
***SBC Midwest Performance Measurements
Internal Change Management Policy, Procedures
and Guidelines***



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Table of Contents

General Policy Statement	Page 2
Policy Objective	Page 3
Scope	Page 4
Definition of Terms	Page 5
Approvals Required	Page 7
General Responsibilities	Page 8
Process Overview	Page 11
1. Identify Need for Change	Page 11
2. Submit Change for Review by the PMCMT	Page 11
3. Conduct Weekly PMCMT Meeting	Page 11
4. Communicate Change to CLECs and Regulatory Agencies	Page 12
5. Change Area Owner and Required Resource Assignment	Page 13
6. Development	Page 13
7. Testing	Page 13
8. Implementation	Page 13
9. Communicate Completion of Change Area X to Change Area X+1 Owner	Page 13
10. Change Closed	Page 14
11. Change Area Owner Updates Resource Assignments as Necessary	Page 14
12. Stop	Page 14
Standard Process Flow	Page 15
ADDENDUM	
A-1. Restatement Guidelines	Page 16



General Policy Statement

It is the policy of the SBC Midwest Performance Measurement organization to adequately analyze, plan, and control the implementation of proposed changes to the systems, processes, and documentation supporting the creation and reporting of SBC Midwest performance measurements. To this end, an internal change management process has been developed to address the workflow, communications and record keeping requirements of activities associated with the proposal, approval and implementation of changes to SBC Midwest performance measurements. All proposed changes require the review and approval of the Performance Measurements Change Management Team ("PMCMT"). All SBC personnel affiliated with the implementation of SBC Midwest's Performance Measurement are required to adhere to this policy and its provisions, as outlined herein.



Policy Objective

The ultimate objective of the change management process is to reduce the potential for adversely affecting the integrity of performance measurements reporting caused by the introduction of changes to SBC Midwest's performance measurement systems and processes. In order to achieve these objectives, proposed changes, as defined in this policy, are required to be duly authorized, reviewed, and approved by the Performance Measurements Change Management Team prior to implementation.



Scope

This policy applies to:

- The implementation of new performance measurements,
- Changes to existing performance measurements and/or their implementation,
- Updates to performance measurements documentation,
- Changes to performance measurements systems,
- Changes to performance measurements remedy plan programs,
- Changes to processes for generating and reporting performance measurement results.



Definition of Terms

Change Areas:

Collection of systems, processes or documents impacted by a particular Enhancement Request.

Change Area Owner:

Individual responsible for addressing the resolution of a particular change area, ensuring the timely completion of the change, and communicating/updating the change area status to the PMCMT and/or CMPM.

Change Management Database (CMDB):

Tool and/or tools that facilitate documenting, tracking, and communicating the status of requested and approved changes to performance measurements to ensure their proper implementation.

Change Management Project Manager (CMPM):

Individual assigned the responsibility for the coordination of activities associated with the maintenance of changes to policy and procedure documentation, and for updating the Change Management Database to reflect the current state of the change management processes established for each change area and the administration of the CMDB.

Documentation:

- *Data Flow Diagram (DFD)*: Data flows will reflect the location where measurement data is created as well as the entire system and/or manual path data flows from its root to measurement reporting.
- *Data Element Mapping (DEM)*: A spreadsheet with every data element used in the creation of performance measurements reports, providing the logic applied for any derived data elements and the path each element follows from its root to reporting.
- *Measurement Specific Business/Technical Requirements (BTR)*: Documentation compiled by measurement SMEs providing business and technical descriptions of how to calculate a performance measurement, including exclusions, inclusions, calculation logic and general procedures applied to produce measurement results.
- *System of Record (SOR)*: Identification of the system or systems responsible for data retention of a measurement's root data.
- *System Retention Policy (SRP)*: Documentation identifying, for each System of Record, a system description, a data architecture overview, and details regarding performance measurement data retention.

Enhancement Request (ER):

Request for modification to a performance measurement implementation, system, process, or document.

Enhancement Request Originator:

Individual (any and all SBC employees or agents of SBC) that identifies and communicates need for a change to a performance measurement implementation, system, process, or document by submitting an ER to the PMCMT.

Out-of-Process/Emergency Enhancement Requests:

Requests for changes/enhancements/error corrections that are submitted to the CMPM in between scheduled PMCMT meetings requiring immediate action in order to accurately report performance measurement results. Requires director-level approval prior to submission for PMCMT approval.



Performance Measurement Business Process Owner:

Individual/s representing the SBC Business Unit responsible for the results/content reported for the performance measurement.

Performance Measurements Change Management Team (PMCMT):

Group of technical, process, and administrative experts with the assigned authority and responsibility to review and make implementation decisions on proposed changes to performance measurements.

Production Environment Change Agent:

Individual accountable for planning, coordinating, monitoring and communicating changes/enhancements within the IT source systems or their service delivery environments affecting the production/implementation of performance measurements and the reporting of their results.

Restatement:

Reprocessing and republishing of previously published performance measurement results. Posting of results to the web site is considered publishing of the results. The actual results published as a result of the restatement may or may not be different from the results previously published. (Addendum A-1, page 16 details the SBC Midwest Performance Measurement Restatement Guidelines).



Approvals Required

Appropriate management review and authorization is required prior to implementation of a qualified change. To achieve this, all Enhancement Requests must receive the review of the performance measurement Business Owner and approval of the PMCMT. The PMCMT is vested with the authority to approve, reject with cause, or defer proposed changes. The decision of the PMCMT is to be communicated with explanation to the Enhancement Request Originator if the Originator and/or designate is not present during the PMCMT meeting where the request is discussed.

Out-of-process/Emergency Enhancement Requests must receive Long Distance Compliance (LDC) Performance Measurements organization director-level approval with a notification to the PMCMT prior to implementation.



General Responsibilities

Performance Measurements Change Management Team:

The Performance Measurements Change Management Team (PMCMT) has overall responsibility for the approval/disapproval of the implementation and prioritization of all enhancement requests. The responsibilities of PMCMT members include:

- Attending regularly scheduled (i.e., weekly) PMCMT meetings;
- Reviewing and evaluating qualified enhancement request documentation materials submitted by Enhancement Request Originators;
- Evaluating/prioritizing all open Enhancement Requests (including identification of any additional operational, resource, or schedule considerations which should be weighed in the go/no-go decision);
- Determining the completeness and quality of the analysis, planning and documentation required for the change and for determining the existence of operational or priority conflicts resulting from the proposed implementation date;
- Ensuring that all affected change areas have been identified and assigning and confirming the assignment of Change Area Owners;
- Recommending improvements to the Change Management Policy, its processes and procedures.

Currently, the PMCMT is made up of representatives from the following responsibility/function areas:

- Long Distance Compliance Performance Measurements Group;
- Long Distance Compliance Mechanization Performance Measurements Group;
- Long Distance Compliance Performance Measurements Analysis Group;
- Long Distance Compliance Performance Measurements Production Group;
- Long Distance Compliance Remedy Plan Program Group;
- Performance Measurement Business Process Owners;
- Other Process Groups.

The PMCMT membership may be expanded as required to fulfill Change Management needs and business requirement implementation. The need to expand membership is determined by the CMPM with input from current members.

The senior manager of the above responsibility/function areas determines the group's representation.

Enhancement Request Originator:

The Enhancement Request Originator is the initiator of the Enhancement Request. This individual, having identified the need for a performance measurement change, submits to the CMPM a Request for Enhancement for review by the PMCMT. A copy of the Request for Enhancement is forwarded to the Business Process Owner at the same time as to the CMPM.

It is the Originator's responsibility to ensure that the Request for Enhancement provides complete information and that the Business Process Owner is aware of the request.

The Originator is also required to attend the PMCMT meeting during which the Originator reviews the request and responds to any raised questions. If the Originator is not able to attend the PMCMT meeting, it is the Originator's responsibility to either ensure that the Business Process Owner is able to attend the meeting and is able to respond to raised questions or to assign a designate to attend the meeting and respond to raised questions.



SBC personnel and/or duly authorized agents of SBC must submit Requests for Enhancement Form whenever a change affects the way a performance measurement is implemented/reported. This includes, but is not exclusive of, changes made to

- Documentation – such as: Data Flow Diagram (DFD), Data Element Mapping (DEM), Measurement Specific Business/Technical Requirements (BTR), System of Record (SOR), System Retention Policy (SRP) and/or other pertinent documents related to the implementation of a change;
- Planned system changes/reporting system changes – such as: the introduction of new interfaces and/or the implementation of data sourcing systems;
- Remedy plan program changes impacted by revised/new State Commission ordered plans, revised/new negotiated agreements, and changes in plan interpretation.

Performance Measurement Business Process Owner:

The Performance Measurement Business Process Owner is the individual responsible for the ultimate implementation of changes to performance measurements within his/her area of responsibility.

It is the Business Process Owner's responsibility to:

- Review received Requests for Enhancement;
- Attend regularly scheduled PMCMT meetings (if unable to attend, send a representative);
- Ensure that the implementation of the requested change/enhancement follows and is within the intent of the performance measurement business rule;
- Communicate and obtain approval, as required, within their Business Unit, regarding the implementation of changes/enhancements;
- Assist (as needed and requested) Change Area Owners so that the work required for change implementation occurs in a timely fashion;
- Work with the Change Area Owners to ensure that all of the required documentation affecting the performance measurement change implementation has been updated;
- Ensure that all affected downstream systems are involved in the change implementation and follow the required processes to effect the change;
- Verify that the change has been implemented as defined by the Request for Enhancement
- Sign-off on the change.

Change Management Project Manager (CMPM):

The CMPM is responsible for operational issues relating to the change management process and the administration of the CMDB, as well as having overall responsibility for coordinating and tracking progress in all affected change areas. The responsibilities of the CMPM include the following activities:

- Maintaining the Change Management Policy and distributing the document revisions to authorized recipients;
- Performing required CMDB administrative duties, updating ER status where appropriate, updating ER priority, creating status reports for the PMCMT meeting;
- If the Enhancement Request Originator is not present at the PMCMT meeting, as soon as possible following the PMCMT meeting during which the request is presented to the PMCMT, the Originator of the ER is notified by the CMPM of the PMCMT decision. Should a Request for Enhancement be accompanied by supplemental documentation, this documentation is forwarded to the Business Process Owner of the addressed/affected performance measurement;
- Coordinating and tracking progress status in affected change areas;
- Providing education and training in the Change Management Policy as required.



Change Area Owner:

The Change Area Owner is the primary driver of the changes and is responsible for addressing the resolution (and/or working with resources to address the resolution) of a particular change area, for ensuring the timely completion of the change, and for communicating/updating the change area status to the Business Process Owner, PMCMT and the CPM. The responsibilities of the Change Area Owner include the following activities:

- Resolving and/or working with resources to resolve the change area;
- Determining and assigning timelines for the different required steps to complete the change;
- Assuming responsibility for the coordination of all implementation activities within their change area and coordinating activities with other change areas as appropriate;
- Updating the status and progress of the change to the Business Process Owner, PMCMT and the CPM.

Production Environment Change Agent:

The Production Environment Change Agent is accountable for ensuring that all necessary plans and quality assurance steps have been taken (as defined by internal, system-specific processes) assuring a timely, accurate and successful change implementation. The Change Agent is responsible for:

- Initiating a Request for Enhancement whenever a change is necessitated to reporting systems/applications/processes (including all affiliated documentation);
- Communicating the need for a system change to the performance measurement Business Process Owner;
- Ensuring that the identified change/enhancement is scheduled and implemented at a time and in a manner least likely to affect production availability;
- Attending (or sending a representative) to the PMCMT meeting and keeping the PMCMT, Business Process Owner, Change Area Owner informed of the status of the system change/enhancement;
- Assisting in the resolution of unanticipated concerns;
- Ensuring the full, complete and accurate documentation of the change/enhancement.



Process Overview

1. Identify Need for Change

Problems and/or required/desired enhancements within the current performance measurements environment are identified by any of a number of SBC personnel.

2. Submit Change for Review by the PMCMT

A request to address the required/desired enhancement is submitted by the Enhancement Request Originator to the CMPM with a copy to the Performance Measurement Business Process Owner. The information provided is entered onto the Potential ERs matrix by the CMPM, and is subject to review by the PMCMT.

Requests for Enhancement must be completed and submitted for all changes pertaining to the implementation and publication of performance measurement results. The types of changes that would require a submission of a Request for Enhancement include, but are not exclusive of, the following:

- Adding of a New Measurement – as approved/required/mandated by the CLEC Collaborative and State Commissions and the FCC;
- Documentation changes (Data Flow Diagrams, Data Element Maps, Measurement Specific Business/Technical Requirements, System of Record, System Retention Policy);
- Planned System Changes/Production Environment Changes (changes to interfaces and/or computer/reporting systems supporting the generation of performance measurement data—based on the Performance Measurement Business Process Owner’s assessment of the change impact on the reporting of performance measurement results);
- Improvements required by business rule interpretation, system/processing changes, program code modifications, change in calculation, criteria logic changes, etc.;
- Error correction required for erroneously provided data, data input errors, system/processing problems, incomplete data, erroneous criteria/logic application/interpretation;
- Information gathering/analysis/internal audit;
- Web display modification;
- Remedy plans program changes.

3. Conduct Weekly PMCMT Meeting

A. Evaluate Status of Open and New Enhancement Requests

Each Change Area Owner and/or Business Process Owner provides an update on the progress of implementation/change activities against established timelines. When necessary, updates to the priority assignment may be made, and should be updated in the CMDB.

B. Prioritize all Open and New Enhancement Requests (Assign Timelines)

For all new ERs, a priority must be assigned based upon agreement from the PMCMT. Generally, the following criteria are used to establish a priority:

- **High Priority** – ERs relating to expressed Commission and CLEC urgent requests, along with those intended to alter metric implementation to match updated understandings of the true intent of agreed upon performance measurements.



- **Medium Priority** –ERs concerned with implementing Commission discussed and, with urgency, newly agreed upon performance measurements, changes expressed by Commissions, CLECs, and SBC Midwest through Collaborative discussions with moderate urgency, and internal data collection and reporting changes required to better report upon agreed upon business rules.
- **Low Priority** – ERs concerned with implementing Commission discussed and, with low urgency, newly agreed upon performance measurements, changes expressed by Commissions, CLECs, and SBC Midwest through Collaborative discussions with little urgency, and internal data collection and reporting changes required to better report upon agreed upon business rules.

All existing ERs should be reviewed to ensure that the assigned priority is still applicable based upon activities during the prior week.

The CMPM is responsible for updating the CMDB with the appropriate priority for all ERs.

4. Communicate Change to CLECs and Regulatory Agencies

SBC Midwest’s performance measurement Change Management Process requires that SBC Midwest notify the industry in advance of planned modifications to performance measurements as charted below.

NOTE: SBC Midwest is not under obligation to notify CLECs and/or Commissions of changes to an internal system or process when such is required in order for SBC Midwest to continue properly reporting performance measurement results.

Additionally, modifications to the web site itself will be communicated via an Accessible Letter, which is the standard communication vehicle used in SBC for communication to CLECs and regulatory agencies. Commission staff representatives and CLEC contact personnel receive the Accessible Letters via e-mail and the Accessible Letters are posted to the SBC web site. These vehicles will ensure that CLECs receive the appropriate information and notices, as well as SBC’s account managers, who are then better able to support the necessary information exchanges.

Suggested notification intervals for changes to performance measurements are:

<i>Type of Change</i>	<i>Minimum Notice Interval</i>
1. New Measurement	30 days prior to implementation via implementation schedule
2. Changed Business Rules	30 days prior to implementation via implementation schedule
3. Changed Report Format (Electronic)	30 days prior to implementation via Accessible Letter
4. Change Requiring Restatement of Previously Reported Results	At the next posting or re-posting date via Web Page Notification



5. Change Area Owner and Required Resource Assignment:

The Change Area Owner is responsible for addressing (and/or working with resources to address) the resolution of a particular change area. The different types of changes may require the utilization of different resources. It is the Change Area Owner's (together with the Performance Measurement Business Process Owner's) responsibility to obtain and work with the required resources.

The Change Area Owner should also ensure the timely completion of the change and should communicate/update the Change Area status to the Performance Measurement Business Process Owner, the PMCMT and in the CMPM.

6. Development

For changes to performance measurements, systemic or manual processes will need to be developed to address the change (e.g., for new measurements, processes will need to be created for collecting data from the appropriate source system(s), calculating the measurement in the measurement reporting systems, and reporting the measurement results on the web site.

The Change Area Owner is responsible for updating the Performance Measurement Business Process Owner, the CMPM and the PMCMT. Such updates usually occur as part of the weekly PMCMT meeting. The CMPM is responsible for updating the status of the ER in the CMDB as part of the normal updating process.

7. Testing

Thorough testing of processes that have been changed/created during the Development phase needs to occur to ensure that the systems/processes are functioning properly before and after implementation.

The Change Area Owner is responsible for ensuring that the data provided for implementation is accurate and informing the Performance Measurement Business Process Owner, the PMCMT and the CMPM during the weekly update meetings that the change is ready to be implemented. The CMPM then updates the CMDB as part of the usual CMDB update process.

8. Implementation

Changes are deemed ready for implementation when the Change Area Owner informs the Performance Measurement Business Process Owner, the PMCMT, and the CMPM that the change is ready to be reported.

The CMPM is responsible for updating the status of the ER in the CMDB when the change is ready to be implemented as part of the usual CMDB update process.

9. Communicate Completion of Change Area X to Change Area X+1 Owner

A particular ER may impact several Change Areas (e.g., a new measurement will require changes to (1) the measurement reporting systems, (2) documentation, and (3) the web site). It may not be possible to address all of these Change Areas concurrently. When a change has been completed in one Change Area, and other Change Areas that are impacted by the ER have not yet been addressed, the Change Area Owner must appropriately communicate completion to the owner of other impacted Change Areas. The PMCMT and the CMPM needs to be updated of such communication during the weekly PMCMT meeting.



Should the Change Area Owner and/or the CMPM deem it necessary, a new Request for Enhancement may be created to track additional changes.

10. Change Closed

An ER is deemed ready for closure when the following actions have occurred:

- Implementation of a particular change area (once the change has been effected on the web and the Change Area Owner and/or Business Owner has communicated that the change is completed),
- No other areas are affected by the ER
- The CMPM designates the ER as “complete” in the CMDB and issues a “Request for Sign-off” to the Business Process Owners and/or Change Area Owners.

The Business Process Owners and/or Change Area owners indicate in writing that the specific ER can be closed as complete. The CMPM updates the status of the ER in the CMDB to be “Closed”, indicates the date that the sign-off was received and, as the final update, enters the date and from whom the sign-off was received in the Update field.

11. Change Area Owner Updates Resource Assignments as Necessary

If during the weekly meetings of the PMCMT, the priority of a particular ER is changed (and the implementation timelines thus change), the Change Area Owner may need to reprioritize resource assignments for addressing the ER.

See Step 5: *Change Area Owner and Required Resource Assignment* for details on the process.

The CMPM is responsible for updating the priority of the ER in the CMDB.

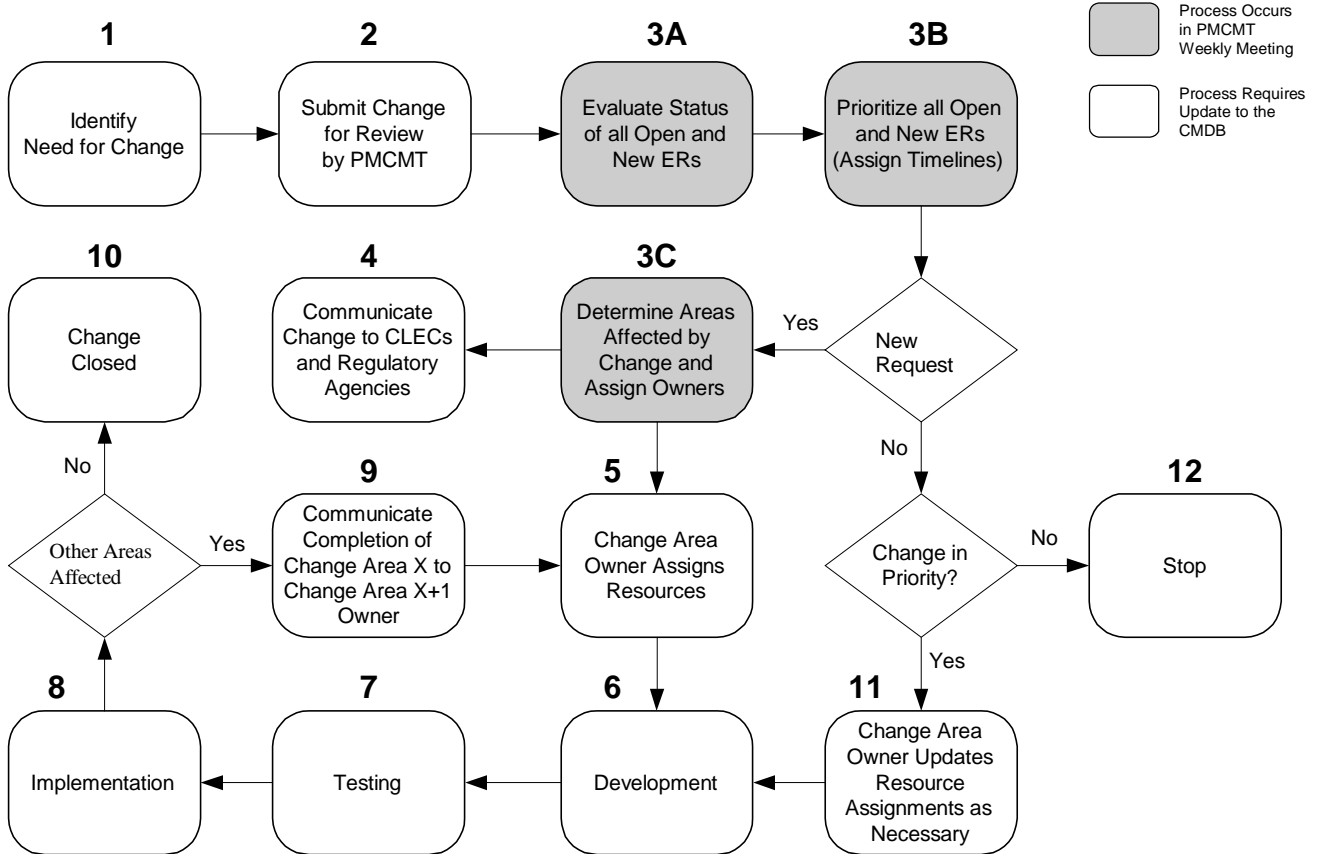
12. Stop

If an outstanding ER is being reviewed in the weekly PMCMT meeting and does not have a change in priority, no additional action is necessary at that time.



Standard Process Flow

SBC Midwest's performance measurement Change Management Process flow is defined as follows:





ADDENDUM

SBC Midwest Performance Measurement Restatement Guidelines (Eff. December 7, 2001) Revised April, 2003

Restatement requests follow the process set forth in the SBC Midwest Performance Measurements Internal Change Management Policy, Procedures & Guidelines. There are occasions when it is recognized after publication that the performance measures data that has been published is incomplete or incorrect. Dealing with these occasions is the subject of this addendum.

Restatement Defined

Any time previously published performance measurement results are recalculated and republished, a restatement of the results previously published has occurred. Posting of results to the web site is considered publishing of the results. The actual results published as a result of the restatement may or may not be different from the results previously published.

The determination of whether or not to restate results depends upon the materiality of any changes to previously reported results. SBC Midwest defaults to restating the published results unless it can be determined, through reasonable analysis that can be completed in a timely fashion, that the restated results would not be materially different from the results originally published. SBC Midwest does not conduct this analysis on every restatement, and in those cases instead chooses to restate regardless of materiality. The process to determine the materiality of any changes is discussed below under the section header "Materiality Determination".

Materiality Determination

Materiality is determined based upon two factors:

1. Performance calculations that result in a shift in the performance in the aggregate from a "make" condition to a "miss" condition.
2. Performance calculations that result in a further degradation of reported performance of more than 5% for measures that are in a "miss" condition, provided there are at least 100 CLEC transactions in the sub-metric.

For measurements that are purely diagnostic (i.e. are not subject to remedies and have no established benchmark or comparison), generally restatements will not be made. SBC reserves the right to restate results in certain situations regardless of materiality. These restatements will be made only with the approval of the Vice President, Performance Measures – Long Distance Compliance.

Implementation of Restatements

Determining when to implement restatements is dependent upon (a) the complexity of implementing the improvements/corrections, and/or (b) the availability of performance measurement reporting resources required to both re-process the data and results for the measurement be restated and also meet the monthly production reporting obligations.



Notification of Material Restatements

Notification of material restatement is made to CLECs and State Commissions via the News Page on the CLEC OnLine website (<https://clec.sbc.com>). This notification provides a listing of the specific results being restated (PMs and months) and an explanation of why the restatement is required.

Text defining the performance measures and months of result being recalculated and reposted, along with an explanation of the issue that drives the need for recalculation and reposting of results is compiled into a draft News Page by the CMPM. This draft notice is based upon the information documented in the Change Management Database through the Change Management Process. The Director-Change Management reviews the draft News Page for completeness, accuracy and readability. The Director-Performance Measurement also reviews the draft News Page for completeness, accuracy and readability. The monthly Additions and Modifications matrix is utilized as the primary source for reviewing accuracy. Any modifications are jointly agreed upon and approval of both Directors is obtained. The approved version of the News Page is posted on the web site upon completion of results loading.

Posting of restatements generally occurs on either the normal scheduled reporting date (the 20th of the month or the first business day thereafter should the 20th fall on a holiday or weekend) or the 5th calendar day of the following month (or the next business day should the 5th fall on a weekend or holiday). Any out-of-cycle restatements will be made only with the approval of the Vice President, Performance Measures – Long Distance Compliance.

In no case should SBC's notification of a restatement be considered a guarantee of differences in newly published results from previously published results. Notices of material restatements indicate only which performance measurement results have been/will be restated (as defined under "Restatement Defined" above). Previously posted results will not necessarily change in every situation. The CLEC specific report will list the actual performance measurement changes that affected that CLEC. An aggregate report will reflect the changes that impact State results.