

Finding Number	Finding	Classification	Applicable Measure	May Affect Measure Reporting	May Affect Tier 1 Payments	May Affect Tier 2 Payments	Qwest Concurs	Qwest Taking Action	Liberty Comments	Qwest Additional Comment	Qwest Implementation Recommendation
1	Qwest's process for calculating New Service Installation Quality Reported to Repair (OP-5A) may ignore troubles on some auxiliary lines.	2	OP-5A	X	X	X	X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
2	Qwest is excluding troubles from New Service Installation Quality Reported to Repair (OP-5A) that do not correspond to valid exclusions documented in the PID.	2	OP-5A	X	X	X			Qwest does not agree with this finding, but Liberty recommends that Qwest clarify through the appropriate process with the Commission whether its current process for excluding these trouble reports is compliant with the expectation for this measure.	This process finding with potential impact on QPAP or performance measurement language has no concrete change associated with it and should be addressed in a different forum.	Address when modifying QPAP and or performance measurements
3	Qwest is excluding LSRs with an "unknown state" data entry from LSRs Rejected (PO-4A and PO-4B) which does not correspond to valid exclusions documented in the PID.	2	PO-4	X				X	Although Qwest does not concur with the finding, it is taking action to mitigate the impact. Liberty recommends that Qwest review its actions with the Commission for concurrence.	Qwest believes the exclusion was valid but took steps to modify programming for mechanized state identification. PO-4 is not included in the QPAP and warrants no further modification.	Include impacted measure as proposed in second ROC audit.
4	Qwest did not include all products that should roll up to the "DS3 and Above" product disaggregation when calculating the New Service Installation Quality Reported to Repair (OP-5A) measure.	2	OP-5A	X	X	X	X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
5	The PID for LSRs Rejected (PO-4) does not clearly address the treatment of LSRs rejected for non-standard reasons.	4	PO-4						Liberty recommends that Qwest review its PID interpretation with the Commission for concurrence.	Qwest believes its interpretation is reasonable and consistent with the definition. PO-4 is not included in the QPAP so any additional potential changes will not result in a payment impact and should be discussed in a forum where QPAP and performance measurement modifications are the subject.	Address when modifying QPAP and or performance measurements
6	Qwest occasionally classifies retail trouble reports incorrectly as wholesale records with an unknown company ID, and then excludes these records from the calculation of the Repair Appointment Met (MR-9) measure.	2	MR-9	X					Liberty concurs that no further action is necessary because the impact is small.	Qwest and Liberty agree that given the size of the potential impact, no further action is warranted.	Find no action warranted at this time given the cost and unknown benefit.

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7	Qwest did not use the correct retail product as the parity standard for the wholesale "Non-Loaded 2-Wire Loop" product disaggregation when calculating the New Service Installation Quality Reported to Repair (OP-5A) measure.	1	OP-5A	X	X	X	X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
8	Qwest's documentation of the parity performance standards for the New Service Installation Quality Reported to Repair (OP-5A) measure is unclear and misleading for unbundled loops	4	OP-5A						Qwest has indicated that it is willing to clarify the PID language at the next appropriate opportunity. Liberty recommends this action.	Qwest updated its documentation and suggests that additional changes are more appropriately addressed when considering modifications to QPAP or performance measurement language.	Address when modifying QPAP and or performance measurements
9	Qwest did not implement a requirement of the Manual Service Order Accuracy (PO-20) PID that Service Orders created from CLEC Local Service Requests (LSRs) must be received and completed in the same version of IMA-GUI or IMA-EDI.	1	PO-20	X	X		X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
10	Qwest does not exclude all non-bill impacting records that originate in IABS from the Billing Completeness (Resale and UNE) measure (BI-4A).	2	BI-4A	X	X	X	X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
11	Qwest has been omitting the UNE-P (Centrex 21) product from the Manual Service Order Accuracy (PO-20) results beginning with the December 2004 reporting month.	2	PO-20	X	X		X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
12	Qwest did not input the benchmark for the Installation Interval – Dispatches within MSAs (OP-4A & OP-4B) measures for the Line Splitting product.	1	OP-4		X	X	X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
13	Qwest does not have point-to-point controls in place for the transmission of Business Processing Layer (BPL) data from IMA to PANS.	3	PO-4						This is a process finding. The extent to which this can affect reporting is unknown. However, because, PO-4 is not a QPAP measure, there will be no impact on payments. Although Qwest does not concur, Liberty recommends that Qwest institute the proper controls.	The absence of actual problems, the additional costs necessary to implement and the fact that this measure does not fall within the QPAP lead Qwest to conclude action at this time is not supported.	Find no action warranted at this time given the cost and unknown benefit. Include impacted measure as proposed in second ROC audit.
14	Qwest does not correctly calculate the Work Completion Notification Timeliness (PO-6) notification interval for orders originating in northern Idaho.	1	PO-6	X	X		Not applicable in North Dakota	Not applicable in North Dakota			NA - Idaho specific

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15	Qwest's implementation of the Nebraska, Iowa, Montana, New Mexico, Wyoming, and South Dakota QPAPs does not allow for escalation of Tier 1 payments beyond 24 months.	2	All		X		Not applicable in North Dakota	Not applicable in North Dakota			NA - NE, IA, MT, NM, WY & SD specific
16	The Nebraska payment reference table for Tier 2 payments lists payment amounts to state funds that are not consistent with the Nebraska QPAP.	2	All			X	Not applicable in North Dakota	Not applicable in North Dakota			NA - Nebraska specific
17	The Washington payment reference table for Tier 1 payments to CLECs for specific products lists "DS1 - LIS-ISP," but that product is not included in the payment input files.	2	All		X		Not applicable in North Dakota	Not applicable in North Dakota	Liberty recommends that Qwest and the Commission discuss this issue to clarify the intention of the QPAP.		NA - Washington specific
18	RRS documentation containing Qwest's processes and methods for calculating its performance measures contains errors and is not up to date.	4	All					X	Liberty recommends that Qwest update its documentation to address the errors and omissions noted.	Qwest agreed that the documentation needed some updating and made changes to both update and correct any errors.	Accept Finding and Qwest Action, include as proposed in second ROC audit
19	The Service Order Validation (SOV) logic allows some non-inward activity service orders to be included in the calculation of the Manual Service Order Accuracy (PO-20) performance measure.	2	PO-20	X	X		X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
20	Qwest's manual error override process requires an error override before a jeopardy notice can be sent, sometimes resulting in a misreporting of the Manual Service Order Accuracy (PO-20) performance results.	2	PO-20	X	X		X		Qwest believes that the situation noted is rare and therefore declines to take action. Although it cannot confirm Qwest's assertion, Liberty believes it is likely to be true.	Qwest and Liberty agree that given the size of the potential impact, no further action is warranted.	Find no action warranted at this time given volume and probability of occurrence.
21	Qwest personnel improperly issue Service Order Validation (SOV) error overrides in many cases resulting in the inaccurate reporting of the Manual Service Order Accuracy (PO-20) performance results.	2	PO-20	X	X		X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
22	Qwest software did not properly include all appropriate call center tickets resulting in the inaccurate reporting of the Manual Service Order Accuracy (PO-20) performance results.	2	PO-20	X	X		X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit
23	Qwest does not include all eligible EDI billing notifications in PO-7B results.	1	PO-7	X	X		X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit

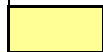
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24	Qwest does not have point-to-point controls in place for the transmission of CRIS billing information to MCAS.	3	BI-4A						This is a process finding. The extent to which this can affect reporting and QPAP payments is unknown. Although Qwest does not concur, Liberty recommends that Qwest institute the proper controls.	Qwest does not believe point-to-point controls for CRIS information transmission to MCAS are needed although Qwest acknowledges such controls are not in place.	Find no action warranted at this time given the cost and unknown benefit. Include impacted measure as proposed in second ROC audit.
25	Qwest incorrectly included PID changes in Minnesota that were not yet approved.	1	All		X	X	Not applicable in North Dakota	Not applicable in North Dakota	Qwest believes that most of the premature implementation of PID changes are in the favor of the CLEC and therefore declines to take action. Assuming that the Commission approves the PID changes for implementation in the QPAP, Liberty concurs that no further action is necessary.		NA - Minnesota specific
26	Qwest did not include the product disaggregation "EEL_DS1 Capable" in its QPAP payments for New Service Installation Quality Reported to Repair (OP-5A).	1	OP-5A		X	X	X	X		Qwest both agreed and made systems changes to address the finding.	Accept Finding and Qwest Action, include as proposed in second ROC audit

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Items for which Qwest and Liberty agree that no further action is necessary.



Items on which Qwest took action despite its initial lack of concurrence noted by Liberty



Items warranting no further action or to be considered in PAP/PID discussions

