the trouble that involved inward activity.

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### 2.5.1 Delay in Updating LMOS

CGE&Y analyzed the MTAS and RSOR data for Eschelon and identified 14 troubles that were not flagged as installation related because the service order was not yet updated in the LMOS database at the time the trouble was reported. (Qwest Data Request 578) A side-by-side comparison of these troubles as they are coded in MTAS with CGE&Y’s determination of how they should have been coded per the PID is presented in table 2.5.1.

Table 2.5.1 Delay in Updating LMOS with completed Service Order								
Case	Order Completion Date	Trouble Date	MTAS			CGE&Y Findings		
			Trouble Cause Responsibility	‘I’	‘I_CNT’	Trouble Cause Responsibility	‘I’	‘I_CNT’
32	6/5	6/5	Qwest	No	No	Qwest	Yes	Yes
16	5/3	5/8	Qwest	No	No	Qwest	Yes	Yes
34	5/21	5/23	Qwest	No	No	Qwest	Yes	Yes
35	5/22	5/22	Qwest	No	No	Qwest	Yes	Yes
36	5/22	5/22	Qwest	No	No	Qwest	Yes	Yes
37	5/24	5/24	Qwest	No	No	Qwest	Yes	Yes
38	5/21	5/21	Qwest	No	No	Qwest	Yes	Yes
39	6/4	6/10	Qwest	No	No	Qwest	Yes	Yes
23	5/31	5/31	Eschelon	No	No	Qwest	Yes	No; See OP-5C
10	5/24	5/24	Eschelon	No	No	Eschelon	Yes	No
50	6/13	6/26	Eschelon	No	No	Eschelon	Yes	No
51	5/23	5/23	Eschelon	No	No	Eschelon	Yes	No
52	5/22	5/22	Eschelon	No	No	Eschelon	Yes	No
53	5/8	5/8	Eschelon	No	No	Eschelon	Yes	No

Of the cases identified in table 2.5.1, 8 troubles were Qwest-caused in MTAS and should be eligible for OP-5. (See Eschelon Cases 16, 32, 34, 35, 36, 37, 38, and 39) The remaining 6 troubles in table 2.5.1, that were not flagged as installation related due to the LMOS not being updated were initially determined by Qwest to be CLEC-caused and therefore not eligible for OP-5. (See Eschelon Cases 23, 10, 50, 51, 52 and 53) Of these 6 troubles, Qwest agreed that 1 trouble was incorrectly coded as CLEC-related. (Qwest Data Request 579; See Eschelon Case 23) Therefore, CGE&Y found that this trouble should be eligible for OP-5. CGE&Y finds that the remaining 5 troubles should have been flagged as installation related, but would not be eligible for OP-5 because they were coded as Eschelon’s responsibility.

Qwest described the LMOS update process as follows:

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“If an order is completed prior to 5:00 p.m. on the due date, it is placed on a ‘batch’ report which then goes to LMOS for posting that evening. Those orders are posted to LMOS sometime between 10:00 p.m. on the date of completion, and 1:00 a.m. the following day. If the order doesn't complete until after 5:00 p.m., it is placed on the ‘next days’ batch report and is posted the following evening into the 3rd day.” (Qwest Data Request 575)

Qwest also detailed the resolution of errors on service orders as follows:

“Orders which complete in the SOP fatal error in LMOS approximately 3% of the time. Fatal errors in LMOS disallow the line record updates until the errors are fixed. LMOS errors are sent on a flat file to Qwest’s LMOS Error Correction Center daily, so those that errors are noticed within 1 business day. Once the Correction Center receives the file of errors, the errors are worked in priority order by error type (fatal errors first). Errors are worked one-by-one in real time. In some cases, corrections can take up to 10 days to be completed.” (Qwest Data Request 578S1 Row 6)

Of the 9 troubles above that CGE&Y determined to be OP-5 eligible, 6 occurred on the same day the order completed. However, 3 troubles occurred 2, 5, and 6 days after the installation. Thus, CGE&Y finds that the current method LMOS uses to identify qualifying service orders results in the exclusion of several troubles from OP-5 that were actually reported within 30 days of the installation activity.

In addition, CGE&Y is concerned that Qwest’s stated overall 3% fallout rate of completed orders not being updated into LMOS, understates the rate for CLEC’s. Among the 228 Eschelon lines experiencing trouble during May-June 2002, at least 7% (16) erred out in LMOS and had not been fixed before the trouble occurred. Several more lines likely had errors, which had been fixed by the time the trouble occurred. These problems seem to occur more frequently when an ‘N’ and a ‘D’ order are worked on the line on the same day, which occurs relatively more frequently among CLEC orders than among retail orders. For these reasons, CGE&Y considers that the fallout rate among CLEC orders is substantially larger than 3%, and recommends that these errors be identified and

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adjustment made for them during measurement processing. See CGE&Y’s Recommendations section 6.5.

### 2.5.2 Intervening Ineligible Order Type

In addition to the delay in LMOS posting service order activity described above, CGE&Y identified 2 troubles that was not considered installation related because when LMOS looked back for a qualifying order, it identified the most recent order which happened to be an invalid record order. (See Eschelon Cases 40 and 50) In doing so, LMOS ignored an earlier inward installation activity that occurred within 30 days of the trouble ticket but before the record order. These troubles are detailed in Table 2.5.2 below.

Case	Order Completion Date	Trouble Date	MTAS			CGE&Y Findings		
			Trouble Cause	‘I’	‘I_CNT’	Trouble Cause	‘I’	‘I_CNT’
40	5/28	6/19	Qwest	No	No	Qwest	Yes	Yes
50	6/13	6/26	Eschelon	No	No	Eschelon	Yes	No

Qwest indicated that LMOS only considers the most recent service order when setting the installation indicator, in this case, the more recent record order was chosen over the earlier inward installation activity. Therefore, LMOS did not flag this trouble as installation related which is not compliant with the PID. CGE&Y finds that in determining whether a trouble is installation related, the LMOS logic improperly excludes troubles that occur within 30 days of installation if there is a more recent record or change order on the account that does not involve installation. Although CGE&Y finds that these 2 troubles should have been flagged as installation related, CGE&Y finds that only 1 trouble is eligible for OP-5. The remaining trouble tickets are ineligible for OP-5 because the troubles were coded as Eschelon’s responsibility.

### 2.5.3 Inclusion of Orders with No Inward Activity

CGE&Y analyzed the MTAS and RSOR data for Eschelon and identified 10 troubles, which Qwest flagged as installation related and eligible for OP-5, but CGE&Y could not locate an inward installation activity within 30 days. These are detailed below in Table 2.5.3.

**Table 2.5.3 No inward activity within 30 days prior to trouble**

Case	Order w/ Inward Activity	Order w/o Inward Activity	Trouble Date	MTAS			CGE&Y Findings		
				Trouble Cause	'I'	'I_CNT'	Trouble Cause	'I'	'I_CNT'
39	None	5/3	5/9	Qwest	Yes	Yes	Qwest	No	No
55	None	4/13; 4/22	5/10	Qwest	Yes	Yes	Qwest	No	No
56	None	5/14	5/21	Qwest	Yes	Yes	Qwest	No	No
57	None	5/20	5/22	Qwest	Yes	Yes	Qwest	No	No
1	4/17	5/15; 5/29; 6/5	6/5	Qwest	Yes	Yes	Qwest	No	No
58	5/20	6/4	6/21	Qwest	Yes	Yes	Qwest	No	No
59	None	6/15	6/19	Qwest	Yes	Yes	Qwest	No	No
60	4/16	6/4	6/19	Qwest	Yes	Yes	Qwest	No	No
61	None	6/12	6/17	Qwest	Yes	Yes	Qwest	No	No
62	None	5/28	6/21	Qwest	Yes	Yes	Qwest	No	No

CGE&Y issued DR-300 detailing these 10 troubles and requested that Qwest verify if these troubles were actually installation related. Qwest responded that the installation-related indicator (“I”), which indicates that a ticket was received within 30 days of an inward order, was based on a definition of an inward order that is “not as restrictive as the PID defined ‘inward activity’ used for order inclusion in the order and provisioning (OP) measures.” Qwest added, “this causes instances where the I flag from LMOS is triggered by orders for which the criteria have not been met in RSOR, and therefore exist in the extract used for the numerator for OP-5.” (Qwest Data Request 575) Qwest provided the most recent service orders on each of the 10 lines identified by CGE&Y. Qwest stated that only 2 of these orders constituted an eligible inward service order for OP-5. However, CGE&Y’s research revealed that one of these eligible orders was actually a retail activity and the remaining eligible order occurred 32 days prior to the trouble. Thus, CGE&Y finds that of the 10 troubles identified, none occurred within 30 days of a valid inward installation activity. Therefore, CGE&Y finds that Qwest included these 10 troubles in the numerator of OP-5 in error due to LMOS including orders that had no inward activity. In addition, CGE&Y identified an additional 6 troubles that were flagged as installation related in error by LMOS, but were not eligible for OP-5 because they were Eschelon’s responsibility. These troubles were flagged as installation related in error as a result of the same problem identified by Qwest.

Qwest’s response to this data request indicated “the criteria used by RSOR to classify the order as eligible for the denominator” was more “precise” than the I

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flag in LMOS used for the numerator and excludes ineligible orders. (Qwest Data Request 575) Qwest also identified the following fix to the measure:

“[Under the current process] more "I" flags are set than would be the case if the RRS code associated the denominator orders with repair tickets received within 30 days in the derivation of the numerator of OP-5. Then, the measure would identify and exclude non-eligible orders free of trouble within 30 days of completion. Such a change would bypass the LMOS limitation with the result that the numerator criteria would be consistent with the denominator. This change to the code would improve the precision of the OP-5 results. It would also allow, in the case of troubles on the same day as the order completes, the code to use the MCN of the order to drive the calculation of the CLEC\_ID for OP-5.” (Qwest Data Request 575)

In its supplemental response to the same data request, Qwest indicated that it intended to implement the fix described by the end of 2002.

#### **2.5.4 Findings Impact on OP-5**

CGE&Y finds the 8 troubles were inappropriately excluded from being flagged as installation related and eligible for OP-5 due to the service order information not being updated in LMOS. CGE&Y finds that Qwest excluded 1 Eschelon trouble from OP-5 in error due to the most recent order being an invalid type. Therefore, CGE&Y finds that Qwest included 10 troubles in its OP-5 results in error because LMOS recognized a service order that did not have any inward activity.

#### **2.6 Incorrect Trouble Cause Disposition**

CGE&Y identified 11 troubles that appeared to be coded as CLEC-caused in MTAS in error based on information received from Eschelon and the information available in MTAS. (See Eschelon Cases 3, 4, 17, 19, 20, 23, 25, 31, and 41) CGE&Y also identified 2 additional Eschelon troubles that appeared to be coded as Qwest caused in MTAS in error. (See Eschelon Cases 23 and 29) These 11 troubles are detailed in Table 2.6 below.

Case	Order Completion Date	Trouble Date	MTAS			CGE&Y Findings		
			Trouble Cause	'I'	'I_CNT'	Trouble Cause	'I'	'I_CNT'
3	5/14	5/22	Eschelon	No	No	Qwest	Yes	Yes
20	5/8	5/22	Eschelon	Yes	No	Qwest	Yes	Yes
20	5/8	5/23	Eschelon	No	No	Qwest	Yes	Yes
17	5/1	5/9 19:01	Eschelon	Yes	No	Neither, Referred	Yes	No, OP-5C
25	5/28	6/4	Eschelon	Yes	No	Qwest	Yes	Yes
25	5/28	6/11	Eschelon	No	No	Qwest	Yes	Yes
31	5/24	6/11	Eschelon	No	No	Neither, Referred	Yes	No, OP-5C
4	5/7	5/21	Eschelon	No	No	Qwest	Yes	Yes
41	5/28	6/3	Eschelon	No	No	Qwest	Yes	Yes
23	5/31	5/31	Eschelon	No	No	Qwest	Yes	No; See OP-5C
19	5/7	5/23	Eschelon	Yes	No	Qwest	Yes	Yes
23	5/31	6/3 11:49	Qwest	No	No	Eschelon	Yes	No
29	5/24	6/18 14:34	Qwest	Yes	Yes	Eschelon	Yes	No

### 2.6.1 Qwest Agrees CLEC-Caused Disposition Code Is Incorrect

In 2 cases, Qwest agreed the trouble was coded CLEC-related in error. (See Eschelon Case 4 and 41) Therefore, CGE&Y finds that these 2 troubles were incorrectly coded as CLEC-caused, resulting in them not being counted in OP-5. One of these troubles is also discussed in section 2.4.1. (See Eschelon Case 4)

### 2.6.2 Qwest Does Not Agree CLEC-Caused Disposition Code Is Incorrect

In 9 cases, Qwest stated there was no definitive evidence that the trouble was not CLEC-caused. In 2 of these cases, the trouble was referred to another department for resolution with an additional service order, and CGE&Y finds they should not be the responsibility of either Qwest or the CLEC. (See Eschelon Cases 17 and 31) These troubles are reflected in CGE&Y's OP-5C, service order accuracy measure. (See section 4) CGE&Y believes that the remaining 7 of these troubles were incorrectly coded as CLEC-caused. (See Eschelon Cases 3, 20, 23, and 25)

### 2.6.3 Qwest Incorrectly Coded Trouble as Qwest-Caused

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In 2 cases, CGE&Y found that Qwest coded the trouble as its responsibility in MTAS. However, Based on information available to CGE&Y, it appears that these troubles were actually the responsibility of the CLEC. (See Eschelon Cases 23 and 29). Therefore, CGE&Y finds that these 2 troubles should have been flagged as installation related and coded as CLEC-caused, therefore making them ineligible for OP-5.

#### **2.6.4 Findings Impact on OP-5**

According to Qwest, it is unable to alter a trouble disposition or cause code after the trouble ticket has been closed. Once the ticket is closed, it is archived and changes cannot be made. (Qwest DR-551) However, Qwest indicated that it audits disposition and cause codes on a weekly basis and results of the audits reflect a greater than 95% accuracy rate. (Qwest DR-568) Qwest provided CGE&Y with documentation relating to Qwest's audits of disposition and cause codes, including a description of the process and the results. Qwest's June results indicated a 97.99% accuracy rate for non-designed tickets.

In performing this data reconciliation, CGE&Y had the benefit of several data sources to recreate the events surrounding each case. This included the information provided by Eschelon and the adhoc MTAS data, allowing for an examination of multiple troubles on the same line over a period of time. Much of this information would not have been available to Qwest in its original assigning of the trouble disposition code. In addition, Qwest's current auditing practices do not avail itself of looking at a history of multiple troubles on the same line when evaluating each individual case of trouble. Based on the information available, CGE&Y found that Qwest coded 11 troubles as CLEC-caused in error, however Qwest only agrees with CGE&Y's findings on 2 of these cases. In addition, CGE&Y found that Qwest coded 2 troubles as Qwest-caused in error.

CGE&Y finds that 8 troubles were inappropriately excluded from being flagged as installation related and eligible for OP-5 because Qwest coded these troubles as CLEC-caused in error. Of these 8 troubles, 4 were also discussed and included in the results of sections 2.4 and 2.5. (See Eschelon Cases 3, 4, 20, and 25) In addition, CGE&Y finds that 1 trouble was inappropriately included in the OP-5 results because Qwest coded the trouble as Qwest-caused in error. Thus, the net impact of cases where there was an incorrect disposition code and it has not already been addressed in this report, is that Qwest's published OP-5 results are understated by 3. CGE&Y also finds that 3 troubles would be included in its OP-5C, service order accuracy results.

## 2.7 Troubles Classified as Incorrect Carrier

CGE&Y analyzed the MTAS and RSOR adhoc data and determined that among 22 troubles on 19 lines whose service order activity in RSOR suggests that the line was an Eschelon account at the time of the trouble, 10 were correctly classified as retail tickets because they involved win-back situations and the remaining 12 were Eschelon tickets mistakenly classified as retail tickets. Among these, 5 tickets should be considered installation-related and included in OP-5 (See Eschelon Case 4, 17, 44, and 45), and 5 others should be considered service disruptions on the day of installation (See Eschelon Cases 13, 43, 46, 47, and 48; see also Section 3). The remaining 2 tickets should be considered canceled tickets (See Eschelon Cases 8 and 63). These 12 troubles are included in table 2.7(a).

CGE&Y identified 14 other tickets classified as retail which contained character strings in the Initial or Final Status narrative fields in MTAS suggesting Eschelon involvement. CGE&Y determined that 10 were actually Eschelon tickets on 8 lines. Of these, 1 ticket should be included as a service disruption on the day of installation and as a service order accuracy issue (See Eschelon Case 49; see also Sections 3 and 4). The remaining tickets are not installation related and would not be eligible for OP-5. (See Eschelon Cases 56, 64, 65, 67, 68, and 69) These 10 troubles are included in table 2.7(a).

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<b>Table 2.7(a) Eschelon Troubles Incorrectly Classified as Retail or Unknown</b>										
Case	Order Comp Date	Trouble Date	MTAS				CGE&Y Findings			
			CLEC ID	Trouble Cause	I	I_CNT	CLEC ID	Trouble Cause	I	I_CNT
4	5/7	5/14	Qwest	Qwest	No	No	Eschelon	Qwest	Yes	Yes
17	5/1	5/2	Qwest	Qwest	No	No	Eschelon	Qwest	Yes	Yes
44	5/24	5/29	Unknown	Qwest	No	No	Eschelon	Qwest	Yes	Yes
45	5/22	5/25	Qwest	Qwest	No	No	Eschelon	Qwest	Yes	Yes
45	5/22	5/26	Qwest	Qwest	No	No	Eschelon	Qwest	Yes	Yes
43	6/18	6/18	Qwest	Non-Qwest	No	No	Eschelon	Qwest	Yes	Yes; See OP5-B
13	5/7	5/7	Qwest	Non-Qwest	No	No	Eschelon	Neither; Referred	Yes	No; See OP5-B
46	5/31	5/31	Qwest	Qwest	No	No	Eschelon	Qwest	Yes	Yes; See OP5-B
47	6/28	6/28	Qwest	Qwest	No	No	Eschelon	Qwest	Yes	Yes; See OP5-B
48	5/21	5/21	Qwest	Non-Qwest	No	No	Eschelon	Neither; Referred	Yes	No; See OP5-B
8	5/30	6/28	Qwest	Canceled <sup>9</sup>	Yes	No	Eschelon	Canceled	Yes	No
63	5/7	5/9	Unknown	Canceled	No	No	Eschelon	Canceled	Yes	No
49	4/26	5/1	Qwest	Customer	No	No	Eschelon	Qwest	Yes	Yes; See OP-5C
64	5/24	5/30	Qwest	Qwest	Yes	Yes	Eschelon	Qwest	No	No
64	5/24	5/31	Qwest	Qwest	No	No	Eschelon	Qwest	No	No
56	NA	5/8	Qwest	Qwest	No	No	Eschelon	Qwest	No	No
65	NA	5/15	Qwest	Customer	No	No	Eschelon	Eschelon	No	No
66	NA	5/29	Qwest	Customer	No	No	Eschelon	Eschelon	No	No
67	NA	6/18	Qwest	Customer	No	No	Eschelon	Eschelon	No	No
68	NA	6/18	Qwest	Customer	No	No	Eschelon	Eschelon	No	No
69	NA	5/16	Qwest	Qwest	No	No	Eschelon	Qwest	No	No
69	NA	5/17	Qwest	Qwest	No	No	Eschelon	Qwest	No	No

CGE&Y identified 1 trouble that was classified as an Eschelon trouble ticket, but was actually a Qwest retail trouble ticket. (See Eschelon Case 54) This trouble is detailed in table 2.7(b).

<b>Table 2.7(b) Qwest Retail Troubles Incorrect Classification as Eschelon</b>										
Case	Order Comp Date	Trouble Date	MTAS				CGE&Y Findings			
			CLEC ID	Trouble Cause	I	I_CNT	CLEC ID	Trouble Cause	I	I_CNT
54	5/3	5/3	Eschelon	Qwest	Yes	Yes	Qwest	Qwest	Yes	Yes

### 2.7.1 Findings Impact on OP-5

<sup>9</sup> A disposition code of '650' indicates that Qwest received notification from the CLEC that the trouble may be closed before Qwest has diagnosed the trouble.

As described above, CGE&Y identified 22 troubles classified in MTAS that were actually Eschelon trouble tickets. In addition, CGE&Y identified 1 trouble that was classified as an Eschelon trouble in MTAS but was actually a Qwest retail trouble. The impact of these restatements adds 9 trouble tickets previously not included in the OP-5 results and removes 1 trouble ticket previously included in the OP-5 results. CGE&Y’s findings also add 6 incidents to its service disruption on the day of installation total (OP-5B). (See sections 3 and 6.3). CGE&Y’s findings also add 1 incident to its service order accuracy total (OP-5C). (See sections 4 and 6.3).

### 3 Service Disruptions – Day of Installation

Based on the information provided by Eschelon and available in MTAS, CGE&Y identified 11 installations in May and June 2002 where Eschelon’s end-user experienced a disruption of service for an extended period of time on the day of installation. (See Eschelon Cases 5, 6, 7, 8, 11, 12, 13, 43, 46, 47, and 48) In most of these cases, the new service was to be provisioned with a disconnect (“D”) order disconnecting the old service, and a new (“N”) order establishing the new service. For UNE-P orders, the end-user is expected to experience little if any service disruption. The service disruption that resulted in these 11 cases were due to the N and D orders separating and the D order being worked hours in advance of the N order. Because the end-user is not expected to experience a service outage for more than a few minutes, CGE&Y finds that these service disruptions represent installation errors that should impact the OP-5 quality of installation measure.

Case	Order Completion Date	Call Center Ticket/Trouble Date
5	6/5/02	6/5/02
6	5/17/02	5/17/02
7	5/21/02	5/22/02
8	5/30/02	5/30/02
11	5/21/02	5/21/02
12	5/31/02	5/31/02
13	5/7/02	5/7/02
43	6/18/02	6/18/02
46	6/3/02	6/3/02
47	6/28/02	6/28/02
48	5/21/02	5/21/02

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Eschelon followed the “Recent Service Request Activity” process to resolve the out of service condition describe above in all but one case (See Eschelon Case 48). In response to DR-553 Qwest provided a description of this process:

“[T]here is a documented process that requires the CLEC to contact the ISC within 72 hours. Currently in the Maintenance and Repair CLEC documentation located on the Qwest website it states Recent Service Request Activity: If your service request was completed within the past 72 business hours contact Qwest's Interconnect Service Center (ISC) at Redacted for assistance. After researching the issue, the Customer Service Inquiry and Education Center (CSIE) will contact you regarding resolution of your issue. If your service request was completed more than 72 business hours ago, and you determined the problem is in Qwest's network as described above, submit your trouble report to Qwest in one of two ways. Qwest implemented this process based on CLEC feedback received during on site visits in late 1999.”

This process did not result in a trouble ticket being opened for 6 of the 11 out of service conditions described above. (See Eschelon Cases 5, 6, 7, 8, 11, and 12) As a result, these installation errors were not included in Qwest’s OP-5 calculation. CGE&Y identified 5 troubles classified as retail that occurred on the same day an Eschelon order was being worked. (See Eschelon Cases 13, 43, 46, 47, and 48) As a result, these installation errors were not included in Qwest’s OP-5 calculation for Eschelon. CGE&Y finds these troubles were related to Eschelon customer service disruptions that should be reflected in Qwest’s monthly performance reports. Therefore, CGE&Y finds that Qwest’s OP-5 results underreport the percentage of new installations that experience a trouble within the first 30 days of installation. Qwest’s position is that the CLEC order was still pending, therefore these service disruptions are properly excluded from OP-5 per the current PID because the new installation order (N order) has not yet been reported as complete. In each case, Qwest ultimately completed the service order once Eschelon notified it of the out of service condition. CGE&Y finds these customer affecting installation errors should be reflected in Qwest’s monthly performance reports. CGE&Y includes these results in its proposed OP-5B measure. (See section 6.3)

Qwest has conducted preliminary research on the problem of disconnects on the day of cut and has indicated that it believes the population of the “Frame Due Time” field on the LSR may contribute to the disassociation of the N and D orders. There is no FDT on UNE-P orders, but Qwest allows CLECs to populate the FDT field. According to Qwest,

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it has no responsibility to meet a FDT on a UNE-P installation, but the presence of the FDT might cause the D order to be completed earlier than the N order. Qwest indicated that it would research this matter further. CGE&Y finds that Qwest is responsible for the service disruptions regardless of the impact of the FDT field. If Qwest finds that the FDT is causing the service disruption, then it is Qwest’s responsibility to notify CLECs they are not to use this field.

#### 4 Service Order Accuracy – Customer Affecting

Eschelon identified 7 installations in May and June 2002 which were not provisioned as ordered on its LSR. (See Eschelon Cases 4, 9, 17, 21, 22 and 33) In each of these cases, CGE&Y reviewed the available information and verified that the service order did not accurately include all the features requested by Eschelon on its LSR. Eschelon followed the same “Recent Service Request Activity” process described in the service disruption section to correct the order provisioned incorrectly. CGE&Y also identified 3 troubles in MTAS that indicated there was an error on the service order. (See Eschelon Cases 23, 31, and 50) Specifically, the MTAS internal narratives indicated that a feature was not working and that it was being referred to carrier services for resolution with a service order.

<b>Table 4. Service Order Accuracy – Customer Affecting</b>		
<b>Case</b>	<b>Order Completion Date</b>	<b>Call Center Ticket/Trouble Date</b>
4	5/7/02	5/16/02
9	6/5/02	6/5/02
17	5/1/02	5/9/02
21	5/8/02	5/9/02
22	5/10/02	5/20/02
23	5/31/02	5/31/02
31	5/24/02	6/11/02
33	5/24/02	5/28/02
49	4/18/02	5/1/02

Qwest described the resolution process for features not provisioned as a result of an error on the service order as follows:

“When the cause of the problem is an omission or error on the service order, the problem cannot be resolved through a

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trouble report but rather must have a subsequent order issued by the ordering center. This process applies equally to retail and wholesale. For wholesale, in these instances, the occurrence of an LSR/SO mismatch is captured in Qwest's reporting of additional information titled Order Accuracy, which is being reported on the page immediately following PO-20 results. The process to capture call center tickets flagged as LSR/SO mismatches was deployed June 27, 2002." (Qwest data request 552)

Qwest indicated that each of the 7 cases identified would be reflected in the "OP-5 Supplemental Data" had it been deployed at the time. CGE&Y did not audit this "OP-5 Supplemental Data" measure, however, CGE&Y reviewed Attachment 3 of the August 2001- July 2002 notes summary with described the Order Accuracy measure via call center data. According to Qwest, only the first call center ticket opened on a given line is eligible for the "OP-5 Supplemental Data." CGE&Y believes this rule is intended to prevent the inclusion of repeat call center tickets in the measure. However, this rule has the unintended affect of excluding otherwise eligible tickets from inclusion in the measure. For example, if the CLEC contacts Qwest via the call center for an issue unrelated to service order accuracy, a call center ticket is opened. This ticket would not be flagged as an LSR/SO mismatch. If the CLEC were to call later that day and report a feature was not provisioned as ordered on the LSR, the call center ticket opened would also not be flagged as an LSR/SO mismatch because the first ticket is the only eligible ticket by definition. Therefore, CGE&Y finds that Qwest's rule for making only the first call center ticket on a line eligible for the "OP-5 Supplemental Data" underreports the percentage of service orders that contain errors. Qwest notified CGE&Y that it was in fact including only the first call center ticket flagged as an LSR/SO mismatch even if it is not the first call center ticket opened. CGE&Y finds this treatment acceptable and recommends that Qwest amend the language in the notes summary to reflect that only the first call center ticket flagged as an LSR/SO mismatch will be considered regardless of whether a previous unrelated ticket was opened.

During CGE&Y's visit to Eschelon in August 2002, Eschelon provided CGE&Y with the results of an internal comparison it made between its LSR and the PSON received from Qwest. The PSON is provided to Eschelon approximately one hour after the Firm Order Confirmation (FOC). According to Eschelon, because it's services were not being provisioned as ordered so frequently, it had begun comparing LSRs to PSONs so that it could identify any errors on the PSON and notify Qwest prior to the installation so that the order would be provisioned as ordered. Eschelon's initial results indicated that 7 out of 12 PSONs compared to LSRs that had required manual handling contained errors. CGE&Y independently compared the same LSRs and PSONs and found the same results. On September 12, CGE&Y requested the latest results of Eschelon's comparison. These results showed that 21.43% of all manual off-net conversions had service orders with

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errors (15/70). This problem is limited to those orders requiring manual intervention, about 50% of Eschelon's orders. CGE&Y finds that each error Eschelon discovers on the PSON and notifies Qwest prior to the installation due date, reduces the numerator of Qwest's "OP-5 Supplemental Data" measure by one.

CGE&Y finds that the current PSON notification process places the burden on CLECs to identify errors made by Qwest typists on service orders. Eschelon indicated that it was required to hire one full time employee dedicated to making these LSR/PSON comparisons. It is CGE&Y's opinion that Qwest should be responsible for insuring that it is typing service orders accurately. As far as the measurement results are concerned, it is CGE&Y's opinion that service order errors discovered prior to installation should be captured in Qwest's PO-20 measure which is intended to report on service order accuracy and those discovered by the end user resulting in a trouble or escalation report should be counted in the OP-5 measure. Qwest's position is that these issues are not specifically identified in the PID and that there is no accounting for these instances of the customer not getting what was ordered on the retail side so parity is achieved. CGE&Y's position is that these are customer affecting issues, therefore they should be accounted for in the PID. In addition, Qwest has other methods available to ensure its retail customers get what they have ordered such as online recap of the service order prior to disconnecting from the customer.

## 5 Findings From the PMA, Data Reconciliation and FTTC

During the Performance Measures Audit (PMA), CGE&Y determined that Qwest included repeat repair reports in its calculation of OP-5 for designed services. CGE&Y believed it was inappropriate to include repeat repair reports in OP-5 because the intent of the measure is to evaluate installation quality. CGE&Y believed that repeat repair reports reflected repair quality, which was already measured by MR-7, rather than installation quality. CGE&Y issued AZIWO2041 reporting its findings.

Several instances of OP-5 calculations resulting in negative numbers led CGE&Y to the conclusion that repeat reports were being counted in OP-5. CGE&Y did notice at the time that these were occurring for designed services results for OP-5, which are calculated using the WFAC adhoc data source. CGE&Y considered that this was due to the relatively much lower volume of designed service orders that the possibility of negative OP-5 results arose, and therefore negative OP-5 results would not be expected to be found among the much higher volume non-designed services, even if repeat reports were being included. As no issue had been clearly suggested by its data analysis, CGE&Y did not separately investigate whether the non-designed OP-5 results, calculated from the MTAS adhoc data source, included repeat repair reports as well. When AZIWO2041 was discussed at a TAG meeting, it was decided that repeat repair reports would continue to be included in the PID, and the IWO was therefore closed.

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During the data reconciliation, CGE&Y verified that the Qwest adhoc data included all the Pseudo-CLEC data accurately. This did not include validating the eligibility fields for the PID measurements.

During the Functionality Test Results Comparison (FTRC) effort, CGE&Y recalculated functionality test measures using Pseudo-CLEC collected data and compared the results to calculations of the same measures using the Qwest adhoc data. Due to the limited number of troubles experienced during the functionality test, Qwest's exclusion of repeat repair reports in OP-5 was not encountered or reported.

With respect to the issue of installation related troubles not being flagged as such due to the presence of earlier troubles within 30 days, CGE&Y did not investigate why all troubles were not flagged as installation related during the PMA, and therefore, did not identify LMOS's limitations in setting the installation indicator. Due to the limited number of troubles experienced by the Pseudo-CLEC, this issue was not discovered during the data reconciliation or FTRC efforts.

There was no way to complete a widespread audit of the accuracy of Qwest's disposition and cause codes during the PMA, however, CGE&Y did do a limited evaluation of disposition cause codes through ride days with outside field forces. CGE&Y followed up on troubles closed during the ride days by verifying they final disposition through Qwest's systems. During the data reconciliation, CGE&Y did not evaluate disposition cause codes. During the FTRC effort, CGE&Y did not encounter incorrect disposition codes due to the limited number of troubles experienced by the Pseudo-CLEC.

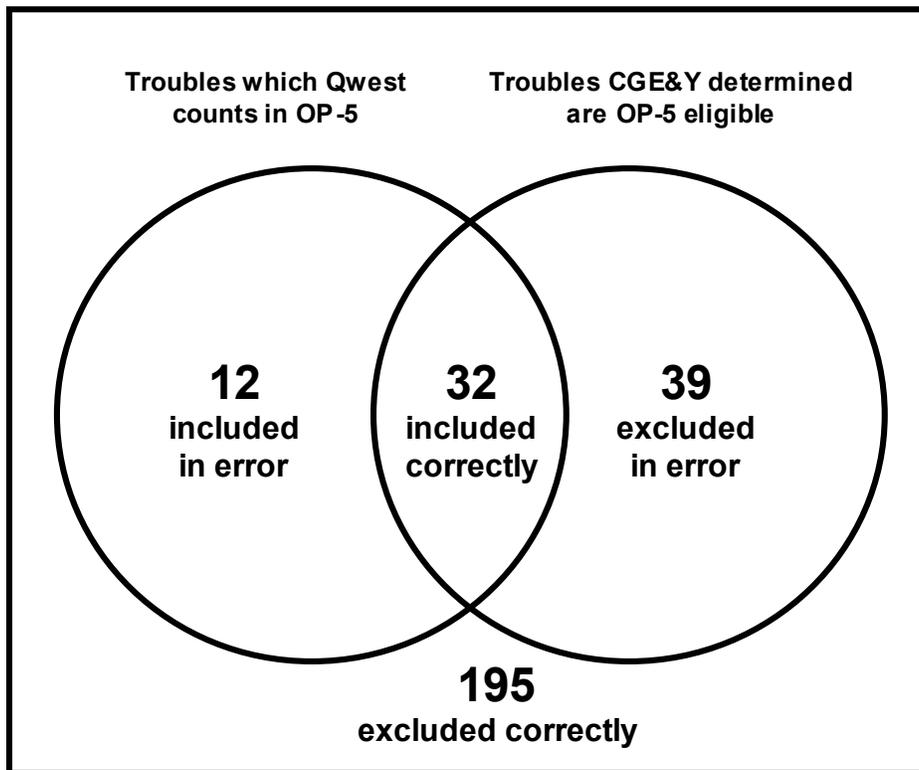
CGE&Y identified cases of Pseudo-CLEC troubles classified as retail tickets during the PMA and data reconciliation. These incidents were noted in AZIWOs 1206 and 2063. CGE&Y closed AZIWO1206 based on the number of incidents reported and the timing of the trouble ticket in relation to the completion of the order. The focus of AZIWO2063 became restricted to cases where the market unit identifier was unknown and the proportion of these was sufficiently reduced by Qwest system fixes to be considered insignificant so that the IWO was closed. From Qwest's response to AZIWO1206, CGE&Y became aware that SOP updates to LMOS were sometimes delayed resulting in troubles on CLEC-converted lines being incorrectly coded as Retail. The IWO was closed, while recognizing that this was inherent LMOS limitation.

CGE&Y did not discover similar service disruptions to those experienced by Eschelon's end-users during the PMA, data reconciliation, or the FTRC effort because they were not reflected in the Pseudo-CLEC collected data or in Qwest's adhoc data.

## 6 Conclusions and Recommendations

### 6.1 Qwest is not Calculation OP-5 Per PID 7.0

CGE&Y found that Qwest’s published OP-5 results for Eschelon incorrectly excluded 9 repeat reports, 9 “trouble reports due to the LMOS limitation of only designating the first trouble within 30 days as ‘I’=’1’, 9 troubles incorrectly coded as a retail trouble, 4 troubles incorrectly coded as CLEC-related and not included in other categories, and 8 troubles for which LMOS could not find the most recent inward service order activity. CGE&Y also found that Qwest’s published OP-5 results for Eschelon incorrectly included 10 troubles for which there were no valid inward installations within the prior 30 days, 1 trouble incorrectly coded as Qwest-caused, and 1 retail trouble incorrectly classified as an Eschelon trouble. Therefore, CGE&Y finds that Qwest’s published OP-5 results underreported the number of eligible installation related troubles by 27. Of the 44 troubles coded by Qwest as OP-5 eligible, 27% (12) were incorrectly coded as eligible. In addition, CGE&Y finds that of the 234 troubles Qwest coded as ineligible for OP-5, 17% (39) should have been coded as eligible. Therefore, CGE&Y finds that of the 83 troubles coded as OP-5 eligible by either Qwest or CGE&Y, Qwest coded 61% (51) incorrectly.



Qwest’s published result for OP-5 for Eschelon for the combined period May and June 2002 was 92.17% (518/562). By contrast, CGE&Y finds that the true result for OP-5 for Eschelon for the same time period was 87.37% (491/562). CGE&Y also calculated the OP-5 result relying on the disposition code included in the Qwest MTAS data, except where Qwest indicated it had closed the trouble to an incorrect disposition code in its response to a CGE&Y data request. The result of this calculation was 88.26%, and does not include the 6 cases where CGE&Y disputes Qwest’s disposition of the trouble and Qwest does not agree with CGE&Y’s findings, nor the 1 case where CGE&Y determined Qwest had incorrectly coded a trouble to Qwest responsibility.

CGE&Y also recalculated the retail OP-5 result, excluding cases where there was no service order with inward activity in the thirty days prior to trouble, and including those cases which were coded as Qwest’s responsibility and had a service order with inward activity in the 30 days prior to trouble. This approach constitutes a workaround which resolves all the issues in sections 2.3, 2.4, and 2.5 above. It does not take into account the issues in 2.6 and 2.7, (incorrect assignment of responsibility for trouble or ownership of account), as these would need to be evaluated one trouble at a time. These modifications increased Qwest’s retail comparison OP-5 value from 85.34% to 86.84%.

These results are summarized in the following table:

<b>Table 6.1 OP-5 results for Eschelon UNE-P and UNE-E during May-June 2002</b>		
	<b>Qwest’s published report</b>	<b>OP-5 per PID 7.0</b>
Eschelon	92.17%	87.37%*
Qwest Retail	85.34%	86.84%

\*The range of 87.37-88.26% represent the difference in results obtained from relying on Qwest’s disposition codes for the troubles in MTAS versus CGE&Y’s disposition of the troubles. Both results indicate parity performance.

## 6.2 Repeat Reports Should be Excluded From OP-5

The intent of OP-5 is to evaluate the quality of Qwest’s ordering and installation services. In the opinion of CGE&Y, the inclusion of repeat repair reports in OP-5 does not accomplish this goal. Repeat repair reports do not represent subsequent

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installation errors, but instead reflect Qwest’s failure to clear the trouble the first time. Repeat repair reports are indicative of the quality of Qwest’s maintenance and repair services, and are already reflected in the MR-7 measure, “Repair Repeat Report Rate”.

Qwest’s current LMOS logic prevents later troubles which do not qualify as “repeat reports” from being counted as installation related and therefore eligible for OP-5. The result of this logic is to exclude several troubles that CGE&Y considers eligible for OP-5. Thus, CGE&Y proposes the following language to clarify which repair reports should be eligible for OP-5. CGE&Y recommends that only the first Qwest-caused report within 30 days of an inward installation should be included in OP-5. This language will allow for the inclusion of the first Qwest-caused trouble occurring after a CLEC-caused or a Qwest non-repair related trouble.

Under this definition, the 9 Repeat troubles in Section 2.3, and 15 of the installation-related troubles discussed in Sections 2.4, 2.5, 2.6, and 2.7 would not be classified as ineligible. CGE&Y finds that Qwest’s published OP-5 results for May and June 2002 underreported the number of eligible installation related troubles by 3 in comparison with CGE&Y’s suggested OP-5A. CGE&Y finds that Qwest’s actual new service installation quality measure result for Eschelon’s UNE-P product for the combined period of May and June 2002 was 91.64%. This is CGE&Y’s result for OP-5A. See Section 6.3 for an explanation of this measure. (This result includes all the troubles CGE&Y found were coded as CLEC-caused in error)

Without a thorough detailed analysis of Qwest’s 15000 retail troubles it is not possible for CGE&Y to provide a precise retail analogue for this Eschelon result. However, the retail result would be somewhere between the retail result determined above in Section 6.1 and a result which assumes that the troubles added in that result would not be the first Qwest-caused trouble on the line or if they were, they would invalidate a later trouble which had been previously included in Qwest’s published OP-5 result. CGE&Y has determined this range to be from 86.84% to 90.99%.

<b>Table 6.2 OP-5 results for Eschelon UNE-P and UNE-E during May-June 2002</b>			
	<b>Per Qwest published report</b>	<b>OP-5 per PID 7.0</b>	<b>CGE&amp;Y’s OP-5</b>
Eschelon	92.17%	87.37%	91.64%%
Qwest	85.34%	86.84%	86.84% - 90.99% *

\* the paragraph immediately above the table explains this range.

CGE&Y’s OP-5A is in parity with Qwest’s analogous retail results.

### 6.3 OP-5 Is Incomplete

As described in Sections 3 and 4, CGE&Y found several instances of customer affecting issues that are not eligible for inclusion to OP-5 per the current PID. These issues included service disruptions as the result of a new installation and features not provisioned as ordered due to Qwest writing the service order inaccurately. CGE&Y finds that these represent service-affecting issues to the CLEC's end-user customer, and therefore, are relevant to the intent of OP-5, new service installation quality. However, Qwest's current adhoc data does not allow for the inclusion of these conditions in its OP-5 calculation. Therefore, absent their inclusion in OP-5 as it is currently constituted, CGE&Y recommends disaggregating the current OP-5 measure to include these issues as follows: the current PID version of OP-5 (OP-5A); the service disruptions – day of installation (OP-5B); service order accuracy (OP-5C); and overall installation quality (OP-5D).

OP-5A – CGE&Y recommends that OP-5A reflect the current version of the PID with repeat reports excluded as described above. (See section 5.2) This will represent the percentage of new installations that do not require a trouble ticket within the first 30 days of installation. CGE&Y finds that for the combined period May and June 2002 the proper result was 91.64%.

OP-5B – CGE&Y recommends that OP-5B measure the percentage of new installations that place the end user out of service for more than a specified amount of time that is agreed to by the parties. CGE&Y recommends that the denominator for this measure be the number of new orders on lines which had a new and disconnect the same day, because CGE&Y found that this issue was almost entirely due to the separation of N and D orders. Qwest's current performance data reporting regime does not allow for the mechanized calculation of this measure. In order to capture data for this measure, Qwest will have to examine trouble tickets coded to retail while the CLEC order is pending as well as call center tickets opened on the day of installation. CGE&Y finds that for the combined period May and June 2002 the result for this measure would be 20.00%% (9/45). CGE&Y did not include 2 of the cases identified in Section 3 because neither involve an 'N' installation order.

OP-5C – CGE&Y recommends that OP-5C measure the percentage of manual service orders that contain LSR/SO mismatches due to Qwest errors. Qwest's current performance data reporting regime does not allow for the mechanized calculation of this measure. In order to capture data for this measure, Qwest will have to examine trouble tickets coded to 10XX and/or referred to other non-repair related departments as well as call center tickets opened. CGE&Y recommends this measure include only the first instance of an LSR/SO mismatch. CGE&Y finds it would be instructive to also calculate a measure based on the total number of

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LSR/SO mismatches. This would include all instances of an LSR/SO mismatch and reflect the average number of LSR/SO mismatches per service order. As described earlier, the burden of identifying LSR/SO mismatches is currently on the CLEC. CGE&Y finds that Qwest should be responsible for ensuring that all service orders are written per the LSR. Until such time as Qwest performs this task, CGE&Y finds that LSR/SO mismatches discovered prior to installation should be reflected in PO-20 since the service was provisioned as ordered. Those errors not discovered prior to installation that result in a customer-affecting condition should be included in OP-5C. CGE&Y finds that for the combined period of May and June 2002 the result for this measure was 5.69% (16/281).

In determining this result, CGE&Y had to combine troubles based on the May 1 – June 30 time range with escalation tickets based on the May 8 – June 7 time range. CGE&Y therefore doubled the number of escalation tickets found during the May 8 – June 7 timeframe to extrapolate the entire May 1 – June 30 timeframe. In addition, CGE&Y did not independently determine the percentage of manually-handled orders, but rather used the 50% result repeatedly reported over several months by Eschelon.

OP-5D – CGE&Y recommends that OP-5D measure the total percentage of new installations without a trouble or customer affecting condition experienced within the first 30 days of installation. CGE&Y envisions this measure as an aggregation of the “trouble” situations identified in OP-5A, B, and C. This measure would be the most instructive in determining the overall quality of Qwest’s ordering and provisioning services. CGE&Y calculated this by combining the 47 OP-5A troubles, the 9 OP-5B Day of Cut Disruptions, and the extrapolated 16 OP-5C order inaccuracies, resulting in a total of 72 trouble instances, and dividing by the denominator 562 determined from Qwest’s published results. This results in an overall installation quality measurement result of 87.19%. If installation-related troubles which are not the first Qwest-caused trouble are also included (as per PID 7.0), this result would drop to 82.82%. There is no analogous result for retail performance, therefore, no determination of parity is possible. CGE&Y recommends a benchmark be developed through the long term PID administration.

Even including these troubles does not lower the measurement of installation service quality to the region consistently reported on Eschelon’s report cards. The most recent result provided by Eschelon is 40.7% for the month of April. In an effort to glimpse whether results in that realm can possibly be consistent with the data received from Qwest, CGE&Y considered including all troubles within 30 days of any service order, regardless of whether the service order had inward activity, and regardless of whether the trouble was due to causes for which Qwest was responsible or due to causes for which Qwest is not responsible. This resulted in 127 troubles. If these are combined with the 9 Day of Cut Service Disruptions and the estimated 16

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LSR / Service Order mismatches, this would lead to a maximum possible value of 152 troubles and a lower bound for order installation quality of 72.95% for the months of May and June. CGE&Y does not consider this an appropriate estimate of OP-5 Installation quality, but it indicates a lower bound below which any OP-5 result would be unreasonable.

#### **6.4 Qwest Should Correlate Troubles to Service Orders**

CGE&Y finds that Qwest should implement the fix described in its response to Qwest Data Request 575 to properly correlate troubles to service orders. CGE&Y recommends that this fix be audited once in place to verify it accomplishes the goals set forth in Qwest's proposal. However, while this would correct for the many cases CGE&Y observed where troubles were not flagged as installation related due to LMOS' inability to recognize qualifying services orders, it does not represent a complete fix of all the issues identified by CGE&Y during this data reconciliation. Specifically, this fix does not address all the cases of actual CLEC troubles mistakenly identified as retail. While it provides a fix for many of these troubles with regards to OP-5, the troubles would still be coded as retail troubles in MTAS and would be excluded from the wholesale results for the other M&R measures, and included instead in the retail results. Further investigation of correcting the overall issue of customer misidentification is beyond the scope of this report.

#### **6.5 Qwest Should Track Corrections and Incorporate them in Performance Measurement Calculations**

As indicated above in Section 6.1, of the 71 troubles CGE&Y determined were installation-related and eligible for OP-5, Qwest did not code 55% (39) of them as OP-5 eligible. This was largely due to LMOS being unaware of an order with inward activity having completed when processing the ticket, its inability to consider a trouble installation related when an earlier trouble exists within the prior 30 days, or the account was misassigned because the information used during legacy system processing was outdated or inappropriate. By the time the legacy system is updated with the appropriate information, the transaction of concern has already been processed with incorrect values and archived. The incorrect results are then incorporated into the next 12 months of performance reports. Similarly, dispositions entered by the technician closing out a trouble are archived and not revised if future information becomes available to Qwest indicating that the trouble was actually Qwest's responsibility.

Specifically regarding account misassignment, CGE&Y asked Qwest in a data request:

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“Is there any process in place for identifying CLEC troubles incorrectly coded as retail and correcting reported performance results?”

Qwest responded:

“...In the event, an account is misassigned and a trouble ticket is taken against the account before its ownership designation is changed, Qwest does not alter the trouble ticket. Once the ticket is closed, it is archived and changes cannot be made. Consequently, Qwest does not revise its performance results. The instability that would result in revising performance results is not warranted by the low incidence of misassignments, and in fact, could be unmanageable and confusing.”  
(Qwest data request 565)

Moreover, Qwest’s stance that it does not revise its performance results applies to all of the potential errors discussed above. CGE&Y finds 55% much too high an incidence rate to be ignored, and recommends that a database of corrections be developed, which would be utilized in the performance reporting system to improve the accuracy of results, without endangering data integrity by modifying the original archived records.

## 6.6 Troubles Not in MTAS

CGE&Y finds that Qwest should not consider tickets excluded from MTAS when assigning the installation related indicator to subsequent tickets on the same line. In addition, in cases where these troubles are excluded because they were referred to another department, CGE&Y believes that such cases should be considered by the TAG for inclusion in service installation quality or upon agreement of the parties, referred to the Long Term PID Administration.

## 6.7 Summary

In general, CGE&Y’s analysis of the OP-5 data provided by both Eschelon and Qwest results in the overall conclusion that Qwest’s reporting of the quality of installation provided to Eschelon during the May 1 – June 30, 2002, time frame at 92.17% does not reflect the true service quality per PID 7.0 that CGE&Y determined was between 87.37% and 88.26%. CGE&Y’s recommended OP-5A, which counts

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only the first Qwest-responsible installation-related trouble and adjusted disputed dispositions indicated a 91.64% installation service quality. When the measure is expanded to include service disruptions on the day of cut and order-writing inaccuracies, service installation quality would be further reduced to an estimated OP-5D = 87.19%, but is not as severe as what was reported by Eschelon for April 2002 as 40.7%. Of troubles considered OP-5 eligible by either Qwest or CGE&Y, CGE&Y determined that Qwest misclassified 62% of them.

## 7 Observations

During the course of the Eschelon data reconciliation project, CGE&Y observed conditions not related to the task at hand but relevant to situations affecting either CLEC performance or an end user experience. These observations are discussed in the following sections.

### 7.1 Observation 1

Based on a recent Qwest process allowing a CLEC a window of 72 hours to contact the call center and expedite a trouble condition, service order installation related issues are omitted from the performance measurement calculations. According to Qwest's response to DR-299, the process was created to help a CLEC to reach a quick resolution to an order related problem that resulted within a certain period of time following installation. Prior to this process, trouble reports received by Qwest's customer care centers, were sometimes confused with recent service order activity not posted in all legacy systems. Call Center Tickets (Escalation Tickets) are recorded in an independent database maintained by the CLEC order center personnel and are not documented in the normal trouble ticket processes. The problem observed is that service order generated problems are resolved through the call center process without a trouble ticket being generated in LMOS and therefore there is not record of such a problem to count towards the OP-5 performance measure. Although CGE&Y recommended that service affecting call center tickets be included in the its OP-5B and C calculations, this observation only addresses the fact that there is no documentation describing the criteria used to identify candidates for the "supplemental OP-5 data" measure.

### 7.2 Observation 2

Trouble Isolation Charges (TIC) get applied to a CLEC trouble report when a dispatched Qwest repair employee determines the fault location exists beyond the DEMARC or the network interface. CGE&Y observed certain Eschelon trouble tickets where TIC charges were applied when the repair ticket was cleared to a Qwest caused fault. The problem observation is based on the Qwest dispute

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resolution process. Qwest does not itemize the resolution of the reported defect clearly when the charges are applied to the CLEC master bill. Employee abbreviations are confusing to read and provide limited information for proper agreements to the dispositions. This makes it difficult for CLECs to dispute repair charges.

### **7.3 Observation 3**

CGE&Y observed a situation where LMOS had not been updated with account information from a recent CLEC service order. When a trouble report is submitted via CEMR, the CLEC ticket assumes the retail attributes and gets forwarded for processing. The CGE&Y observation detected Eschelon trouble reports for May and June 2002 were coded as a retail account and ineligible for OP-5 measure calculations. Per the current PID, same day trouble tickets are valid qualifiers for the OP-5 measure however, the limitations with the LMOS batch update process prevents CLEC trouble tickets from being issued the day of the service order completion. CGE&Y also observed a few cases where LMOS was not updated within the expected amount of time for the batch update process.

### **7.4 Observation 4**

CGE&Y observed that several outside plant dispatched trouble reports were associated with a recent CLEC installation service request. The criteria for the observations were related to outside plant tagging issues and facility fault conditions. Based on the information provided in Qwest's response to DR-300/572, a Qwest technician is only dispatched when a new (F1/F2) facility is assigned or the CLEC requests an appointment. The observation detected, that for new installation service requests, no facility information is provided to the CLEC in the pre-ordering or ordering processes unless the CLEC specifically requests such information from Qwest. It would be helpful if Qwest would add the facility information to the CLEC order notifications removing the hardships observed during the Eschelon visit. CGE&Y feels that this should be introduced via the Qwest Change Management Process (CMP).

### **7.5 Observation 5**

CGE&Y's calculated OP-5 results in section 6.1 are substantially different from the results provided on Eschelon's report cards. Eschelon indicated a 40.7% service installation quality result for April 2002. CGE&Y was not provided Eschelon's source data for this calculation and a reconciliation of Eschelon's 40.7% result was not intended in this report. However, CGE&Y finds that the difference in results may be include but are not limited to all of the following possibilities:

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- Eschelon may include troubles on lines that had an order on it, but with no inward activity.
- Eschelon is including trouble situations that are not resolved through trouble tickets and are not currently eligible per the PID.
- Eschelon may be including troubles that are coded as CLEC-caused which Qwest properly excludes.
- Eschelon may be using a denominator different from Qwest's.

CGE&Y determined that there were a large number of troubles that occurred within 30 days of a service order with no inward activity. (See the last paragraph of Section 6.3). While the intent of the OP-5 PID is to measure installation quality when new service is installed, Eschelon has been experiencing substantial difficulty with Qwest's programming of Feature and PIC changes. Perhaps another PID measurement should be developed to track the quality of provisioning of non-inwardly active service orders.

### 7.5 Observation 6

CGE&Y identified several cases where Qwest assigned the cause disposition code to CLEC-caused in error. CGE&Y finds this issue would be lessened if Qwest consulted with CLECs prior to assigning the cause disposition codes, as they cannot be changed once the ticket is closed. An example of this would be Eschelon Case 19, where the trouble ticket was closed to the disposition code 650, trouble canceled. In this case, through its investigation of the trouble, Qwest fixed the trouble, but did not yet find the cause. The CLEC contacted Qwest and notified them the trouble was cleared, so because Qwest did not yet identify the trouble, it coded it to trouble canceled. If the parties collaborated prior to assigning the cause disposition code, it is likely that Qwest would have determined the trouble to be its responsibility. This collaboration would also lessen the need for repair trip billing charge resolution in those cases where the CLEC believes the trouble ticket was not its responsibility in general. This observation should be considered as a recommendation for the Qwest Change Management Process (CMP)

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## Appendix A – Glossary of Terms

This attachment lists the terms and acronyms used in this document.

Acronym	Term	Definition
ACC	Arizona Corporation Commission	
ACR	Assigned Commissioner Ruling	
CGE&Y	Cap Gemini Ernst & Young	
CT	Capacity Test	Test ability of new mechanized systems to support the Testing Load. A pre-order and order test will be performed for purposes of this test.
CLEC	Competitive Local Exchange Carrier	A communications company which sells/re-sells communications services in direct competition with the Incumbent Local Exchange Carrier (ILEC)
CLLI	Common Language Location Identifier	An 11 digit alphanumeric code used as a method of identifying physical locations and equipment i.e., central office relay racks etc.
CO	Central Office	
CPE	Customer Premises Equipment	Customer-owned equipment
CRIS	Customer Records Information System	A department and system within the ILEC that records and bills exchange calls placed over the network.
CSR	Customer Service Record	A record of customer specific information such as name, address, telephone number, telecommunication services subscribed to and certain other data relating to the services provided.
DOJ	Department of Justice	
DSL	Digital Subscriber Line	Generic name for a family of evolving digital services to be provided by local telephone companies to their local subscribers
DS1L	DS1 Loop	
DSR	Directory Service Request	
EBI	Electronic Bonding Interface	
EB-TA	Electronic Bonding-Trouble Administration	
EDI	Electronic Data Interchange	Interface protocol that provides for mechanized order processing. Both the CLECs and the ILEC will have systems (EDI Interface) to support the EDI functionality
ETE	End-to-End Testing	For the purposes of this testing end-to-end is defined as testing to demonstrate the flow through capability of providing local service requests to the CLECs in parity to existing retail.
EXACT	Exchange Access Control and Tracking system	The system is used to receive Access Served Requests (ASR) from the Inter-exchange Carriers (IC) and CLECs to process the ASR and create the service order. Firm Order Confirmation (FOC) is also sent back via this system.
FCC	Federal Communications Commission	
FOC	Firm Order Confirmation	Response from the service order processor that acknowledges successful receipt of a CLEC order (i.e., provides notification SOP edits have passed).

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Acronym	Term	Definition
FT	Functionality Test	A documented set of instructions designed to test and/or validate specific functions of a process or system.
GUI	Graphical User Interface	A simplified method of accessing programs within a computer by using a mouse to point to icons, which in turn cause the programs to perform a specific function.
HPC	High Performance Communications	The Pseudo-CLEC.
IMA	Interconnect Mediated Access	A WEB-based that allows CLECs electronic access to the ILEC Operational Support System to perform pre-order, order, and repair business functions. The WEB access, also known as the IMA GUI, provides pre-order transactions.
ILEC	Incumbent Local Exchange Carrier	In this document, the term ILEC represents the ILEC.
IR	Incident Report	
ISDN	Integrated Services Digital Network	Digital services designed for use with desktop applications, telephone switches, computer telephony and voice processing systems
IXC	Inter-exchange Carrier	Long-haul, long distance inter-LATA carriers for voice, video and data traffic.
	Jeopardy (relative to MTP process)	A notice that is issued whenever a key-project milestone and/or commitment is at risk according to the MTP.
LATA	Local Access and Transport Area	As defined in 47 U.S.C. Section 3 (25)
LIDB	Line Information Data Base	Database used primarily for residential customers.
LNP	Local Number Portability	
LNPL	LNP with Loop	The ability to change Service Providers location or services while retaining the same local directory number.
LNPO	LNP Only	
LOA	Letter of Authorization	
	Loop Qualification	The Pre-order process to validate that xDSL loop meets the requirements of the ILEC for DSL service
LPIC	Local Primary Inter-exchange Carrier	Local primary inter-exchange carrier selected by end-user.
LPWP	Loop with Port	
	Loop	A transmission path that connects an end-user's premises to a the ILEC Central Office
LSOG	Local Service Ordering Guidelines	
LSR	Local Service Request	A form prepared by the CLEC to request the ILEC to provide the services as specified in the specific tariffs/contracts agreements. Information required for administration, billing and contact details is provided for in the various fields within the LSR.
M&P	Methods and Procedures	Current methods and procedures (e.g., tasks) defined to support operations required. These tasks are thoroughly planned out, explained and typically are outlined in detailed steps.
M&R / MNTR	Maintenance and Repair	Ability to provide for requests, status and resolution of potential troubles
	Migration	Refers to "conversion as is" or "conversion as specified."

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Acronym	Term	Definition
MLT	Mechanized Loop Test	A mechanized test used to determine loop situations
MTP	Master Test Plan	
NDR	Network Design Request	
NP	Number Portability	
OBF	Ordering and Billing Forum	Industry Standards Organization dedicated to resolving critical issues such as billing format issues between competing local exchange carriers, etc.
OC&C	Other Charges & Credits	Other Charges and Credits Bill Section
OCN	Operating Company Number	A four-digit number assigned to uniquely identify CLECs.
OSS	Operations Support Systems	For purposes of this test OSS refers to systems that are included for testing within this MTP.
PIC	Primary Inter-exchange Carrier	Primary interexchange carrier selected by end-user.
PON	Purchase Order Number	A unique number placed on an LSR to track the order.
POTS	Plain Old Telephone Service	
RESL	Resale	Service that allows a CLEC to purchase the ILEC retail services in order to resell these services to their own end-user.
RETL	Retail	
RSRP	Resale Repair	
RTRP	Retail Repair	
RPONS	Related Requests	
SME	Subject Matter Expert	
SOC	Service Order Completion	Response from the service order processor that acknowledges the provisioning systems provided a successful completion of the request (LSR) (i.e., provides notification the service has been provisioned).
SUPP	Supplemental	
TAG	Test Advisory Group	Consists of the ACC, its consultant, the TA, the Pseudo-CLEC, the ILEC, and those CLECs and other participants who wish to participate
TA	Test Administrator / Manager	Oversees the execution and assesses the processes and test execution
TN	Telephone Number	A number associated with a telephone service, typically 7 digits in length; the first 3 digits are associated with the prefix and the last 4 with a specific range
UNE	Unbundled Network Elements	As defined in MTP.
UNE-P	Unbundled Network Element Platform	Similar to Resale
UNE-E	Resale	Similar to Resale with a special billing rate
UNE-L	UNE Loop	A transmission path that connects an end-user's premises to a the ILEC Central Office
xDSL	"x" Digital Subscriber Line	A general name for an evolving high speed transmission technology which uses existing copper wire from the telephone company central office to the subscriber's premise and has electronic equipment at the central office and at the subscriber's premises, and transmits and receives high speed digital signals

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## Appendix B – Eschelon Trouble Cases

### Case 1 (Issues: Repeat repair reports): Redacted

According to the Eschelon service ticket history, this line was to have call forwarding with a cycle of one. On 6/6/02 the customer notified Eschelon of a trouble on the line. Eschelon checked CEMR, which showed the feature as active, however, calls were getting a ring no answer. According to the Eschelon service ticket history, CEMR indicated that the “RCYC” was set to 30 seconds. Eschelon validated that the CSR was correct. Eschelon also indicated it contacted Qwest, and Qwest agreed that RCMAC would fix the problem “shortly.” Eschelon validated that the call forwarding worked and that the RCYC in CMER was correct. Eschelon then closed the trouble ticket.

Qwest MTAS data indicates that there were 3 troubles on this line, the first on 6/5/02, and the other two troubles on 6/6/02. Only the first trouble was flagged as installation related, eligible for OP-5. The other two troubles were flagged as repeat repair reports and were not flagged as eligible for OP-5 in the Qwest MTAS data, although their - disposition codes were Qwest-caused. Additional research by Eschelon revealed that it did record the trouble on 6/5/02 identified in the Qwest MTAS data. Thus, both Qwest and Eschelon agree that the trouble on 6/5/02 was installation related. The Qwest DLETH history of the 6/6/02 trouble described by Eschelon agreed that ring cycle on the line was incorrect and needed to be reprogrammed. According to version 7.0 of the Arizona PID, repeat reports are not excluded from OP-5, however, Qwest MTAS data indicates that only the 6/5/02 trouble is eligible for OP-5. CGE&Y reviewed May 2002 MTAS adhoc data, and of the 53,823 troubles reports 11,350 were installation related (21.5%), and 5,492 (10.4%) were flagged as repeat reports. None of the repeat repair reports were considered installation related. Results for June were similar, with no repeat repair reports considered installation related. CGE&Y issued data request 299 to Qwest for clarification why these repair reports were not flagged as installation related and as eligible for OP-5, and whether Qwest in general excludes repeat repair reports from OP-5. Qwest responded that due to “an inherent system/process limitation in LMOS,” the repeat (“R”) and installation (“I”) indicators are mutually-exclusive and cannot be flagged simultaneously. (Qwest Data Request 549) According to Qwest, LMOS sets the “I” indicator to 1 for the first trouble reported within 30 days of installation. Thereafter, LMOS sets the “R” indicator to 1 for any subsequent repair reports not closed to disposition codes 12XX or 13XX. CGE&Y finds this programming logic is not consistent with the PID in its current form and that the two troubles on 6/6/02 should have been eligible for OP-5. Qwest explained that it believes that the inclusion of repeat reports is inconsistent intent of OP-5 and recommended “parties should collaborate on how to account for this, on a going forward basis, under the auspices of Long Term PID Administration.” CGE&Y performed additional research and found that these three troubles did not occur within 30 days of an inward installation. CGE&Y reported these troubles in DR-300, and Qwest verified that these troubles did not occur within 30 days

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of an inward installation. (Qwest Data Request 575) The trouble on 6/5/02 was incorrectly flagged as installation related due to LMOS' programming logic which considers installations with no inward activity when setting the installation indicator. Qwest proposed a fix for this issue and plans on implementing it before the end of 2002. CGE&Y has not audited this fix.

### **Case 2 (Issues: Repeat repair reports): Redacted**

Qwest MTAS data and Eschelon agree that the no dial tone condition experienced on 5/17/02 was installation related and should be included in the OP-5 calculation. Qwest MTAS data also indicates a repeat repair report on 5/20/02, which was coded to Qwest-caused. The Qwest DLETH history indicates that loops needed to be tagged per Eschelon. The Eschelon service ticket history indicates that Qwest opened a new trouble ticket on 5/20/02 because there was a disconnect recording on all the customer's lines. According to Eschelon, Qwest informed Eschelon that the lines had not been ported therefore Qwest sent a technician to the DEMARC to port the lines. Qwest MTAS data does not reflect this trouble as installation related or eligible for OP-5 even though it was within 30 days of the installation activity. CGE&Y issued data request 299 to Qwest for clarification why these repair reports were not flagged as installation related and as eligible for OP-5, and whether Qwest in general excludes repeat repair reports from OP-5. Qwest responded that LMOS was incapable of flagging repeat reports as installation related and was not including repeat repair reports in OP-5 (Qwest Data Request 550). See Case 1. CGE&Y finds Qwest's programming logic for OP-5 inconsistent with the PID in its current form.

### **Case 3 (Issues: Trouble coded to CLEC incorrectly; Repeat repair reports): Redacted**

According to the Eschelon service ticket history, this line experienced a trouble on 5/21/02. Eschelon data indicated that the line was tagged at the DEMARC, but there was no dial tone on the line. Eschelon reported that Qwest had replaced the "jumper" on 5/20/02 and the "MLT" tested ok. The service ticket history indicated that Eschelon opened a trouble ticket on 5/22/02 for no dial tone at the DEMARC where the line was tagged. Qwest tested all the customer lines and found that the line was tagged twice at the DEMARC and one was an old tag. Qwest removed the old tag from the DEMARC location leaving only one pair tagged and the trouble was closed.

Qwest MTAS data indicates there were 3 troubles on this line, on 5/20/02, 5/22/02, and 5/23/02. Only the first trouble, which replaced a bad jumper, was flagged as installation related. The trouble on 5/22/02 was for the line being dead at the DEMARC and was flagged as CLEC-related and according to Eschelon was called in by the end user vendor.

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The trouble on 5/23/02 was flagged as a repeat trouble and was coded to Qwest-caused. Thus, although Qwest and Eschelon agree that there was an installation related trouble on this line eligible for OP-5, Qwest also indicates there were two other troubles. Based on the evidence provided by Eschelon, and the fact that Qwest was forced to dispatch a technician twice within two days to restore service, CGE&Y was uncertain if the 5/22/02 trouble, coded as CLEC-related, was actually CLEC-related. CGE&Y issued data request 299 asking Qwest if the technician had closed this trouble to a CLEC-related trouble code in error. Qwest responded that on 5/22/02 the technician found that the line was good to the DMARC and coded the trouble report to “disposition code 1230, trouble is suspected or isolated beyond the Network Interface.” (Qwest data request 551) Qwest then indicated that on 5/23/02 a technician was dispatched to the customer premises and “repaired the F2 cable at the inside terminal and coded the ticket to 421, Qwest cable trouble.” According to Qwest, “there is no definitive evidence that the trouble report on 5/23/02 was related to the trouble on 5/22/02. The trouble on 5/23/02 could have been a new trouble condition.” CGE&Y finds that the evidence presented by Eschelon and Qwest indicate that the trouble on 5/22/02 was not cleared, requiring a second dispatch on 5/23/02, when the Qwest technician identified and cleared the correct trouble. Thus, CGE&Y finds that the trouble on 5/22/02 was erroneously coded to CLEC-related. In addition, this trouble was not flagged as installation related because of the earlier trouble on 5/20/02, but was not flagged as a repeat report because of its disposition code. CGE&Y finds that this trouble should have been coded to Qwest-related, flagged as a repeat report, and flagged as installation-related and eligible for OP-5. Furthermore, CGE&Y finds that the repeat report on 5/23/02 should have been flagged as installation-related and eligible for OP-5. As previously explained, LMOS does not flag repeat reports as eligible for OP-5. See Case 1. CGE&Y also finds that Eschelon was charged in error for a repair trip for the trouble on 5/22/02.

**Case 4 (Issues: Qwest Trouble coded as Retail; LSR/SO mismatch; Trouble incorrectly coded to CLEC; Repeat repair report): Redacted**

The Eschelon service ticket history reported that on 5/14/02 all lines associated with this account were down, therefore, Eschelon issued a trouble ticket. This account was converted on 5/7/02. According to Eschelon, Qwest did not have the numbers programmed in the switch. At 4:00 PM on 5/14/02, Qwest advised Eschelon that the numbers had been programmed in the switch. Qwest MTAS data does not include this trouble ticket. CGE&Y issued data request 299, asking whether Qwest had any record of this trouble and why it was not included in the MTAS data. Qwest responded that its record for this trouble indicated that all the lines were programmed per the order and that it was coded to the disposition code 540. (Qwest data request 552) Although Qwest did not indicate it in its response, CGE&Y found this trouble coded as retail. In its response to data request 300, Qwest indicated that the service order associated with this line contained errors that required LMOS to manually update and post, resulting in the trouble

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being coded as retail. Because LMOS did not have a line record when this trouble was taken, the installation indicator was set to 0. (Qwest Data Request 578) CGE&Y finds that this trouble was coded as retail in error, and should have been installation related and eligible for OP-5.

On 5/16/02, the end-user notified Eschelon that he could not dial long distance on his fax line (Redacted). According to Eschelon, the PIC/LPIC was requested on the LSR, but Qwest indicated that the PIC/LPIC was not on the completed order. CGE&Y checked the order confirmation and validated that Eschelon did correctly order the PIC/LPIC. According to Eschelon it opened a trouble ticket with a 2 PM commit time, but Qwest repair advised Eschelon that the PIC/LPIC was not on the line and opened an escalation ticket. Qwest issued an order with a due date and completion date of 5/17/02 which added the PIC. Eschelon did not issue a trouble ticket; therefore, Qwest MTAS data does not include an associated trouble ticket. CGE&Y issued data request 299 requesting that Qwest describe the call center process. Qwest responded that:

“[t]here is a documented process that requires the CLEC to contact the ISC within 72 hours. Currently in the Maintenance and Repair CLEC documentation located on the Qwest website it states Recent Service Request Activity: If your service request was completed within the past 72 business hours contact Qwest's Interconnect Service Center (ISC) at Redacted for assistance. After researching the issue, the Customer Service Inquiry and Education Center (CSIE) will contact you regarding resolution of your issue. If your service request was completed more than 72 business hours ago, and you determined the problem is in Qwest's network as described above, submit your trouble report to Qwest in one of two ways. Qwest implemented this process based on CLEC feedback received during on site visits in late 1999.” (Qwest data request 553)

CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, Qwest did not type the service order per the LSR, resulting in Qwest not provisioning service as ordered. This error impacted the end-user, preventing him from dialing long distance. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded:

“When the cause of the problem is an omission or error on the service order, the problem cannot be resolved through a trouble report but rather must have a subsequent order issued by the ordering center. This process applies equally to retail and wholesale. For wholesale, in these instances, the occurrence of an LSR/SO mismatch is captured in Qwest's reporting of additional information titled Order Accuracy, which is being reported on the page immediately following

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PO-20 results. The process to capture call center tickets flagged as LSR/SO mismatches was deployed June 27, 2002.” (Qwest data request 552)

CGE&Y has not audited this “OP-5 supplemental” measure.

On 5/20/02 at 5:40 PM, Eschelon issued a trouble ticket on this line due to a no dial tone/ring no answer condition. The Eschelon service ticket history indicates that on 5/22/02 Qwest informed Eschelon that this line was ported from one Qwest central office to another and there appeared to be a bad channel unit on the line. This trouble was cleared due to a bad channel bank. Qwest MTAS data indicates one trouble on 5/21/02 that was CLEC-related and a repeat trouble on 5/22/02 that was Qwest-related. Qwest performance measurement reporting did not flag either trouble as installation related despite both occurring within 30 days of the most recent inward activity on the line. The Qwest DLETH history indicates that on 5/21/02 this number was not built into Facilities Operations Management (“FOMS”) and test results showed it was going to intercept. Qwest was unable to verify the number in the preferred switch. On 5/22/02, the DLETH history states that there was no trouble found in RCMAC and that the number was programmed in the DV switch. It also stated that it could not test the PGL because it “looks like there was a cut on this line.” It appears from the documentation that the 5/21/02 trouble described in Qwest’s MTAS data may have been incorrectly coded to the CLEC. CGE&Y issued data request 299, asking Qwest whether the trouble on 5/21/02 was coded correctly to the CLEC and if so, whether Qwest had any process for reversing disposition codes for performance measurement reporting purposes. Qwest responded that the trouble was coded incorrectly and Qwest should have tested the line and coded the trouble to Qwest-caused. (Qwest data request 552) Qwest also indicated that it could not change trouble disposition or cause codes once the ticket is closed. In its supplemental response to Qwest DR-578, Qwest stated that “MTAS logic determined that there was a previous report on 5/14/02 and did not flag the trouble as installation related. CGE&Y finds that this trouble should have been coded as Qwest related, flagged as a repeat report, flagged as installation related and eligible for OP-5. CGE&Y In addition, CGE&Y finds that the 5/22/02 repeat report should also have been installation related and eligible for OP-5 since repeat reports are not excluded from OP-5 per the PID. See Case 1.

### **Case 5 (Issues: Service disruption day of cut): Redacted**

According to the Eschelon service ticket history, on 6/5/02, the day of the cut, there was a disconnect intercept message on the line. There was to be no loss of dial tone to the end user. Eschelon advised Qwest of the situation at 10:53 AM. Qwest responded that the conversion was taking place and to try again later and if the line wasn’t working to escalate. When Eschelon tested the line an hour later, it was still down. Eschelon contacted Qwest via the call center, opening a call center ticket. According to Eschelon,

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Qwest responded that the service order had an error on it that stopped it from completing in the system. Qwest corrected the error, RCMAC worked the order and service was restored to the end-user.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, the new and disconnect orders were worked separately, resulting in a loss of service for the end-user. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded that there was no measure to capture this service disruption because the CLEC order was still pending. (Qwest data request 553) CGE&Y finds that an unexpected service disruption to the CLEC's end-user represents a service installation error that should be reported.

#### **Case 6 (Issues: Service disruption day of cut): Redacted**

The Eschelon service ticket history indicates that on 5/17/02, the day of the cut, there was no dial tone on this line and the order was pending auto-complete at 5 PM. According to Eschelon, the Frame Due Time ("FDT") it requested for this line was 7 AM. Eschelon notified Qwest that although the Disconnect ("D") order had been worked, the accompanying New ("N") order had not been worked. Eschelon contacted Qwest via the call center, opening a call center ticket. Qwest worked the order and dial tone was restored to the line the same day.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, the new and disconnect orders were worked separately, resulting in a loss of service for the end-user. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded that there was no measure to capture this service disruption because the CLEC order was still pending. (Qwest data request 553) CGE&Y finds that an unexpected service disruption to the CLEC's end-user represents a service installation error that should be reported.

#### **Case 7 (Issues: Service disruption day of cut): Redacted**

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The Eschelon service ticket history indicates that on 5/21/02, the day of the cut, there was no dial tone on this line several hours after the FDT. According to Eschelon, the FDT it requested for this line was 7 AM. Eschelon notified Qwest that the test lines were still disconnected at 2:23 PM. Eschelon notified Qwest that although the Disconnect (“D”) order had been worked, the accompanying New (“N”) order had not been worked. Eschelon contacted Qwest via the call center, opening a call center ticket. According to Eschelon, Qwest responded that the first line was working and the second line would be double-checked and the ticket closed.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, the new and disconnect orders were worked separately, resulting in a loss of service for the end-user. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded that there was no measure to capture this service disruption because the CLEC order was still pending. (Qwest data request 553) CGE&Y finds that an unexpected service disruption to the CLEC’s end-user represents a service installation error that should be reported.

**Case 8 (Issues: Service disruption day of cut; Trouble classified as retail): Redacted**

The Eschelon service ticket history indicates that on 5/30/02, the day of the cut, there was a disconnect message on this line at 11:19 AM, following what was requested by Eschelon to be a 1 AM FDT. Eschelon notified Qwest that although the Disconnect (“D”) order had been worked, the accompanying New (“N”) order had not resulting in a loss of dial tone to the customer. Eschelon contacted Qwest via the call center, opening a call center ticket. According to Eschelon, Qwest responded that the numbers were brought up in the Qwest switch at 4 AM. According to Eschelon, Qwest indicated it would provide RCMAC with a corrected order to program. At 2:51 PM, Qwest advised Eschelon that RCMAC had programmed the lines correctly and the trouble had been resolved.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, the new and disconnect orders were worked separately, resulting in a loss of service for the end-user. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any

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performance measurement in place to capture these types of customer affecting issues. Qwest responded that there was no measure to capture this service disruption because the CLEC order was still pending. (Qwest data request 553) CGE&Y finds that an unexpected service disruption to the CLEC's end-user represents a service installation error that should be reported.

On 6/28/02, Eschelon issued a trouble ticket for an out of service condition. This ticket was flagged as installation related, but not eligible for OP-5 because it was closed as to the disposition code canceled. However, this trouble was classified as a retail ticket. CGE&Y finds that this trouble should have been classified as an Eschelon trouble ticket.

### **Case 9 (Issue: LSR/SO mismatch): Redacted**

The Eschelon service ticket history indicates that Qwest installed the N84457116 order in error. According to Eschelon, when this line rang busy, it was to forward to Redacted and then to Redacted. CGE&Y validated that Eschelon ordered the call forwarding busy line properly on the LSR. However, the Qwest service order incorrectly forwards Redacted to Redacted when busy. As a result, Eschelon contacted Qwest via the call center, opening a call center ticket. A change order was issued to correct the problem on 6/5/02.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded that this type of customer affecting issue is captured in its "OP-5 supplemental data" which Qwest began capturing in late June 2002. (Qwest data request 557) See Case 4.

### **Case 10 (Issues: SO/LSR mismatch; Repeat repair report): Redacted**

The Eschelon service ticket history indicates a trouble on this line on 5/24/02. The end-user was unable to call long distance. Eschelon contacted Qwest via the call center at 2:25 PM opening a call center ticket. Later that same day, the end-user reported to Eschelon that no calls were getting through. A trouble ticket on this line was issued creating an MTAS record at 3:54 PM on 5/24/02. On 5/27/02 at 12:41 PM, Qwest notified Eschelon that the line was good to the wall terminal and closed the trouble ticket. This ticket was flagged as CLEC-related and was excluded from OP-5. This trouble ticket was opened to resolve the out of service condition and not the long distance issue.

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Therefore, the Qwest technician closed the ticket to CLEC-related when he found the line was good. Furthermore, Eschelon's representative approved of Qwest's closure of the ticket on the service ticket history. However, CGE&Y finds that this trouble should have been flagged as installation related because it occurred on the day of installation. It was not flagged as installation related because the service order information had not yet been updated into LMOS. (Qwest Data Request 578)

On 5/28/02, the end-user notified Eschelon that he still couldn't call long distance and was uncertain if incoming calls were ringing. Eschelon contacted Qwest via the call center and Qwest opened another call center ticket. The service ticket history shows that Qwest changed the LCC on 3 lines. This corrected the long distance trouble. Eschelon followed the Recent Service Request Activity process to resolve the long distance trouble rather than through a repair ticket. CGE&Y finds that although no trouble was generated, this represents an installation error. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded that this type of customer affecting issue is captured in its "OP-5 supplemental data" which Qwest began capturing in late June 2002. (Qwest data request 558) See Case 4.

The Eschelon service ticket history indicates a trouble on Redacted on 6/7/02 due to a feature being activated by accident. Eschelon determined this to be a customer issue. Qwest MTAS data includes this trouble and coded it to CLEC related. Qwest flagged this trouble as installation related but it was excluded because it was charged to the CLEC. CGE&Y issued data request 299, asking Qwest to explain why this trouble was not flagged as a repeat report since there was a previous trouble reported on 5/24/02. Qwest responded that LMOS did not flag trouble reports coded to disposition codes 12XX or 13XX (CLEC-related) as repeats. See Case 1.

On 6/20/02, the Eschelon service ticket history indicates that there were problems with the hunting on Redacted, sending busy calls to a voice mail box even though the customer did not have voice mail. Eschelon checked in CEMR and found that the last number in the hunt group did not have call forwarding busy on it. Eschelon issued a CEMR ticket. Eschelon contacted Qwest and determined that it was now programmed correctly and closed the ticket. Qwest MTAS data includes this trouble and flagged it as Qwest-related. However, this trouble was not flagged as installation related even though it occurred within 30 days of installation (5/24/02). CGE&Y issued data request 299, asking Qwest to provide an explanation of why this trouble was not considered installation related. In addition, CGE&Y requested that Qwest explain why this trouble was not flagged as a repeat report since there were trouble reports on this line on 5/24/02 and 6/7/02. Qwest responded that due to "an inherent system/process limitation in LMOS," the repeat ("R") and installation ("I") indicators are mutually-exclusive and

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cannon be flagged simultaneously. According to Qwest, LMOS sets the “I” indicator to 1 for the first trouble reported within 30 days of installation. Thereafter, LMOS sets the “R” indicator to 1 for any subsequent repair reports not closed to disposition codes 12XX or 13XX. (Qwest Data Request 549) Thus, the trouble on 6/20/02 was not flagged as installation related because it was not the first trouble after installation, and was not flagged as a repeat because it was coded to the disposition code 1370 according to Qwest. However, CGE&Y reviewed MTAS and this trouble was coded to the disposition code 0701, Qwest-related. Therefore, CGE&Y finds that this trouble should have been coded as a repeat report. CGE&Y also finds that this was the first Qwest-related trouble report on this line within 30 days of installation. CGE&Y finds the LMOS programming logic that excludes subsequent repair reports from inclusion in OP-5 inconsistent with the PID in its current form, which does not exclude repeat repair reports.

On 6/24/02, Eschelon contacted the customer and determined that their service problems had not been fixed. According to the customer, when they answer line 1 (Redacted) there is a fax tone. The customer had a circular hunt with lines 1, 2 and 3. Eschelon tested all the lines and found that one line (Redacted) had a bad remote terminal channel unit. Eschelon opened a CEMR ticket which Qwest closed on 6/27/02 after replacing the remote terminal units. CGE&Y did not find an MTAS trouble ticket on this date for Redacted, the number indicated by Eschelon. CGE&Y did locate an MTAS trouble ticket for Redacted. This trouble is shown as installation related, charged to Qwest and counted in the OP-5 calculation, however the main account for Redacted is Redacted according to Qwest records. Therefore, CGE&Y finds that Qwest handled this trouble properly in accordance with the PID.

### **Case 11 (Issue: Service disruption day of cut): Redacted**

The Eschelon service ticket history indicates that on 5/21/01, the day of the cut, there was no dial tone on this line several hours after the 7 AM FDT requested by Eschelon. Eschelon contacted Qwest via the call center, opening a call center ticket. Eschelon notified Qwest that although the Disconnect (“D”) order had been worked, the accompanying New (“N”) order had not been worked. Qwest worked the order and dial tone was restored to the line the same day.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, the new and disconnect orders were worked separately, resulting in a loss of service for the end-user. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues.

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Qwest responded that there was no measure to capture this service disruption because the CLEC order was still pending. (Qwest data request 553) CGE&Y finds that an unexpected service disruption to the CLEC's end-user represents a service installation error that should be reported.

### **Case 12 (Issues: Service disruption day of cut): Redacted**

The Eschelon service ticket history indicates that on 5/31/02, the day of the installation, at 11:13 AM, the customer notified Eschelon that all their lines were out of service. Eschelon requested a 7 AM FDT for this order. Eschelon contacted Qwest via the call center, opening a call center ticket. Qwest responded that RCMAC was pushing the N order through. At 2:08 PM Eschelon verified that all lines were up.

Eschelon did not issue a trouble ticket, and thus, Qwest MTAS data indicates no trouble on this line. Instead, Eschelon followed the Recent Service Request Activity process described in Qwest data request 553. See Case 4. CGE&Y finds that although no trouble was generated, this represents an installation error. In this case, the new and disconnect orders were worked separately, resulting in a loss of service for the end-user. However, OP-5 does not include these types of installation errors because a trouble ticket was not generated. CGE&Y issued data request 299, asking Qwest whether there is any performance measurement in place to capture these types of customer affecting issues. Qwest responded that there was no measure to capture this service disruption because the CLEC order was still pending. (Qwest data request 553) CGE&Y finds that an unexpected service disruption to the CLEC's end-user represents a service installation error that should be reported.

### **Case 13 (Issues: Service Disruption day of cut; Trouble coded as retail): Redacted**

The Eschelon service ticket history indicates that at 12:27 PM on 5/7/02, the day of the installation, the customer notified Eschelon that their lines were out of service. Eschelon requested a FDT of 1 AM for this order. Eschelon contacted Qwest via the call center, opening a call center ticket. Qwest notified Eschelon that all the lines were working. Eschelon attempted to notify the customer, but got a ring no answer. According to Eschelon, at 12:48 PM, it issued a trouble ticket. Qwest advised Eschelon that all the lines tested OK at 1:30 PM. Qwest's MTAS data reflects this trouble as belonging to a retail account. CGE&Y identified this problem in the data reconciliation during the functionality test. CGE&Y issued AZIWO1206 concerning troubles on Pseudo-CLEC accounts coded as Qwest retail. Qwest responded as follows:

“When the ticket was entered into LMOS under the additional line telephone number (the new Wholesale account), LMOS would have cross-referenced and

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accessed existing records under the main account telephone number (the Retail account). MTAS grabbed the MCN (Retail) from the report opened under the Retail MTN. LMOS would not have accessed the wholesale account until the order was completed in the SOP and LMOS was updated.”

Although Eschelon’s customer experienced an out of service condition and a trouble ticket was issued, this trouble is not included in OP-5 results because the trouble was coded as a Retail trouble. CGE&Y finds that an unexpected service disruption to the CLEC’s end-user represents a service installation error that should be reported. This is reflected in CGE&Y’s proposed OP-5B

#### **Case 14 (Issues: Repeat repair reports): Redacted**

The Eschelon service ticket history indicates that the message waiting audio was not working on this line on 5/24/02. Eschelon checked the CSR and validated that there was message waiting audio on this line. Eschelon then issued a CEMR ticket. According to Eschelon, it checked CEMR and found that the line was built in the incorrect message group (MSAAD.0024). Eschelon indicated that the line needed to be built in the MSAAM MSDI group. On 5/25/02 at 11:49 AM, Eschelon contacted Qwest and was told the routing was fixed for the message waiting audio.

Qwest MTAS data indicates there was a trouble on 5/24/02 and another trouble on 5/29/02, both were Qwest-related but neither was installation related. Qwest’s DLETH history indicated that the line was programmed incorrectly in the switch per the CSR and the trouble ticket. The most recent activity on this line was a change order on 5/15/02. CGE&Y issued data request 299, asking Qwest why neither trouble were considered installation related. Qwest responded that there was an earlier trouble on this line on 5/22/02, and per its response to Qwest data request 549, any subsequent trouble would not be coded as installation related. (Qwest data request 562). CGE&Y was unable to find any record of the 5/22/02 trouble in MTAS. In a supplemental response to CGE&Y’s DR-300, Qwest stated as follows:

“The trouble reported on 5/22/02 was because the message waiting audio on the voice messaging product was not working. This type of trouble is considered a Qwest non-repair related report because the voice messaging services are managed by another department with its own trouble ticketing processes, and unrelated to the LMOS trouble clearing process. Consequently, the report was referred to the voice messaging center for handling and was closed on 5/22/02 with a 1012 disposition code.” (Qwest Supplemental Data Request 578S1)

Based on this response, CGE&Y finds it inappropriate to consider the 5/22/02 “trouble” as a repair ticket eligible for OP-5. However, CGE&Y finds that it is likely that the

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“trouble” on 5/22/02 was the same issue, was referred to a different department in error, and should have been included in the adhoc MTAS data. The impact of this would be to add another eligible repeat to the OP-5 results. Regardless, CGE&Y finds that the trouble on 5/24/02 was the first trouble in the adhoc MTAS on this line within 30 days of installation. CGE&Y finds that LMOS should not consider troubles that are excluded from the adhoc MTAS when setting the installation indicator in the adhoc MTAS data. CGE&Y finds Qwest’s handling of the troubles on 5/24/02 and 5/29/02 inconsistent with the PID. CGE&Y finds that the trouble on 5/24/02 should have been flagged as installation-related and eligible for OP-5, and the trouble on 5/29/02 should have been flagged as a repeat report, installation-related, and eligible for OP-5.

**Case 15 (Issue: Repeat repair report): Redacted**

The Eschelon service ticket history indicates there was a no dial tone condition on this line on 5/20/02. Eschelon issued a trouble ticket. According to Eschelon, CEMR indicated an “intercept” on the line. Qwest advised Eschelon that it was in the process of building this line between two facilities and had pushed back the due date until 5/21/02. On 5/21/02 Eschelon contacted Qwest, and Qwest stated that this line was disconnected. On 5/22/02, Eschelon tested the line ok. The most recent new installation on this line was completed on 5/7/02.

Qwest MTAS data also reflects an out of service trouble on 5/20/02 that was Qwest-related but not installation related. The Qwest DLETH history indicates that the ported number had no dial tone due to routing trouble. The DLETH also stated that there was a programming error. CGE&Y issued data request 299, asking Qwest why the trouble on 5/20/02 was not considered installation related. Qwest responded that there was an earlier trouble on this line on 5/16/02, and per its response to Qwest data request 549, any subsequent trouble would not be coded as installation related. (Qwest data request 563). CGE&Y already identified the 5/16/02 “trouble” on this line in Case 4. However, this trouble ticket was not included in MTAS, and an escalation ticket ultimately resolved the “trouble.” CGE&Y finds that the “trouble” on 5/16/02 referenced by Qwest did not constitute a valid trouble occurrence eligible for OP-5. In its supplemental response to Data Request 578, Qwest stated it was “unable to draw a definitive conclusion as to why the 5/20 trouble was not marked as installation related.” Therefore, the trouble on 5/20/02 was the first trouble occurring on this line. CGE&Y finds Qwest’s handling of the 5/20/02 trouble is inconsistent with the PID. Furthermore, CGE&Y finds that this trouble should have been flagged as installation related and eligible for OP-5.

**Case 16 (Issues: LMOS did not recognize SO): Redacted**

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The Eschelon service ticket history indicates that on 5/7/02, Eschelon contacted Qwest via the call center, opening a call center ticket, because hunting was not programmed on the line. On 5/8/02, Eschelon opened a CEMR ticket and Qwest programmed hunting on the line the same day.

Qwest MTAS data indicates that the trouble received on 5/8/02 was due to hunting not working. This trouble was coded as Qwest related, but was not flagged as installation related and not included in the calculation for OP-5. The Qwest DLETH history indicates that hunting was programmed on the line per a change order with a due date of 5/7/02. CGE&Y issued data request 299, asking Qwest why this trouble was not considered installation related. Qwest responded:

“On 5/3, a ‘D’ order and a ‘N’ order completed in the SOP but erred in LMOS, requiring manual updates. On 5/8 when the trouble was taken, the LMOS updates were not complete (service orders not posted to LMOS). Therefore, LMOS did not classify the trouble ticket as installation-related.” (Qwest data request 578)

CGE&Y finds that this trouble was miscoded by Qwest as a retail trouble due to a deficiency in Qwest’s methodology for identifying qualifying troubles for OP-5. Qwest relies on LMOS to identify whether a service order occurred within 30 days of a trouble. As evident in this example, if LMOS is not updated in a timely manner, it does not see the eligible service order for the line on which the trouble was experienced. To correct for this, CGE&Y finds that Qwest should tie trouble reports to service orders so that it does not need to rely on LMOS to perform this task.

CGE&Y finds that the trouble on 5/8/02 represents a service installation error and should be reflected in OP-5.

### **Case 17 (Issues: Trouble coded as retail; LSR/SO mismatch): Redacted**

The Eschelon service ticket history indicates that this line experienced 3 troubles. These troubles occurred on 5/2/02, 5/9/02, and 5/10/02. Eschelon data reflects that the trouble ticket issued on 5/2/02 was due to a Qwest facilities issue. This ticket was closed on 5/3/02, when the customer was able to receive calls. Although, the Qwest DLETH history did indicate a trouble on 5/2/02, the Qwest MTAS data for Eschelon did not reflect this trouble. According to the DLETH history, this line was out of service and the lines were not tagged at the DEMARC. Upon further research CGE&Y identified the trouble on 5/2/02 as coded as Qwest retail. Therefore, this trouble would not have been reflected in the CLEC results for OP-5. CGE&Y finds that this trouble should have been coded as an Eschelon trouble and should have been included in OP-5. CGE&Y issued data request 299, asking Qwest whether it has any process in place for correcting troubles coded as retail in error and amending performance results. Qwest responded:

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“In the event, an account is misassigned and a trouble ticket is taken against the account before its ownership designation is changed, Qwest does not alter the trouble ticket. Once the ticket is closed, it is archived and changes cannot be made. Consequently, Qwest does not revise its performance results. The instability that would result in revising performance results is not warranted by the low incidence of misassignments, and in fact, could be unmanageable and confusing.” (Qwest data request 565)

The Eschelon service ticket history reflects one trouble on 5/9/02 that was installation related. Eschelon issued a CEMR ticket for static on Redacted and another associated line. This line also experienced ringing when another call came in, as well as intermittent calls that would ring once then disconnect. Qwest MTAS data also reflects a trouble on 5/9/02 that was installation related and was included in OP-5 results. CGE&Y finds that Qwest handled this trouble in accordance with the PID.

The Eschelon service ticket history indicates that while the first trouble on 5/9/02 was still opened, Eschelon notified Qwest that the call forwarding busy line was not working and to update the repair ticket. The Qwest DLETH history indicates that the ticket was updated with the call forward busy line trouble at 6:01 PM. Per MTAS, the distribution facility line was cut dead to the field, clearing the trouble, but features were not present on the line at 6:25 PM. Thus, CGE&Y finds that the technician in the field was not aware of the ticket update and closed the ticket once the static and intermittent troubles were cleared. Qwest MTAS data also includes a second trouble opened at 7:01 PM on 5/9/02 that was CLEC caused and beyond the DEMARC that was cleared on 5/10/02. It is CGE&Y’s opinion that this ticket was opened to correct the remaining call forwarding trouble, but the technician was most likely not aware of this condition and when he was dispatched to the site on 5/10/02, he tested the lines, found them ok, and closed the ticket to a suspected heavy ground condition past the DEMARC. CGE&Y finds that although this trouble did not clear the call forwarding trouble for which it was opened, the Qwest technician closed the ticket appropriately. However, CGE&Y finds that this trouble should have been flagged as installation related. It was not flagged as installation related because LMOS determined that it was not the first trouble within 30 days of installation. Although not in this case, CGE&Y finds that this logic in some cases prevents valid otherwise eligible troubles from being flagged as installation related and eligible for OP-5. Moreover, the call forwarding trouble was due to a LSR/SO mismatch, which could not be resolved through the trouble ticket process. Instead a change order was required to change the call forwarding number to 10-digit dialing per the LSR. The Qwest DLETH history indicates that the order was completed without 10-digit dialing on the call forwarding number and was resolved through the issuance of a change order. Per Qwest, this constituted an order writing issue. (Qwest data request 565) Therefore, this trouble would be reflected in Qwest’s “OP-5 supplemental data.”

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### **Case 18 (Issues: No Issue): Redacted**

The Eschelon service ticket history indicates that the call waiting on this line was disconnecting the original caller and the trouble was reported to Qwest on 5/9/02. Eschelon checked CEMR and there was no record of call waiting on this line. In addition, call waiting was not on the Qwest CSR. According to Eschelon it had ordered call waiting on the LSR. CGE&Y validated that the order confirmation sent by Qwest to Eschelon included the addition of the feature “ESX” which is call waiting on this line. Qwest MTAS data indicates there was a trouble with the call waiting not working on this line on 5/9/02 and was installation related, but it was excluded because it was CLEC-related. CGE&Y issued data request 299, asking why this trouble was coded to CLEC-related. Qwest responded that it found no trouble on the line and RCMAC found that the call waiting was programmed OK. (Qwest data request 566) Both Eschelon and Qwest data indicates that no further action was taken. Therefore, CGE&Y finds that the call waiting trouble was due to an Eschelon’s customer issue. CGE&Y finds it likely that the customer either did not use call waiting correctly, or there was a problem with the customer’s phone. The fact that no corrective action was taken and on 5/10/02 the customer indicated that the call waiting was working confirms this. CGE&Y finds that Qwest handled this trouble correctly.

### **Case 19: (Issues: Trouble coded CLEC-related in error): Redacted**

The Eschelon service ticket history indicates there was no dial tone on this line and a trouble report was issued on 5/23/02. According to Eschelon, the MLT showed a trouble on the line, and Qwest advised that there was a trouble outside. There was a problem with a shelf and Qwest replaced a card. Qwest MTAS data also indicates that there was a trouble on this line, but it was closed to a CLEC-caused disposition code excluding it from the OP-5 measure. However, in the DLETH history Qwest indicated that it replaced a card in a shelf. This line was a UNE-P line, and Eschelon did not have any facilities on the line. Therefore, the shelf in question appears to be Qwest equipment and therefore the disposition code would be in error. CGE&Y issued data request 299, asking Qwest why this trouble was coded to CLEC-related. Qwest responded that the trouble was coded to disposition code 650, “Request to cancel report per the customer whether verbal or from a subsequent report when nothing was done to correct the trouble condition.” Qwest indicated that “the customer called Qwest at 7:28 PM on 5/23/02 stating that the service was working. Qwest was still determining if the trouble was associated with the F-1 cable pair or with a shelf. Qwest had not determined what the trouble was when the CLEC called and stated that the service was working.” (Qwest data request 567) The Eschelon service ticket history indicates that Eschelon tested the line after it was notified by Qwest that it had replaced a card. Eschelon found the line tested ok and advised Qwest it was ok to close the ticket. According to Qwest, it received the consent to close

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the ticket before it had actually closed the ticket, thus the 650 disposition code. CGE&Y finds that this trouble was Qwest-related and was coded to 650 in error. CGE&Y finds that this trouble was installation related and should have been eligible for OP-5.

**Case 20 (Issue: Troubles coded CLEC-related in error): Redacted**

The Eschelon service ticket history indicates that on 5/22/02 the customer vendor went to the DEMARC and found that the lines were not tagged and the lines had no dial tone. The MLT showed “open out balanced.” Eschelon advised Qwest and opened a trouble ticket. According to Eschelon, Qwest said the lines were already tagged on binding posts 85 and 86 on the outside wall terminal. Qwest MTAS data includes this trouble, and it is coded to CLEC-related. Eschelon notified the vendor that Qwest indicated the lines were tagged. On 5/23/02, the vendor went back to the DEMARC and again verified that the lines were not tagged at the binding posts Qwest provided. The vendor also said that the dial tone did not make it to the DEMARC. Eschelon then issued a second trouble ticket. According to Eschelon, its vendor reported that Qwest then replaced a bad feeder cable to the crossbox and ran new pairs to the binding posts. This trouble is included in MTAS, but is also coded as CLEC related. LMOS identified the earlier trouble on this line on 5/22/02 but did not code it as a repeat report due to its disposition code. Because this was not the first trouble on the line, LMOS did not flag this trouble as installation related. Qwest maintains “there is no definitive evidence that the trouble was in Qwest's network.” (Qwest data request 568) Based on the information provided by Eschelon, CGE&Y finds that Qwest did not tag the lines at the correct DEMARC. CGE&Y finds that the troubles on 5/22/02 and 5/23/02 were incorrectly coded to CLEC-related. The trouble on 5/23/02 should have been coded as a repeat trouble, flagged as installation related, and both of these troubles should have been coded as Qwest-related and eligible for OP-5.

Eschelon and Qwest data both indicate that Qwest charged Eschelon for both dispatches, despite there being evidence that the lines were never tested, tagged or working properly at the appropriate DEMARC. CGE&Y finds that Eschelon was charged in error for these two repair trips.

**Case 21 (Issues: Trouble not in MTAS; LSR/SO mismatch): Redacted**

The Eschelon service ticket history indicates that the lines on this account were not forwarding to voice mail. In order to resolve this issue, Eschelon contacted Qwest via the call center, opening a call center ticket to have call forwarding programmed on the line with 10 digits. On 5/9/02, Eschelon checked CEMR and found that Redacted was forwarding to the wrong number (Redacted). Eschelon then validated that it requested on its LSR the correct number (Redacted). CGE&Y validated that Eschelon requested the

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correct number and feature (call forwarding busy line – EVO) on the order confirmation provided by Qwest to Eschelon. CGE&Y found that Redacted was ordered to call forward after 3 rings (FDJ) to Redacted. That same day, Eschelon opened a CEMR ticket and Qwest advised Eschelon that the call forwarding was ordered incorrectly and an order needed to be submitted to correct the feature. CGE&Y was unable to locate this trouble in the Qwest MTAS data. CGE&Y issued data request 299, asking Qwest why this trouble was not included in MTAS. Qwest responded “The Repair Call Handling Center transferred the customer to the appropriate market unit for correction of the current order activity. Disposition code 1006 is assigned at the time of the referral, which causes MTAS to exclude the record from the adhoc data.” (Qwest data request 569) CGE&Y agrees that this trouble situation is not handled by the trouble repair process and was appropriately referred to another department. Eschelon opened two call center tickets to correct the call forwarding on 5/10/02 and 5/13/02, respectively. CGE&Y issued data request 299, asking Qwest how the call forwarding was ordered incorrectly. Qwest indicated that the Qwest typist entered the wrong USOC (FVJ) instead of the one requested on the LSR (FDJ). (Qwest data request 569) Qwest also indicated that this error represented an LSR/SO mismatch captured in Qwest’s “supplemental OP-5 data.”

#### **Case 22 (Issues: LSR/SO mismatch): Redacted**

The Eschelon service ticket history indicates that on 5/20/02, the customer notified Eschelon that the line could not call long distance. Eschelon checked CEMR which showed that the CSR did not designate a PIC on this line. According to Eschelon, Qwest admitted that it had made a mistake and subsequently fixed the trouble. Qwest MTAS data includes a trouble on 5/20/02 and it was flagged as installation related.

The Eschelon service ticket history indicates that the customer notified Eschelon on 5/22/02 that he still could not call long distance on this line. Eschelon notified Qwest who responded that the line was programmed correctly. On 5/23/02, Qwest advised Eschelon that the line was ordered with a restriction feature that would not let the customer call long distance. Eschelon opened a call center ticket and Qwest stated they would research the issue. On 5/29/02, Qwest issued a change order to change the LCC. CGE&Y issued data request 299, asking Qwest for clarification of what prevented the end-user from dialing long distance. Qwest responded that the Qwest typist had entered an incorrect line class code on the service order. (Qwest data response 570) Qwest also indicated that this trouble would be reflected in its “supplemental OP-5 data.”

The following cases were identified through CGE&Y research of Qwest’s MTAS and RSOR data

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**Case 23 (Issues: LSR/SO mismatch; Repeat report not eligible; Trouble coded incorrectly as Qwest's responsibility): Redacted**

This line was installed on 5/31/02. On the same day, Eschelon contacted Qwest via the call center, opening a call center ticket because there was no dial tone on the line. This call center ticket was also reflected in MTAS, coded as Eschelon's responsibility with a disposition of 1006, referred to another group. CGE&Y found that this trouble was Qwest's responsibility as the service order contained an error. Qwest agreed with CGE&Y's findings in DR-579. Qwest ultimately fixed this trouble by issuing a service order. Therefore, CGE&Y finds that this trouble should be reflected in Qwest's "supplemental OP-5 data," CGE&Y's OP-5C.

On 6/3/02 at 11:49 AM, Eschelon opened a trouble ticket on this line for a no dial tone condition. This trouble was coded in MTAS as a repeat trouble of Qwest's responsibility. CGE&Y initially found that this trouble should have been flagged as installation related and eligible for OP-5 as repeat reports are not excluded from OP-5. However, based on the resolution of another trouble ticket the same day (see below) for the same problem, CGE&Y finds that this trouble should have been coded as Eschelon's responsibility and not eligible for OP-5, although flagged as installation related.

On 6/3/02 at 5:32 PM, Eschelon opened another trouble ticket due to the same no dial tone condition. This trouble was flagged as installation related. Qwest determined that this trouble was due to Eschelon ordering ground start instead of loop start on the LSR. (Qwest DR-579) Therefore, this trouble was coded as Eschelon's responsibility. CGE&Y agrees with Qwest's finding.

**Case 24 (Issues: Repeat report not eligible): Redacted**

This line was installed on 4/23/02. On 5/9/02 Eschelon opened a trouble ticket which was flagged as installation related and eligible for OP-5 in the MTAS data. Qwest resolved this trouble by changing a pair that had been incorrectly assigned. On 5/10/02 Eschelon opened another trouble ticket that flagged as a repeat report and Qwest's responsibility in MTAS, but not installation related or eligible for OP-5. Qwest resolved this trouble by tagging the lines at the DEMARC. CGE&Y finds that the trouble on 5/10/02 should have been flagged as installation related and eligible for OP-5 as repeat reports are not excluded from OP-5 per the PID.

**Case 25 (Troubles incorrectly coded as Eschelon's responsibility; Repeat report not eligible): Redacted**

This line was installed on 5/29/02. On 6/4/02, Eschelon opened a trouble ticket because the end-user could not call long distance. This trouble was included in MTAS and was

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flagged as installation related, but not eligible for OP-5 because it was Eschelon's responsibility. There was no dispatch for this repair. On 6/7/02, Eschelon opened another trouble ticket because the end-user could not call long distance. This ticket was flagged as Qwest's responsibility but not flagged as installation related in MTAS. This ticket was not flagged as a repeat because the earlier report was the CLEC's responsibility. Eschelon opened a trouble ticket on 6/11/02 for the same problem. There was no dispatch for this repair and the ticket was flagged as Eschelon's responsibility. Eschelon issued a final trouble ticket for the same problem on 6/12/02, which was coded as a repeat report and Qwest's responsibility, but neither installation related nor eligible for OP-5. Based on the fact that Eschelon submitted four trouble tickets for the same problem, the last one of which was coded as Qwest's responsibility, CGE&Y finds that all four troubles were Qwest's responsibility and should have been flagged as installation related and eligible for OP-5. In addition, the second and third troubles should also have been flagged as repeat reports.

**Case 26 (Issues: Repeat report not eligible): Redacted**

This line was installed on 6/7/02. On 6/13/02, Eschelon opened a trouble ticket for an out of service condition. The end user could not be called. This trouble was included in MTAS and was flagged as installation related and eligible for OP-5. On 6/14/02, Eschelon opened another trouble ticket because he could not be called and there was ringing on the line. This ticket was Qwest's responsibility and was coded as a repeat report in MTAS, but was not flagged as installation related or eligible for OP-5. CGE&Y finds that this trouble should have been flagged as installation related and eligible for OP-5, as the PID does not exclude repeat reports.

**Case 27 (Issues: Repeat report not eligible): Redacted**

This line was installed on 5/31/02 and there was a feature change order on 6/10/02. Eschelon opened a trouble ticket on 5/10/02, which was in MTAS and flagged as installation related and eligible for OP-5. Eschelon issued another trouble ticket on 5/11/02 for an issue with the hunting on the line. This ticket was flagged as a repeat and Qwest's responsibility in MTAS, but was not flagged as installation related or eligible for OP-5. CGE&Y finds that this trouble should have been flagged as installation related and eligible for OP-5, as the PID does not exclude repeat reports.

**Case 28 (Issues: Repeat report not eligible): Redacted**

This line was installed on 4/30/02. On 5/14/02, Eschelon opened a trouble ticket on this line for a no dial tone condition. This trouble was included in MTAS and was flagged as installation related and eligible for OP-5. Eschelon opened another ticket on 5/15/02 for the same problem. This ticket was flagged as a repeat and Qwest's responsibility in MTAS, but was not flagged as installation related or eligible for OP-5. CGE&Y finds

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that this trouble should have been flagged as installation related and eligible for OP-5, as the PID does not exclude repeat reports.

**Case 29 (Issues: LMOS setting of installation indicator): Redacted**

This line was installed on 5/24/02. Eschelon issued a trouble ticket on 6/18/02 for a no dial tone condition. This trouble was in MTAS and was flagged as installation related and eligible for OP-5. Eschelon opened another trouble ticket the same day for the same problem. According to MTAS, there was dial tone at the wire frame and a line test showed there was a short inside. This trouble is coded as Eschelon's responsibility and is not flagged as installation related. CGE&Y agrees with Qwest that the second trouble is not eligible for OP-5, however, CGE&Y finds that the trouble should have been flagged as installation related. In addition, CGE&Y finds that the first trouble should not be eligible for OP-5 as the trouble was ultimately found to be Eschelon's responsibility.

**Case 30 (Issues: LMOS setting of installation indicator): Redacted**

This line was installed on 6/14/02. Eschelon issued a trouble ticket on 6/17/02 for an out of service condition. This trouble was in MTAS and was flagged as installation related, but ineligible for OP-5 as it was coded as Eschelon's responsibility. Eschelon opened another trouble ticket on 6/18/02 for the same problem, but this trouble was coded as Qwest's responsibility. According to MTAS this trouble was not flagged as installation related or eligible for OP-5. CGE&Y finds that the 6/18/02 trouble is eligible for OP-5 per the PID and should have been flagged as installation related and eligible for OP-5 in MTAS.

**Case 31 (Issues: LMOS setting of installation indicator; LSR/SO mismatch): Redacted**

This line was installed on 5/24/02. On 6/6/02, Eschelon contacted Qwest via the call center, opening a call center ticket, notifying Qwest that the message group was not ordered as requested on the LSR. According to the call center ticket, the problem was forwarded to the UNE-P project. On 6/11/02, a trouble ticket was opened because the message waiting audio on the line was not working. This trouble is coded as Eschelon's responsibility and is not flagged as installation related in MTAS. CGE&Y issued DR-300, asking Qwest why this trouble was not flagged as installation related. Qwest responded that it was not flagged as installation related because there was an earlier ticket that did not appear in MTAS because it had a Category of Report equal to '6', and only values of '1' are included in the adhoc MTAS file. This trouble was eventually resolved through a service order being issued on 6/12/02. CGE&Y finds that the 6/11/02 trouble should have been flagged as installation related, but agrees that it should not be eligible for OP-5 as it required a service order to resolve and was therefore not a repair issue.

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CGE&Y finds that this issue represents an LSR/SO mismatch and should be reflected in Qwest's "supplemental OP-5 data," CGE&Y's OP-5C.

**Case 32 (LMOS not updated with service order information): Redacted**

There was a change order with inward activity completed on this line on 6/5/02. Eschelon issued a trouble ticket on the same day because the call forwarding/don't answer wasn't working. This ticket was coded as Qwest's responsibility but was not flagged as installation related or eligible for OP-5 because LMOS was not updated with the service order information when it assigned the installation indicator. CGE&Y finds that this trouble occurred within 30 days of a service order within inward activity and therefore, should have been coded as installation related and eligible for OP-5.

**Case 33 (Issues: LSR/SO mismatch): Redacted**

On 5/28/02, the end-user stated that caller ID was not working on Redacted, a second line installed as part of the same service order as Redacted. According to Eschelon, caller ID was not programmed on the line, although it was requested on the LSR so Eschelon contacted Qwest via the call center, opening another call center ticket to get caller ID programmed on the line. A change order was submitted to add caller ID on the line in question. Eschelon then determined everything was "working fine." In this instance too, no MTAS ticket was generated as it took a change order to resolve the caller ID issue. Therefore, OP-5 would not reflect this customer affecting issue. However, Qwest responded to CGE&Y data request 299 that this LSR/SO mismatch would be reflected in its "supplemental OP-5 data." (Qwest data request 558) See Case 4.

**Case 34 (Issue: Invalid order type preceded trouble): Redacted**

This line was installed on 5/21/02 and there was a feature change order completed on 5/23/02. Eschelon issued a trouble ticket on 5/23/02 that was coded as Qwest's responsibility but was not coded as installation related. CGE&Y found that this trouble was not flagged as installation related because LMOS had not been updated with the service order information for either of the two orders. However, CGE&Y finds that this trouble occurred within 30 days of a valid installation activity (5/21/02). Therefore, this trouble should have been flagged as installation related and eligible for OP-5.

**Case 35 (Issue: LMOS not updated with service order information): Redacted**

Eschelon issued an inwardly active 'C' order establishing UNE-P-POTS service on this line which completed on 5/22/02. On that same day, a trouble ticket was entered into MTAS indicating that there was a service outage with no dial tone. Qwest closed the ticket the next day to a disposition code indicating a line translation problem which the Central Office had not programmed a feature per the customer's request. In response to

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CGE&Y's DR-578, Qwest indicated that the ticket was mistakenly not flagged as installation-related because LMOS had not yet been updated with the information that a service order had been completed that day, and therefore did not find any service orders within the past month on this line to render it installation-related. Since the trouble was installation-related and was Qwest's responsibility, CGE&Y finds this trouble to be OP-5 eligible.

**Case 36 (Issue: LMOS not updated with service order information): Redacted**

Eschelon issued an inwardly active 'C' order establishing UNE-P-POTS service on this line which completed on 5/22/02. On that same day, a trouble ticket was entered into MTAS indicating that the customer could not call out. Qwest closed the ticket within an hour to a disposition code indicating a miscellaneous Central Office translation problem, which Qwest fixed in LCAS. In response to CGE&Y's DR 578, Qwest indicated that the ticket was mistakenly not flagged as installation-related because LMOS had not yet been updated with the information that a service order had been completed that day, and therefore did not find any service orders within the past month on this line to render it installation-related. Since the trouble was installation-related and was Qwest's responsibility, CGE&Y finds this trouble to be OP-5 eligible.

**Case 37 (Issue: LMOS not updated with service order information): Redacted**

Eschelon issued an inwardly active 'C' order establishing UNE-P-POTS service on this line which completed on 5/24/02. On that same day, a trouble ticket was entered into MTAS indicating that both this line and another line on the same account were out of service and had no dial tone. the customer could not call out. Qwest immediately resolved this trouble by reprogramming the lines and closed the ticket to a disposition code indicating they had restored a line, which had been disconnected in error. In response to CGE&Y's DR 578, Qwest indicated that the ticket was mistakenly not flagged as installation-related because LMOS had not yet been updated with the information that a service order had been completed that day, and therefore did not find any service orders within the past month on this line to render it installation-related. Since the trouble was installation-related and was Qwest's responsibility, CGE&Y finds this trouble to be OP-5 eligible.

**Case 38 (Issue: LMOS not updated with service order information): Redacted**

Eschelon converted a previous Qwest retail Centrex 21 account to its UNE-P POTS service on 5/21/02. Both the retail 'D' order and the Eschelon 'N' order completed on 5/21. That evening, a trouble report was entered into MTAS indicating that the line was out-of-service and had no dial tone. Qwest closed the ticket the next morning to a disposition code indicating that an un-repaired F1 cable was "Cut to Clear". Eschelon also called the Customer Service center on 5/23 to determine if the CSR for this account

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(which also includes Case 48, see below) was coded as Eschelon's. Qwest responded that this had not yet occurred. In response to CGE&Y's DR 578, Qwest indicated that the ticket was mistakenly not flagged as installation-related because LMOS had not yet been updated with the information that a service order had been completed that day, and therefore did not find any service orders within the past month on this line to render it installation-related. Since the trouble was installation-related and was Qwest's responsibility, CGE&Y finds this trouble to be OP-5 eligible.

**Case 39 (Issues: Qwest incorrectly counted trouble as installation-related when previous orders had no inward activity; Service order not yet updated in LMOS when trouble reported): Redacted**

On 5/3/02 Eschelon made a modification to the UNE-Star (POTS) service on this line, which did not involve inward activity. On 5/9 Eschelon submitted a CEMR ticket indicating that Call Waiting feature was not working. The disposition code in MTAS indicates that the line tested OK, and that Qwest did not find any trouble or perform any work. This disposition code is considered Qwest's responsibility. Qwest closed the ticket, advising Eschelon that call waiting had been programmed. This trouble was flagged as installation related and eligible for OP-5. However, since there was no service order activity within 30 days within inward activity, CGE&Y finds that this trouble should not have been flagged as installation related or eligible for OP-5.

On 6/4/02 this line was converted to UNE-P (POTS), involving an inward activity. A trouble ticket was entered into MTAS on 6/10. This trouble was flagged as Qwest's responsibility, but was not flagged as installation related or eligible for OP-5. Qwest tested the line and found it OK, advising Eschelon to discuss the 6/4 order with either the customer or Qwest's service center. Eschelon immediately made an inquiry to the call center regarding what exactly was on the LSR. CGE&Y reviewed the call center ticket, and there was no indication that Qwest was at fault. The next day another service order was completed involving no inward activity.

In response to CGE&Y's DR 578, Qwest indicated that the second (6/10) ticket was mistakenly not flagged as installation-related because LMOS had not yet been updated with the information that a service order had been completed that day, and therefore did not find any service orders within the past month on this line to render it installation-related. Initially, CGE&Y considered that this trouble ticket was therefore OP-5 eligible. However, after considering the sequence of Qwest's advice to Eschelon, Eschelon's immediate query to the service center, and then the issuance and completion of a (non-inward) change order the next day, CGE&Y now considers that Qwest coding of the disposition as Qwest-responsible was in error, and therefore this ticket should not be OP-5 eligible.

**Case 40 (Issues: Intervening order of invalid type): Redacted**

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This line was converted via an inwardly active change order on 5/28/02. Eschelon issued a trouble ticket on 6/19/02 because the call forwarding was not working properly. This trouble was coded as Qwest's responsibility, but was not flagged as installation related or eligible for OP-5 in MTAS. In this case, the order was written correctly but not provisioned correctly. In Qwest DR 578, Qwest indicated that this trouble was not flagged as installation related because there was a record ('R') order completed on this line on 5/29/02. Specifically, Qwest stated as follows:

“When establishing whether a trouble report is an initial installation-related report or a repeat report, LMOS evaluates the first preceding order. Only N, T & C orders are evaluated. In this case, the preceding order was an R (record only) order, completed on 5/29. Therefore, because the first preceding order was not an N, T or C order, LMOS did not set the 'I' flag for this trouble ticket.”

CGE&Y finds that the trouble on 6/19/02 occurred within 30 days of an order with inward activity and was coded as Qwest's responsibility, and therefore, should be flagged as installation related and eligible for OP-5.

**Case 41 (Issues: Trouble coded as CLEC-caused in error): Redacted**

This line was converted via an inwardly active change order on 5/28/02. Eschelon issued a trouble on 6/3/02 because the hunting was not working on this line. This trouble was coded as Eschelon's responsibility and ineligible for OP-5. However, although this was the first trouble within 30 days of an inwardly active order, it was not flagged as installation related. Eschelon issued a second trouble ticket on 6/3/02 13 minutes after the previous trouble was closed. This ticket was for the same problem and was coded as Qwest's responsibility and flagged as installation related and eligible for OP-5. In DR-578, Qwest initially indicated there was a trouble ticket on 6/1/02, which prevented the first ticket on 6/3/03 from being flagged as installation related. However, upon CGE&Y's supplemental request asking Qwest why the second trouble was considered installation related and why neither trouble was flagged as a repeat, Qwest “acknowledg[ed] that the events in this scenario appear to be inconsistent with the business rules. Because of LMOS archiving rules (retaining only the last 60 days of data), Qwest has some historic information to evaluate, but does not have the raw input data to LMOS. Therefore, Qwest is unable to determine the events that explain the disposition of these trouble tickets.”

CGE&Y finds that the first trouble on 6/3/02 was coded as Eschelon's responsibility in error because it required a second trouble ticket to resolve, which was coded as Qwest's responsibility. Qwest agreed with CGE&Y's findings in DR-579. Thus, CGE&Y finds that the first trouble on 6/3/02 should have been flagged as installation related and

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eligible for OP-5. In addition, CGE&Y finds the second trouble on 6/3/02 should have been flagged as repeat report, installation related, and eligible for OP-5.

**Case 42 (Issue: None): Redacted**

This line was converted via an inwardly active change order on 5/23/02. Eschelon issued a trouble on 5/29/02 because there was a no dial tone condition. This trouble was coded as Eschelon's responsibility and ineligible for OP-5. Qwest indicated that this trouble was beyond the network interface in its response to DR-579. However, Qwest's response and the narrative in MTAS for this trouble, indicate that Qwest changed the F1 but there was still not dial tone. CGE&Y has no information to contradict Qwest's description of the events, and therefore, accepts Qwest's explanation.

**Case 43 (Issues: Trouble classified as retail; Service disruption day of installation): Redacted**

On 5/2/02 there was a retail change order with no inward activity to a Qwest retail business service on this line. On 6/18/02, there was an Eschelon change order with inward activity converting this line to megabit service. Eschelon contacted the call center at 10:59 AM on 6/18/02 because the line rings disconnect, opening a call center ticket. There was a trouble on this line on this line on 6/18/02 at 11:26 AM. This trouble was coded in MTAS as a retail trouble ticket coded as the customer's responsibility. The call center ticket information indicates that this line was put out of service at 7AM, and was not restored until Eschelon notified Qwest of the ringing disconnect condition. According to the call center ticket, at 12:25 PM RCMAC indicated that the line was now ringing no answer and advised Eschelon to check that the line was working. By the time the repair department cleared the trouble ticket at 12:45 PM, the escalation department had already resolved the problem. Based on this information, CGE&Y finds that this trouble was classified as retail in error and should be classified as an Eschelon trouble ticket. In addition, CGE&Y finds that this trouble was actually Qwest's responsibility and should be coded as installation related and eligible for OP-5. CGE&Y also finds that this case represents a service disruption on the day of installation and would be reflected in CGE&Y's proposed OP-5B.

**Case 44 (Issue: Trouble classified as unknown): Redacted**

On 4/29/02 the Qwest service on this line was disconnected and new Eschelon UNE-Star Centrex 21 service was installed. On 5/28/02, Eschelon issued a trouble ticket that was coded as Qwest's responsibility, flagged as installation related, and eligible for OP-5. However, Eschelon issued another trouble ticket on 5/29/02 that was classified as unknown CLEC. This trouble was coded as a repeat report and Qwest's responsibility but not installation related. CGE&Y finds that this trouble ticket should have been classified as an Eschelon trouble. In addition, CGE&Y finds that this trouble should have been flagged as installation related and eligible for OP-5 as repeat reports are not

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excluded from OP-5 and this trouble occurred within 30 days of the most recent inward service order activity.

**Case 45 (Issue: Troubles classified as retail): Redacted**

On 5/6/02, Eschelon contacted Qwest via the call center asking whether this line was their account. Qwest confirmed that the CSR indicated that line was converted to Eschelon via IMA on 12/18/00. On 5/23/02 this line was converted to UNE-Star Centrex 21. On 5/25/02, there was a trouble ticket opened on this line. This trouble ticket was coded as Qwest's responsibility but was not flagged as installation related because the service order information had not yet been updated into LMOS. However, this ticket was also classified as a retail ticket in MTAS. Eschelon issued another trouble ticket on 5/26/02 on this line. This ticket was similarly coded as Qwest's responsibility and as a repeat report. This ticket was also classified as a retail ticket. Eschelon issued a second trouble ticket on 5/26/02 that was coded as Eschelon's responsibility. This trouble was also classified as a retail trouble. CGE&Y finds that these three troubles should have been classified as Eschelon troubles. CGE&Y is uncertain what prevented from recognizing that these troubles were on an Eschelon account that was converted over 2 years prior. In addition the trouble ticket on 5/25/02 and the first ticket on 5/26/02 should have been flagged as installation related and eligible for OP-5.

**Case 46 (Issue: Trouble classified as retail): Redacted**

On 5/31/02 the Qwest Centrex 21 service on this line was disconnected and new Eschelon UNE-P service was installed. On the day of installation, 5/31/02, there was a trouble ticket for an out of service ring no answer condition as well as a problem with the hunting on all the lines associated with the order. This trouble was coded as Qwest's responsibility, but was not flagged as installation related because the service order information had not yet been updated into LMOS. This also caused the ticket to be classified as a retail ticket in MTAS. CGE&Y finds that this trouble should have been classified as an Eschelon trouble. In addition this trouble should have been flagged as installation related and eligible for OP-5. CGE&Y also finds that this should be reflected in its OP-5B measure, service disruptions on the day of installation.

**Case 47 (Issue: Trouble classified as retail): Redacted**

On 5/20/02 there was an inward active retail change order on the Qwest retail business service on this line. This change order was followed by two retail record orders, one on 5/20/02, and one the next day, 5/21/02. On 6/28/02, there were two Eschelon change orders converting this line to a UNE-Star Centrex 21 service. On 6/28/02, Eschelon contacted Qwest via the call center, opening a call center ticket at 11:10 AM. Eschelon also issued a trouble ticket later that day at 11:24 AM. This ticket was closed as Qwest's responsibility, but was not flagged as installation related because the service order

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information had not yet been updated into LMOS. This also caused the ticket to be classified as a retail ticket in MTAS. CGE&Y finds that this trouble should have been classified as an Eschelon trouble. In addition this trouble should have been flagged as installation related and eligible for OP-5. CGE&Y also finds that this should be reflected in its OP-5B measure, service disruptions on the day of installation.

**Case 48 (Issues: Trouble classified as retail): Redacted**

On 5/21/02, the Qwest retail Centrex 21 service on this line was disconnected and Eschelon UNE-P service was installed via a new order with inward activity. That same day, Eschelon issued a trouble ticket. This ticket was closed to customer action because it was opened on the wrong number. However, this ticket was classified as a retail ticket. CGE&Y finds that this trouble should be classified as an Eschelon trouble. In addition, CGE&Y finds that this trouble should have been flagged as installation related but ineligible for OP-5 as troubles coded to customer action are excluded. CGE&Y also finds that this should be reflected in its OP-5B measure, service disruptions on the day of installation.

**Case 49 (Issues: Trouble classified as retail; LSR/SO mismatch): Redacted**

On 5/1/02, Eschelon issued a trouble ticket because this line was out of service. The repair department issued another service order on the behalf of Eschelon with a due date of 5/8/02. This ticket was then closed as Eschelon's responsibility. Eschelon contacted Qwest via the call center, opening a call center ticket, because the 5/8/02 due date was not soon enough. The call center ticket indicated that the N order originally establishing service was typed incorrectly and canceled. The escalation department verified that UNE-P service was installed on 4/18/02. The escalation department pushed the order through and it completed on 5/2/02. CGE&Y finds that the trouble on 5/1/02 was incorrectly coded as Eschelon's responsibility. It was not flagged as installation related, because the preceding service order was canceled. CGE&Y finds that this represents an installation error and should be flagged as installation related and eligible for OP-5. In addition, CGE&Y finds that Qwest typed the service order incorrectly, which represents a service order accuracy issue that would be reflected in CGE&Y's OP-5C.

**Case 50 (Issue: Intervening orders of invalid type): Redacted**

On 5/28/02 this line was converted from a Qwest retail business line to an Eschelon UNE-P line. There was also a new order 6/13/02 for this account. Eschelon issued a trouble ticket on 6/26/02. This trouble was coded as Eschelon's responsibility. It was not flagged as installation related because there were intervening invalid disconnect, record and change orders on this line on 6/14/02, 6/15/02, and 6/28/02, respectively. CGE&Y finds that despite the intervening invalid orders, this trouble occurred within 30

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days of an inward installation and should have been flagged as installation related. However, CGE&Y agrees that this trouble is not eligible for OP-5.

Qwest also indicated in its response to DR-578 the following:

“The N order for this TN was completed on 6/13. However, on 6/14, there was a D order received. Because of the sequencing and timing of these events, LMOS required manual updates. During the manual updates, the order field and completion date fields were not updated appropriately, so this ticket was not recognized as installation-related. LMOS does not allow the installation flag to be reset manually.” (Qwest Data Request 578)

Therefore, CGE&Y finds that there were likely two reasons that would have prevented this trouble from being flagged as installation related.

**Case 51 (Issue: LMOS not updated with service order information): Redacted**

On 5/23/02, there was an inward active change order on this line establishing UNE-P service. On the same day, Eschelon issued a trouble ticket. This ticket was coded as Eschelon’s responsibility. It was not flagged as installation related because the service order information had not yet been updated into LMOS. CGE&Y finds that this ticket occurred within 30 days of an inward order and should be flagged as installation related. However, CGE&Y agrees that this trouble was not eligible for OP-5.

**Case 52 (Issue: LMOS not updated with service order information): Redacted**

On 5/22/02, there was an inward active change order on this line establishing UNE-P service. On the same day, Eschelon issued a trouble ticket. This ticket was coded as Eschelon’s responsibility. It was not flagged as installation related because the service order information had not yet been updated into LMOS. CGE&Y finds that this ticket occurred within 30 days of an inward order and should be flagged as installation related. However, CGE&Y agrees that this trouble was not eligible for OP-5.

**Case 53 (Issue: LMOS not updated with service order information): Redacted**

On 5/8/02, there was an inward active change order on this line. On the same day, Eschelon issued a trouble ticket. This ticket was coded as Eschelon’s responsibility. It was not flagged as installation related because the service order information had not yet been updated into LMOS. CGE&Y finds that this ticket occurred within 30 days of an inward order and should be flagged as installation related. However, CGE&Y agrees that this trouble was not eligible for OP-5.

**Case 54 (Issue: Trouble incorrectly classified as Eschelon): Redacted**

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On 5/1/02, there was an Eschelon feature change order on the UNE-Star service on this line. On 5/3/02, this line was converted to Qwest retail Centrex 21. On the same day, there was a trouble ticket issued for no dial tone, however it was classified as an Eschelon trouble rather than a Qwest retail trouble. This ticket was coded as Qwest's responsibility, flagged as installation related, and eligible for OP-5. However, this ticket was classified as an Eschelon ticket because the Qwest retail service order information had not yet been updated into LMOS. CGE&Y finds that Qwest incorrectly included this trouble in Eschelon's results for OP-5 and all other M&R measures. CGE&Y finds that this ticket was correctly flagged as installation related and eligible for OP-5, but should have been classified as a Qwest retail ticket.

**Case 55 (No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 5/10/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service orders within 30 days were on 4/13/02 and 4/22/02, but had no inward activity. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 56 (Trouble classified as retail; No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 5/8/02. This trouble was classified as a retail ticket, however the narratives in MTAS indicate that this was an Eschelon trouble. It was coded as Qwest's responsibility, but was not flagged as installation related because there was not a valid inward service order within the previous 30 days. On 5/14/02, there was an Eschelon feature change only order on this line. Eschelon issued a trouble ticket on 5/21/02. This trouble was classified as Eschelon. This trouble was also coded as Qwest's responsibility, and was flagged as installation related and eligible for OP-5. However, the service order on 5/14/02 was not a valid inward service activity. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5. A third trouble on 6/7/02 was coded as Eschelon's responsibility and was not flagged as installation related by LMOS because of the prior ticket on 5/21/02. However, CGE&Y finds that this ticket was correctly not flagged as installation related because there was no valid service order within 30 days. There were an additional 6 tickets that occurred more than 30 days after the 5/14/02 order and were appropriately not flagged as installation related.

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**Case 57 (No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 5/22/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service order within 30 days was a feature change only order with no inward activity. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 58 (No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 6/21/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service order within 30 days had no inward activity. The most recent service order with inward activity was on 5/20/02, 32 days earlier. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 59 (No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 6/19/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service order within 30 days on 6/15/02 had no inward activity. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 60 (No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 6/19/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service order within 30 days on 6/4/02 had no inward activity. The most recent service order with inward activity was on 4/16/02. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 61 (No Inward activity within prior 30 days): Redacted**

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There was a trouble on this line on 6/17/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service order within 30 days on 6/12/02 had no inward activity. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 62 (No Inward activity within prior 30 days): Redacted**

There was a trouble on this line on 6/21/02. It was coded as Qwest's responsibility and was flagged as installation related and eligible for OP-5. However, CGE&Y found that there was no inward service activity within the previous 30 days. The only service order within 30 days on 5/28/02 had no inward activity. In its response to DR-575, Qwest agreed that there was not a valid service order within the prior 30 days, and this trouble was not installation related. Therefore, CGE&Y finds that this trouble should not be flagged as installation related and should not be eligible for OP-5.

**Case 63 (Trouble classified as CLEC unknown): Redacted**

There was an inward active Eschelon change order on this line on 5/7/02. Then on 5/8/02, there was a Qwest retail record order on this line. On 5/9/02, Eschelon issued a trouble ticket. According to MTAS, this ticket was canceled per Eschelon, and was not flagged as installation related. However, this ticket was classified as a CLEC=unknown. CGE&Y finds that this ticket should have been classified as an Eschelon trouble ticket and should have been flagged as installation related. CGE&Y agrees that this trouble was not eligible for OP-5.

**Case 64 (Trouble classified as CLEC unknown): Redacted**

There was a new service order on this line on 5/24/02. Qwest's RSOR data classifies this service order as a Qwest retail service order. There was a trouble on this line on 5/30/02. The narrative in MTAS indicates that this trouble was related to an Eschelon customer; "MISC MED ESCHELON@@TIC NO CHRONIC TIC NO QWST ASSIGNED THIS TO ANOTHER." A second ticket was issued on 5/31/02, which was also classified as a Qwest retail ticket. According to a call center ticket opened by Eschelon 5/30/02, this number (Redacted) had been assigned to an Eschelon customer since February 2001. Qwest's service order on 5/24/02 assigned this number to its customer. This placed the Eschelon customer out of service. There was an additional trouble ticket on this line on 6/5/02 that was classified as an Eschelon trouble ticket. Therefore, CGE&Y finds that the troubles on 5/30/02 and 5/31/02 should have been classified as Eschelon troubles because these troubles affected Eschelon's customers. CGE&Y finds that the troubles on 5/30/02 and 5/31/02 were Qwest's responsibility, but were not installation related as there

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was no Eschelon service order within 30 days. Qwest incorrectly included the 5/30/02 trouble in its retail results.

**Case 65 (Trouble classified as retail): Redacted**

There was a trouble on this line on 5/15/02. This trouble was classified as a retail ticket. However, the narratives in MTAS indicated that this trouble was related to an Eschelon customer, “NDT OOS MED ESCHELON@@NDT RNA TIC NO ALT P A07 YARD YES” and “TOK TO IT DEMARC OK TESTOR MATT ESHELON ALT P S.” Therefore, CGE&Y finds that this trouble was actually an Eschelon trouble and was classified as a retail trouble in the MTAS data in error. This trouble was not eligible for OP-5, as it did not occur within 30 days of an inward active order.

**Case 66 (Trouble classified as retail): Redacted**

There was a trouble on this line on 5/29/02. This trouble was classified as a retail ticket. However, the narratives in MTAS indicate that this trouble was related to an Eschelon customer, “NDT OOS MED ESCHELON@@NDT GOES TO VM TIC NO CF 6022636023 CLB4 DSP LTO” and “THIS IS NOT A QWEST ACCT BELONGS TO ESCHLN.” Therefore, CGE&Y finds that this trouble was actually an Eschelon trouble and was classified as a retail trouble in the MTAS data in error. This trouble was not eligible for OP-5, as it did not occur within 30 days of an inward active order.

**Case 67 (Trouble classified as retail): Redacted**

There was a trouble on this line on 6/18/02. This trouble was classified as a retail ticket. The most recent service order activity in RSOR for this line was a Qwest retail disconnect order on 5/8/02. However, the narratives in MTAS indicate that this trouble was related to an Eschelon customer, “NDT OOS MED ESCHELON@@NDT ROL UNISTAR CLB4 DSP LTO” and “REFD BK TO VENDR THIS IS ESCHELON SWITCH.” Therefore, CGE&Y finds that this trouble was actually an Eschelon trouble and was classified as a retail trouble in the MTAS data in error. This trouble was not eligible for OP-5, as it did not occur within 30 days of an inward active order. Moreover, this trouble was not Qwest’s responsibility.

**Case 68 (Trouble classified as retail): Redacted**

Eschelon contacted Qwest via the call center three times, twice on 5/28/02, and once on 6/18/02 about this line. The call center tickets indicated that this line was an Eschelon account, and Eschelon requested the due date of a pending order be pushed back to 7/1/02. There was also a trouble on this line on 6/18/02. The trouble on 6/18/02 is classified as a retail ticket in MTAS. Based on the narrative in MTAS and the information contained on the call center tickets, CGE&Y finds that this trouble should

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have been classified as an Eschelon trouble ticket. There was no inward order within 30 days, so CGE&Y agrees that this trouble was not installation related.

**Case 69 (Trouble classified as retail): Redacted**

There was a trouble on this line on 5/16/02. This trouble was classified as a retail ticket. However, the narrative in MTAS indicates that this trouble was related to an Eschelon customer, "MEM MED ESCHELON@@CUSTOM RING NWKG SUB HAS FEAT ADL 520 327 8887 TIC NO." Therefore, CGE&Y finds that this trouble was actually an Eschelon trouble and was classified as a retail trouble in the MTAS data in error. This trouble was not installation related because it did not occur within 30 days of an inward active order. There was a second trouble on this line on 5/17/02 for custom ringing not working. CGE&Y finds that this trouble was actually an Eschelon trouble and was classified as a retail trouble in the MTAS data in error. As with the previous trouble on 5/16/02, his trouble was not installation related.