

This exhibit consists of the following:

VCI CR SCR061405-03ESDR Detail

http://www.qwest.com/wholesale/cmp/archive/CR_SCR061405-03ESDR.htm

VCI Escalation of Qwest's Denial:

http://www.qwest.com/wholesale/downloads/2005/051006/SCR061405_03_E36_VCI.doc

Qwest Response to VCI Escalation:

http://www.qwest.com/wholesale/downloads/2005/051013/101305_Qwest_Response_E36_Posted_to_Web_101305.doc

MCI Escalation #E18:

http://www.qwest.com/wholesale/downloads/2003/030902/MCI_Escalation-E18.doc

Qwest Response to MCI Escalation:

http://www.qwest.com/wholesale/downloads/2003/030917/QwestResponsetoMCIescalationE18_9-16-03.doc

MCI Response to Qwest's Response:

http://www.qwest.com/wholesale/downloads/2003/030922/MCIResponsetoEscalation_E18_9-19-03.doc

CMP Oversight Committee Meeting Minutes (10/20/03):

<http://www.qwest.com/wholesale/downloads/2003/031029/CMPOversightCommitteeMeetingMinutes102003MCIComments.doc>

CMP Oversight Committee Meeting Minutes (10/27/03):

<http://www.qwest.com/wholesale/downloads/2003/031110/CMPOversightCommitteeMeetingMinutes102703.doc>

Archived System CR SCR061405-03ESDR Detail

Title: Daily Reject/Jeopardy Report to view and export into Excel. Quantity of Daily Reject/Jeopardy Report to view and export in Excel. Qnty of reject/Jeops by Username, PON, LSR, and reject comm with the ability to also view if the Reject had been corrected

CR Number	Current Status Date	Level of Effort	Interface/ Release No.	Area Impacted	Products Impacted
SCR061405-03ESDR	Denied 9/12/2005	-	IMA Common/		Resale, POTS

Originator: Gupta, Milan

Originator Company Name: VCI Company

Owner: Winston, Connie

Director: Winston, Connie

CR PM: Stecklein, Lynn

Description Of Change

CLEC's will benefit by a Daily Reject/Jeopardy Report to make certain IMA users are correcting rejects the same day. This change will also allow personnel to keep tally of rejects received each day for each user. Reports should have quantity of rejects by user and type of error.

IMA will allow CLEC's to View and export a daily Reject/Jeopardy Report that includes the User name, PON rejected or Jeopardized and the comment from the FOC. This report will also show if the LSR had been corrected.

Total Quantity received, corrected and detailed description

6/13/2005 REJECTS CORRECTED TOTAL

AMANDA 3 3 3

6/13/2005 AMANDA

An Tn mismatch 1

Pending orders work impacting

Subscriber access 1

Other 1

Total 3

Examples of comments are as follows:

_AN TN Mismatch

- _Pending orders impacting
- _Subscriber Access, Sucscriber other, Subscriber Later
- _Working Left in
- _LTS Value Invalid
- _End User, name or address mismatch
- _Company Facility
- _Class of service invalid
- _Type of service invalid
- _CLEC does not own the account
- _Activity has already been requested or performed
- _TN already working
- _Appointment does not match
- _Address not valid for wire center
- _TN not valid for wire center
- _USOCs already present on account
- _For Switch DMS100 HBQ and ORDMS not valid together
- _LSR requests work on non-working account
- _TN and BTN do not match
- _Invalid request type
- _No cus code for new connect
- _No sup for Jeop received
- _Outlisting mismatch
- _Other

Status History

Date	Action	Description
6/14/2005	CR Submitted	
6/15/2005	CR Acknowledged	
6/16/2005	Clarification Meeting Scheduled	
6/20/2005	Clarification Meeting Held	
6/29/2005	Status Changed	Status changed to Clarification

7/7/2005	Additional Information	QPP will benefit with the implementation of this CR
7/26/2005	Status Changed	Status changed to Presented
7/26/2005	Discussed at Monthly CMP Meeting	Discussed at the June CMP Sytems Meeting - See Attachment B in the Systems Distribution Package
7/20/2005	Discussed at Monthly CMP Meeting	Discussed at the July CMP Sytems Meeting - See Attachment B in the Systems Distribution Package
8/23/2005	Discussed at Monthly CMP Meeting	Discussed at the August CMP Systems Meeting - See Attachment I in the Distribution Package
9/15/2005	Status Changed	Status changed to Denied
9/15/2005	Qwest Response Issued	
9/22/2005	Discussed at Monthly CMP Meeting	Discussed in the September Systems CMP Meeting - See attachment G in the Systems Distribution Package
10/5/2005	Escalation Initiated	Escalation Initiated by VCI - Acknowledged on 10/6/05 E36
7/19/2005	General Meeting Held	Additional Clarification Meeting Held
4/7/2006	Additional Information	CMP Oversight Review Issue Submission - CMPR.04.05.06.F.03840

Project Meetings

10/15/05 Escalation Acknowledgment

Amanda,

This is to acknowledge receipt of your escalations SCR061405-03-E36 and SCR061405-01-E37.

The Escalations were received in our CMP Escalation mailbox on Wednesday, October 5, 2005 1:49 PM CT and 2:23 PM CT respectively.

NOTE: One of your escalation emails shows SCR091405-03 however there is no SCR with that number. I have assumed the escalation is associated with SCR061405-03. If that is not the correct SCR, please get back with me as soon as possible.

This acknowledgment is being sent at approximately 1:00 PM CT, October 6, 2005.

Loretta Huff - Director Prog/Project Mgmt is assigned to these escalations. She can be reached at 303 965 3709 or by e-mail at Loretta.A.Huff@qwest.com.

Qwest will respond with binding position e-mails no later than COB October 13, 2005.

Please contact me with any questions.

Thank you, Susan Lorence Qwest CMP Manager 402 422-4999 --Original Message-- From: amandas@vcicompany.com [mailto:amandas@vcicompany.com] Sent: Wednesday, October 05, 2005

1:49 PM To: amandas@vcicompany.com Subject: VCI COMPANY
CR#SCR091405-03 Denied

Escalation Company: VCI COMPANY CR#: SCR091405-03 Status Code:
Denied

= = = = =
= = = = Description: VCI objects to the denial of this CR. Qwest denied
the CR due to No Demonstrable Business Benefit.

History of Item: 6/16/05 Clarification Meeting Scheduled 6/20/05
Clarification Meeting Held 7/20/05 Discussed at July CMP meeting 8/10/05
sent request to CMP to be added as late adder in IMA 19.0 8/10/05 LOE to
be determined 8/23/05 Qwest stated needs until Sept CMP to give LOE
9/15 Qwest changed CR to denied

Reason for Escalation / Dispute: VCI objects to the denial. It is impossible
for Qwest to deny or disprove. Qwest said they look at what is available
today. What the costs are to implement and weighs it against the business
value to determine if there is no demonstrable benefit. Our objection to
this is that there is nothing available today that gives CLEC's a quantity of
rejects by day as well as a description of the reject in one report by
username. In addition Qwest has never disclosed the Level of Effort for this
CR therefore it should of never been determined that there is no
demonstrable benefit.

Business Need and Impact: The need for this CR is to reduce the number
of rejects by User. CLEC's need to export this information for tracking and
retraining efforts.

Desired CLEC Resolution: That Qwest withdraw the denial. And efficiently
provide a LOE.

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Lead Submitter: Name: Amanda Silva Title: Carrier Relations Phone
Number: 253 219-3437 E-mail Address: amandas@vcicompany.com

Joint Submitters:

Date/Time Submitted: Wed Oct 5 11:04:12 PDT 2005

9/21/05 Systems CMP Meeting

Anne Robberson/Qwest stated that this CR has been denied. Anne said
that Qwest currently sends Reject and Jeopardy Notifications to the CLECs
as these notices are generated. She said that notices are sent to the
originators of the LSRs in the format that the originator requests. She said
that the CLECs also have access to the existing IMA Post Order tool that
allows queries of notices via the LSR Notice Inquiry. Anne said that Qwest
denies this request due to no demonstrable benefit. Amanda Silva/VCI
Company stated that current tool will not allow them to export the data.
(Comments to minutes received from VCI Company 9/30/05) These tools
do not provide what VCI is requesting. We are seeking a report with
quantity of rejects per day and type of error. Benefit is for Provisioners.
CLECs must know what types of rejects continue to occur to be able to
provide coaching and development to provisioners. Amanda stated that
VCI would be escalating. Bonnie Johnson/Eschelon stated that she takes
offense when Qwest makes the assumption that there is no demonstrable
benefit to the CLEC. Bonnie said that she does not know where this comes
from and that saying that there is no demonstrable benefit to the CLECs is

inappropriate. Jill Martain/Qwest said that Qwest is not saying that there is no benefit to the CLECs. She said that the CMP document states that this can be used when there is no demonstrable benefit for Qwest or the CLECs. Jill stated that Qwest looks at what is available today, what the costs are to implement and then weighs it against the business value to determine if there is a demonstrable benefit to both Qwest and the CLEC. Liz Balvin/Covad said that it might help to engage the CLEC before you make that decision with a simple phone call. Jill Martain/Qwest said that we could have that discussion prior to CMP. Sharon Van Meter/AT&T stated that she agreed with Eschelon and that the no demonstrable benefit reason should apply to Qwest not to the CLEC. Bonnie Johnson/Eschelon agreed that the no demonstrable benefit reason needs to say there is no benefit to Qwest. She said that was her issue when Eschelon's CR was denied. (Comments to Minutes Received from Eschelon 9/30/05) Bonnie said a CLEC would not submit the CR if there was no benefit to the CLEC. Bonnie also said that she questions why this request would not be a benefit to Qwest with the possibility of reducing the number of rejects. Jill Martain/Qwest stated that we will take a look at these concerns

8/17/05 Systems CMP Meeting

Jill Martain - Qwest stated that Qwest continues to evaluate this CR and hopes to have a response in the September CMP Meeting.

7/20/05 Systems CMP Meeting

Amanda Silva - VCI Company stated that they have a business need to help in finding common provisioning errors when the LSR is rejected. They are requesting the PON, Version, Req. Type, and for the type of Reject in remarks on this report Liz Balvin - Covad asked how often do you want Qwest to refresh the information. Amanda Silva - VCI said they want the information refreshed on a daily basis. Liz Balvin - Covad asked if this was GUI specific. Amanda Silva - VCI said that this request was for IMA Common. Jill Martain - Qwest said that this CR will move to a Presented Status.

7/19/05 E-mail received from VCI

Hi Lynn,

BLOCK ACTIVITY and STATE would be important to this report. Is it possible to have that added? For example Blocks: AHKMNO2378 State: IA

-Amanda

VCI Company

7/19/05 Additional Clarification Meeting Amanda Silva - VCI Company, Chuck Anderson - Qwest, Carol Mckenzie - Qwest, Lynn Stecklein - Qwest

Lynn Stecklein - Qwest stated that the purpose of this meeting is to gather additional information regarding VCIs Request. She said that information was e-mailed to VCI prior to this call and will be reviewed. (see below)
From: Stecklein, Lynn Sent: Tuesday, July 19, 2005 8:42 AM To: 'Amanda (E-mail)' Subject:

Hi Amanda,

Below and attached you will find information that will be discussed on our call at 10:00 am MT. The call in number is 877 260-8255 passcode

2467196.

Thanks,

Lynn

Title: SCR061405-03 Daily Reject/Jeopardy Report to view and export into Excel

Description Of Change

CLEC's will benefit by a Daily Reject/Jeopardy Report to make certain IMA users are correcting rejects the same day. This change will also allow personnel to keep tally of rejects received each day for each user. Reports should have quantity of rejects by user and type of error. IMA will allow CLEC's to View and export a daily Reject/Jeopardy Report that includes the User name, PON rejected or Jeopardized and the comment from the FOC. This report will also show if the LSR had been corrected. Total Quantity received, corrected and detailed description

CLEC Ex: 6/13/2005 REJECTS CORRECTED TOTAL AMANDA 3 3 3

6/13/2005 AMANDA An TN mismatch 1 Pending orders work impacting Subscriber access 1 Other 1 Total 3

Examples of comments are as follows: AN TN Mismatch Pending orders impacting Subscriber Access, Subscriber other, Subscriber Later Working Left in LTS Value Invalid End User, name or address mismatch Company Facility Class of service invalid Type of service invalid CLEC does not own the account Activity has already been requested or performed TN already working Appointment does not match Address not valid for wire center TN not valid for wire center

- Title: SCR061405-01 Provisioning report to view and export into Excel

Description Of Change

CLEC's will benefit by keeping record of staff production through an easy to use report of quantity and type of orders submitted by Username. The search function should have daily and monthly detail. IMA will allow CLEC's to View and export Provisioning reports by Username.

Itemized order detail as follows:

NEW CONNECT TRANSFER CONVERSION DISCONNECT SUSPEND LINE
FREEZE REMOVAL TELEPHONE NUMBER CHANGE FEATURE REMOVE/ADD
PIC & LPIC REMOVE/ADD NAME CHANGE RESTORE RECONNECTION
WINBACK OTHER

Total Quantity of orders submitted by Staff member, then a more detailed description of orders submitted.

Report Example: June-05 AMANDA New Connect 6 Transfer 3 Conversion 3
Total 12

Description Of Change

Allow CLECS to query and export a Provisioning Report to view and export into Excel which shall provide a record of staff production including quantity and type of orders submitted by Username in IMA. The search

function should have daily and monthly detail.

- Qwest Comments: Items not included in scope for Provisioning Report:
TN Change, Name Change, Winback, Other

Amanda Silva - VCI Company stated that the information provided and discussed during this call is what they are requesting on this request.

Lynn Stecklein - Qwest stated that VCI will be presenting this CR in the July 20, 2005 Systems CMP Meeting. 6/20/05 Clarification Meeting

Attendees: Amanda Silva - VCI Company, Alexis Steckler - VCI Company, Steph Prull - Eschelon, Denise Martinez - Qwest, Carol Mckenzie - Qwest, Jan Martin - Qwest, Phyllis Sunins- Qwest, Anne Robberson - Qwest, Jim Recker - Qwest, Lynn Stecklein - Qwest

Review Description of CR Amanda Silva - VCI is requesting a Daily Reject/Jeopardy Report to view and export into Excel.. She said that they would like the quantity of reject/Jeops by Username, PON, LSR, and reject comments with the ability to also view if the Reject had been corrected.

Discussion: Denise Martinez - Qwest asked if VCI wanted the specific reject codes as well as the comments. Amanda Silva - VCI said that they would like both and that the standard code does not provide the information they need. Denise Martinez - Qwest asked if they were looking for errors too (non fatal) Amanda Silva - VCI said that they can't pull errors in IMA because they have no description Denise Martinez - Qwest asked if they were only looking at rejects/jeops that were specific to them. Amanda Silva - VCI said yes. Denise Martinez - Qwest asked if there were no rejects for the user would they want the user name to appear. Amanda Silva - VCI said that they would still like this information. She said they would like a positive and negative report on rejects and would also like to see if they are corrected. Denise Martinez - Qwest asked if they would like the rejects and jeopardies separated. Alexis Steckler - VCI said that it did not matter. Jan Martin - Qwest asked if there was an error on the LSR that was supp'd, would that be considered a correction. Amanda Silva - VCI said yes. She said that versions would also help

Products and Interface Impacted Resale, POTS, QPP IMA Common

Establish Action Plan Lynn Stecklein - Qwest said that VCI will present this CR in the July 20th Systems CMP Meeting.

QWEST Response

September 12, 2005

DRAFT RESPONSE For Review by the CLEC Community and Discussion at the September 21, 2005 CMP Meeting

TO: Amanda Silva VCI Company

SUBJECT: CLEC CR SCR061405-03 Daily Reject/Jeopardy Report to view and export into Excel. Quantity of Daily Reject/Jeopardy Report to view and export in Excel. Qty of reject/Jeops by Username, PON, LSR, and reject comm. with the ability to also view if the Reject had been corrected

VCI proposes that Qwest develop and implement a report that allows CLECs to view and export details associated to rejects and jeopardies.

Qwest currently sends Reject and Jeopardy Notifications to the CLECs as these notices are generated. Notices are sent to the originators of the LSRs

in the format that the originator requests.

Additionally, CLECs have access to the existing IMA Post Order tool that allows queries of notices via the LSR Notice Inquiry.

Since there is existing functionality already in place that provides details associated to rejects and jeopardies, Qwest denies this request due to No Demonstrable Business Benefit.

Sincerely, Qwest

[<Back](#)

Information Current as of 6/4/2007

CR#SCR061405-03 E36 VCI ESCALATION October 5, 2005

10/05/2005 01:49 PM CT

Sent by: Amanda Silva, VCI Company

Subject: VCI COMPANY --- CR#SCR091405-03 --- Denied

Escalation
Company: VCI COMPANY
CR#: SCR091405-03
Status Code: Denied

= = = = =

Description:
VCI objects to the denial of this CR. Qwest denied the CR due to No Demonstrable Business Benefit.

History of Item:
6/16/05 Clarification Meeting Scheduled
6/20/05 Clarification Meeting Held
7/20/05 Discussed at July CMP meeting
8/10/05 sent request to CMP to be added as late adder in IMA 19.0
8/10/05 LOE to be determined 8/23/05 Qwest stated needs until Sept CMP to give LOE 9/15 Qwest changed CR to denied

Reason for Escalation / Dispute:
VCI objects to the denial. It is impossible for Qwest to deny or disprove. Qwest said they look at what is available today. What the costs are to implement and weighs it against the business value to determine if there is no demonstrable benefit. Our objection to this is that there is nothing available today that gives CLEC's a quantity of rejects by day as well as a description of the reject in one report by username. In addition Qwest has never disclosed the Level of Effort for this CR therefore it should of never been determined that there is no demonstrable benefit.

Business Need and Impact:
The need for this CR is to reduce the number of rejects by User. CLEC's need to export this information for tracking and retraining efforts.

Desired CLEC Resolution:
That Qwest withdraw the denial. And efficiently provide a LOE.

= = = = =

Lead Submitter:
Name: Amanda Silva
Title: Carrier Relations
Phone Number: [redacted]
E-mail Address: [redacted]

Joint Submitters:

Date/Time Submitted: Wed Oct 5 11:04:12 PDT 2005

Escalation #SCR061405-03 -E36

October 13, 2005

Amanda Silva
VCI

Subject: VCI Escalation on SCR061405-03 -E36 associated with Qwest denial of this SCR citing No Demonstrable Business Benefit

This letter is Qwest's binding response to your October 5, 2005 escalation regarding CLEC Change Request number SCR061405-03 E-36 **"Daily Reject/Jeopardy Report to view and export into Excel. Quantity of Daily Reject/Jeopardy Report to view and export in Excel. Qnty of reject/Jeops by Username, PON, LSR, and reject comm with the ability to also view if the Reject had been corrected"** and VCI's request to implement this SCR.

Qwest has reviewed the formal escalation and maintains its position that since there is existing functionality that currently provides details associated with rejects and jeopardies, this SCR will continue to be denied due to No Demonstrable Business Benefit.

Although the detail provided in the IMA Post Order Status Update Tool is not exportable, it does provide a means of looking for data which can be requested by either Rejected or Jeopardy status or all statuses can be selected. Additionally, the query can be filtered by:

- Hours – ranging from 1 to 82 hour timeframes
- User ID
- Status types of either LSR or Order
- LSRs entered by EDI, GUI, or both

Once the query is complete, the data can be sorted by any column by clicking the header labels:

- Date/time
- User ID
- PON
- VER (Version)
- AN (Account Number)
- LSR ID
- DDD (Desired Due Date)
- LSR Status
- Order Number
- Order Due (DD)
- Order Status
- Entered By (Source of LSR – EDI or GUI)

Selecting all Status and sorting by PON and date provide an indication of whether a status has been resolved or not.

If additional detail is required, there is supplementary functionality in:

- the IMA Post Order LSR/BRC Notice Inquiry which provides notice specifics
- the IMA Post Order Status Inquiry which provides more detailed status by PON or LSR

As your Service Management team has discussed with you, there is also another source of data outside of CMP that is available to you that contains both BPL and manual reject information. This data is accessible via the Qwest Wholesale website on the CLEC Performance Results Report url and can be exported to Excel. These CLEC specific data reports can be requested through your Service Management team and require a digital certificate.

In summary, the combination of data available in IMA and through the Qwest Performance Results Report URL supports Qwest denial of this CR.

Loretta Huff
Qwest Wholesale
Director Program/Project Mgmt

ESCALATION #E18 – MCI – SEPTEMBER 2, 2003

Sent by: Liz Balvin (MCI) [email redacted] 08/29/2003 02:01 PM CST

08/29/2003 02:01 PM CST

Sent by: Elizabeth Balvin (MCI) [email redacted]
Please respond to Elizabeth Balvin (MCI) [email redacted]

To:
cmpesc@qwest.com

cc:
Connie Winston (Qwest) [email redacted], Inotari (Qwest) [email redacted], Steven Kast (Qwest) [email redacted], Tom Priday (MCI) [email redacted]

Subject:
ESCALATION: Response to TT 141666

- C.htm
- TechEsc_TT242666-MCI Final2.doc

Subject: Escalation

Company: WorldCom

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=====

Description: Escalating trouble ticket 141666 response from Qwest (Tier 6) because it inappropriately places the burden on MCI (CLECs) to update its coding that was based on Qwest published business rules. MCI initiated a trouble ticket because Qwest OSS imposes edits on address fields that are optional per Qwest published EDI disclosure documented business rules. Optional "usage definition" as defined by Qwest is "this field is optional for this activity, for this product. The system shall not enforce any business rules and should allow a valid entry." The EDI disclosure documentation reflects no valid entries because given the field is optional, no business rules shall be enforced.

MCI noted that the following fields were optional:

Field name "SAPR" for all activity types

Field name "SASD" for all activity types

Field name "SATH" for all activity types

Field name "SASS" for all activity types

Field name "BOX" for all activity types

and requested that Qwest lift any edits associated with these fields given the published documentation. MCI specifically stated that to change the usage definition for these fields from "optional" to "conditional" would place the burden on CLECs to adjust their code. Thus, Qwest's response inappropriately places the burden on CLECs to change their code when these fields should have no edits applied. Qwest should remove the edits prior to version 14.0 because the system currently is not working according to the EDI disclosure published business rules.

History: Qwest address validation rejects invalid when applied to these optional fields.

Reason for Escalation: See Description

Business need and impact: See Description

Desired CLEC resolution: See Description

CLEC Contact Information: Liz Balvin, Carrier Management (MCI) [contact information redacted]

Thanks,

Liz Balvin
WorldCom Carrier Management - Qwest
[contact information redacted]

-----Original Message-----

From: Winston, Connie (Qwest) [email redacted]
Sent: Thursday, August 28, 2003 4:53 PM
To: Liz Balvin (MCI) [email redacted]
Cc: Owen, Randy
Subject: Response to TT 141666(Qwest Note:242666)

Hi Liz,

Attached (See Attachment 1 following) is the written response you request. This will close the technical escalation for trouble ticket 242666. Of course if you have any questions please feel free to contact Randy Owen or myself.

Thanks,
Connie Winston
[contact information redacted]

Attachment 1

Response to MCI's Technical Escalation re: address validation on optional fields.

Liz Balvin of MCI opened a trouble ticket (242666) and requested a technical escalation of Qwest on August 19, 2003 at 11:13am. The description of the trouble ticket follows:

Problem Description: wants to have the entire edit for address validation lifted due to the SATH field being 'Optional' per the 12.0 disclosure documentation

Explanation: Because of this field being 'optional' they have had numerous LSRs rejected because they have designed their systems not to include certain variations on the SATH abbreviations (i.e. AV or TER) and have interpreted the disclosure to mean that IMA

After preliminary investigation, Qwest agrees to change the usage from "optional" to "conditional" for several of the address fields on the End User form. Documentation updates will be included in Qwest's 12.0 and 13.0 Disclosure addenda targeted for publication September 15, 2003.

Regarding the request to lift the address validation edits, Qwest has evaluated this request (which impacts all CLECs) and decided to keep the edits in place. This decision was based on the following:

1. There is a scheduled date for the documentation changes.
2. MCI's request is for temporary removal of the edits until the documentation changes can be implemented. Removing these edits could not be completed earlier than the documentation

changes.

3. This edit has consistently been communicated to implementing EDI CLECs, in team meetings, during the implementation process, and through the following EDI FAQ Pre-Order #1:

The exact address as provided by the Address Validation Query should always be the address used by the CLEC on an LSR, as this is the address on which the BPL performs its address validation edit.¹

In conclusion, Qwest continues to consider future system enhancements proposed by the CLEC community. An example of this is the 14.0 SCR022703-24, "Allow post migration transaction order types to be processed by TN and SANO" that allows for other product and activity types to be submitted with only full AN or TN and SANO rather than a full address from the customer.

Sincerely,
Connie Winston
Director Information Technologies
Qwest

¹ http://www.qwest.com/wholesale/downloads/2003/030225/12_0_Frequently_Asked_Questions-02.25.03.PDF

Escalation #E18
September 16, 2003

Liz Balvin
MCI

Dear Ms. Balvin:

This letter is in response to your September 2, 2003 (E18) escalation regarding the MCI position that the trouble ticket 242666(Noted as 1416666) response from Qwest (Tier 6) was an issue because it *“inappropriately places the burden on MCI (CLECs) to update its coding that was based on Qwest published business rules.”* MCI further states *“MCI initiated a trouble ticket because Qwest OSS imposes edits on address fields that are optional per Qwest published EDI disclosure documented business rules.”*

On August 28, 2003, Qwest issued a response to MCI for a technical escalation MCI had initiated regarding this issue. As part of the response, Qwest stated the following:

“Regarding the request to lift the address validation edits, Qwest has evaluated this request (which impacts all CLECs) and decided to keep the edits in place. This decision was based on the following:

- 1. There is a scheduled date for the documentation changes.*
- 2. MCI’s request is for temporary removal of the edits until the documentation changes can be implemented. Removing these edits could not be completed earlier than the documentation changes.*
- 3. This edit has consistently been communicated to implementing EDI CLECs, in team meetings, during the implementation process, and through the following EDI FAQ Pre-Order #1:*

The exact address as provided by the Address Validation Query should always be the address used by the CLEC on an LSR, as this is the address on which the BPL performs its address validation edit.¹.”

As of September 15, 2003, Qwest has updated the documentation associated with this issue. Additionally, Qwest has reviewed question logs that are maintained as part of Qwest’s EDI implementation process, and the question logs maintained for MCI indicate that Qwest responded several times to MCI with information that detailed these fields and their associated edits.

In conclusion, Qwest does not plan to remove the edits as requested in this escalation.

¹ http://www.qwest.com/wholesale/downloads/2003/030225/12_0_Frequently_Asked_Questions-02.25.03.PDF

Please contact me by telephone at [contact information redacted], or by e-mail at [email redacted] if you have any additional questions.

Sincerely,
Connie Winston
Director-Information Technologies
Qwest

09/19/2003 11:58 AM CST

Sent by: Elizabeth Balvin (MCI) [email redacted]
Please respond to Elizabeth Balvin (MCI) [email redacted]

To:

cmpesc@qwest.com

cc:

Subject:

MCI CMP OVERSIGHT REVIEW ISSUE SUBMISSION

Thanks for Qwest's binding response surrounding escalation E18 (attached). Also attached is Qwest response to trouble ticket 242666.

MCI would like to note the following as discussed at the September CMP Meetings:

- 1) An event notifications should have resulted in the issuance of trouble ticket # 242666 because the edits are not only imposed on MCI's orders (multiple CLECs). At a minimum, this issue should have been categorized as severity 1 or 2 based on production support criteria set in the CMP documentation.
- 2) Qwest's addendum changes places the burden on CLECs to adjust coding. Had Qwest lifted the edits already noted in the disclosure documents as option, NO coding changes would be required for CLECs.
- 3) Qwest expects an exact SAV response match be populated in the address fields, none of which is documented in the EDI disclosure documents. Coding changes are required to accommodate populating a preorder query response to the order, thus this type of information is critical to be noted in disclosure (the bible to building CLECs side of the EDI interface).

Points of clarification:

- 1) MCI did not "request temporary removal of the edits until the documentation changes can be implemented." MCI specifically requested Qwest lift the inappropriate edits, as even noted in the trouble ticket "wants to have the entire edit for address validation lifted due to the SATH field being 'Optional' per the 12.0 disclosure documentation"
- 2) With reference to the following "Qwest has reviewed question logs that are maintained as part of Qwest's EDI implementation process, and the question logs maintained for MCI indicate that Qwest responded several times to MCI with information that detailed these fields and their associated edits." MCI would like it noted that per the 12.0 Question, there are no statements made by Qwest that back-end address validation edits would be imposed on CLECs. MCI was very specific when initiating the trouble ticket that we were referencing 12.0 production orders and disclosure documentation.

In addition, MCI would like to initiate review of this issue to the "Oversight Committee". MCI believes Qwest documentation changes are out of process of the CMP document whereby the following is documented ">>>Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated).>>>Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release.>>>Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue associated with a trouble ticket."

Qwest documentation changes required CLECs to code to accommodate. What should have resulted from the trouble ticket issuance was a "Patch Release" whereby the system edits would have been lifted because the system was not working in accordance with the documented business rules. MCI notes the following for discussion purposes:

http://www.uswest.com/disclosures/netdisclosure409/12/12_AddendumVer6.pdf

Expected resolution would be that Qwest cannot update documentation that impacts CLEC coding. That would changes included but not limited to the following:

Qwest documented Usage Definitions: >Usage = N Definition: Not required - This field is not required for this activity, for this product. If the indicator is (N) for all activities, QWest does not mat the field and will not return a -997 if populated. >Usage = R Definition: Required - this field is required for this activity, for this product. The system shall enforce business rules and only allow a valid entry. >Usage = O Definition: Optional - This field is optional for this activity, for this product. The system shall not enforce any business rules and should allow a valid entry. >Usage = C Definition: Conditional - This field is required for activity based upon a condition. The system shall enforce the business rule and require a valid entry when the condition is true. >Usage = P Definition: Prohibited - If this field is populated it will result in a fatal reject.<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

Example 1)

http://www.uswest.com/disclosures/netdisclosure409/12/12_0_Addendum_Ver1.pdf

Whereby Qwest changed a field "usage" from not required to prohibited.

EU 25a 3/17/03 AHN* Usage Code Changed For product 14 and activities N, D, W, C and T From: N To: P

NOTE: Changing the usage from not required to prohibited would result in fatal rejects if the CLEC built to populate the field. This would constitute a system defect because the

system is not performing as expected based on the published business rules. By simply publishing business rule changes, Qwest places the burden on CLECs to adjust their code.

Example #2)

http://www.uswest.com/disclosures/netdisclosure409/12/12_0_Addendum_Ver_3.pdf

TN1 TNSQ1 6/04/03 CCNA Usage Code Changed From: "O" optional To: "R" required

TN TNSQ2 6/04/03 TXNUM Usage Code Changed From: "O" optional To: "R" required

TN TNSQ3 6/04/03 D/TSENT Usage Code Changed From: "O" optional To: "R" required

TN TNSQ4 6/04/03 TXTYP Usage Code Changed From: "O" optional To: "R" required

TN TNSQ5 6/04/03 TSACT Usage Code Changed From: "O" optional To: "R" required

TN TNSQ6 6/04/03 PON Usage Code Changed From: "O" optional To: "R" required

NOTE: Changing usage definitions from Optional to Required means that CLECs will have accommodate the coding to populate fields or be faced with fatal rejects. This would constitute a system defect because the system is not performing as expected based on the published business rules. By simply publishing business rule changes, Qwest places the burden on CLECs to adjust their code.

Example #3)

http://www.uswest.com/disclosures/netdisclosure409/12/12_Addendum_Ver_4.pdf

LSR 91 8/11/03 EMAIL

Usage Code Changed From: "O" (Product 14, Activities N, D, W, C, T) To: "R" (Product 14, Activities N, D, W, C, T)

NOTE: Changing usage defections from Optional to Required means that CLECs will have accommodate the coding to populate fields or be faced with fatal rejects. This would constitute a system defect because the system is not performing as expected based on the published business rules. By simply publishing business rule changes, Qwest places the burden on CLECs to adjust their code.

Thanks,

Liz Balvin
MCI Carrier Management - Qwest
[contact information redacted]

CMP Oversight Committee Meeting Minutes October 20, 2003

(Qwest Note: These minutes were distributed to the Oversight Committee on October 24, 2003. The deletions and additions in this document are changes made by Liz Balvin-MCI)

In attendance:

Donna Osborne-Miller – ATT
Becky Quintana – Colorado PUC
Mike Zulevic – Covad
Bonnie Johnson – Eschelon
Liz Balvin – MCI
Beth Foster - Qwest
Jim Maher - Qwest
Lynn Notarianni - Qwest
Judy Schultz - Qwest
Kit Thomte – Qwest
Christy Turton - Qwest
Connie Winston - Qwest

Attachment #1 Qwest Response to Oversight Review Issue 10-03-03

Attachment #2 Qwest Response to CMP Escalation #E18 09-16-03

Attachment #3 Qwest Technical Escalation Response to #242666

A CMP Oversight Committee meeting was held on October 20, 2003. The purpose of the CMP Oversight Committee meeting was to review an issue that MCI referred to the Oversight Committee. (See CMP notifications CMPR.09.23.03.F.01573.OversightReviewIssue, CMPR.10.03.03.F.01586.OversightIssueResponse, and CMPR.10.07.03.F.01587.OversightReviewIssue)

Jim Maher-Qwest reviewed the history of the issue and then asked Liz Balvin-MCI to give an overview of the issue. Balvin explained that the issue was associated with Qwest Wholesale Systems Help Desk trouble ticket #242666 MCI had opened regarding address fields that Qwest systems documentation showed as optional fields, and as optional fields Qwest should not edit on these fields. Balvin stated that Qwest was editing on these fields, and that MCI requested that the Qwest edits be removed since the documentation indicated the fields were optional. Balvin then referred to the Definition of Terms in the CMP document that included definitions for a Major Release, Point Release, and Patch Release. Balvin stated that the definition of Patch Release should result in Qwest removing the edits that were in place. ~~Balvin further explained that if Qwest did not remove the edits, then that placed the burden on the CLECs to do CLEC coding.~~ Balvin stated that had Qwest removed the edits, no changes to CLEC coding would have been necessary. When Qwest changed the usage definitions from optional to conditional, Qwest placed the burden on CLECs to adjust coding to accommodate the change.

Becky Quintana-Colorado PUC asked Balvin if MCI had built their interface based on documentation that showed the fields as optional. Balvin stated that CLECs must rely on Qwest documented business rules to understand what edits will be applied. MCI had built their interface based on the documentation, and that when this issue came to light MCI issued a trouble ticket through the Qwest IT Wholesale Systems Help Desk because based on the CMP procedures,

this would be the means to address a software defects. Balvin stated the Qwest response to the trouble ticket was to update the documentation through an EDI addendum, and that Qwest had issued EDI addenda on more than just the address fields. Quintana asked Balvin if MCI thought the trouble ticket should result in Qwest removing the edit. Balvin responded yes, that as a response to the trouble ticket Qwest changed the address fields from optional to conditional and that this had significant impacts to the CLECs. Balvin continued saying that MCI did not believe that the documentation could just be updated due to the impacts to CLEC coding, that the current CMP document language specifically states a Major Release can be CLEC impacting to process and systems and that the only time a Point Release could impact coding and/or procedures is when Qwest disclosed the change. Balvin emphasized that and that if Qwest had removed the edits there would have been no impacts to the CLECs.

Judy Schultz-Qwest stated that this general issue is being addressed as part of the CLEC-Qwest meetings being held regarding systems documentation and event notifications. Schultz further stated that she does not think that making changes to Qwest's systems would be appropriate in all cases. Schultz provided a potential example of Qwest implementing a CLEC Systems CR, and during implementation missing a systems documentation update. Schultz stated that in that case she believes that CLECs would not want Qwest to update the system and remove the functionality introduced with that CR, but would want the documentation updated. Schultz stated that as issues like this arise it would be in everyone's interest to have flexibility to address solutions. Bonnie Johnson-Eschelon stated that this issue had been part of the CLEC-Qwest meeting that took place on October 14th, but that MCI had been dealing with this issue for months. Connie Winston-Qwest stated that when MCI opened the trouble ticket for this issue Qwest recognized that the documentation was incorrect. She further clarified that the IMA system had been operating with these edits in place for a long time and Qwest had identified in the trouble ticket resolution section that a systems documentation update was going to take place. Winston also stated that this issue was being resolved in IMA 14.0 based on a CMP CR submitted by MCI. Johnson asked if Qwest was making the change in IMA 14.0 due to the MCI CR, or if Qwest would have made the change anyway because of the trouble ticket. Winston responded that Qwest would not have made the changes in IMA 14.0 if the MCI CR had not been submitted since Qwest resolved the trouble ticket with corrections to the Qwest systems documentation. Balvin stated that the crux of the issue is that Qwest regularly updates systems documentation through addenda and that these updates required CLEC coding and that the examples were provided in the initiation of the Oversight review. Lynn Notarianni-Qwest asked Balvin how MCI determined a CMP CR was required for this change and why the CR was submitted prior to the trouble ticket. Balvin responded that MCI had learned of the issue through IMA 10.0 question logs and that they were told by Qwest to issue a CMP CR since these were Qwest back-end system edits. Balvin stated that address validations rejects are significant and that the CR was issued way back when as an overall means to eliminate unnecessary address information to provision LSRs. Balvin also stated that as soon as it was identified back-end system edits were being applied, MCI initiated the trouble ticket. Balvin ~~also~~ stated that MCI assumed that there would be a Qwest systems patch for this issue rather than a documentation update based on the current documented process. She said that it was easy for Qwest to update the documentation, but that left the CLECs with making coding changes, in addition to the current rejects that continue to be caused. Schultz-Qwest pointed out that the CMP document did allow Qwest to resolve trouble tickets by means of a process, software or documentation patch and that the language allowed flexibility depending on the situation. Balvin stated that the flexibility benefited Qwest and not the CLECs. Schultz stated that Qwest was working with the CLECs to determine solutions to problems like these and that she realized that did not solve this specific issue. Balvin responded that she questioned Qwest's understanding of its own Qwest systems because according to Qwest, these edits have been in place for a very long time, yet the documentation flaw was never identified, and that the documentation for this issue remained incorrect for so long. She said the burden was on the CLECs to point out problems like this one. Balvin stated that she would like to propose language that would limit Qwest's ability to make changes that impacted the CLECs and required CLEC coding. Schultz responded saying that the CMP document language did address issues like this from a broader perspective that gave the

parties the flexibility to determine whether a process, software or documentation change was appropriate for a particular situation. Balvin stated that she would rather risk taking a narrower definition with a CMP language change since she did not know of any situation when CLECs would be negatively impacted by more specific language. Schultz stated that such narrow language could be more harmful to the CLECs than to Qwest and that there was a CMP Global Action Item to determine how situations like this could be best managed for all parties while retaining flexibility necessary to develop case specific solutions. Balvin said she did not want changes that impact CLEC coding and that documentation changes could take place for changing fields from conditional to optional since CLEC coding would not be affected. Connie Winston stated that in this instance the system had been operating with these edits in place for years and that the documentation correction was appropriate. Balvin responded saying she believed the documentation clearly outlines that coding impacts should not be occurring outside Major Release and only with Point Releases whereby Qwest disclosed the changes. that she would like to recommend a CMP documentation change that would limit Qwest from making changes that require CLEC coding.

Becky Quintana-Colorado PUC stated that what she had heard from the discussion caused her to concur with Qwest's position. She stated that the language Balvin might recommend could be too narrow and specific to this particular MCI issue. Quintana stated she agreed with Balvin that language could be introduced but that it should be broader in scope such as "prior to making any changes Qwest would have a general meeting with the CLECs". Balvin responded saying that this could leave the burden with the CLECs, and if Qwest had removed the edits this would not have been an issue. Quintana said she understood the language Balvin was considering in relation to this particular issue, but there could be times when CLECs have coded differently and are split on a particular issue. Quintana continued that any language change should be more global and less narrow. Donna Osborne-Miller-ATT stated that ATT wouldn't want the process to be too rigid, and that she would take any language recommendation back to ATT for consideration. Balvin explained that the language she was considering would not affect system documentation changes that changed fields to optional. Those changes do not enforce business rules and CLEC coding would not be required. Connie Winston explained that Qwest was not in a position to know the breadth of CLEC coding and when changes would impact some CLEC's coding and not others. Connie stated that this issue was not a change that took place because of a release but was system behavior that had been in place for years and that had been documented incorrectly.

Becky Quintana asked Liz Balvin if she could develop CMP language that could be reviewed by this team. Balvin agreed that she would have recommended CMP language to the team by close of business October 20th. The Oversight Committee members also agreed that the next meeting would take place on October 27, 2003.

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Qwest Response to MCI Oversight Issue October 3, 2003
MCI Oversight Request/Escalation Response #E18 9-19-03

09/19/2003 11:58 AM CST

Sent by: Elizabeth Balvin (MCI) [email redacted]
Please respond to Elizabeth Balvin (MCI) [email redacted]

To:
cmpesc@qwest.com
cc:
Subject:
MCI CMP OVERSIGHT REVIEW ISSUE SUBMISSION

Thanks for Qwest's binding response surrounding escalation E18 (attached). Also attached is Qwest response to trouble ticket 242666. (QWEST NOTE: SEE ESCALATION #E18 AT <http://www.qwest.com/wholesale/cmp/escalations.html>)

MCI would like to note the following as discussed at the September CMP Meetings:

1) An event notifications should have resulted in the issuance of trouble ticket # 242666 because the edits are not only imposed on MCI's orders (multiple CLECs). At a minimum, this issue should have been categorized as severity 1 or 2 based on production support criteria set in the CMP documentation.

(1.) Qwest Response: MCI opened trouble ticket 242666 with the Qwest Wholesale Systems Helpdesk on 8/19/03. Qwest reviewed the issue and determined the trouble to be a multi-CLEC impacting event and distributed an Event Notification to the CLEC community on 8/20/03 (See Attachment 1, Event Notification 242666 IMA GUI-EDI Initial-Closure). Subsequently, Qwest distributed an Event Notification to the CLEC community on 9/2/03 announcing the date the documentation would be updated (See Attachment 2, 242666 IMA GUI-EDI 090203 Update Closure). Qwest determined the issue was a severity level 3 based on the production support criteria set forth in the CMP document: "low to medium visibility and minimal loss of functionality." While the Event Notification incorrectly labeled the issue as severity 4, Qwest processed and tracked the issue as a severity 3. Pursuant to Section 12.5 of the CMP¹, if a CLEC disagrees with the severity level Qwest assigns to an issue, the CLEC may utilize the technical escalation process. While MCI did initiate a technical escalation on this trouble ticket, MCI did not contest the severity level assigned to the ticket in that escalation.

2) Qwest's addendum changes places the burden on CLECs to adjust coding. Had Qwest lifted the edits already noted in the disclosure documents as option, NO coding changes would be required for CLECs.

¹ "If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, the CLEC may escalate using the Technical Escalation Process."

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(2.) Qwest Response: Qwest has followed CMP requirements for addendum changes defined in the CMP document in section 8.1.7.² As discussed at the monthly systems CMP meetings in August and September 2003, Qwest recognizes that there have been CLEC concerns raised regarding the impact of addendum changes to CLECs and is addressing those issues in joint ad-hoc meetings with the CLECs to help mitigate and resolve those concerns. The first of these meetings was held on Friday, September 12, 2003 during which Qwest and the CLEC community attempted to jointly come up with solutions to address CLEC concerns. Qwest will continue to work this issue jointly with the CLEC community.

3) Qwest expects an exact SAV response match be populated in the address fields, none of which is documented in the EDI disclosure documents. Coding changes are required to accommodate populating a preorder query response to the order, thus this type of information is critical to be noted in disclosure (the bible to building CLECs side of the EDI interface).

(3.) Qwest Response: Qwest agrees with MCI that this information is critical and should be noted in disclosure. As noted in the Event Notification titled 242666 IMA GUI-EDI 090203 Update Closure, Qwest updated its disclosure documentation for IMA 12.0 and 13.0 on September 15, 2003 to include the following: "The field is part of the overall End User Address, and the address information is validated for all orders (with the exception of UNE-P conversion orders) against data in the Qwest Legacy systems. If data exists for this field in the Legacy system for the End User address, the field must be populated and must exactly match the data from the Qwest Legacy system as returned on an Address Validation Response."

Points of clarification:

1) MCI did not "request temporary removal of the edits until the documentation changes can be implemented." MCI specifically requested Qwest lift the inappropriate edits, as even noted in the trouble ticket "wants to have the entire edit for address validation lifted due to the SATH field being 'Optional' per the 12.0 disclosure documentation"

(4.) Qwest Response: As noted in the Qwest response to the MCI technical escalation date August 28, 2003, this edit has consistently been communicated to implementing EDI CLECs, in team meetings, during the implementation process, and through the following EDI FAQ Pre-Order #1: *The exact address as provided by the Address Validation Query should always be the address used by the CLEC on an LSR, as this is the address on which the BPL performs its address validation edit.*

Lifting the edits as MCI has requested would be an enhancement to the system, therefore to address MCI's concern the documentation was updated on September 15, 2003. For example, when the MCI CMP CR SCR061302-01 (Migrate UNE-P Customers by TN) was implemented with IMA 12.0, as noted in the body of the CR and in the description of change, IMA was enhanced and edits were lifted to remove the need for name validation and address validation for UNE-P conversion activities. Additionally, MCI submitted a CMP Change Request(CR) for a new enhancement on February 27, 2003, SCR022703-24, (Allow post migration transaction order

² "After the Final Technical Specifications are published, there may be other changes made to documentation or the coding that is documented in the form of addenda.

- 1st Addendum – 2 weeks after the Release the 1st addendum is sent to the CLECs, if needed.
- Subsequent Addendum's – Subsequent addendum's are sent to the CLECs after the Release Production Date as needed. There is no current process and timeline. "

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types to be processed by TN and SANO) which is currently targeted for implementation with IMA 14.0 on December 8, 2003. Qwest believes this CR is requesting an expansion of the functionality implemented in 12.0 to include UNE-P Post Migration activity and will address MCI's desire for lifting the edits in the system currently applied to the SATH field for address validation.

2) With reference to the following "Qwest has reviewed question logs that are maintained as part of Qwest's EDI implementation process, and the question logs maintained for MCI indicate that Qwest responded several times to MCI with information that detailed these fields and their associated edits." MCI would like it noted that per the 12.0 Question, there are no statements made by Qwest that back-end address validation edits would be imposed on CLECs. MCI was very specific when initiating the trouble ticket that we were referencing 12.0 production orders and disclosure documentation.

(5.) Qwest Response: All of the MCI questions regarding address validation that Qwest references exist in the 10.0 Question log, and nothing changed for address validation in either IMA-EDI disclosure documentation or in the IMA system between IMA releases 10.0 and 12.0 relative to this issue. SCR061302-01 (Migrate UNE-P Customers by TN) was the only CLEC impacting CR implemented for address validation between 10.0 and 12.0, however it was specific to migrate activities and had no impact on the existing edits for post-migration address validation. Additionally, the MCI CR SCR022703-24, (Allow post migration transaction order types to be processed by TN and SANO) is an enhancement scheduled for 14.0 which will change address validation functionality for post migration activities and will remove the edits for post-migration address validation.

In addition, MCI would like to initiate review of this issue to the "Oversight Committee". MCI believes Qwest documentation changes are out of process of the CMP document whereby the following is documented ">>>Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated).>>>Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release.>>>Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue associated with a trouble ticket."

(6.) Qwest Response: The above CMP language provided is in the Qwest Wholesale Change Management Process Document in the "Definition of Terms" section at the end of that document. This MCI issue is not the result of a Major Release, Point Release, or Patch Release. This MCI issue is the result of a documentation error that has been in effect since the earliest releases of IMA. Qwest did not make any changes in IMA EDI 12.0 or in any point release that resulted in this MCI issue. MCI began using the IMA EDI release 10.0 function of Order Products on January 14, 2003, but did not identify these edit issues until August 12, 2003. Additionally, MCI issued CMP CR SCR022703-24 on February 27, 2003 (Currently prioritized as the #2 candidate for IMA 14.0), which will resolve this issue. Qwest did not implement a software patch because this issue was identified as an existing documentation error, Qwest subsequently fixed with a documentation update in an addendum on September 15, 2003. This fix, which was identified in Event Notifications distributed for trouble ticket 242666, was communicated to the CLEC community on September 15, 2003, via the addendum notifications SYST.09.15.03.F.04386.IMA_E_13.0_Disc_Ad3, and SYST.09.15.03.F.04387.IMA_E_120_Disc_Ad6.

Qwest documentation changes required CLECs to code to accommodate. What should have resulted from the trouble ticket issuance was a "Patch Release" whereby the system edits would

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have been lifted because the system was not working in accordance with the documented business rules. MCI notes the following for discussion purposes:

http://www.uswest.com/disclosures/netdisclosure409/12/12_AddendumVer6.pdf

Expected resolution would be that Qwest cannot update documentation that impacts CLEC coding. That would changes included but not limited to the following:

Qwest documented Usage Definitions: >Usage = N Definition: Not required - This field is not required for this activity, for this product. If the indicator is (N) for all activities, QWest does not mat the field and will not return a -997 if populated. >Usage = R Definition: Required - this field is required for this activity, for this product. The system shall enforce business rules and only allow a valid entry. >Usage = O Definition: Optional - This field is optional for this activity, for this product. The system shall not enforce any business rules and should allow a valid entry. >Usage = C Definition: Conditional - This field is required for activity based upon a condition. The system shall enforce the business rule and require a valid entry when the condition is true. >Usage = P Definition: Prohibited - If this field is populated it will result in a fatal reject.<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

Example 1) http://www.uswest.com/disclosures/netdisclosure409/12/12_0_Addendum_Ver1.pdf

Whereby Qwest changed a field "usage" from not required to prohibited.

EU 25a 3/17/03 AHN* Usage Code Changed For product 14 and activities N, D, W, C and T
From: N To: P

NOTE: Changing the usage from not required to prohibited would result in fatal rejects if the CLEC built to populate the field. This would constitute a system defect because the system is not performing as expected based on the published business rules. By simply publishing business rule changes, Qwest places the burden on CLECs to adjust their code.

(7.) Qwest Response: When MCI initiated the trouble ticket, Qwest identified this issue as a documentation defect that has been present since the earliest IMA releases. As a result, Qwest fixed the documentation in addenda on September 15, 2003. Qwest did not make any changes in any recent IMA EDI major, point, or patch releases that caused this issue. Lifting an edit of this nature is considered an enhancement to the system, and will be addressed when the MCI CMP CR SCR022703-24, (Allow post migration transaction order types to be processed by TN and SANO) is implemented.

Example #2)

http://www.uswest.com/disclosures/netdisclosure409/12/12_0_Addendum_Ver_3.pdf

TN1 TNSQ1 6/04/03 CCNA Usage Code Changed From: "O" optional To: "R" required

TN TNSQ2 6/04/03 TXNUM Usage Code Changed From: "O" optional To: "R" required

TN TNSQ3 6/04/03 D/TSENT Usage Code Changed From: "O" optional To: "R" required

TN TNSQ4 6/04/03 TXTYP Usage Code Changed From: "O" optional To: "R" required

TN TNSQ5 6/04/03 TSACT Usage Code Changed From: "O" optional To: "R" required

TN TNSQ6 6/04/03 PON Usage Code Changed From: "O" optional To: "R" required

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NOTE: Changing usage definitions from Optional to Required means that CLECs will have accommodate the coding to populate fields or be faced with fatal rejects. This would constitute a system defect because the system is not performing as expected based on the published business rules. By simply publishing business rule changes, Qwest places the burden on CLECs to adjust their code.

(8.) Qwest Response: When MCI initiated the trouble ticket, Qwest identified this issue as a documentation defect that has been present since the earliest IMA releases. As a result, Qwest fixed the documentation in addenda on September 15, 2003. Qwest did not make any changes in any recent IMA EDI major, point, or patch releases that caused this issue. Lifting an edit of this nature is considered an enhancement to the system, and will be addressed when the MCI CMP CR SCR022703-24, (Allow post migration transaction order types to be processed by TN and SANO) is implemented.

Example #3) http://www.uswest.com/disclosures/netdisclosure409/12/12_Addendum_Ver_4.pdf

LSR 91 8/11/03 EMAIL

Usage Code Changed From: "O" (Product 14, Activities N, D, W, C, T) To: "R" (Product 14, Activities N, D, W, C, T)

NOTE: Changing usage defections from Optional to Required means that CLECs will have accommodate the coding to populate fields or be faced with fatal rejects. This would constitute a system defect because the system is not performing as expected based on the published business rules. By simply publishing business rule changes, Qwest places the burden on CLECs to adjust their code.

(9.) Qwest Response: When MCI initiated the trouble ticket, Qwest identified this issue as a documentation defect that has been present since the earliest IMA releases. As a result, Qwest fixed the documentation in addenda on September 15, 2003. Qwest did not make any changes in any recent IMA EDI major, point, or patch releases that caused this issue. Lifting an edit of this nature is considered an enhancement to the system, and will be addressed when the MCI CMP CR SCR022703-24, (Allow post migration transaction order types to be processed by TN and SANO) is implemented.

Thanks,

Liz Balvin
MCI Carrier Management - Qwest
[contact information redacted]

ATTACHMENT 1



IT Wholesale Systems Help Desk

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest IT Wholesale Systems Help Desk
Date: August 20, 2003
Subject: System Event Notification

Initial Update Closure

This Event Notification is sent to advise you that Qwest had experienced trouble with the below system:

PCRM Ticket Number: 242666 Ticket Severity: 4 Event Internally Identified by Qwest, no reporting CLECs

ISC Ticket Number:

Event Onset

Time: 10:00 MTN

AM PM

Date: 08/20/03

Description of Trouble: Qwest is making clarifications to its 12.0 and 13.0 pre-order documentation. Fields identified as "Optional" that may be part of the overall End User Address validation process will now be identified as "Conditional." As part of the condition, the Negotiated Business Rules will be worded to the effect that: "The field is part of the overall End User Address, and the address information is validated for all orders (with the exception of UNE-P conversion orders) against data in the Qwest Legacy systems. If data exists for this field in the Legacy system for the End User address, the field must be populated and must exactly match the data from the Qwest Legacy system as returned on an Address Validation Response."

Business Impact: Fields previously identified as "optional" will now be identified as "conditional" with the condition cited above.

Qwest Proposed Work Around: None required. Impact is to documentation only.

System/Application:

- IMA-GUI
- IMA-EDI 12.0, 13.0
- TELIS/EXACT
- E-Commerce Gateway
- CEMR
- Resale Product Database
- MEDIAACC
- Other: _____

Client Region:

- Eastern
- Central
- Western
- All Regions

Estimated resolution Time: 5:00 MTN AM PM Date: TBD

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Event Closure Resolution: To be resolved in addendum to the Disclosure Documentation, date TBD.

Time: 10:15 MTN

AM PM

Date: 08/20/03

System Event Notification has been closed.

Escalation:

Additional questions may be directed to the Qwest IT Wholesale Systems Help Desk at 1-888-796-9102, Option 3.

ATTACHMENT 1



IT Wholesale Systems Help Desk

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest IT Wholesale Systems Help Desk
Date: August 20September 2, 2003
Subject: System Event Notification

Initial Update Closure

This Event Notification is sent to advise you that Qwest had experienced trouble with the below system:

PCRM Ticket Number: 242666 Ticket Severity: 4 Event Internally Identified by Qwest, no reporting CLECs

ISC Ticket Number:

Event Onset

Time: 10:00 MTN

AM PM

Date: 08/20/03

Description of Trouble: Qwest is making clarifications to its 12.0 and 13.0 pre-order documentation. Fields identified as "Optional" that may be part of the overall End User Address validation process will now be identified as "Conditional." As part of the condition, the Negotiated Business Rules will be worded to the effect that: "The field is part of the overall End User Address, and the address information is validated for all orders (with the exception of UNE-P conversion orders) against data in the Qwest Legacy systems. If data exists for this field in the Legacy system for the End User address, the field must be populated and must exactly match the data from the Qwest Legacy system as returned on an Address Validation Response."

Business Impact: Fields previously identified as "optional" will now be identified as "conditional" with the condition cited above.

Qwest Proposed Work Around: None required. Impact is to documentation only.

System/Application:

- IMA-GUI
- IMA-EDI 12.0, 13.0
- TELIS/EXACT
- E-Commerce Gateway
- CEMR
- Resale Product Database
- MEDIAACC
- Other: _____

Client Region:

- Eastern
- Central
- Western
- All Regions

Estimated resolution Time: 5:00 MTN AM PM Date: TBD

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Event Closure Resolution: To be resolved in addendum to the Disclosure Documentation, date **TBD.09/15/03**.

Time: 10:15 MTN

AM PM

Date: 08/20/03

System Event Notification has been closed.

Escalation:

Additional questions may be directed to the Qwest IT Wholesale Systems Help Desk at 1-888-796-9102, Option 3.

ATTACHMENT 2

Escalation #E18
September 16, 2003

Liz Balvin
MCI

Dear Ms. Balvin:

This letter is in response to your September 2, 2003 (E18) escalation regarding the MCI position that the trouble ticket 242666(Noted as 1416666) response from Qwest (Tier 6) was an issue because it *"inappropriately places the burden on MCI (CLECs) to update its coding that was based on Qwest published business rules."* MCI further states *"MCI initiated a trouble ticket because Qwest OSS imposes edits on address fields that are optional per Qwest published EDI disclosure documented business rules."*

On August 28, 2003, Qwest issued a response to MCI for a technical escalation MCI had initiated regarding this issue. As part of the response, Qwest stated the following:

"Regarding the request to lift the address validation edits, Qwest has evaluated this request (which impacts all CLECs) and decided to keep the edits in place. This decision was based on the following:

- 1. There is a scheduled date for the documentation changes.*
- 2. MCI's request is for temporary removal of the edits until the documentation changes can be implemented. Removing these edits could not be completed earlier than the documentation changes.*
- 3. This edit has consistently been communicated to implementing EDI CLECs, in team meetings, during the implementation process, and through the following EDI FAQ Pre-Order #1:*

The exact address as provided by the Address Validation Query should always be the address used by the CLEC on an LSR, as this is the address on which the BPL performs its address validation edit.³"

As of September 15, 2003, Qwest has updated the documentation associated with this issue. Additionally, Qwest has reviewed question logs that are maintained as part of Qwest's EDI implementation process, and the question logs maintained for MCI indicate that Qwest responded several times to MCI with information that detailed these fields and their associated edits.

In conclusion, Qwest does not plan to remove the edits as requested in this escalation.

Please contact me by telephone at [contact information redacted], or by e-mail at [email redacted]. if you have any additional questions.

Sincerely,
Connie Winston
Director-Information Technologies
Qwest

³ http://www.qwest.com/wholesale/downloads/2003/030225/12_0_Frequently_Asked_Questions-02.25.03.PDF

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-----Original Message-----

From: Winston, Connie (Qwest) [email redacted]
Sent: Thursday, August 28, 2003 4:53 PM
To: Elizabeth Balvin (MCI) [email redacted]
Cc: Owen, Randy
Subject: Response to TT 141666(Qwest Note:242666)

Hi Liz,

Attached (See Attachment 1 following) is the written response you request. This will close the technical escalation for trouble ticket 242666. Of course if you have any questions please feel free to contact Randy Owen or myself.

Thanks,
Connie Winston
[contact information redacted]

Response to MCI's Technical Escalation re: address validation on optional fields.

Liz Balvin of MCI opened a trouble ticket (242666) and requested a technical escalation of Qwest on August 19, 2003 at 11:13am. The description of the trouble ticket follows:

Problem Description: wants to have the entire edit for address validation lifted due to the SATH field being 'Optional' per the 12.0 disclosure documentation

Explanation: Because of this field being 'optional' they have had numerous LSRs rejected because they have designed their systems not to include certain variations on the SATH abbreviations (i.e. AV or TER) and have interpreted the disclosure to mean that IMA should not validate for this information therefore, they want to have the Address Validation edit lifted until the documentation has been updated to show the SATH field as being 'Conditional' and the conditional requirement published and they have been given time to update their systems based on these requirements.

After preliminary investigation, Qwest agrees to change the usage from "optional" to "conditional" for several of the address fields on the End User form. Documentation updates will be included in Qwest's 12.0 and 13.0 Disclosure addenda targeted for publication September 15, 2003.

Regarding the request to lift the address validation edits, Qwest has evaluated this request (which impacts all CLECs) and decided to keep the edits in place. This decision was based on the following:

4. There is a scheduled date for the documentation changes.
5. MCI's request is for temporary removal of the edits until the documentation changes can be implemented. Removing these edits could not be completed earlier than the documentation changes.
6. This edit has consistently been communicated to implementing EDI CLECs, in team meetings, during the implementation process, and through the following EDI FAQ Pre-Order #1:

The exact address as provided by the Address Validation Query should always be the address used by the CLEC on an LSR, as this is the address on which the BPL performs its address validation edit.⁴

⁴ http://www.qwest.com/wholesale/downloads/2003/030225/12_0_Frequently_Asked_Questions-02.25.03.PDF

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In conclusion, Qwest continues to consider future system enhancements proposed by the CLEC community. An example of this is the 14.0 SCR022703-24, "Allow post migration transaction order types to be processed by TN and SANO" that allows for other product and activity types to be submitted with only full AN or TN and SANO rather than a full address from the customer.

Sincerely,
Connie Winston
Director Information Technologies
Qwest

CMP Oversight Committee Meeting Minutes October 27, 2003

In attendance:

Donna Osborne-Miller – ATT
Becky Quintana – Colorado PUC
Mike Zulevic – Covad
Bonnie Johnson – Eschelon
Liz Balvin – MCI
Jim Maher - Qwest
Lynn Notarianni - Qwest
Judy Schultz - Qwest

Attachment #1 MCI Draft CMP Document Language

Attachment #2 Becky Quintana 10-20-03 E-mail and Draft CMP Document Language

Attachment #3 Qwest Draft CMP Document Language

A CMP Oversight Committee meeting was held on October 27, 2003. The purpose of the CMP Oversight Committee meeting was to continue discussion and review CMP language associated with an issue that MCI referred to the Oversight Committee. (See CMP notifications CMPR.09.23.03.F.01573.OversightReviewIssue, CMPR.10.03.03.F.01586.OversightIssueResponse, and CMPR.10.07.03.F.01587.OversightReviewIssue)

Liz Balvin-MCI stated that she had sent in revisions to the October 20, 2003 meeting minutes (Posted at <http://www.qwest.com/wholesale/cmp/coc.html>) which clarified that MCI interpreted the documentation updates that Qwest had made relative to this issue as being out of scope based on the CMP language. Balvin explained that was why MCI had brought this issue to the CMP Oversight Committee. Balvin then stated that the language MCI had submitted (See Attachment 1) would specifically address changes that impact CLEC coding, and that she had reviewed Becky Quintana's draft language (See Attachment 2). Balvin stated she also agreed with Quintana's draft language since it did not allow CLEC code-affecting updates. Lynn Notarianni-Qwest stated that Qwest had received Quintana's e-mail and draft language and that in the e-mail Becky had asked if patches could be CLEC code affecting. Lynn explained that the example being reviewed by the Oversight Committee was CLEC code impacting. Lynn further stated that Qwest had submitted draft language that would allow Qwest and the CLECs to discuss situations like this in advance with the CLECs, determine CLEC impacts, and discuss options for resolution. Becky asked Lynn if Qwest was intentionally impacting CLEC coding in patches. Lynn responded that Qwest cannot always know how CLECs have coded their interface, and that the CLECs may have put constraints or edits on their side of the interface, which would need to be changed, based on a Qwest patch. Becky asked if a patch release and a point release could be correlated, and stated that her understanding was that a point release and a patch differed only because of timing. Lynn explained that major and point releases were based on CMP CRs, that point releases were designed to deliver changes that had been disclosed in a major release, and that the patch releases were meant to resolve software bugs. Balvin stated that in Redesign it was discussed that CLEC code impacting changes could only be made in major releases, and that the language in the CMP document made that clear. Judy Schultz-Qwest stated that Section 12.3 of the CMP document states that patches could be an emergency release of software, process, or documentation, and that it was not in the CLECs' best interest to have restrictive language that did not allow flexibility to resolve issues on a case by case basis. Balvin-MCI stated that there needed to be language developed around making Qwest system changes when the "system was not working according to documented business rules". Balvin stated that the CLECs rely on

Qwest business rules to do the coding of their interfaces, and that the CLECs rely on the documentation to know the correct edits to code to. Quintana again stated that it was her understanding a patch and point release were the same thing, and differed only in timing. Lynn explained that with this particular issue, Qwest had determined that IMA had been applying the address validation edits for many years, and that the systems documentation was wrong. Lynn said that the definition of a point release included "to fix bugs introduced in previous releases", and that cases like that would involve situations where Qwest had developed the documentation correctly, but the system was not behaving according to the documentation. She said Qwest would fix the system because it was a systems bug. Lynn said that did not take into consideration cases where the documentation was incorrect, and it made the most sense to deal with those instances on a case by case basis. Lynn stated that to Schultz's earlier point, there could be situations where the system was coded correctly, but the documentation was in error and in that case it was assumed all CLECs would agree to the update and correction of the documentation. Bonnie Johnson-Eschelon asked if that meant that when the CLECs determined whether it should be a Qwest systems change that Qwest would make the change based on the CLEC determination. Schultz responded that that was not necessarily the case, and that it would be based on the particular case. Balvin stated that in the event that Qwest and the CLECs did not agree, then Qwest would have the final say. Balvin stated that these situations only affected the CLECs, and that the CLECs did not want the existing situations to keep occurring due to the open-ended language in the CMP document. Notarianni stated that the language that MCI was recommending went to the other extreme and was too limiting. Lynn continued that there needed to be a compromise solution developed because, in some cases, there could be situations when the CLEC coding requirements would be nominal compared to the Qwest coding requirements for resolution of a particular issue but the MCI language required that Qwest make the system coding change. Balvin responded that she thought the existing CMP language precluded Qwest from make changes outside a major release that were CLEC code impacting. She said Qwest having the final say placed 100% of the burden on the CLECs since they would need to escalate or follow other processes if they did not agree with the Qwest solution, and that the Qwest recommended language was the opposite extreme. Schultz stated that there were instances when the CLECs and Qwest had developed mutually agreed to solutions and that was what the Qwest language was trying to capture. Balvin responded that the Qwest proposed language was too open-ended, and that under existing language disagreements were subject to a unanimous vote. Schultz asked if there was a way to develop criteria that could be used for determining solutions to these types of issues. Balvin stated the CMP document language could remain as is since MCI understood code-impacting changes can only take place in a major release, and that other CLEC code impacting changes would only occur if Qwest requested an Exception. Notarianni stated that the Exception would require unanimous approval, and one CLEC voting no against the Exception would result in denial of the Exception request. Balvin stated that in some cases the CLECs would accept the documentation update, and there could be agreement reached that a majority vote be used for that decision. Schultz stated that even in the cases with a majority vote Qwest realized that the CLECs usually support each other in their dealings with Qwest.. Balvin reiterated that Qwest needed to have a stake in the ground with resolving these issues, and with Qwest having the final say that left the CLECs bearing the burden. Balvin stated that Qwest should have responded with more detail regarding the effort to lift the address validation edits. She said that if Qwest had provided a Level of Effort for lifting the address validation edits that would have helped, but that MCI never saw an LOE associated with this work. Notarianni stated that developing decision-making criteria would force all parties to identify the impacts so that solution options could be discussed and more clearly understood. Balvin stated she did not know what CMP language could be recommended to resolve these extremes, and that the existing CMP language precluded Qwest from making changes that were CLEC code impacting. Donna Osborne-Miller-ATT stated that there are so many cases when Qwest listens to the issue, but that Qwest does make the decision on how the particular situation is to be resolved. Balvin stated that with this address validation issue, the documentation was updated and each CLEC was going to have a different LOE for the coding work they had to do. Balvin asked how the CLECs get a guarantee that they can build to the documentation. Balvin stated that Qwest thinks that the CMP document allows Qwest to make CLEC code impacting changes

outside a major release and that she did not believe that was agreed to in Redesign. Notarianni stated that the definitions would be confirmed with Jeff Thompson-Qwest who was a primary Qwest IT representative in Redesign. Balvin stated that there needed to be some CMP language developed that more clearly defined when CLEC coded impacting changes could take place. Schultz stated the Oversight Committee members should think of CMP language that could address these issues. Notarianni stated that she had captured three options that could be explored:

1. Vote on the MCI language change that had been submitted.
2. Submit CMP document language that addressed the concerns raised by both Qwest and the CLECs.
3. Develop decision criteria language that would be followed for determining solution to issues like this address validation edit issue.

Mike Zulevic-Covad stated that he would like to see language that addressed a decision criteria approach. He stated that a decision matrix needed to be created, but that the first step should always be for Qwest to assess the effort to make the code change. Schultz stated that Qwest would go back and look at decision criteria and a potential decision tree. Balvin stated that the language Quintana submitted could be used. Notarianni asked Liz how she thought Quintana's language differed from MCI's. Liz stated that the MCI language stated there could be no CLEC impacts, while the Quintana language did allow operational impacts to the CLECs. Quintana stated that what was missing from her language was the situation when there would be CLEC coding impacts. Quintana further stated that if a compromise was going to be made that there needed to be consideration of how it accommodated Qwest not making a change versus a CLEC impacting change. Schultz stated there were five Qwest action items:

1. Contact Jeff Thompson to get clarification on Redesign discussion regarding CLEC code impacting changes.
2. Review Quintana draft language and suggest modifications to address concerns raised at this meeting.
3. Determine how situations can be handled when Qwest cannot accommodate a Qwest systems change.
4. Determine what Qwest can do other than making a documentation change when it is CLEC code impacting.
5. Identify decision-making criteria that can be used for solution assessment.

The meeting adjourned and it was agreed that the next meeting would take place on November 6th from 11:00-12:00 PM MST.

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12.0 Production Support

12.1 Notification of Planned Outages

Planned Outages are reserved times for scheduled maintenance to OSS Interfaces. Qwest sends associated notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS Interface
- Description of the scheduled OSS Interface maintenance activity
- Impact to the CLECs (e.g., geographic area, products affected, system implications, and business implications)
- Scheduled date and scheduled start and stop times
- Work around, if applicable
- Qwest contact for more information on the scheduled OSS Interface maintenance activity

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel no later than two (2) calendar days after the scheduling of the OSS Interface maintenance activity.

12.2 Newly Deployed OSS Interface Release

Following the Release Production Date of an OSS Interface change, Qwest will use production support procedures for maintenance of software as outlined below. Problems encountered by the user will be reported, if at all, to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest. Problems reported will be known as IT Trouble Tickets.

A week after the deployment of an IMA Release into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow this CMP for documenting the meeting as described in Section 3.2. Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly CMP Systems Meeting.

12.3 Request for a Production Support Change

The IT Help Desk supports CLECs who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper Subject Matter Expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket.

Qwest will assign each CLEC generated and Qwest generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 12.5. Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency Release of process, software or documentation (known as a Patch) ~~(known as a Patch)~~. **NOTE: Documentation updates are permitted if the updates do not impact CLECs coding. For example, a documentation update that imposes edit(s) that were not disclosed in a major release, would not be permitted.** If Qwest and CLEC deem implementation is not timely,

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and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming Patches, Major Releases and Point Releases and any synergies that exist with work being done in the upcoming Patches, Major Releases and Point Releases.

The first time a trouble is reported by Qwest or CLEC, the Qwest IT Help Desk will assign an IT Trouble Ticket tracking number, which will be communicated to the CLEC at the time the CLEC reports the trouble. The affected CLEC(s) and Qwest will attempt to reach agreement on resolution of the problem and closing of the IT Trouble Ticket. If no agreement is reached, any party may use the Technical Escalation Process, <http://www.qwest.com/wholesale/systems/productionsupport.html>. When the IT Trouble Ticket has been closed, Qwest will notify CLECs with one of the following disposition codes:

- No Trouble Found – to be used when Qwest investigation indicates that no trouble exists in Qwest systems.
- Trouble to be Resolved in Patch – to be used when the IT Trouble Ticket will be resolved in a Patch. Qwest will provide a date for implementation of the Patch. This is typically applied to Severity 1 and Severity 2 troubles, although Severity 3 and Severity 4 troubles may be resolved in a Patch where synergies exist.
- CLEC Should Submit CMP CR – to be used when Qwest's investigation indicates that the System is working pursuant to the Technical Specifications (unless the Technical Specifications are incorrect), and that the IT Trouble Ticket is requesting a systems change that should be submitted as a CMP CR.
- Resolved – to be used when the IT Trouble Ticket investigation has resolved the trouble.

If Qwest has identified the source of a problem for a Severity 3 or Severity 4 IT Trouble Ticket but has not scheduled the problem resolution, Qwest may place the trouble ticket into a "Date TBD" status, but will not close the trouble ticket. Once a trouble ticket is placed in "Date TBD" status, Qwest will no longer issue status notifications for the trouble ticket. Instead, Qwest will track "Date TBD" trouble tickets and report status of these trouble tickets on the CMP Web site and in the Monthly CMP Systems Meeting. When a "Date TBD" trouble ticket is scheduled to be resolved in a Patch, Release or otherwise, Qwest will issue a notification announcing that the trouble ticket will be resolved and remove the trouble ticket from the list reported on the CMP Web site and in the Monthly CMP Systems Meeting.

For "Date TBD" trouble tickets, either Qwest or a CLEC may originate a Change Request to correct the problem. (See Section 5.0 for CR Origination.) If the initiating party knows that the CR relates to a trouble ticket, it will identify the trouble ticket number on the CR.

Instances where Qwest or CLECs misinterpret Technical Specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified OSS Interface are identified and resolved during the change management review of the Change Request.

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12.4 Reporting Trouble to IT

Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The ITWSHD Tier 1 will communicate the ticket number to the CLEC at the time the trouble is reported.

If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the ITWSHD recognizes that it is the same problem, a new ticket is not created. The ITWSHD documents each subsequent call in the primary IT trouble ticket.

If one or more CLECs call in on the same problem, but it is not recognized as the same problem, one or more tickets may be created. When the problem is recognized as the same, one of the tickets becomes the primary ticket, and the other tickets are linked to the primary ticket. The ITWSHD provides the primary ticket number to other reporting CLECs. A CLEC can request its ticket be linked to an already existing open IT ticket belonging to another CLEC. When the problem is closed, the primary and all related tickets will be closed.

12.4.1 Systems Problem Requiring a Workaround

If a CLEC is experiencing problems with Qwest because of a system "issue", the CLEC will report the trouble to the ITWSHD. The ITWSHD will create a trouble ticket as outlined above.

The ITWSHD Tier 1 will refer the ticket to the IT Tier 2 or 3 resolution process. If, during the resolution process, the Tier 2 or 3 resolution team determines that a workaround is required ITWSHD (with IT Tier 2 or 3 on the line, as appropriate) will contact the CLEC to develop an understanding of how the problem is impacting the CLEC. If requested and available, the CLEC will provide information regarding details of the problem, e.g., reject notices, LSRs, TNs or circuit numbers. Upon understanding the problem, the IT Tier 1 agent, with the CLEC on the line, will contact the ISC Help Desk and open a Call Center Database Ticket. The IT Tier 2 or 3 resolution team along with the WSD Tier 2 team, and other appropriate SMEs, (Resolution Team) will develop a proposed work around. The WSD Tier 2 team will work collaboratively with the CLEC(s) reporting the issue to finalize the work around. The ITWSHD will provide the CLEC and the WSD Tier 2 team with the IT Trouble Ticket number in order to cross-reference it with the Call Center Database Ticket. The ITWSHD will also record the Call Center Database Ticket number on the IT Trouble Ticket. The CLEC will provide both teams with primary contact information. If the CLEC and Qwest cannot agree upon the work around solution, the CLEC can use either the Technical Escalation process or escalate to the WSD Tiers, as appropriate. Qwest will use its best efforts to retain the CLEC's requested due dates, regardless of whether a work around is required.

12.5 Severity Levels

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLEC(s) and impact to the CLEC's business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLEC(s) or its business.

Guidelines for determining severity levels are listed below. Severity level may be determined by one or more of the listed bullet items under each Severity Level (the list is not exhaustive). Examples of some trouble ticket situations follow. Please keep in mind

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these are guidelines, and each situation is unique. The IT Help Desk representative, based on discussion with the CLEC, will make the determination of the severity level and will communicate the severity level to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, the CLEC may escalate using the Technical Escalation Process.

Severity 1: Critical Impact

- Critical.
- High visibility.
- A large number of orders or CLECs are affected.
- A single CLEC cannot submit its business transactions.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.
- A Software Defect in an edit which prevents any orders from being submitted.

Severity 2: Serious Impact

- Serious
- Moderate visibility
- Moderate to large number of CLECs, or orders affected
- Potentially affects online commitment
- Serious slow response times
- Serious loss of functionality
- Potentially affects production – potential miss of priority batch commitment
- Moderate impact on revenue
- Limited use of product or component
- Component continues to fail. Intermittently down for short periods, but repetitive
- Few or small files lost
- Problems may have a possible bypass; the bypass must be acceptable to CLECs
- Major access down, but a partial backup exists

Examples:

- A single company, large number of orders impacted
- Frequent intermittent logoffs
- Service and/or other work order commitments delayed or missed

Severity 3: Moderate Impact

- Low to medium visibility
- Low CLEC, or low order impact

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- Low impact on revenue
- Limited use of product or component
- Single CLEC device affected
- Minimal loss of functionality
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs
- Automated workaround in place and known. Workaround must be acceptable to CLECs

Example:

- Hardware errors, no impact yet

Severity 4: Minimal Impact

- Low or no visibility
- No direct impact on CLEC
- Few functions impaired
- Problem can be bypassed; bypass must be acceptable to CLECs
- System resource low; no impact yet
- Preventative maintenance request

Examples:

- Misleading, unclear system messages causing confusion for users
- Device or software regularly has to be reset, but continues to work

12.6 Status Notification for IT Trouble Tickets

There are two types of status notifications for IT Trouble Tickets:

- Target Notifications: for tickets that relate to only one reporting CLEC – Target Notifications may be communicated by direct phone calls
- Event Notifications: for tickets that relate to more than one CLEC or for reported troubles that Qwest believes will impact more than one CLEC
- Event Notifications are sent by Qwest to all CLECs who subscribe to the IT Help Desk. Event Notifications will include ticket status (e.g., open, no change, resolved) and as much of the following information as is known to Qwest at the time the notification is sent:

Description of the problem

Impact to the CLECs (e.g., geographic area, products affected, business implications, other pertinent information available)

Estimated resolution date and time if known

Resolution if known

Severity level

Trouble ticket number(s), date and time

Work around if defined, including the Call Center Database Reference Ticket number

Qwest contact for more information on the problem

System affected

Escalation information as available

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Both types of notifications will be sent to the CLECs and appropriate Qwest personnel within the time frame set forth in the table below and will include all related system trouble ticket number(s).

12.7 Notification Intervals

Notification Intervals are based on the severity level of the ticket. “Notification Interval for Any Change in Status” means that a notification will be sent out within the time specified from the time a change in status occurs. “Notification Interval for No Change in Status” means that a notification will be sent out on a recurring basis within the time specified from the last notification when no change in status has occurred, until resolution. “Notification Interval upon Resolution” means that a notification will be sent out within the time specified from the resolution of the problem.

Notification will be provided during the IT Help Desk normal hours of operation. Qwest will continue to work severity 1 problems outside of Help Desk hours of operation which are Monday-Friday 6:00 a.m. - 8:00 p.m. (MT) and Saturday 7:00 a.m. - 3:00 p.m. (MT), and will communicate with the CLEC(s) as needed. A severity 2 problem may be worked outside the IT Help Desk normal hours of operation on a case-by-case basis.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Help Desk.

Severity Level of Ticket	Notification Interval for initial ticket	Notification Interval for Any Change in Status	Notification Interval for No Change in Status	Notification Interval Upon Resolution
Severity Level 1	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 2	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 3	Immediate acceptance	Within 4 hours	48 hours	Within 4 hours
Severity Level 4	Immediate acceptance	Within 8 hours	48 hours	Within 8 hours

12.8 Process Production Support

Process troubles encountered by CLECs will be reported, if at all, to the ISC Help Desk (Tier 0). In some cases the Qwest Service Manager (Tier 3) may report the CLEC trouble to the ISC Help Desk. Tier 0 will open a Call Center Database Ticket for all reported troubles.

12.8.1 Reporting Trouble to the ISC

The ISC Help Desk (Tier 0) serves as the first point of contact for reporting troubles that appear process related. Qwest has seven Tiers in Wholesale Service Delivery (WSD) for process Production Support. References to escalation of process Production Support issues means escalation to one of these seven tiers. Contact information is available through the Service Manager (Tier 3). The Tiers in WSD are as follows:

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- Tier 0 – ISC Help Desk
- Tier 1 – Customer Service Inquiry and Education (CSIE) Service Delivery Coordinator (SDC)
- Tier 2 – CSIE Center Coaches and Team Leaders, Duty Pager, Process Specialist
- Tier 3 - Service Manager
- Tier 4 – Senior Service Manager
- Tier 5 – Service Center Director
- Tier 6 – Service Center Senior Director

A CLEC may, at any point, escalate to any of the seven Tiers.

If a CLEC is experiencing troubles with Qwest because of a process issue, the CLEC will report the trouble to Tier 0. Tier 0 will attempt to resolve the trouble including determining whether the trouble is a process or systems issue. To facilitate this determination, upon request, the CLEC will provide, by facsimile or e-mail, documentation regarding details of the trouble, e.g., reject notices, LSRs, TNs or circuit numbers if available. Tier 0 will create a Call Center Database Ticket with a two (2) hour response commitment (“out in 2 hour” status), and provide the ticket number to the CLEC. If Tier 0 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4. With respect to whether the trouble is a systems or process issue, a CLEC may escalate to Tier 1 before the Tier 0 follows the process outlined in Section 12.8.4.

If Tier 0 does not determine that the trouble is a systems issue or is not able to resolve the trouble, Tier 0 will offer the CLEC the option of either a warm transfer to Tier 1 (with the CLEC on the line), or have Qwest place the Call Center Database Ticket into the Tier 1 work queue. Tier 1 will then analyze the ticket and attempt to resolve the trouble or determine if the trouble is a systems or a process issue. If the trouble is a process issue, Tier 1 will notify the Tier 2 process specialist. Tier 2 process specialist will notify all call handling centers (Tier 0, Tier 1 and Tier 2 at each center) of the reported trouble and current status. If Tier 1 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4.

The reporting CLEC(s) and Qwest will attempt to reach agreement on resolution of the trouble. This resolution includes identification of processes to handle affected orders reported by the CLEC and orders affected but not reported. If Qwest and the CLEC determine that the trouble can be resolved in a timely manner, Qwest will status the CLEC every 2 hours by telephone, unless otherwise agreed, until the trouble is resolved to the CLEC’s satisfaction. If, at any point, the parties conclude that they are unable to resolve the trouble in a timely manner, the CLEC and Qwest will proceed to develop a work around, as described below. At any point, the reporting CLEC may elect to escalate the issue to a higher Tier.

Except in a work around situation, see Section 12.8.3, once the trouble is resolved and all affected orders have been identified and processed, Qwest will seek CLEC agreement to close the ticket(s). If agreement is not reached, CLEC may escalate through the remaining Tiers.

After ticket closure, if the CLEC indicates that the issue is not resolved, the CLEC contacts Tier 2 and refers to the applicable ticket number. Tier 2 reviews the closed ticket, opens a new ticket, and cross-references the closed ticket.

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Qwest will use its best efforts to retain the CLEC's requested due dates.

12.8.2 Multiple Tickets

If one or more CLECs call in multiple tickets, but neither the CLECs nor Qwest recognize that the tickets stem from the same trouble, one or more tickets may be created.

Qwest will attempt to determine if multiple tickets are the result of the same process trouble. Also, after reporting a trouble to Tier 0, a CLEC may determine that the same problem exists for multiple orders and report the association to Tier 0. In either case, when the association is identified, Tier 0 will designate one ticket per CLEC as a primary ticket, cross-reference that CLEC's other tickets to its primary ticket and provide the primary ticket number to that CLEC. Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and Service Managers (Tier 3) of the issue.

Once a primary ticket is designated for a CLEC, the CLEC need not open additional trouble tickets for the same type of trouble. Any additional trouble of the same type encountered by the CLEC may be reported directly to Tier 2 with reference to the primary ticket number.

Qwest will also analyze the issue to determine if other CLECs are impacted by the trouble. If other CLECs are impacted by the trouble, within 3 business hours after this determination, the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Managers (Tier 3) of the issue and the seven digit ticket number for the initial trouble ticket (Reference Ticket). At the same time, Qwest will also communicate information about the trouble, including the Reference Ticket number, to the impacted CLECs through the Event Notification process, as described in Section 12.6. If other CLECs experience a trouble that appears related to the Reference Ticket, the CLECs will open a trouble ticket with Tier 0 and provide the Reference Ticket number to assist in resolving the trouble.

12.8.3 Work Arounds

The reporting CLEC(s) and Qwest will attempt to reach agreement on whether a workaround is required and, if so, the nature of the work around. For example, a work around will provide a means to process affected orders reported by the CLEC, orders affected but not reported, and any new orders that will be impacted by the trouble. If no agreement is reached, the CLEC may escalate through the remaining Tiers.

If a work around is developed, Tier 1 will advise the CLEC(s) and the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the work around and the Reference Ticket number. Tier 1 will communicate with the CLEC(s) during this affected order processing period in the manner and according to the notification timelines established in Section 12.8.1. After the work around has been implemented, Tier 1 will contact the CLECs who have open tickets to notify them that the work around has been implemented and seek concurrence with the CLECs that the Call Center Database tickets can be closed. The closed Reference Ticket will describe the work around process. The work around will remain in place until the trouble is resolved and all affected orders have been identified and processed.

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Once the work around has been implemented, the associated tickets are closed. After ticket closure, CLEC may continue to use the work around. If issues arise, CLEC may contact Tier 2 directly, identifying the Reference Ticket number. If a different CLEC experiences a trouble that appears to require the same work around, that CLEC will open a Call Center Data base ticket with Tier 0 and provide the Reference Ticket number for the work around.

12.8.4 Transfer Issue from WSD to ITWSHD

CLECs may report issues to the ISC Help Desk (Tier 0) that are later determined to be systems issues. Once the ISC Help Desk or higher WSD Tier determines that the issue is the result of a system error, that Tier will contact the CLEC and ask if the CLEC would like that Tier to contact the ITWSHD to report the system trouble. If the CLEC so requests, the Tier agent will contact the ITWSHD, report the trouble and communicate the Call Center Database Ticket to the ITWSHD agent with the CLEC on the line. The ITWSHD agent will provide the CLEC and the WSD agent with the IT Trouble Ticket number. The IT Trouble Ticket will be processed in accordance with the Systems Production Support provisions of Section 12.0.

12.9 Communications

When Call Center Database and IT Trouble Tickets are open regarding the same trouble, the IT and WSD organizations will communicate as follows. The WSD Tier 2 Process Specialists will be informed of the status of IT Trouble Tickets through ITWSHD system Event Notifications. Additionally, WSD Tier 2 has direct contact with the ITWSHD as a participant on the Resolution Team, as necessary. As the circumstances warrant, the WSD Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the information pertinent to ongoing resolution of the trouble.

Definition of terms, page 127 of the CMP document:

A Release is an implementation of changes resulting from a CR or production support issue for a particular OSS Interface. There are three types of Releases for IMA.:

- Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated).
- Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release.
- Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue associated with a trouble ticket. **A Patch Release may come in the form of a process and/or documentation enhancement. NOTE: Documentation updates are permitted if the updates do not impact CLECs**

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| coding. For example, a documentation update that imposes edit(s) that were not disclosed in a major release, would not be permitted.

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-----Original Message-----

From: Quintana, Becky [mailto:Becky.Quintana@dora.state.co.us]

Sent: Monday, October 27, 2003 11:06 AM

To: 'liz.balvin@mci.com'; 'Lorence, Susan'; 'Bonnie Johnson'; 'Donna Osborne-Miller'; Quintana, Becky; 'Mike Zulevic'

Cc: 'Schultz, Judy'; 'Thomte, Kit'; 'Maher, Jim'; 'Steph Prull (E-mail)'

Subject: RE: MCI CMP OVERSIGHT REVIEW ISSUE SUBMISSION

Just language for discussion purposes later - here's another version of Liz's proposed language with my edits. What I don't know (that might make this proposal incorrect) is whether Patch Release ever do require CLEC coding changes. To discuss at 2:00....

Becky

(Qwest Note: following is the attached language included in the above Becky Quintana e-mail)

12.0 Production Support

12.1 Notification of Planned Outages

Planned Outages are reserved times for scheduled maintenance to OSS Interfaces. Qwest sends associated notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS Interface
- Description of the scheduled OSS Interface maintenance activity
- Impact to the CLECs (e.g., geographic area, products affected, system implications, and business implications)
- Scheduled date and scheduled start and stop times
- Work around, if applicable
- Qwest contact for more information on the scheduled OSS Interface maintenance activity

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel no later than two (2) calendar days after the scheduling of the OSS Interface maintenance activity.

12.2 Newly Deployed OSS Interface Release

Following the Release Production Date of an OSS Interface change, Qwest will use production support procedures for maintenance of software as outlined below. Problems encountered by the user will be reported, if at all, to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest. Problems reported will be known as IT Trouble Tickets.

A week after the deployment of an IMA Release into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow this CMP for documenting the meeting as described in Section 3.2. Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly CMP Systems Meeting.

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12.3 Request for a Production Support Change

The IT Help Desk supports CLECs who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper Subject Matter Expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket.

Qwest will assign each CLEC generated and Qwest generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 12.5. Resolution of Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency Patch Release of process, software or documentation. ~~(known as a Patch) (known as a Patch).~~ NOTE: Documentation updates are permitted if the updates do not impact CLECs coding. For example, a documentation update that imposes edit(s) that were not disclosed in a major release, would not be permitted. If Qwest and CLEC deem implementation is not timely, and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming Patches, Major Releases and Point Releases and any synergies that exist with work being done in the upcoming Patches, Major Releases and Point Releases.

The first time a trouble is reported by Qwest or CLEC, the Qwest IT Help Desk will assign an IT Trouble Ticket tracking number, which will be communicated to the CLEC at the time the CLEC reports the trouble. The affected CLEC(s) and Qwest will attempt to reach agreement on resolution of the problem and closing of the IT Trouble Ticket. If no agreement is reached, any party may use the Technical Escalation Process, <http://www.qwest.com/wholesale/systems/productionsupport.html>. When the IT Trouble Ticket has been closed, Qwest will notify CLECs with one of the following disposition codes:

- No Trouble Found – to be used when Qwest investigation indicates that no trouble exists in Qwest systems.
- Trouble to be Resolved in Patch – to be used when the IT Trouble Ticket will be resolved in a Patch. Qwest will provide a date for implementation of the Patch. This is typically applied to Severity 1 and Severity 2 troubles, although Severity 3 and Severity 4 troubles may be resolved in a Patch where synergies exist.
- CLEC Should Submit CMP CR – to be used when Qwest's investigation indicates that the System is working pursuant to the Technical Specifications (unless the Technical Specifications are incorrect), and that the IT Trouble Ticket is requesting a systems change that should be submitted as a CMP CR.
- Resolved – to be used when the IT Trouble Ticket investigation has resolved the trouble.

If Qwest has identified the source of a problem for a Severity 3 or Severity 4 IT Trouble Ticket but has not scheduled the problem resolution, Qwest may place the trouble ticket into a "Date TBD" status, but will not close the trouble ticket. Once a trouble ticket is placed in "Date TBD" status, Qwest will no longer issue status notifications for the trouble ticket. Instead, Qwest will track "Date TBD" trouble tickets and report status of these trouble tickets on the CMP Web site and in the Monthly CMP Systems Meeting. When a "Date TBD" trouble ticket is scheduled to be resolved in a Patch, Release or otherwise, Qwest will issue a notification announcing that the trouble ticket will be

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resolved and remove the trouble ticket from the list reported on the CMP Web site and in the Monthly CMP Systems Meeting.

For "Date TBD" trouble tickets, either Qwest or a CLEC may originate a Change Request to correct the problem. (See Section 5.0 for CR Origination.) If the initiating party knows that the CR relates to a trouble ticket, it will identify the trouble ticket number on the CR.

Instances where Qwest or CLECs misinterpret Technical Specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified OSS Interface are identified and resolved during the change management review of the Change Request.

12.4 Reporting Trouble to IT

Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The ITWSHD Tier 1 will communicate the ticket number to the CLEC at the time the trouble is reported.

If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the ITWSHD recognizes that it is the same problem, a new ticket is not created. The ITWSHD documents each subsequent call in the primary IT trouble ticket.

If one or more CLECs call in on the same problem, but it is not recognized as the same problem, one or more tickets may be created. When the problem is recognized as the same, one of the tickets becomes the primary ticket, and the other tickets are linked to the primary ticket. The ITWSHD provides the primary ticket number to other reporting CLECs. A CLEC can request its ticket be linked to an already existing open IT ticket belonging to another CLEC. When the problem is closed, the primary and all related tickets will be closed.

12.4.1 Systems Problem Requiring a Workaround

If a CLEC is experiencing problems with Qwest because of a system "issue", the CLEC will report the trouble to the ITWSHD. The ITWSHD will create a trouble ticket as outlined above.

The ITWSHD Tier 1 will refer the ticket to the IT Tier 2 or 3 resolution process. If, during the resolution process, the Tier 2 or 3 resolution team determines that a workaround is required ITWSHD (with IT Tier 2 or 3 on the line, as appropriate) will contact the CLEC to develop an understanding of how the problem is impacting the CLEC. If requested and available, the CLEC will provide information regarding details of the problem, e.g., reject notices, LSRs, TNs or circuit numbers. Upon understanding the problem, the IT Tier 1 agent, with the CLEC on the line, will contact the ISC Help Desk and open a Call Center Database Ticket. The IT Tier 2 or 3 resolution team along with the WSD Tier 2 team, and other appropriate SMEs, (Resolution Team) will develop a proposed work around. The WSD Tier 2 team will work collaboratively with the CLEC(s) reporting the issue to finalize the work around. The ITWSHD will provide the CLEC and the WSD Tier 2 team with the IT Trouble Ticket number in order to cross-reference it with the Call Center Database Ticket. The ITWSHD will also record the Call Center Database Ticket

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number on the IT Trouble Ticket. The CLEC will provide both teams with primary contact information. If the CLEC and Qwest cannot agree upon the work around solution, the CLEC can use either the Technical Escalation process or escalate to the WSD Tiers, as appropriate. Qwest will use its best efforts to retain the CLEC's requested due dates, regardless of whether a work around is required.

12.5 Severity Levels

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLEC(s) and impact to the CLEC's business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLEC(s) or its business.

Guidelines for determining severity levels are listed below. Severity level may be determined by one or more of the listed bullet items under each Severity Level (the list is not exhaustive). Examples of some trouble ticket situations follow. Please keep in mind these are guidelines, and each situation is unique. The IT Help Desk representative, based on discussion with the CLEC, will make the determination of the severity level and will communicate the severity level to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, the CLEC may escalate using the Technical Escalation Process.

Severity 1: Critical Impact

- Critical.
- High visibility.
- A large number of orders or CLECs are affected.
- A single CLEC cannot submit its business transactions.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.
- A Software Defect in an edit which prevents any orders from being submitted.

Severity 2: Serious Impact

- Serious
- Moderate visibility
- Moderate to large number of CLECs, or orders affected
- Potentially affects online commitment
- Serious slow response times
- Serious loss of functionality
- Potentially affects production – potential miss of priority batch commitment
- Moderate impact on revenue

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- Limited use of product or component
- Component continues to fail. Intermittently down for short periods, but repetitive
- Few or small files lost
- Problems may have a possible bypass; the bypass must be acceptable to CLECs
- Major access down, but a partial backup exists

Examples:

- A single company, large number of orders impacted
- Frequent intermittent logoffs
- Service and/or other work order commitments delayed or missed

Severity 3: Moderate Impact

- Low to medium visibility
- Low CLEC, or low order impact
- Low impact on revenue
- Limited use of product or component
- Single CLEC device affected
- Minimal loss of functionality
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs
- Automated workaround in place and known. Workaround must be acceptable to CLECs

Example:

- Hardware errors, no impact yet

Severity 4: Minimal Impact

- Low or no visibility
- No direct impact on CLEC
- Few functions impaired
- Problem can be bypassed; bypass must be acceptable to CLECs
- System resource low; no impact yet
- Preventative maintenance request

Examples:

- Misleading, unclear system messages causing confusion for users
- Device or software regularly has to be reset, but continues to work

12.6 Status Notification for IT Trouble Tickets

There are two types of status notifications for IT Trouble Tickets:

- Target Notifications: for tickets that relate to only one reporting CLEC – Target Notifications may be communicated by direct phone calls
- Event Notifications: for tickets that relate to more than one CLEC or for reported troubles that Qwest believes will impact more than one CLEC
- Event Notifications are sent by Qwest to all CLECs who subscribe to the IT Help Desk. Event Notifications will include ticket status (e.g., open, no change, resolved) and as much of the following information as is known to Qwest at the time the notification is sent:

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- Description of the problem
- Impact to the CLECs (e.g., geographic area, products affected, business implications, other pertinent information available)
- Estimated resolution date and time if known
- Resolution if known
- Severity level
- Trouble ticket number(s), date and time
- Work around if defined, including the Call Center Database Reference Ticket number
- Qwest contact for more information on the problem
- System affected
- Escalation information as available

Both types of notifications will be sent to the CLECs and appropriate Qwest personnel within the time frame set forth in the table below and will include all related system trouble ticket number(s).

12.7 Notification Intervals

Notification Intervals are based on the severity level of the ticket. "Notification Interval for Any Change in Status" means that a notification will be sent out within the time specified from the time a change in status occurs. "Notification Interval for No Change in Status" means that a notification will be sent out on a recurring basis within the time specified from the last notification when no change in status has occurred, until resolution. "Notification Interval upon Resolution" means that a notification will be sent out within the time specified from the resolution of the problem.

Notification will be provided during the IT Help Desk normal hours of operation. Qwest will continue to work severity 1 problems outside of Help Desk hours of operation which are Monday-Friday 6:00 a.m. - 8:00 p.m. (MT) and Saturday 7:00 a.m. - 3:00 p.m. (MT), and will communicate with the CLEC(s) as needed. A severity 2 problem may be worked outside the IT Help Desk normal hours of operation on a case-by-case basis.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Help Desk.

Severity Level of Ticket	Notification Interval for initial ticket	Notification Interval for Any Change in Status	Notification Interval for No Change in Status	Notification Interval Upon Resolution
Severity Level 1	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 2	Immediate acceptance	Within 1 hour	1 hour	Within 1 hour
Severity Level 3	Immediate acceptance	Within 4 hours	48 hours	Within 4 hours
Severity Level 4	Immediate acceptance	Within 8 hours	48 hours	Within 8 hours

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12.8 Process Production Support

Process troubles encountered by CLECs will be reported, if at all, to the ISC Help Desk (Tier 0). In some cases the Qwest Service Manager (Tier 3) may report the CLEC trouble to the ISC Help Desk. Tier 0 will open a Call Center Database Ticket for all reported troubles.

12.8.1 Reporting Trouble to the ISC

The ISC Help Desk (Tier 0) serves as the first point of contact for reporting troubles that appear process related. Qwest has seven Tiers in Wholesale Service Delivery (WSD) for process Production Support. References to escalation of process Production Support issues means escalation to one of these seven tiers. Contact information is available through the Service Manager (Tier 3). The Tiers in WSD are as follows:

- Tier 0 – ISC Help Desk
- Tier 1 – Customer Service Inquiry and Education (CSIE) Service Delivery Coordinator (SDC)
- Tier 2 – CSIE Center Coaches and Team Leaders, Duty Pager, Process Specialist
- Tier 3 - Service Manager
- Tier 4 – Senior Service Manager
- Tier 5 – Service Center Director
- Tier 6 – Service Center Senior Director

A CLEC may, at any point, escalate to any of the seven Tiers.

If a CLEC is experiencing troubles with Qwest because of a process issue, the CLEC will report the trouble to Tier 0. Tier 0 will attempt to resolve the trouble including determining whether the trouble is a process or systems issue. To facilitate this determination, upon request, the CLEC will provide, by facsimile or e-mail, documentation regarding details of the trouble, e.g., reject notices, LSRs, TNs or circuit numbers if available. Tier 0 will create a Call Center Database Ticket with a two (2) hour response commitment (“out in 2 hour” status), and provide the ticket number to the CLEC. If Tier 0 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4. With respect to whether the trouble is a systems or process issue, a CLEC may escalate to Tier 1 before the Tier 0 follows the process outlined in Section 12.8.4.

If Tier 0 does not determine that the trouble is a systems issue or is not able to resolve the trouble, Tier 0 will offer the CLEC the option of either a warm transfer to Tier 1 (with the CLEC on the line), or have Qwest place the Call Center Database Ticket into the Tier 1 work queue. Tier 1 will then analyze the ticket and attempt to resolve the trouble or determine if the trouble is a systems or a process issue. If the trouble is a process issue, Tier 1 will notify the Tier 2 process specialist. Tier 2 process specialist will notify all call handling centers (Tier 0, Tier 1 and Tier 2 at each center) of the reported trouble and current status. If Tier 1 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4.

The reporting CLEC(s) and Qwest will attempt to reach agreement on resolution of the trouble. This resolution includes identification of processes to handle affected orders reported by the CLEC and orders affected but not reported. If Qwest and the CLEC determine that the trouble can be resolved in a timely manner, Qwest will status the

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CLEC every 2 hours by telephone, unless otherwise agreed, until the trouble is resolved to the CLEC's satisfaction. If, at any point, the parties conclude that they are unable to resolve the trouble in a timely manner, the CLEC and Qwest will proceed to develop a work around, as described below. At any point, the reporting CLEC may elect to escalate the issue to a higher Tier.

Except in a work around situation, see Section 12.8.3, once the trouble is resolved and all affected orders have been identified and processed, Qwest will seek CLEC agreement to close the ticket(s). If agreement is not reached, CLEC may escalate through the remaining Tiers.

After ticket closure, if the CLEC indicates that the issue is not resolved, the CLEC contacts Tier 2 and refers to the applicable ticket number. Tier 2 reviews the closed ticket, opens a new ticket, and cross-references the closed ticket.

Qwest will use its best efforts to retain the CLEC's requested due dates.

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Once a primary ticket is designated for a CLEC, the CLEC need not open additional trouble tickets for the same type of trouble. Any additional trouble of the same type encountered by the CLEC may be reported directly to Tier 2 with reference to the primary ticket number.

Qwest will also analyze the issue to determine if other CLECs are impacted by the trouble. If other CLECs are impacted by the trouble, within 3 business hours after this determination, the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Managers (Tier 3) of the issue and the seven digit ticket number for the initial trouble ticket (Reference Ticket). At the same time, Qwest will also communicate information about the trouble, including the Reference Ticket number, to the impacted CLECs through the Event Notification process, as described in Section 12.6. If other CLECs experience a trouble that appears related to the Reference Ticket, the CLECs will open a trouble ticket with Tier 0 and provide the Reference Ticket number to assist in resolving the trouble.

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around will provide a means to process affected orders reported by the CLEC, orders affected but not reported, and any new orders that will be impacted by the trouble. If no agreement is reached, the CLEC may escalate through the remaining Tiers.

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Once the work around has been implemented, the associated tickets are closed. After ticket closure, CLEC may continue to use the work around. If issues arise, CLEC may contact Tier 2 directly, identifying the Reference Ticket number. If a different CLEC experiences a trouble that appears to require the same work around, that CLEC will open a Call Center Data base ticket with Tier 0 and provide the Reference Ticket number for the work around.

12.8.4 Transfer Issue from WSD to ITWSHD

CLECs may report issues to the ISC Help Desk (Tier 0) that are later determined to be systems issues. Once the ISC Help Desk or higher WSD Tier determines that the issue is the result of a system error, that Tier will contact the CLEC and ask if the CLEC would like that Tier to contact the ITWSHD to report the system trouble. If the CLEC so requests, the Tier agent will contact the ITWSHD, report the trouble and communicate the Call Center Database Ticket to the ITWSHD agent with the CLEC on the line. The ITWSHD agent will provide the CLEC and the WSD agent with the IT Trouble Ticket number. The IT Trouble Ticket will be processed in accordance with the Systems Production Support provisions of Section 12.0.

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When Call Center Database and IT Trouble Tickets are open regarding the same trouble, the IT and WSD organizations will communicate as follows. The WSD Tier 2 Process Specialists will be informed of the status of IT Trouble Tickets through ITWSHD system Event Notifications. Additionally, WSD Tier 2 has direct contact with the ITWSHD as a participant on the Resolution Team, as necessary. As the circumstances warrant, the WSD Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the information pertinent to ongoing resolution of the trouble.

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- Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated).
- Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release.
- Patch Release may not be CLEC code impacting, but may affect CLEC operation procedures. The Patch Release is a specially scheduled process, documentation or software system change ~~for the purpose of installing the software~~ required to resolve an issue associated with a trouble ticket. ~~A Patch Release may come in the form of a process and/or documentation enhancement. NOTE: Documentation updates are permitted if the updates do not impact CLECs coding. For example, a documentation update that imposes edit(s) that were not disclosed in a major release, would not be permitted.~~

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QWEST DRAFT LANGUAGE
OCTOBER 27, 2003

12.0 Production Support

12.3 Request for a Production Support Change

The IT Help Desk supports CLECs who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper Subject Matter Expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket.

Qwest will assign each CLEC generated and Qwest generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 12.5. Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency Release of process, software or documentation (known as a Patch). **In the event that Qwest or any CLEC identifies a patch that may impact CLEC coding, either party may initiate a Technical Escalation and request a joint meeting in order to discuss the particular patch. Qwest will notify all CLECs of the joint meeting in which Qwest will review the patch, the proposed resolution, and the variables which affect the resolution. Qwest and the CLECs will discuss any potential resolution options and implementation timeframes. In all instances, these joint meetings are exempt from the five (5) business day advance notification requirement described in Section 3.0.** If Qwest and CLEC deem implementation is not timely, and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming Patches, Major Releases and Point Releases and any synergies that exist with work being done in the upcoming Patches, Major Releases and Point Releases.

Definition of Terms in the last five pages of the CMP document:

<p>Release</p> <ul style="list-style-type: none"> • Major Release • Point Release • Patch Release 	<p>A Release is an implementation of changes resulting from a CR or production support issue for a particular OSS Interface. There are three types of Releases for IMA.:</p> <ul style="list-style-type: none"> • Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated). • Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release. • Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue
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ATTACHMENT 3

	<p>associated with a trouble ticket. In the event that Qwest or any CLEC identifies a patch that may impact CLEC coding, either party may initiate a Technical Escalation and request a joint meeting in order to discuss the particular patch. Qwest will notify all CLECs of the joint meeting in which Qwest will review the patch, the proposed resolution, and the variables which affect the resolution. Qwest and the CLECs will discuss any potential resolution options and implementation timeframes. In all instances, these joint meetings are exempt from the five (5) business day advance notification requirement described in Section 3.0</p>
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