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September 22B, 2003

EX PARTE

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

Re: WC Docket No. 03-194 – Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in the State of Arizona

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to discuss the evolution of Performance Indicator Definition (“PID”) OP-5, and, more specifically, to elaborate on the recent revisions made to that PID through the Long Term PID Administration (“LTPA”) process.

PID OP-5 measures new service installation quality.¹ Specifically, OP-5 today “evaluates the quality of ordering and installation of services, focusing on the percentage of average monthly new order installations that were free of trouble reports for thirty calendar days following an installation, including the percentage of new installations that experienced a trouble report on the installation date after the order [was] reported as work completed by the technician.”² Qwest’s performance under OP-5 is measured on a per product basis, and the standard typically is parity with Retail service.³

During the pendency of Qwest’s first application for Section 271 relief,⁴ the FCC and the Department of Justice expressed interest in reviewing performance data related to Qwest’s order

¹ See Application of Qwest Communications International Inc. to Authorization to Provide In-Region, Inter-LATA Service in the State of Arizona, WC Docket No. 03-194, September 4, 2003 (“Qwest Arizona 271 Application”), at Appendix D, Tab 3.1 (Qwest 14-State PIDs, Version 5.0, June 26, 2002) at 34, *also available at* www.qwest.com/wholesale/downloads/2002/020826/14State271WkgPIDver5.0-26Jun021.pdf.

² *Id.*

³ See *id.* A small number of products are subject to a “diagnostic” standard under OP-5.

⁴ See Application by Qwest Communications International Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148, June 13, 2003.

accuracy. In response, Qwest voluntarily designed a new measure, “OP-5++,” and began reporting results under this new measure beginning with results for July, 2002. OP-5++, which in recent months has also been referred to as Qwest’s “Order Accuracy” measure, is intended to reflect order accuracy based on the number of customer calls received each month by Qwest’s call centers that report service problems attributable to discrepancies between the LSR submitted and the service order issued by Qwest.⁵ Thus, OP-5++, which is reported on a state-specific aggregate basis for all orders evaluated under OP-5, is intended to report those LSR/service order discrepancies that are not captured by PID OP-5, which addresses installation quality.⁶

Although the FCC found that Qwest’s existing PIDs, together with OP-5++, “provide . . . a sufficient picture of Qwest’s performance to determine [that] Qwest is processing [Local Service Requests] accurately,”⁷ certain CLECs expressed concern regarding the efficacy of OP-5. When these concerns were raised in Arizona, the Arizona Corporation Commission Staff directed Cap Gemini Ernst & Young to undertake a data reconciliation effort with respect to OP-5 to assess its continued viability. Although few issues ultimately were found with OP-5, Qwest nevertheless responded to the CLECs’ concerns by negotiating a revised OP-5 through the LTPA process.⁸ In August 2003, the CLECs and Qwest reached unanimous agreement on a revised OP-5 PID that incorporates elements from both the former OP-5 and OP-5++ measure.⁹

The most significant change incorporated into the revised OP-5 PID pertains to scope. Today, OP-5 measures only installation quality while OP-5++ measures order accuracy; the revised OP-5 will measure both “installation quality” and “ordering quality.” Installation quality for the new OP-5 will focus on the provisioning process of service orders with inward line activity. Ordering quality will focus on order errors such as LSR/service order mismatches and conversion outages. This expansion in scope produced significant subcomponents to the revised OP-5. For example, whereas today OP-5 relies on repair trouble reports, the revised OP-5 will include repair trouble reports as well as other types of trouble reports. As a result of this change, OP-5 will include service orders free of repair trouble reports¹⁰ (similar to the existing OP-5),

⁵ See Declaration of Lynn M V Notarianni and Loretta A. Huff, Operations Support Systems, at ¶ 332.

⁶ *Id.*

⁷ *Qwest 9-State 271 Order* at ¶ 104.

⁸ See Declaration of Dean Buhler, Performance Measures Results, at ¶¶ 61-63.

⁹ A copy of the revised OP-5 PID was included in Qwest’s initial filing in this proceeding. See Qwest Arizona 271 Application, Declaration of Dean Buhler, Performance Measures Results, at Exh. DB-PERF-3; *also available at* www.qwest.com/about/policy/ldReentry/Fed271/sept04/declarations/item/PerformanceResults/DB_PERF_3.pdf.

¹⁰ The revised OP-5 will use the term “repair trouble reports,” defined as CLEC/customer notifications to Qwest of out-of-service and other service affecting conditions for which Qwest opens repair tickets in its maintenance and repair management and tracking systems that are closed in the reporting period or the following month subject to specified exclusions.

service orders free of provisioning trouble reports,¹¹ a combined view of repair and provisioning trouble reports, and repeat reports. These subparts will be measured as follows:

- A. New Service Installation Quality Reported to Repair: the number of inward line service orders minus the number of inward line service orders with related repair trouble reports divided by the number of inward line service orders, expressed as a percent;
- B. New Service Provisioning Quality: the number of inward line service orders minus the number of inward line service orders with related provisioning trouble reports divided by the number of inward line service orders, expressed as a percent;
- T. New Service Installation Quality Total: the number of inward line service orders minus the number of inward line service orders with related repair or provisioning trouble reports divided by the number of inward line service orders, expressed as a percent; and
- R. New Service Quality Multiple Report Rate: the number of repeat repair trouble reports and provisioning trouble reports divided by the total number of repair trouble reports and provisioning trouble reports related to inward line service orders.

Another modification to the existing OP-5 PID relates to how the PID will account for service orders completing in one reporting month and trouble reports occurring within 30 days but in a subsequent reporting month. Currently, OP-5 cares for this by using trouble tickets from the reporting month and an average of reporting month and the prior month's completed service orders. The revised OP-5 will report results one month in arrears in order to report on actual new installations during the reporting month while allowing all trouble reports to be included that occur within 30 days of order completion. For example, in November, 2003, inward line service orders will complete throughout the month, including the end of the month. To match trouble reports to the service orders completed at the end of November, it will be necessary to track trouble reports to the end of December in order to meet the 30 day reporting requirement. Therefore, the revised OP-5 will be reported the second month after the reporting period, or, in the example provided, in January 2004 with December results for other measures.

Because agreement has already been reached on the revised OP-5 between Qwest and the CLECs, Qwest is now in the process of seeking approval for this revised measure by the various state regulatory agencies in the company's 14-state region. While it is unclear at present how

¹¹ "Provisioning trouble reports" are defined as CLEC notifications to Qwest of out of service or other service affecting conditions that are attributable to provisioning activities such as LSR/service order mismatches and conversion outages. For these types of reports, Qwest creates call center tickets in its call center database. Capturing these trouble reports will eliminate the need to continue reporting OP-5++ results once reporting of the revised OP-5 commences.

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long it might take to obtain such approval in each of the 14 states, Qwest nevertheless plans to begin reporting results under the revised OP-5 for November, 2003, with performance results posted in January, 2004.

The 20-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

Hance Haney

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