

CENTURYLINK DRAFT PROGRAM MANAGEMENT PLAN

DRAFT
CDRL 79

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PROGRAM MANAGEMENT PLAN (L.30.2.1; G.9.4; F.2.1(79))

CenturyLink will provide focused and comprehensive program management support to ensure the United States Government and taxpayers and provide efficient, effective, and enhanced services for EIS.

CenturyLink's Enterprise Infrastructure Solutions (EIS) Program Management Plan (PMP) defines the business processes that develop and deliver EIS services and the core activities within the program management organization (PMO). CenturyLink will apply its proven management support systems, processes, and professionals that are currently being used successfully on many commercial and federal programs.

CenturyLink's program management philosophy is built on establishing strong mission-focused business relationships with our customers. We will work collaboratively to reach specific goals and objectives and provide superior service and operations support to the General Services Administration (GSA) and EIS customers to successful EIS program outcomes.

1.0 CONTRACT MANAGEMENT REQUIREMENTS (L.30.2.1 (1); G.9.4 (1))

CenturyLink's experience managing and implementing federal programs has given us considerable insight in identifying government dependencies and assumptions that may impact task order execution, including: Government sites are prepared with correct technology, HVAC, power, required conduit and rack space, Correct and timely site representative identification being available for planning, site survey, install, cutover, testing, and acceptance, Site facility admittance conditions (e.g., security clearances, hours of availability, advance notices prior to site arrival) are clearly documented, and accurate and available government configuration information including site maps, cable records, and support documents.

2.0 SERVICE SOLUTION (L.30.2.1 (2); G.9.4(2))

CenturyLink designed its EIS management solution to ensure service continuity, flexible and agile program support and secure effective commercial support systems. Table 2.0-1 summarizes CenturyLink's methodologies for Ordering, Billing, Inventory Management, and Service Management.

Table 2.0-1: The CenturyLink Service Solution Methodology Summary



The table content is redacted with black bars. The table has a header row and several data rows, with some rows highlighted in light green. The redaction covers all text within the table cells.

2.1 ORDERING (G.3, G.9.4 (2))

During pre-sales planning, the CenturyLink account team will work in tandem with an agency to solidify conceptual needs into specific requirements and tailor them for a service order (SO) solution. Initially, our account team will gather the initial agency needs and enter the opportunity into our secured Salesforce.com (SFDC) account. A CenturyLink Sales Engineer (SE) and Customer Support Representative (CSR) will be assigned to work with the agency to accurately define and complete the SO. The account team, the SE, and the CSR will interact directly with the CenturyLink PMO and internal support organizations as needed to refine the SO.

SOs are evaluated by our CSRs and SEs to ensure that they contain the minimum information required as defined in Request for Proposal (RFP) Section J.2.10.2.1.15. Our SEs will work the submitting agency to ensure that the order is complete and a service order acknowledgement (SOA) can be issued. The SOA will trigger our engineers to acquire the remaining information needed for the issuance of a service order confirmation (SOC) and to start the provisioning process. As a result of the SOA, our SFDC will be updated to capture that order as a sales opportunity that will be tracked internally throughout the rest of the business support system (BSS) ordering lifecycle. This acts as a service assurance check on the order fulfillment process along with the order tracking mechanisms provided through the BSS notifications and reporting functions.

CenturyLink will establish access for the Ordering Contracting Officer (OCO), the Contracting Officer's Representative (COR), and any other authorized ordering officials. CenturyLink will create accounts based on the account registration task order (TO) and OCO requirements.

2.1.1 Fair Opportunity (G.3.1, G.3.1.1)

CenturyLink is dedicated to meeting the needs of the government and will work with the OCO within the fair opportunity procedures and exceptions specified in FAR 16.505. CenturyLink will respond to EIS service solicitations through GSA's eBuy in the manner prescribed in the request

2.1.2 Task Orders (G.2.2.1.1, G.3.2. G.3.2.1; J.2.3, J.2.3.1, J.2.3.2, J.2.3.3, J.2.4.1.1)

CenturyLink will assist agencies in all aspects of TO requirements development and provide solicitation responses. CenturyLink CSRs and SEs will consult with agencies to review their requirements, paying particular attention to potential problem areas as reported by agency managers or captured through trouble management reports. Our CSRs and SEs will work with the agencies to determine if an existing service can be upgraded or offered under EIS with a greater cost benefit.

Prior to responding to and negotiating an EIS TO, CenturyLink will confirm with GSA that a delegation of procurement authority (DPA) has been issued by a GSA contracting officer (CO) to an agency OCO or authorized official. To ensure all orders processed are valid and authorized, CenturyLink will only accept TOs or TO modifications upon confirmation of current delegation and only accept SOs from the OCO, OCO-designated COR, or other authorized official. CenturyLink will meet and comply with the processes, data, and systems requirements to support and maintain TOs, as described in RFP Section J.2.3, including TO controlled, TO associated, and system reference data that GSA Conexus and CenturyLink's BSS require for effective data exchange.

CenturyLink will comply with the common operational requirements in the handling of EIS data. After ensuring the DPA exists for a TO, CenturyLink will submit TO data to GSA and deliverables using the methods specified in RFP Section J.2.3.2 and following the content definitions in J.2.3.3 and its subparagraphs.

Access to the EIS BSS, including the ability to place orders and obtain billing, inventory, and performance information, will be controlled through role-based access control (RBAC). Specific access will be established and stored so that only authorized users will be able to access data based on their associated permissions. Once verified, a new user will be given access within seven business days of a government request. Users who no longer have authorized access will be removed within one business day, or sooner if requested by the government. Direct billed setup for RBAC is described in PMP, Section 9.2.3.

After successful completion of joint BSS verification and security testing, CenturyLink will incorporate the GSA-provided system reference data prior to setting up TOs. CenturyLink will configure its BSS so that outgoing data exchange submissions conform to system reference data. GSA will provide updates to the system reference data sets on an as needed basis. A contract modification will not be issued for such updates. CenturyLink will follow the process as described in RFP Section J.2.3.2.2 at initial TO set up before processing any orders for services.

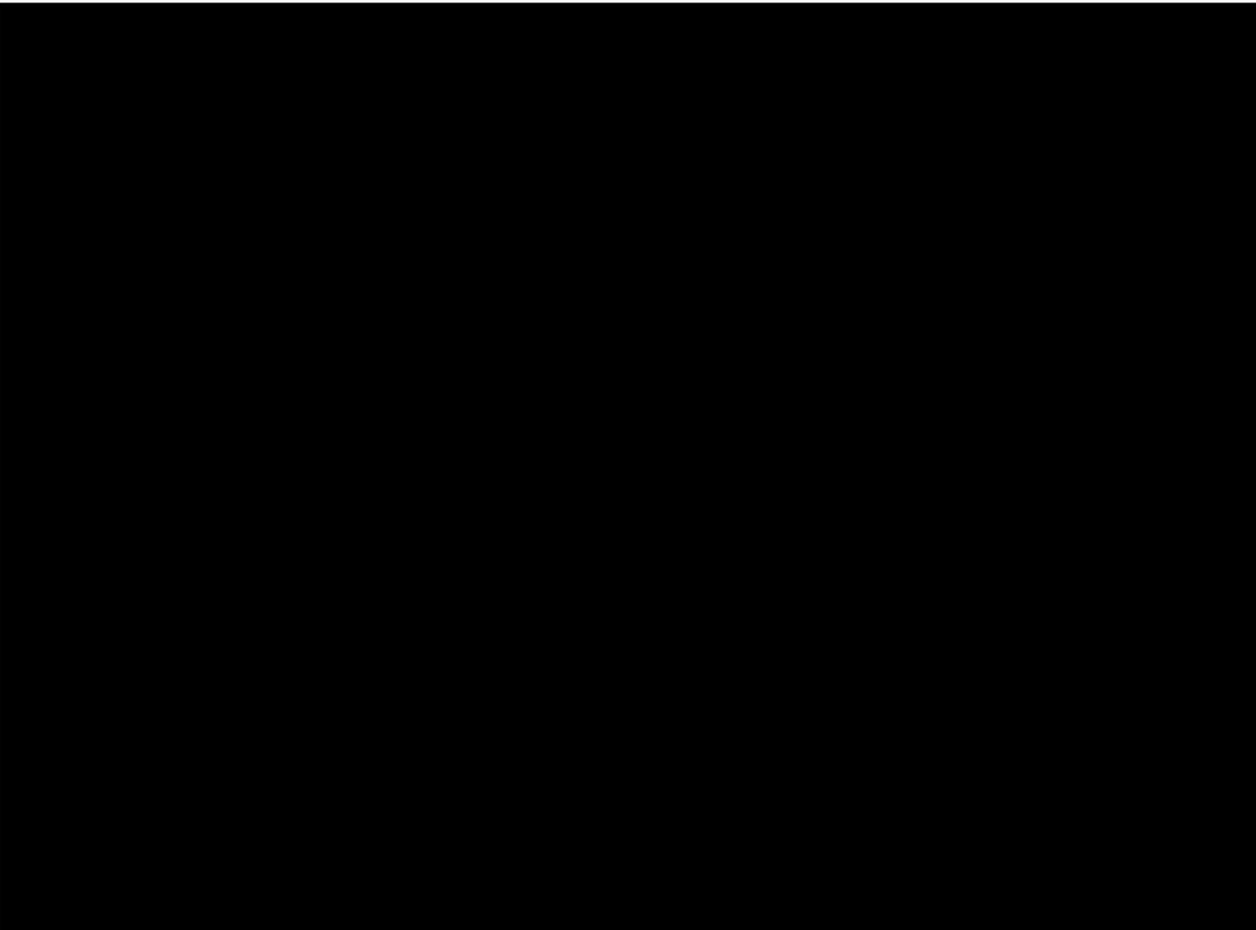
Task Order Award and Modification (G.3.2.1, G.3.2.2): All TOs awarded to CenturyLink are placed directly by the OCO for organizations with a DPA. CenturyLink will follow all necessary process steps for TO modifications, including notification to GSA, to ensure the government efficiently processes modifications to the EIS contract with supportive documentation and pricing submissions for TO-specific pricing and catalog submissions, including submission of TO summary data and pricing tables. CenturyLink will fully comply with the requirements of RFP Section J.2.3. **Figure 2.1.2-1** shows the steps followed, beginning at identification of a fair opportunity through TO management and customer/account setup.

Protests and Complaints (G.3.2.3): Should CenturyLink protest a fair opportunity, it will provide an un-redacted copy of that protest to the GSA CO within three business days. For a FOIA request we will provide a redacted copy of the protest to the GSA CO.

Customer of Record (G.3.2.4): CenturyLink recognizes the government may place orders either from agencies directly or from GSA acting on behalf of an agency or an OCO. We support all ordering options when issued by an OCO with the delegated authority to place an order.

Authorization of Orders (G.3.2.5): Prior to responding to an SO, even when the SO is submitted as part of a TO, CenturyLink will validate that the requesting government official has the authority to issue the TO or SO and that the core-based statistical areas (CBSAs) or services covered by the TO (or an SO under that TO) are part of CenturyLink's contract. CenturyLink will not accept a TO or SO or provision catalog items until the discount class has been added to the contract, and items have been added to the catalog. If either a CBSA or service is missing, CenturyLink will provide a clear notice of the pending modification in its solicitation response.

Once all conditions for authorization of orders are met according to RFP Section G.3.2.5, CenturyLink will submit a bid to the requesting official for fair opportunity processing.



2.1.3 Ordering Services (G.3.3, G.9.4 (2); J.2.4.1.6, J.2.4.2.1, J.2.4.3)

CenturyLink will accept all valid SOs placed by the government. If an order is

missing any required data CenturyLink will work with the agency to obtain all information necessary to complete the order. The following sections describe the processes and requirements for placement, acceptance, and handling of all orders for service, regardless of whether they are incorporated into a TO or placed separately after the issuance of the TO. Unless otherwise specified, CenturyLink will submit all required ordering deliverables, in the process set forth in RFP Section J.2.4.2, to GSA and, if requested, to the customer.

The methods and systems used to meet the data and system process requirements for ordering are described in PMP, Section 9 below. The specific data sets exchanged as part of ordering include the SO and the notifications identified in **Figure 2.1.3-1**.

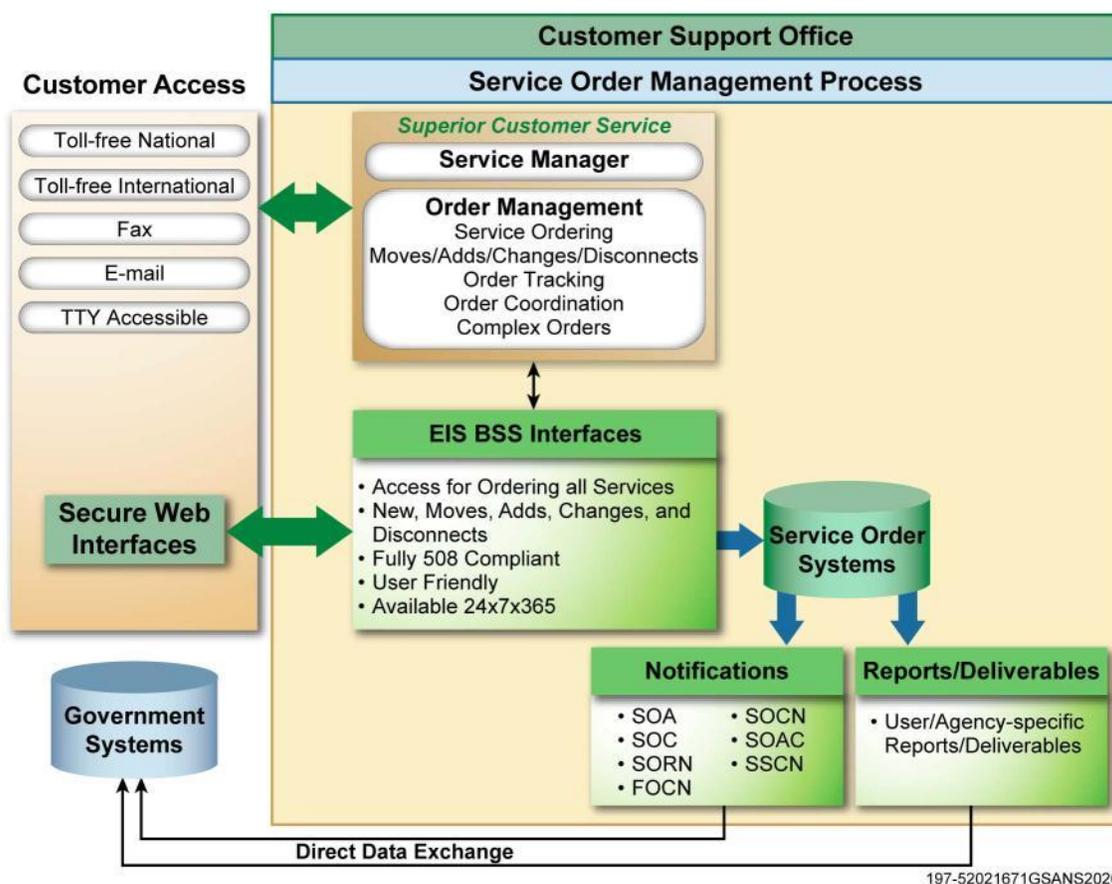


Figure 2.1.3-1. Service Order Management Process

As defined in RFP Section J.2.4.2.1, these notifications are delivered according to the specific type of order, the stage of the ordering process, and the type of service involved. The timing and requirement for a particular notification can be overridden on

an exception basis by a TO but all notifications required for a particular order must be delivered prior to billing for that service.

CenturyLink will comply with the common operational requirements in the handling of EIS data. After ensuring the DPA exists for a TO, CenturyLink will accept SOs and administrative change orders from authorized users, and provide notifications and other deliverables to the appropriate government user using the methods and content definitions as listed in RFP Section J.2.4.3.

Standard orders, including moves, adds, changes (excluding administrative change orders), and disconnect orders, will fully comply with the process described in RFP Section J.2.4.2.1 and Management Response Section 2.1.

2.1.3.1 General Requirements (G.3.3.1, J.2.4.1)

Agency Hierarchy Code (G.3.3.1.1; J.2.4.1.2): The agency hierarchy code (AHC) is an internal government accounting code required on all order line items. CenturyLink's ordering system will require an AHC on each line item within an order and will validate the presence of an AHC on all order line items. AHC changes will occur through the submission of change orders and will not interrupt the associated service. CenturyLink will comply with the AHC requirements in RFP Section J.2.4.1.2 as described in PMP, Section 2.2.1.

Auto-Sold CLINs (G.3.3.1.2; J.2.4.1.7): Certain services contain contract line item numbers (CLINs) that are automatically included in a proposal or quote as though they had been expressly requested (e.g., for audio, web, and video conferencing). All auto-sold CLINs will be included in the TO and listed in all notifications and deliverables associated with an order. New auto-sold CLINs may be added to the contract with GSA approval, through contract TO modification. Such newly added auto-sold CLINs will not be applicable to any previously issued TO unless specifically added via TO modification. If a TO modification is issued to add a new auto-sold CLIN, at which time CenturyLink will then issue a new SOCN for previously provisioned orders under that TO. Unless otherwise specified in the SO or TO, CenturyLink will apply the AHC and agency service request number (ASRN) listed for the base CLIN to all associated auto-sold CLINs. As new capabilities and features are added for the services that have auto-sold CLINs,

CenturyLink will provide updates to RFP Table B.1.2.11.1. CenturyLink will manage the activation and deactivation of auto-sold CLINs in accordance with RFP Sections J.2.4.1.10 and J.2.4.2.5 and will notify the government that the associated unique billing identifier (UBI) has changed state through the issuance of a service state change notice (SSCN). CenturyLink will send a single SSCN within 24 hours of the first usage event related to an auto-sold CLIN and deactivate the CLIN on an SSCN after the CLIN has invoiced.

Customer Want Date (G.3.3.1.3): When an agency submits a request for service against an established TO, the order may include a customer want date (CWD). CenturyLink will make every reasonable effort to accommodate the CWD with the requirements found in RFP Section G.3.3.1.3. CenturyLink will not issue the service order completion notice (SOCN) nor begin billing prior to the CWD unless the order specifies that early installation is acceptable. If the time between the order and the CWD is greater than the defined provisioning interval for the service, the service provisioning service level agreement (SLA) is waived for that service on that order.

Service Order Completion Notice (G.3.3.1.4): CenturyLink will submit a SOCN after completion of provisioning of each SO but no later than three days after service is installed and tested. After a SOCN has been submitted and accepted, no revisions to the SOCN will be permitted without an administrative change order to correct an erroneous submission or to add or remove an auto-sold CLIN.

2.1.3.2 Order Types (G.3.3.2, G.3.3.2.1; J.2.4.2.3)

CenturyLink will accept orders for new services (CLINs not under contract), changes to existing services, updates to in-progress orders, and special order handling.

2.1.3.2.1 Change Existing Services (G.3.3.2.2, G.3.3.2.2.1 through G.3.3.2.2.4)

Once a service has been provisioned and service has been accepted, additional orders to move the service, change a feature, disconnect the service, or apply administrative data changes can be placed against that service. Depending on the nature of the order, appropriate changes will be made to the billing and inventory systems and prescribed notifications provided.

CenturyLink's service delivery processes and BSS enable execution of outside move

orders that require the removal of an existing service and/or service-related equipment (SRE) from one location and the re-installation of the identical service and/or SRE at another location. We will accept, validate, and complete SOs and SRE moves within the same building (including floor-to-floor moves) as the SRE or service resides when such moves do not involve a change to an existing access arrangement for the service. When a move is complete, CenturyLink will update the inventory to reflect the outcome of the move and submit the prescribed notifications.

Certain services offered may have optional features that can be added to the service at initial installation. For feature change orders that require a CLIN change, CenturyLink will process the appropriate order types resulting in the disconnection of the existing features and CLINs and the installation of any new features and CLINs. For feature changes that do not require a CLIN change, CenturyLink will process the appropriate order types to reflect the feature additions and feature removals.

When the government issues a disconnect order, CenturyLink will meet all the disconnect requirements in RFP Section G.3.3.2.2.3, including stopping billing on the completion date in the SOCN. If a disconnect appears to leave other services unusable CenturyLink will provide notification of the full list of associated UBIs and request clarification of the customer's intent to only disconnect the specified service. If a customer indicates all or part of the list is intended for disconnect, CenturyLink will accept it as an order update. After a service is discontinued, CenturyLink will remove associated SRE within 45 days after the termination of services.

When CenturyLink has executed a government service or SRE request and the government has requested administrative changes or service/supplemental changes to the original order, CenturyLink will modify the order to reflect the requested change. Upon completion of the order change, CenturyLink will notify the government of all updated information that pertains to the order and the change.

An administrative change order will be required for any modification of data or billing change to a previously provisioned service which modifies inventory data points that have no impact on service delivery or pricing. Only changes to the ASRN 1, ASRN 2, or AHC fall into this category. CenturyLink will submit all deliverables described in RFP Section J.2.4.2.3.2 to GSA and, if requested, to the customer.

2.1.3.2.2 Supplements or Updates to In-Progress Orders (G.3.3.2.3; J.2.4.2.6)

CenturyLink will fully comply with all requirements of RFP Section J.2.4.2.6.

Supplements or updates to in-progress orders are orders to line items that have not completed the provisioning process and may be supplemented or updated by the government based on the processes defined in RFP Section J.2.4.2.6 and reflected in the Management Volume, 4. Draft BSS Verification Test Plan, Section 4.3.3. Service and supplemental changes may include changes to the service delivery location, CWD, service feature additions or changes, cancellation of the order, or update to administrative data.

Cancel Orders (G.3.3.2.3.1): CenturyLink will fully comply with all requirements in RFP Section G.3.3.2.3.1. CenturyLink will accept an order cancellation from the government if a SOCN has not been issued. CenturyLink will not charge the government network access as long as the cancellation is submitted thirty or more days before the later of the CWD or the firm order commitment (FOC) date. If the government's cancellation request does not meet the timeframe and requirements, the ordering agency will be assessed the non-recurring charge (NRC) for the associated access arrangements using the cancellation CLIN described in RFP Section B.4.1.13, even if the NRC was previously waived by CenturyLink.

Location Change Updates (G.3.3.2.3.2): Location change updates to an in-progress order are defined as updates that change the service delivery location from the one specified. They are categorized as location change updates that have or do not have an impact on local exchange carrier (LEC) provisioning. For location change updates that have an impact on LEC provisioning, whereby the access service request (ASR) has already been transmitted to the access provider, a FOC date has been received, and the FOC date is reached or past, CenturyLink may handle the order as a cancellation order and create a new SO to reflect the location change. For location change updates that do not have an impact on LEC provisioning, CenturyLink will process the order as a supplement order type. Updates to the most recent notification may be applicable to reflect the change, depending on the stage of the order.

Feature Change Updates (G.3.3.2.3.3): Feature change updates are order updates that require changes to the features of an order in progress. They are categorized as

updates that do or do not require a change to the original CLIN. CenturyLink will accept orders that meet these criteria in accordance with RFP Section J.2.10.1.1.4.2.2.

Customer Want Date Change Updates (G.3.3.2.3.4): CWD updates are defined as order updates that change the original order CWD. If the agency delays the CWD prior to receiving the firm order commitment notice (FOCN), CenturyLink will not issue the SOCN or begin billing prior to the new CWD, unless the change requested is fewer than 14 days before the CWD of the initial order.

Administrative Data Change Updates (G.3.3.2.3.5): CenturyLink will accept administrative data change updates to in-progress orders when the data change is limited to data provided by the government that does not impact service delivery or pricing. CenturyLink understands that changing data explicitly included in a TO requires a TO modification and cannot be done through this process.

2.1.3.3 Special Order Handling (G.3.3.3; J.2.4.1.9, J.2.4.2.2)

Telecommunications Service Priority (TSP) Orders (G.3.3.3.1): As discussed in Management Volume, 9. National Security and Emergency Preparedness (NS/EP) Functional Requirements, CenturyLink has significant experience provisioning qualified TSP circuits in accordance with the requirements in RFP Section G.11. The CenturyLink TSP program is managed by CenturyLink's risk management disaster preparedness organization, which ensures it meets all the mandated requirements as noted in the Federal Communications Commission (FCC) Report and Order, issued on November 17, 1989, and the National Communications System (NCS) Service Vendor Handbook for the TSP Program. NS/EP, including urgent or emergency delivery order service, will be separately negotiated on an individual case basis. Consistent with these requirements, CenturyLink provides the following TSP service levels:

- Emergency service: newly ordered services whose criticality requires the earliest possible provisioning (11th character of TSP authorization code = "E")
- Essential services: other NS/EP services assigned restoration and/or provisioning priorities in the TSP System. (11th character of TSP authorization code = 1, 2, 3, 4 or 5)
- Services with a zero (0) in the 11th character of the TSP code indicate provisioning priority of none, and are placed lowest in the provisioning hierarchy

For TSP orders, CenturyLink will apply the ordering process described in PMP Section 2.1.3 with the following caveats: 1) CenturyLink will follow the TSP prioritizations as noted in RFP Sections G.3.3.3.1 and/or G.11; 2) CenturyLink will not delay the delivery of services based on the need to submit deliverables specified.

When the ordering agency requires priority provisioning, or when TSP is invoked, CenturyLink expedites service implementation and restoration in accordance with the defined priority levels. We will implement the ordered service(s) by the CWD, based on essential priorities as certified by the Department of Homeland Security (DHS). CenturyLink complies with the requirements of TSP codes for both provisioning and restoration as specified in the order from Service Delivery Point (SDP) to SDP.

Rapid Provisioning Orders (G.3.3.3.2, G.8.2.4.4; J.2.4.2.4): CenturyLink will fully comply with the requirements of RFP Section J.2.4.2.4. An EIS customer can initiate self-service/rapid provisioning orders for certain products that have been previously provisioned, including for infrastructure as a service (IaaS) (configuration management, topology management, etc.) and for Ethernet (bandwidth-on-demand).

All rapid provisioning orders will be provisioned within 48 hours to meet the provisioning interval SLA. If provisioning occurs within the first 24 hours of that 48-hour interval, just a SOCN will be issued; however if the provisioning interval exceeds 24 hours, both an SOA and a SOCN will be issued. A SOCN will always be issued to ensure inventory accuracy. The ability to place these orders will be restricted by the RBAC and the type of service.

Cloud services offer powerful self-service capabilities that can be used for interacting with the available commercial and technical functions of each service offering. In addition to the self-service capabilities, CenturyLink's standard support model uses an ITIL™-based 24x7x365 Global Technical US Person Adaptive support team for incident management and change management.

Due to the unique nature of individual service offerings, CenturyLink classifies information technology (IT) service orders into one of four implementation models. Targeted intervals are tracked based upon receipt of a fully completed and accurate order. Rapid provisioned cloud services may vary, but delivery intervals are real time in nature and would not exceed 48 hours after first-time customer set-up and onboarding.

Task Order Projects (G.3.3.3.3): CenturyLink will fully comply with all of the requirements in RFP Section G.3.3.3.3. The TO Project Plan (TOPP) identifies CenturyLink’s project management processes, scheduling, procedures, tools, structure, and implementation for managing individual SOs issued under a TO. The agency will indicate within the TO whether the SOs are to be managed as a TO project. CenturyLink will work closely with the COR and OCO to design and engineer cost efficient solutions and create TO unique CLINs (TUCs) to meet the requirements of the end users. Our approach encompasses site surveys, rough order of magnitude estimates, resources allocations, and deliverable timelines to develop a final solution and price agreed to by the government and end customer. The TOPP will include a single point of contact (POC) for service implementation who will be available during implementation activities, coordinate with the OCO and service providers during implementation, and inform the OCO and local government contact of installation and cutover activities.

If required as part of the TO, a TO project manager (PM) will prepare the TOPP based on data gathered during the pre-award planning process. The plan is a dynamic document subject to project change control and will be kept current for the duration of the project. Unless an alternative outline is requested, the TOPP will include the information and the site-specific design plans as required in RFP Section G.3.3.3.3.

Complex Orders (J.2.4.1.9): When an order contains multiple line items for unrelated services or has provisioning services not logically related, CenturyLink engineers will review the order to determine whether the order should be split into suborders prior to provisioning. Each suborder will be processed as a normal order with notifications sent to the ordering agency. If this split is restricted due to TO instructions or if the services are part of a service group ID, the split will not occur.

2.2 BILLING (G.4, G.9.4 (2); J.2.5, J.2.5.1.3, J.2.5.1.8, J.2.5.1.7, J.2.5.1.9, J.2.5.2, J.2.5.3)

CenturyLink has been successfully offering effective online billing options and support to GSA and other government agencies as part of our billing management system since 1999. The CenturyLink EIS billing solution is based on the current internal

billing systems and processes we use for direct billing; addressing billing disputes and adjustments; providing sample billing documents; and responding to the GSA EIS billing requirements described in RFP Section J.2.5. Billing Invoice (BI) will include all taxes, fees and surcharges and will not include any credits or adjustment. The contents of BI and billing adjustment (BA) together calculate the total amount due from the government. CenturyLink will submit billing deliverables as described in RFP Section J.2.5.2 and the Management Response, Section 2.2. CenturyLink’s direct standard billing processes will be applied to EIS TOs. CenturyLink will submit the billing deliverables listed in **Table 2.2-1**, using the transfer mechanisms defined in RFP Section J.2.5.3, not later than the 15th business day of each month.

CenturyLink will fully comply with the requirements of RFP Sections G.4.1 and J.2.5.2 and their subparagraphs. Billing methods for the customer billing level are discussed in PMP, Section 2.2.2.

Table 2.2-1. EIS Standard Report Deliverables

CDRL	Report	Deliver to
117	Billing Invoice (BI)	GSA system and agency COR
118	Tax Detail (TAX)	GSA system and agency COR
119	Associated Government Fee (AGF) Detail	GSA system
120	AGF Transfer Report (ATR)	GSA system
121	Monthly Billing Information Memorandum (if required)	OCO/Agency COR
122	Billing Adjustment (BA)	GSA system and agency COR

All billing deliverables will have the CLIN and any associated individual case basis (ICB) data element(s) for each line item in the deliverable. CenturyLink uses a rigorous pre-invoice audit process to ensure that invoices are accurate and that any errors are quickly remedied before issuance. CenturyLink’s pre-invoice auditing process will reduce EIS customers’ billing management costs by proactively identifying and removing billing errors, thus preventing government costs associated with billing dispute and resolution processes.

Our internal process, shown in **Figure 2.2.1-1**, will ensure that each CLIN matches those on the SOCN associated with a particular order. Deliverables and data sets described in this process are defined in RFP Section J.2.5.3.

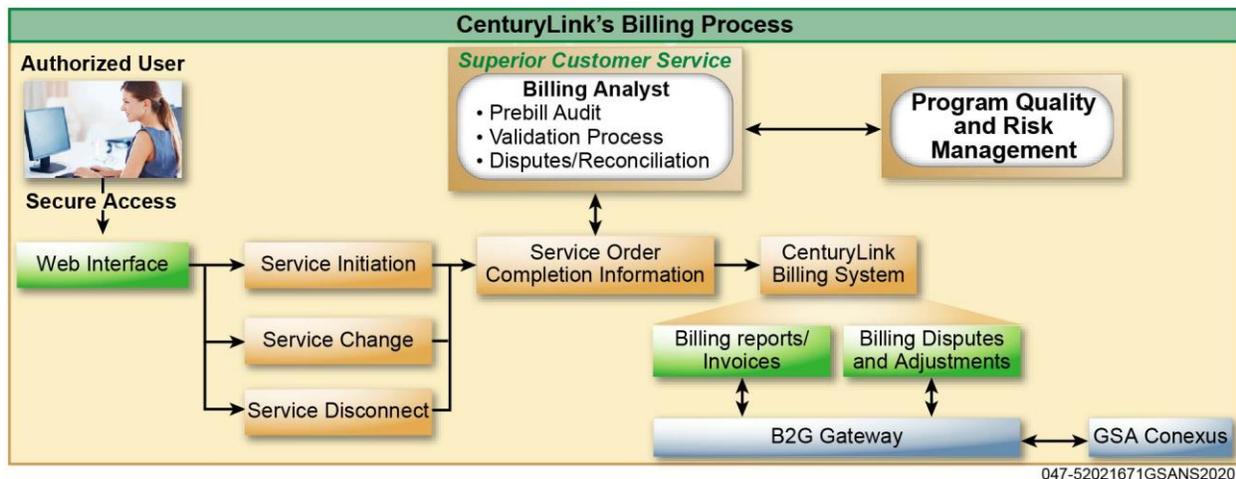


Figure 2.2-1. CenturyLink's Billing System and Process

2.2.1 Billing Prerequisites (G.4.1)

Billing Cycle (G.4.1.1, G.4.1.2, G.4.1.3; J.2.5.1.1): CenturyLink will fully comply with the requirements of RFP Section G.4.1.2. Billing periods will be from the first day through the last day of the calendar month with prorated bills calculated for a partial billing cycle when service initiation, changes, or disconnects occur mid-month. CenturyLink will provide GSA and agency customers with billing invoices and additional required billing related data in arrears at the end of every calendar month. The billing cycle is described in Management Response Section 2.2.

After a service has been successfully tested and prior to billing, our order management system will issue a SOCN. For new services or changes to services that trigger additional charges, the billing start date is the SOCN date.

- CenturyLink will initiate service billing unless the government rejects the services within three days of SOCN receipt. CenturyLink will re-issue a new SOCN for services after corrections are made. In the case of a disconnect order, the completion date is the billing end date or the service disconnect date. A final invoice will then be submitted.

For initial invoicing and all billing adjustments, CenturyLink will submit a billing BI, as referenced in RFP Section J.2.5, for all services and SREs up to 90 days after issuance of the SOCN. Waivers are required by direct billed agencies in order to bill a single charge or portion of a billing charge after 90 days after the charge is incurred.

Unique Billing Identifier (G.4.1.4; J.2.4.1.3, J.2.5.1.2): The UBI is a CenturyLink-

created and assigned code that uniquely identifies one or more billing items linked together for ordering, billing, and inventory management purposes. The UBI will be included on all invoices and as a data element in all billing deliverables. The UBI is a data element in the SOCN which we will ensure matches the billing deliverables. It comprises a grouping of components for a billed service and uniquely identifies each component within that group. A group of services may include one or more related services. The CenturyLink UBI process will follow the process and include the items required in RFP Section J.2.10.1.1.2 and subparagraphs.

Service State (J.2.4.1.10, J.2.4.2.5): The CenturyLink BSS systems and processes will ensure that each UBI will have one of the following three states associated with it: active, inactive, and band_name. With the exception of auto-sold CLINS and UBIs based on band-priced CLINs, the UBI will normally be in an active state from the time a service is provisioned until it is disconnected. During that time, accumulated charges will be listed on the invoice submitted for that UBI. CenturyLink will not change the service state of a UBI except in response to direct government action (e.g., beginning or ending the use of an auto-sold CLIN) or as required based on predefined criteria captured in the contract or the TO. As noted in PMP, Section 2.1.3.1, this state may fluctuate between inactive and active when auto-sold CLINs are used. The band_name state is used with a band-based CLIN as defined in RFP Section B or in the TO. When a service state changes, an SSCN will be issued within 24 hours.

Agency Hierarchy Code (G.4.1.5; J.2.4.1.2): CenturyLink will comply with the AHC requirements in RFP Section J.2.4.1.2. CenturyLink's BSS will ensure that all order line items include AHC and will support AHC changes to provisioned service without interruption of the service in accordance with administrative change order processes.

Agency Service Request Number (G.4.1.6; J.2.4.1.4): The ASRN is an optional internal government control number that will be tracked for all services from order submission through disconnection, when it is provided at the time of SO submission. Orders submitted by the government may be assigned zero, one, or two ASRNs to each line item in a given order. If provided by the government as part of an SO, CenturyLink will include the ASRN on all deliverables that reference that order or the services included in that order.

Electronic Billing (G.4.1.7): CenturyLink will fully comply with the requirements of RFP Section G.4.1.7. CenturyLink will not submit paper invoices except as authorized by the OCO.

2.2.2 Billing Methods (G.4.2, G.9.4 (2); J.2.5.1, J.2.5.1.4, J.2.5.1.8.2)

CenturyLink has demonstrated its proficiency with direct billing under both Networx Universal and Enterprise, as well as other government contracts, and will support both types. An agency will select direct billing (CenturyLink directly invoices for all charges and will be paid by the agency). CenturyLink will provide the AGF as a data element in billing deliverables.

Direct Billing (G.4.2.2, G.4.6): CenturyLink will bill agencies directly when required. Direct billed invoices will be sent for all charges incurred by the agency and its sub-agencies. CenturyLink will calculate the AGF fee per the requirements in RFP Section J.2.10.1.1.1. The agency will issue payment directly to CenturyLink, and CenturyLink will remit the collected AGF for the month to GSA by electronic funds transfer (EFT) no later than the 15th business day of the following month.

2.2.3 Billing Functional Requirements (G.4.3, G.9.4 (2); J.2.4.1.5)

During the ordering process, described in PMP, Section 2.1, each billable element is identified by a CLIN or a case number CLIN. CenturyLink will ensure that the CLINs reported on billing deliverables match those included on the SOCN for a given SO. CenturyLink will provide the CLIN and any associated ICB data element(s) for each line item in all ordering deliverables as required in RFP Section J.2.4.3.2. All CLINs reported on billing files will match those included on the SOCN for a particular order.

CenturyLink will comply with the CLIN requirements in the RFP for billing. All billing deliverables will include the CLINs (matching those on the SOCN) and any associated ICB data element for each line item. All billing deliverables are provided in accordance with RFP Sections J.2.5.2 and J.2.5.3.2. CenturyLink will respond to billing inquiries within seven days.

Adjustments (G.4.3.1): In the event that it is necessary to adjust a bill, CenturyLink will follow the adjustment process described in RFP Section J.2.5, taking into consideration all of the billing pre-requisites described in PMP, Section 2.2.1

Adjustments are applied to the next available bill. In the event of a dispute, the billing disputes process (RFP Section G.4.4) will apply as described in PMP, Section 2.2.4.

Monthly Billing Informational Memorandum (G.4.3.2; F.2.1, CDRL 121):

CenturyLink will provide a monthly billing informational memorandum to customers coinciding with the delivery of billing files. The monthly billing informational memorandum lists an explanation of changes, changes to data formats, new services added to the billing, and issues pertaining to balancing charges.

2.2.4 Disputes (G.4.4, G.9.4 (2); J.2.6)

The dispute process will apply if the government disputes the content of a BI, a tax detail (TAX), the content of an inventory reconciliation (IR), or an SLA credit request (SLACR) response.

The GSA CO, OCO, or ordering official may submit a dispute notice to CenturyLink. The contents of each notice will contain the data set defined in RFP Section J.2.10.2. For each data set, CenturyLink will support all required data transfer mechanisms as defined in RFP Section J.2.9. Upon dispute receipt, CenturyLink will adhere to the requirements of billing disputes as listed in RFP Section G.4.4.1.

The GSA CO or OCO may designate, in writing, additional personnel or systems authorized to submit a dispute notice to CenturyLink. CenturyLink will accept and process the government's disputes and adhere to the processes, deliverables, and data exchange requirements for the delivery of the billing adjustment and dispute report as described in RFP Section J.2.6.

Billing Disputes Resolution (G.4.4, G.4.4.1, J.2.6.2): A billing dispute begins with the submission of the dispute and ends with a mutually agreeable resolution. CenturyLink will, within 180 days of dispute notice, resolve billing disputes with the agency that submitted the dispute.

CenturyLink will fully comply with all requirements of RFP Section G.4.4.1. Upon dispute resolution, CenturyLink will submit any necessary billing corrections on the next available bill and, if applicable, apply any credits on a BA within two billing cycles.

2.2.5 Payment of a Bill by the Government (G.4.5, G.4.7, G.4.8)

CenturyLink will submit billing monthly for accepted services not later than the 15th

business day, and in accordance with RFP Sections G.4.1.7 and J.2.5.

Upon the expiration of the contract or a TO, CenturyLink will submit a final billing invoice for directly billed services within ninety days, unless we request and are granted in writing an extension by the ~~GSA CO~~ or OCO.

Following notice to proceed (NTP), CenturyLink will provide the required information to receive and accept payment through an EFT.

CenturyLink will accept a purchase card as payment for EIS purchases when authorized by the government. CenturyLink will obtain the appropriate Standard Industrial Classification (SIC) code for the EIS contracted services and establish the government purchase card (financial) procedures with our financial institution.

2.2.6 Rounding of Charges (G.4.9; J.2.5.1.6)

CenturyLink will meet and comply with the requirements for rounding as described in RFP Section J.2.5.1.6.

2.2.7 Proration of Monthly Charges (G.4.10; J.2.5.1.5 (1.1 and 1.2))

For services not delivered for the full calendar month billing cycle, our billing system is fully compliant with both proration methods referenced in Section J.2.5.1.5, specifically: Month-Length Proration and Normalized 30-Day Month Proration (Section J.2.5.1.5.1.2). Both methods will be validated during BSS Verification Testing. CenturyLink will indicate the proposed proration type in response to each customer agency solicitation. If the TO does not specify a proration type, Month-Length Proration will be applied. CenturyLink will implement and use the selected proration type for each TO at no cost to the government. Per Section J.2.5.1.5.1.2, if billable days from step 2 is greater than 30, proration does not apply and CenturyLink will bill full MRC for that month. All required elements of Section G.5.5.1 will be followed, if applicable.

~~CenturyLink's billing system will prorate the billing amount based on the number of days that the service is provided during the billing period in accordance with the calculation method delineated in RFP Section J.2.5.1.5.1. When a service change order that necessitates a price change occurs during a billing cycle, the proration formula specified per the requirements in RFP Section J.2.5.1.5.2 will apply to accommodate the price end and price start dates as two separate events and calculate each event~~

~~separately, ensuring that no overlapping billing occurs for that billing cycle.~~

2.2.8 Taxes, Fees and Surcharges (G.4.11; J.2.5.1.7)

CenturyLink will separate billing amounts for taxes, fees, and surcharges and provide them as individual components or amounts on the BI (i.e., will not aggregate taxes, surcharges, and fees) as specified by Amendment 16 file (Mapped_Allowable_Tax_ALL_20161004_Final.xlsx), whether they are part of an original charge or an adjustment. The agency may elect to request prices that include all taxes, fees, and surcharges in its solicitation (as referred to in RFP Sections H.14 and H.23). Where taxes, fees, and surcharges are required to be included in the price, CenturyLink will bill the prices that were proposed, accepted, and included in the TO. CenturyLink will include the aggregated tax, fees, and surcharges for each line item in the billing invoice and the detailed composition in the TAX deliverable (see RFP Section J.2.5.1.7).

2.2.9 Billing Performance Objectives (G.4.12)

CenturyLink will submit invoices that meet the billing performance objectives including no duplicate records within the BI. All applicable data elements will be included on the BI in accordance with RFP Section J.2.10, and the billing data and billing charge accuracy key performance indicators (KPIs) will be calculated in accordance with the method and formulas specified in accordance with RFP Section G.4.12 to ensure we meet or exceed the acceptable quality level (AQL) of 95%. CenturyLink will work with the government to ensure all TO-related fields are included on the required billing accuracy reports.

2.3 INVENTORY MANAGEMENT (G.7.1, G.9.4 (2); C.3.3.3)

CenturyLink will provide a secure web-based interface providing users access to a comprehensive accurate inventory of all EIS services. CenturyLink will capture and validate service inventory data, exchange data with the GSA Conexus system, and enable the government to create custom inventory queries and reports. We will create the necessary EIS transition documentation which includes required delivery details that are not user-visible, including TUCs, managed service configurations, and the designs and functional specifications for cloud based services. **Table 2.3-1** shows CenturyLink

roles and responsibilities to complete the inventory and maintain an accurate database.

Table 2.3-1. CenturyLink Inventory Roles and Responsibilities

Role	Responsibilities
CenturyLink Program Management Office (PMO)	<ul style="list-style-type: none"> • Serve as focal point for all inventory management issues, reports, and discrepancy resolutions • Maintain a complete service inventory of an agency's EIS services, features, SRE, location data, configuration information, and delivery information for all awarded periods of performance • Coordinate all information management processes for transitioned services • Facilitate resolution of inventory management issues and issuance of corrective SOCNs as required • Facilitate addition of new data elements for the IR deliverable based on contract modifications • Oversee inventory management changes as EIS contract matures • Provide single POC with GSA and its agencies for all inventory issues • If requested by GSA's CO, deliver an inventory summary of all services active at the time of the request, by AB code, service, quantity, and location • If requested by the OCOs, deliver an inventory summary of services active at the time of the request
CenturyLink Transition Team	<ul style="list-style-type: none"> • Coordinate all initial information gathering processes • Validate and correct a complete transition inventory of an agency's EIS services, features, SRE, location data, configuration information, and delivery information • Document inventory data • Provide Transition Off deliverables as necessary
CenturyLink BSS Team	<ul style="list-style-type: none"> • Manage CenturyLink web interface and inventory management system • Update inventory data as new and existing services change • Maintain and manage help desk
CenturyLink Service Assurance Team	<ul style="list-style-type: none"> • Run, analyze, and take action on inventory management reports • Perform research on any inventory discrepancies • Ensure completeness of data elements and content in monthly IR delivered to GSA using Conexus as specified in RFP Section J.2.7 and any subsequent contract modifications • Validate and reconcile service inventory every 6 months • Perform monthly validations of an agency's inventory for the final three years of the contract if required

CenturyLink has incorporated an inventory maintenance/audit tool into our system that provides enhanced inventory reports, facilitating an agency's ability to use inventory data for audits, billing verification, and other program management purposes. EIS customers will be able to quickly discern any discrepancies between their SOs and the CenturyLink-reported inventory or invoice. This transaction-based view of the data through the SO lifecycle, the resulting analysis, and reports helps remedy the long-standing inventory maintenance issues raised by GSA and the agencies.

CenturyLink will capture the inventory data elements identified in RFP Section J.2.7.3.2 for services provided to the government under EIS. As new services are added

to the contract, additional data elements may be added to the inventory and made available to the government for service management. As the government audits the EIS inventory on a monthly basis, CenturyLink will investigate data discrepancies and work with the government to resolve them. When required, CenturyLink will make corrections to the EIS inventory by issuing corrected SOCNs or correcting the billing.

The following sections address the inventory management process flow for populating and maintaining the inventory database.

2.3.1 Inventory Management Functional Requirements (G.7.1.1, G.7.1.2; J.2.7.2, J.2.7.3)

CenturyLink's service assurance team will establish an inventory for all EIS services provided to its customers and populate the EIS inventory database with the data elements of the IR file (RFP Section J.2.7.3.2). CenturyLink will populate the EIS inventory within one business day of the issuance of SOCNs for EIS services. CenturyLink will maintain and update the EIS inventory for all EIS services provided and make the EIS inventory data available to the government. Unless otherwise specified, CenturyLink will submit deliverables, in the process set forth in RFP Section J.2.7.2, to GSA and, if requested, to the customer. The IR deliverable will be provided monthly. For each data set, CenturyLink will support all transfer mechanisms defined in RFP Section J.2.9.

2.3.2 EIS Inventory Maintenance (G.7.1.2)

CenturyLink will maintain and update the EIS inventory for all EIS services. Following service installation, we will notify the customer that service is ready for use by issuance of a SOCN and populate the EIS inventory within one business day. As service changes, additions, or deletions are made, we will update the EIS inventory to reflect the changes made to the services being provided within one business day of the issuance of the SOCN.

2.3.3 EIS Inventory Data Availability (G.7.1.3)

The government will be able to access inventory data to make queries, obtain reports, and perform periodic downloads, or may establish data file delivery by email as needed for audits and billing verification or other program management purposes. Data

exports and data files delivered to the government will support common industry standard formats and file structures. There will be no limits imposed on the number of records other than the limits of the file format specification. CenturyLink will leverage its existing query and reporting tools to for these capabilities.

CenturyLink will create and retain monthly snapshots of the inventory. Older snapshots that are archived will be made available for query access within five days of a government request. All snapshots will be retained and provided to the government upon request for three years following the expiration or termination of the contract.

CenturyLink will meet or exceed the access security and performance requirements specified in RFP Section G.5.6. If requested by the government, CenturyLink will, at no additional expense, provide a copy of the records, in the format requested, with data field labels, of the current EIS inventory or any of the monthly snapshots either in their entirety or for a subset specified request. CenturyLink will not restrict the use by the government of EIS inventory data related to this contract during the contract and for three years following the expiration or termination of the contract.

2.3.4 EIS Inventory Data Discrepancies and Accuracy (G.7.1.4, J.2.7.1.3, J.2.7.1.4)

An inventory audit process will be managed by CenturyLink's PMO. The PMO service assurance team will have ultimate responsibility to ensure that all discrepancies are accounted for and for timely completion of the audit process.

For EIS, CenturyLink will work closely with GSA to resolve government identified inventory data discrepancies. These discrepancies will be researched and corrected as they occur or within ten days from the time that the notice of discrepancy is received. If CenturyLink disagrees with a discrepancy notification or finds that there are systemic or other issues contributing to these discrepancies, CenturyLink will advise and work with the government to investigate and resolve the issue. If the discrepancy is escalated to the CO for resolution, we will work with the CO to resolve the issue to their satisfaction.

The PMO's service assurance team will conduct internal audit and reconciliation procedures, used commercially and on other federal contracts, to ensure that the EIS inventory is complete and correct. This audit check will include confirmation that the UBI

and the CLINs on each line item of the IR are the same as on the SOCN and BI, and that the CLIN and any associated ICB data element for each line item are included in the IR deliverable.

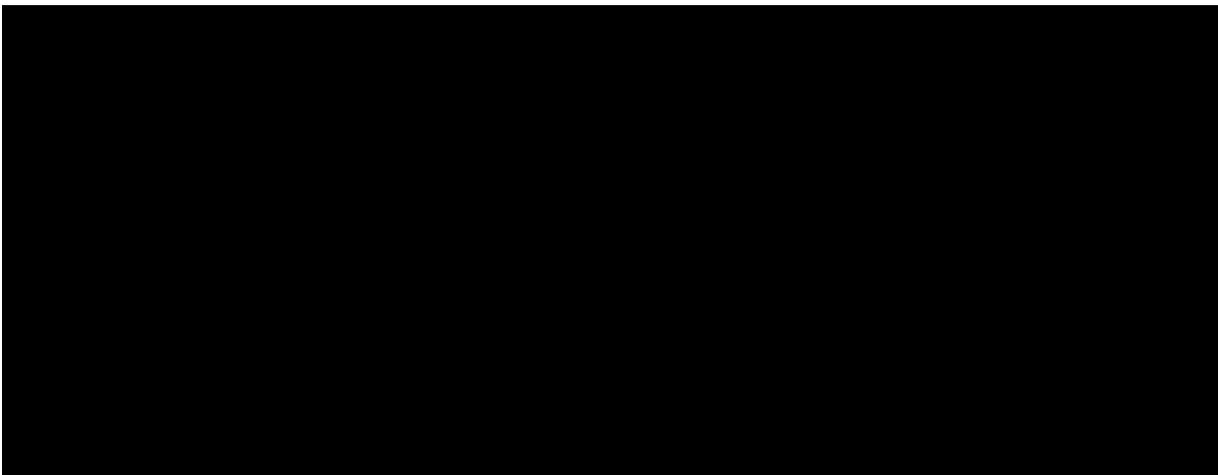
If an inventory data discrepancy is found, or if the government reports a discrepancy, or CenturyLink is directed to resolve a discrepancy by the CO, CenturyLink will correct the discrepancy at no cost to the government. During the investigation, CenturyLink will ascertain whether or not the inventory data elements in the SOCN or Billing Detail (BD) deliverables were correct or in error. If data elements in the SOCN are in error, CenturyLink will issue a corrected or new SOCN that references the error. If the inventory discrepancy resulted in a billing error in the BD, CenturyLink will issue a BA.

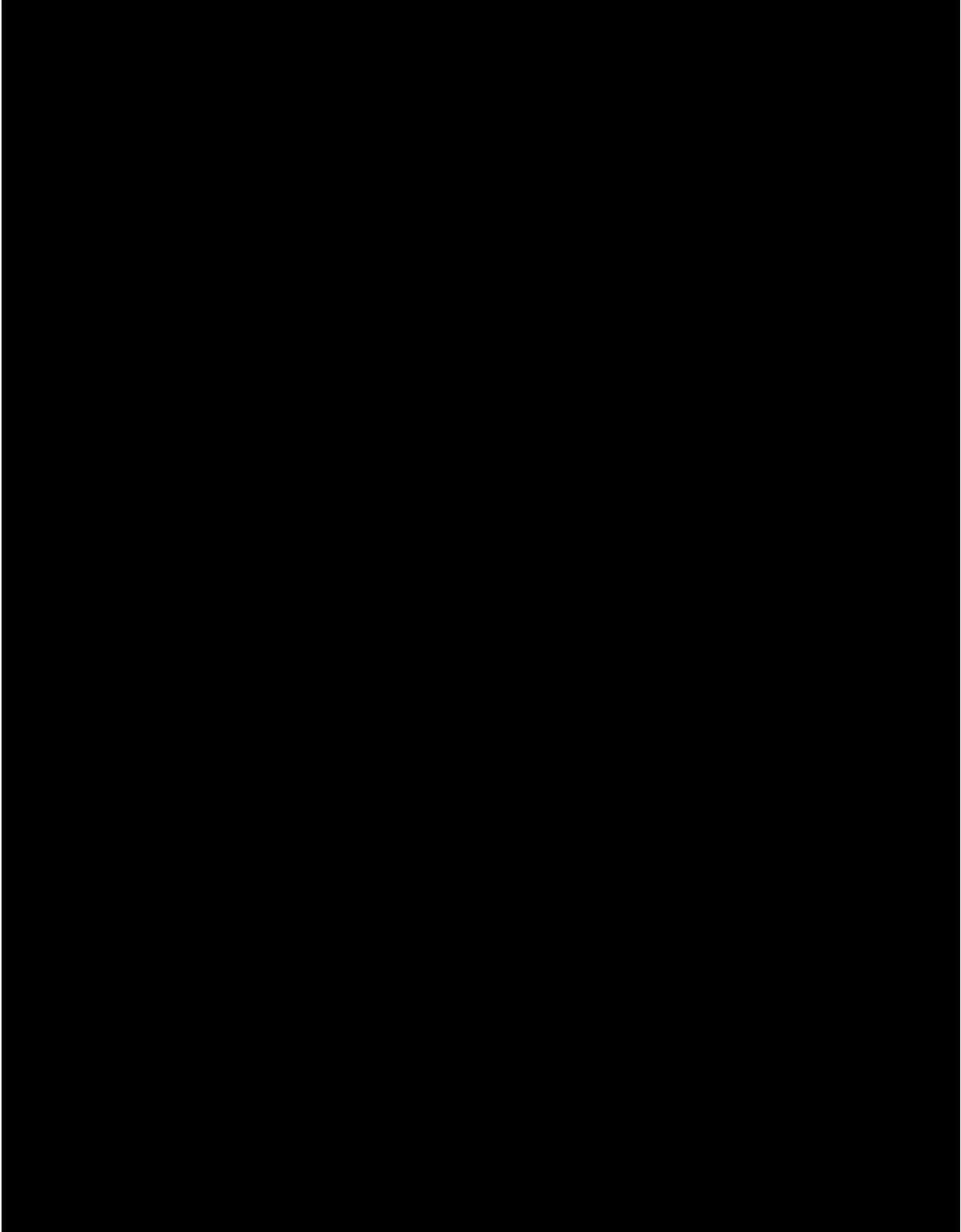
2.3.5 EIS Inventory Reconciliation (G.7.1.5; J.2.7.1.2, J.2.7.3)

CenturyLink will create the IR file and submit the IR deliverable no later than the 15th day of the month using the transfer mechanisms required by RFP Section J.2.9. The AHC will be tracked for all services from order through disconnection. Since AHC changes may occur without a service being interrupted, the AHC will be provided on the monthly IR deliverable. If CenturyLink identifies a discrepancy in a previously submitted IR, a corrected IR will be submitted within three days of identifying the discrepancy. CenturyLink will correct data discrepancies within the IR as they occur and within ten days of government designation.

3.0 PROGRAM MANAGEMENT SCHEDULE (L.30.2.1 (3); G.9.4(3))

A roll-up of CenturyLink's program management schedule is shown in **Figure 3.0-1**.





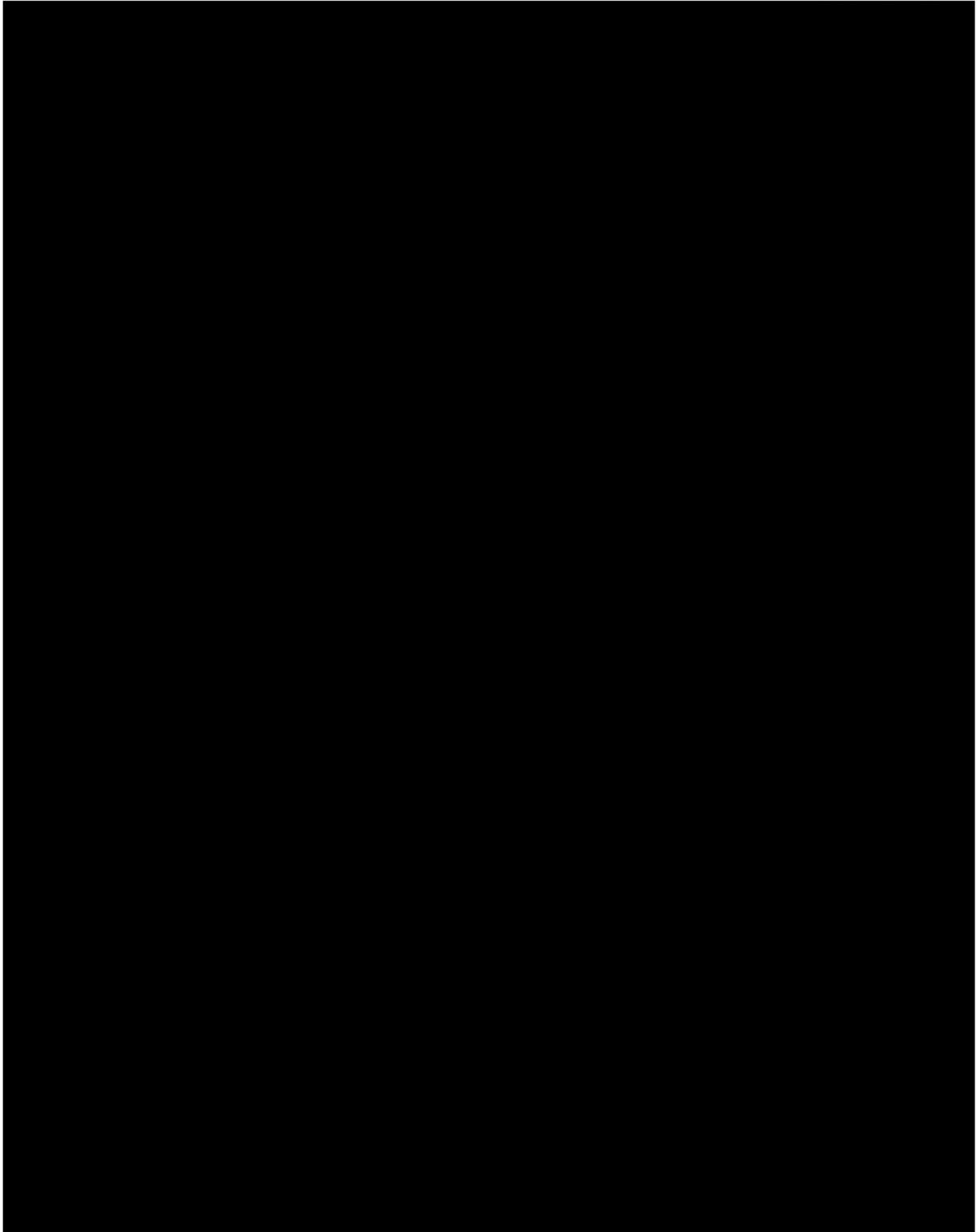
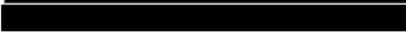


Figure 3.0-1. CenturyLink's 

4.0 TRANSITION MANAGEMENT APPROACH (L.30.2.1 (4); G.9.4 (4); C.3)

The cornerstone to achieving EIS success is conducting a well planned and executed transition from the Network and other GSA Contracts that will be subsumed by EIS, and agency and stakeholder services through EIS TOs. Building upon lessons-learned from our decades of successfully transitioning federal customers, CenturyLink has established an EIS transition team to work collaboratively with GSA to plan and execute the EIS contract transition and implementation. Employing this dedicated team for transition will assist GSA in achieving their goal of completing the EIS transition by the expiration of the Network contracts and regional and local service agreement (LSA) contract extensions. Completing the EIS contract transition on schedule will set the foundation for agencies and stakeholders to complete efficient and timely service transitions through the TO fair opportunity process. The benefit to all Federal entities served by EIS is having more cost-effective, highly reliable, flexible and user-friendly telecommunications and IT services.

[REDACTED]

[REDACTED] The CenturyLink transition team is prepared to assist and support GSA as the agency and stakeholders began to issue TOs for service transitions, process provider proposals and issue fair opportunity awards.

CenturyLink has an established, successful history of transitioning government customers from other service providers to our products and services. CenturyLink's approach will be aligned with agency-level transition plans (ALTPs) to support agency-customized TO transitions and effective implementation of EIS customer services with minimum risk. In cases where we successfully earn EIS TO awards to support legacy CenturyLink Network customers we can achieve greater transition efficiency because our ordering process can differentiate between new services and those that replace active services on other contractual vehicles. Our transition process gives the

appropriate attention to transition types to minimize impact on the ordering agency.

Processes, Procedures and Tools: CenturyLink EIS program and project managers will proactively track projects throughout all phases of implementation and the project lifecycle. Our managers apply industry-standards based practices such as ITIL v3[®] and the Project Management Body of Knowledge (PMBOK[®]) frameworks to the CenturyLink transition process. We apply the same high level standards-based program management applications, methods, and policies described in our Management Response, Section 1.2, to our transitions. These processes provide the oversight necessary for daily administrative, operations, and engineering activities.

Roles and Responsibilities: An effective program management organizational structure with clearly defined roles, responsibilities, authorities, and lines of communications at both the program and TO levels is critical to achieving efficient transition. We have found that the leadership roles and responsibilities shown in **Table 4.0-1** ensures success throughout transition.

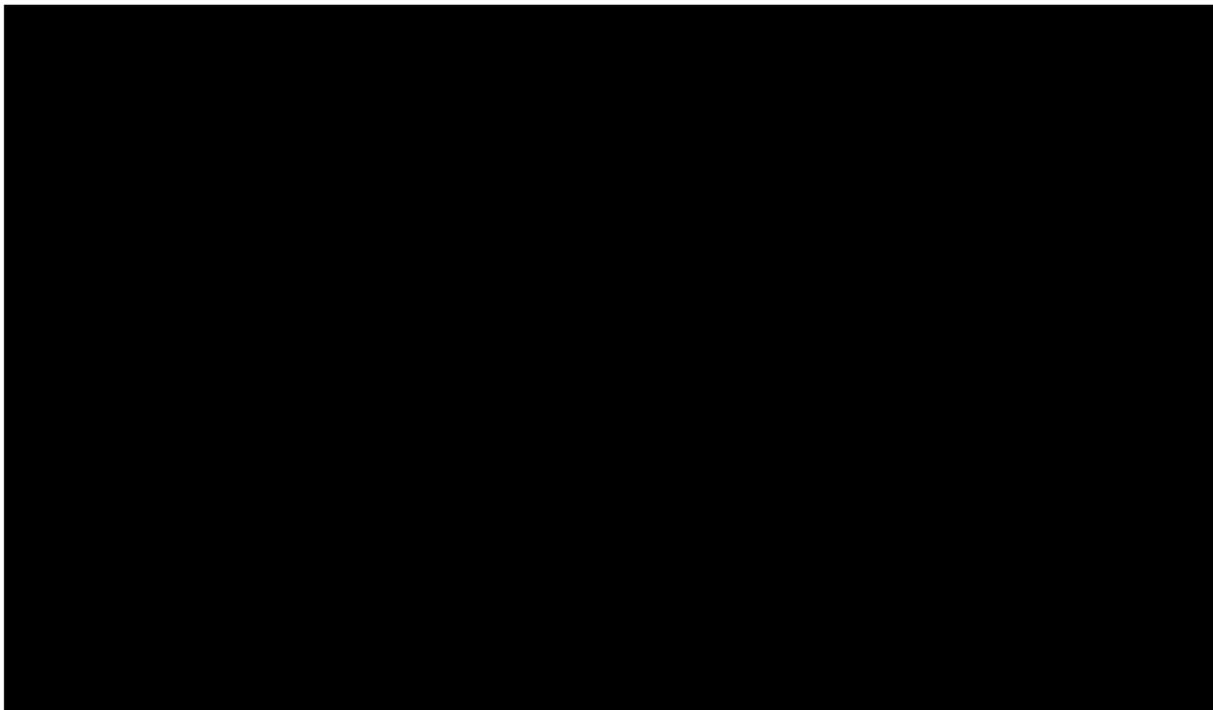
Table 4.0-1. Transition Leadership Roles and Responsibilities

Roles	Responsibilities
Director Federal Programs (Charles Leinbach)	<ul style="list-style-type: none"> • Executive oversight for all elements of program execution at the EIS and TO Levels, including transition • Support the responsible PMs with resources, and any needed executive escalations
EIS PM (Tyler Montgomery)	<ul style="list-style-type: none"> • Overall program responsibility, including transition • Transition oversight; resolve any transition issues and risks; • Manage escalated transition issues and/or risks; escalate as required to met agency and GSA requirements
EIS Transition Management Manager (Clyde Bowie)	<ul style="list-style-type: none"> • Operational responsibility for EIS transition activities and the transition schedule • Manage GSA dependencies • Cross-team coordination; provide standard frameworks for use by TO teams • Identify and communicate transition priorities; manage transition resources and risks • Maintain effective stakeholder communications for status, issues, priorities and risks; escalate unresolved transition issues and/or risks • Provide direct reporting/status to GSA representatives; program SLA tracking and reporting
TO PM Teams	<ul style="list-style-type: none"> • Operational responsibility for TO transition activities and the transition schedule • Coordinate customer activities and dependencies • Cross-team coordination; manage matrixed resources and provide TO status to PMO leaders • Identify and communicate TO transition priorities; manage transition resources and risks • Maintain effective stakeholder communications for status, issues, priorities and risks; escalate unresolved transition issues and/or risks • Provide direct reporting/status to all agency representatives; track and report TO SLAs

These responsible transition leaders align resources to the two areas of focus shown in **Figure 4.0-1**: EIS contract transition—The CenturyLink EIS contract transition team (ECTT) will focus on transitioning the organizational, business, and contract processes from the Networx and regional contracts being replaced by EIS and EIS TO transition. The CenturyLink EIS TO transition team (ETOT) will focus on the organizational, business, and contract processes of TOs and the operational implementation of SOs.

The ECTT is operated day-to-day by the EIS Transition Management function led by Clyde Bowie, who reports directly to our EIS PM. This team will provide dedicated support until the contract transition has been accomplished. Under the leadership of Mr. Bowie, the ECTT will systematically transition or restructure Networx functions to be compliant with EIS requirements. As other contracts are brought under the EIS umbrella, the ECTT will use the same migration approach.

The CenturyLink ETOT reports to Mr. Montgomery and will execute the organizational, business, contract, technical, and operational wide area network (WAN) and IT service transitions, including services installation, cutover, and agency operational acceptance for each TO.



4.1 TRANSITION PROJECT MANAGEMENT (L.30.2.1(4A); G.9.4(4A); C.3.1.2)

There are differences between transition and normal, steady state operations. Specific to meeting the transition project management requirements in RFP Sections L.30.2.1 (4a) and G.9.4 (4a), critical differences include:

- Additional steps are needed for transition in the systems and processes that support billing, service ordering, trouble reporting, and customer service for transitions onto EIS or off of Networx or other GSA contracts
- Record-only SOs for like-for-like transitions when CenturyLink is the incumbent

There are transition-specific risks and mitigation strategies for these risks. The identification, tracking, and management of these risks follow our standard processes as described in PMP, Section 8.0.

4.1.1 Unique Transition Considerations

To ensure special attention is paid to the BSS and processes, an SO will be flagged as a transition order and this flag will be flowed down through service ordering and provisioning. Additionally, a note will be added to the comment field on both the Networx disconnect order and the EIS install order to aid the government in correlating the two orders. This flow down facilitates our ability to manage the transition (either on or off) and to ensure service integrity as services are migrated from one contract to another. From an accounting perspective, transition costs can be more readily tracked for accountability within the capital planning and investment control process.

Billing Transition Considerations: Since the transition services will be established as new under EIS, new account codes will be established under the contract and corresponding TO. As part of the transition billing process, when an LFL transition occurs and CenturyLink is the incumbent as well as the EIS awardee, we report both the old and new account numbers to enable traceability. Special discounts, waivers, and credits will appear on each invoice if the agency is qualified for a CenturyLink transition incentive program as discussed in PMP, Section 4.2.1.

Service Ordering Considerations: Whether the incumbent on the previous contract is CenturyLink or another vendor, there are two types of service sets that can be transitioned: 1) LFL service occurs where the non-EIS service being transition

matches the EIS service; 2) Enhanced services where the EIS service being ordered achieves the same function as the non-EIS service (e.g., Internet protocol voice service (IPVS) replacing basic switched voice) but offers additional capabilities and features.

As part of the EIS transition, a customer can order new services. If these services are ordered during the customer EIS contract transition period, they will be given the same transition flag and unique attention as transition orders to ensure a comprehensive customer solution.

When CenturyLink is not the incumbent, dates of service must be closely coordinated with the incumbent. In these cases, communication becomes more complex between CenturyLink, the agency, and the incumbent to ensure that the FOC dates are reliable and accurate. This scenario is fully described in PMP, Section 4.5.

Trouble Reporting Considerations: During transitions, trouble reporting and management will follow the same base processes as described in the Management Response, Section 2.5.

Customer Service Considerations: CenturyLink’s EIS Customer Support Office (CSO) CSRs are the primary interface for GSA and EIS customers. Our CSO, described in Management Response, Section 2.4.2. will provide the full range of required support services. The CSO is a matrix organization of specialists with varied roles and experience. During a transition, both the CenturyLink ECTT and ETOT will work closely with the CSO to ensure that the CSRs will be fully aware of transition requirements, and will engage the CSRs to help schedule any EIS services and capabilities training that will be needed.

4.1.2 Expediting Transition

For an EIS transition where CenturyLink is the incumbent provider, we will migrate service information from legacy support systems to EIS BSS to expedite the business process lifecycle. If the transition is truly like-for-like, services will be migrated to new EIS BSS as a “record-only” transition to ensure EIS billing synchronization. In these cases, the first bill review will include validation that legacy Network or Regional contract billing has ceased.

Transitions for enhanced services will occur quickly since our sales engineering staff

is fully acquainted with a customer’s functional requirements, expediting the development of engineering specifications and provisioning.

4.1.3 Incumbent Coordination (G.9.4(4a))

The CenturyLink ETOT will coordinate all transition activities with GSA and the agency during the planning phase. Transition sites identified in the TO will be validated with the agency at the kickoff meeting. Upon full site validation, CenturyLink will collaborate with the incumbent(s) and the LEC that provides “last-mile” service to each site. CenturyLink will structure the transition to maximize site and WAN retention of location-to-location interconnectivity and operational availability and stability. We will activate services and successfully cutover to our services from the incumbent’s network with a goal of no user impact.

During the planning and management process, the CenturyLink transition team will capture and validate service data, perform capacity analysis, and create necessary EIS transition documentation to provide and maintain an inventory of services that will be transitioned. Each of these steps will be accomplished in close coordination with the agency, GSA, and the incumbent service providers to include:

- **Capture and Validate Data:** Data items include technology infrastructure and site data. Prior to transition, the data, including any updated (after TO award) network requirements and site POC information will be validated and issues will be addressed with the agency and incumbent service provider
- **Perform Capacity Analysis:** Includes comparing new circuit capacity requirements with CenturyLink network and local access availability. To complete the transition plans and ensure an effective transition, CenturyLink will engage its engineering team to review traffic patterns and usage. This analysis ensures we provision the appropriate inventory and capacity of services to meet EIS and TO requirements, including SLA AQLs
- **Perform Traffic Routing:** During processing of the transition order CenturyLink will coordinate traffic routing and management at user locations for voice and data transitions. We will work with local service providers for voice and data applications, recommending changes in routing tables for either voice or data SRE. This is expanded upon in PMP, Section 4.4

- **Create Transition Documentation:** CenturyLink will work in close coordination with agencies, GSA, and incumbent service providers to identify and document all site addresses, local government contacts, incumbent contractor services, site location details (e.g., wire closets and domain-based message, authentication, reporting, and conformance (DEMARC)), premise wiring specifications, government-furnished equipment (make, model, software version), and other pertinent inventory data elements

CenturyLink will develop a full communications approach that will include agency, department, and bureau briefings and reports to ensure that there is constant flow of information between CenturyLink and all stakeholders throughout transition.

4.1.4 Transition Risks and Mitigations (L.30.2.1 (4a))

CenturyLink’s transition risk management process includes the determination of key functional considerations to incorporate into our mitigation planning. **Table 4.1.4-1** shows high-priority transition risks that may impact agency transition, and lists associated CenturyLink mitigation strategies. For each transition risk, we will apply the risk management methodology discussed in PMP, Section 8.0.

Table 4.1.4-1. Top Transition Risks and Mitigation Strategies.

Risk Area	Risk Mitigation Strategy
Schedule and Delivery	
Scheduling must reflect agency priorities, cyclical activities, and resource constraints	CenturyLink will work closely with the government to determine agency-specific transition schedules that take into account customer priorities, resources, availability, and other objectives. A transition strategy and management plan (TSMP) will be prepared collaboratively with key stakeholders.
Adequate staffing of the transition management team	CenturyLink uses a force-to-load (FTL) model to forecast required staffing. Resource plans are a critical component of the TSMP and will be approved before a project start.
Availability of accurate information regarding location details, inventory, local contacts, etc.	CenturyLink will analyze all available information (agency databases, agency engineering data, CenturyLink design requirements, incumbent feedback, inventory, etc.) and use these analytics in preparation for detailed site visits to pre-populate site visit checklists to facilitate data collection and verification with the local government contact (LGC).
Service Interruption	
Transition sites with disruptive impact to business operations	CenturyLink can conduct transitions after business hours or during scheduled maintenance windows. We will accomplish detailed planning, coordination and communication with LGCs prior to site transitions. CenturyLink will submit a transition action notice prior to the scheduled transition and a transition go/no go notice 24 hours prior to scheduled transitions.
Transition sites with no fal back plan in case of a significant service outage	The CenturyLink TSMP includes fallback plans in case service problems prevent a successful cutover. Where new access or SRE is installed, the fal back will be the existing access and SRE arrangement; where access is reused and reconfigured (e.g., “hot cut”), the fallback is to

Risk Area	Risk Mitigation Strategy
during installation	reconfigure to the original configuration. The TSMP will provide specific fal back plans based on service type, SRE, customer inventory, access facilities, and capacity. Prior to the first transition, a dry run will be performed and transition plans updated.
Scope Changes	
Customer changes in transition requirements	CenturyLink will use a change management process to evaluate requested change impacts on the transition baseline schedule, cost, and scope. For changes that result in cost changes, CenturyLink will request a revised order.
Customer Readiness	
Customer site not prepared for transition	CenturyLink’s site visit and validation processes ensures that all necessary facility build out and site preparation requirements are initiated early in the transition process. Our transition team will monitor and track all LEC, customer, and building owner site preparation activities and CenturyLink will validate completion of all necessary site preparation work.

4.1.5 Contract-Wide Planning and Implementation (C.3.2.2)

During the EIS contract transition period, the CenturyLink EIS PMO will work with all involved contacts at applicable government and commercial locations and provide them information regarding the program’s impact on mission accomplishment. When GSA requires support for planned transition phases, CenturyLink will provide a contact list by name and provide training and orientation for self-help tools or systems to GSA’s transition personnel and agency staff as needed.

The CenturyLink ECTT will execute the transition to the EIS contract using proven performance, quality management, and risk mitigation processes that will provide repeatable transition consistent with GSA’s TSMP. CenturyLink recognizes that active, structured communication is the cornerstone for transition success. Experience performing numerous successful contract transitions has shown that early and continuous engagement during the transition process lowers risk and prevents schedule delay. Upon EIS contract award, Mr. Montgomery will establish open dialogue and collaboration with GSA to ensure a timely, efficient, and transparent transition.

There are diverse contract requirements and structures of the GSA Network Enterprise and Universal contracts, the GSA regional contracts, and the various CenturyLink GSA LSAs. As these contracts transition to EIS, the ECTT has the skill to tailor unique contract processes and apply collaborative teaming and hands-on management, allowing the contracts to transition with minimal disruption. The processes that will form the baseline for the CenturyLink ECTT will be refined from the initial transitions to EIS. CenturyLink EIS transition teams will apply a continuous feedback,

learning, and process improvement loop to improve subsequent contract transitions.

4.2 AGENCY SOLICITATIONS (L.30.2.1 (4B); G.9.4 (4B), (C.3.2.3))

Agency requests for quotation (RFQs) and RFPs will be issued as part of the fair opportunity process. To ensure that CenturyLink provides the best response to the requirements in each RFP/RFQ, the following steps will occur:

- Review and analysis of requirements by the sales and proposal teams, EIS PMO, relevant product engineers, CSRs, security, and the staff supporting the technical and operation functions of the BSS
- Planning meetings are coordinated by the capture and proposal teams to assess agency requirements and develop high level solutions that will address how existing services may best be replaced
- Clarification questions are prepared and submitted to the issuing OCO
- A CenturyLink proposal is prepared and submitted to the agency for evaluation

CenturyLink will assist agencies in all aspects of TO requirements development and provide solicitation responses, from pre-RFQ/RFP through the placement of the SOs that will initiate the transition. This includes validation of legacy service inventories and other transition support data collection.

4.2.1 Incentives to the Agencies

CenturyLink may offer incentives to the agencies at the TO level as a motivation to transition to EIS earlier than the deadlines established by GSA. Incentives are designed to incentivize timely agency transition and to mitigate short- and long-term risks.

There are three categories of incentives that CenturyLink may offer to an agency depending on agency needs: discounts, credits, or waivers. An example of how these incentives may be offered includes upfront cost assistance (e.g., SREs, build-outs, technology upgrades) or they may be time-constrained such as:

- If you transition by (Notional Date), all NRCs are waived during the transition
- If you transition by (Notional Date), you will receive (notional credits) such as CPE credits, 10% discount, etc.
- If you transform your network by (Notional Date), you will receive (higher number of notional credits) such as a 15% discount, more credits, free features, etc.

There are also cost savings that may be offered to an agency as risk avoidance incentives. These include:

- Full waiver of costs for transitions/transformation on a trial basis for certain seat-based services such as cloud services or cybersecurity. This is both a cost and a risk avoidance incentive since an agency is able to evaluate the use of a service before they purchase it
- Complimentary labor services to plan for or manage transitions to EIS or transformation of services within EIS. Examples of these labor services include:
 - A quantitative analysis of cost savings if an agency enhances services
 - A dedicated PM to assist in transition/transformation planning, transition execution, and fixed duration post-transition analysis

4.2.2 Agency Specific Planning and Implementation

CenturyLink has begun the process of assessing current agency service postures for future EIS services. Some legacy services are on our own GSA contracts in GSA regions 5, 6, 7, 8, 9, and 10 that deliver time division multiplex (TDM) services such as Centrex voice and other local exchange offerings. Other contracts in other GSA regions 1 through 4 and the National Capital Region (11) include diverse services that will migrate onto EIS. We are assessing the inventory of our own customers and proactively developing a path that will enable migration to Internet protocol (IP) voice services as they become available. Similarly, we are looking at TOs awarded under contracts outside of our LEC territory to understand where and how to engage with agencies to develop a pathway to acquiring equivalent or enhanced services through EIS.

The primary challenges to technology evolution center on the ability of agencies to invest in the end devices that will make migration to IP-based services possible. Technologies that CenturyLink will make available include those that allow agencies to convert legacy voice switches to IP enabled devices. Our objective will be to replace agencies' existing services with solutions of equal or better levels of performance, ease of use, and cost effectiveness

As described in PMP, Section 2.1.2, CenturyLink CSRs and SEs will work with each transitioning agency to review their requirements with particular attention paid to ongoing agency "pain points." Our CSRs and SEs will work with the agencies to

determine if an existing service can be upgraded or be offered more cost beneficially to the agency under EIS.

Once these requirements are refined as far as possible without in-depth engineering designs, we will appoint an ETOT transition PM whose engineering team will work with the agency during the design phase to further develop the technical requirements.

CenturyLink will assist ordering agencies with placing TOs and SOs to ensure accuracy, completeness, and timeliness and to minimize delays in transitioning. CenturyLink will coordinate with incumbent contractors on all TOs and SOs consistent with industry best practices.

4.3 CUSTOMER SUPPORT DURING TRANSITION (L.30.2.1 (4c); G.9.4 (4c))

With thousands of stakeholders and users at many locations, the success of EIS will depend on the ability of CenturyLink to distribute program-related communications effectively and efficiently. These communications fall into two categories:

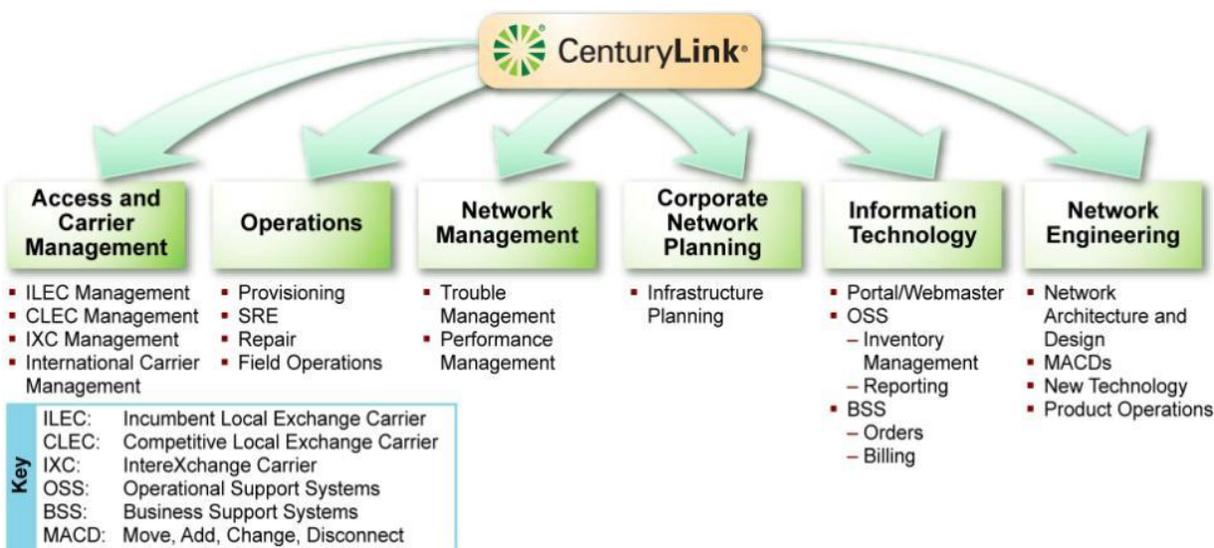
- General administrative and technical transition processes and methodologies
- Specific CenturyLink information relating to services offered, points of contact, Frequently Asked Questions (FAQs), and how-to guides

CenturyLink will provide specific guidelines for necessary customer support with each TO response. Guidelines may be in the form of written check lists, handbooks or general guidance. These will be available within 30 days of contract award for each TO.

4.4 INTERCONNECTION AND TRANSITION CONTINGENCY PLANNING (L.30.2.1 (4D), L.30.2.1(4E); G.9.4 (4D), G.9.4(4E))

The CenturyLink EIS ETOT will coordinate all transition activities with GSA and the agency during the TO planning phase. Transition sites identified in the TO will be validated with the agency at the kickoff meeting. Upon full site validation, CenturyLink will communicate and collaborate with the incumbent for service transition sites, the LEC that provides “last-mile” service to each site, and our internal wholesale, provisioning, and implementation teams. CenturyLink will structure the transition to maximize site and WAN retention of location-to-location interconnectivity and operational availability and stability. We will activate services to our network and successfully cutover from the incumbent’s network with the goal of no user impact.

A distinct advantage is CenturyLink’s resource efficiency from internal support organizations. As an integrated telecommunications solutions provider, we easily apply appropriate shared resources from our networking, technology, IT, and operations organizations. Mr. Montgomery will use this efficiency to support EIS by calling on, and actively managing, the resources from all necessary internal corporate organizations to achieve program objectives. These internal organizations include Access and Carrier Management, Operations, Network Management, Corporate Network Planning, Information Technology and Corporate Network Engineering, as shown in **Figure 4.4-1**.



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Figure 4.4-1. CenturyLink’s PMO Corporate Infrastructure Support

Individuals from these organizations will be directly accountable to our EIS PM to fulfill all program requirements and objectives.

Mr. Montgomery will direct this same support to our TO PMs. The PMs reach-back capability will ensure that the most qualified management, technical, and administrative personnel will be quickly available to solve any EIS customer transitions and operational issues, thus reducing risk to both the transition and to long-term network management.

4.4.1 Transmission Services Interconnection Process

CenturyLink has a structured transition process to efficiently complete large transitions from an incumbent WAN to the CenturyLink WAN. Our process will benefit the TO agency by ensuring full interconnectivity between the incumbent network and the CenturyLink-provided TO-specified network. In order to accomplish a smooth and

logically executed large EIS WAN transition, we will use our proven four phase interconnection process:

Phase One: Establish Gateway Sites. Phase One and its sub-phases address specific transition locations.

Phase 1a: Establish and interconnect the core gateway to the incumbent network. (see **Figure 4.4.1-1**), CenturyLink will install, cutover, and conduct the initial checkout of the agency core site. This solution will maintain full inter-communications within agency facilities.

Phase 1b: Interconnect remaining gateway sites to the incumbent network. During this phase, the remaining agency gateway installations will be completed. For each gateway, the steps are the same as Phase 1a steps (see **Figure 4.4.1-2**).

Phase Two: Connect the Agency Core and Gateways to Agency Local WANs. CenturyLink will connect the agency core to the field WANs upon completion of agency gateway installations (see **Figure 4.4.1-3**).

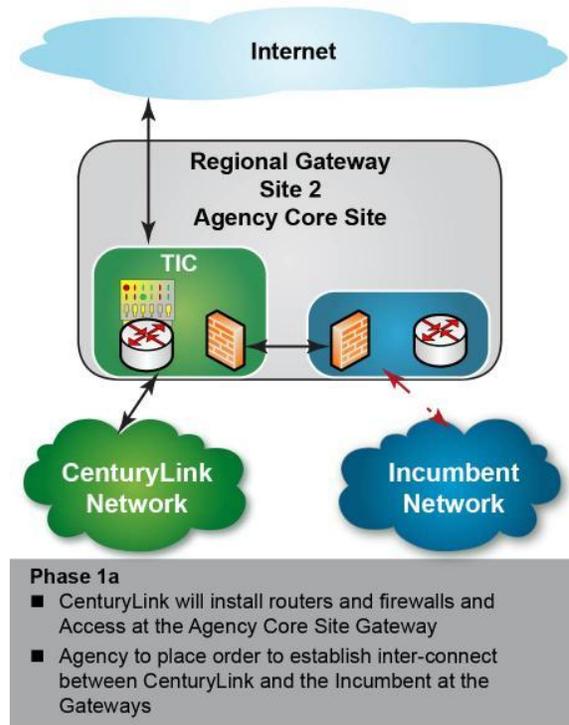


Figure 4.4.1-1. Phase 1a: Agency Core Site Gateway Transition

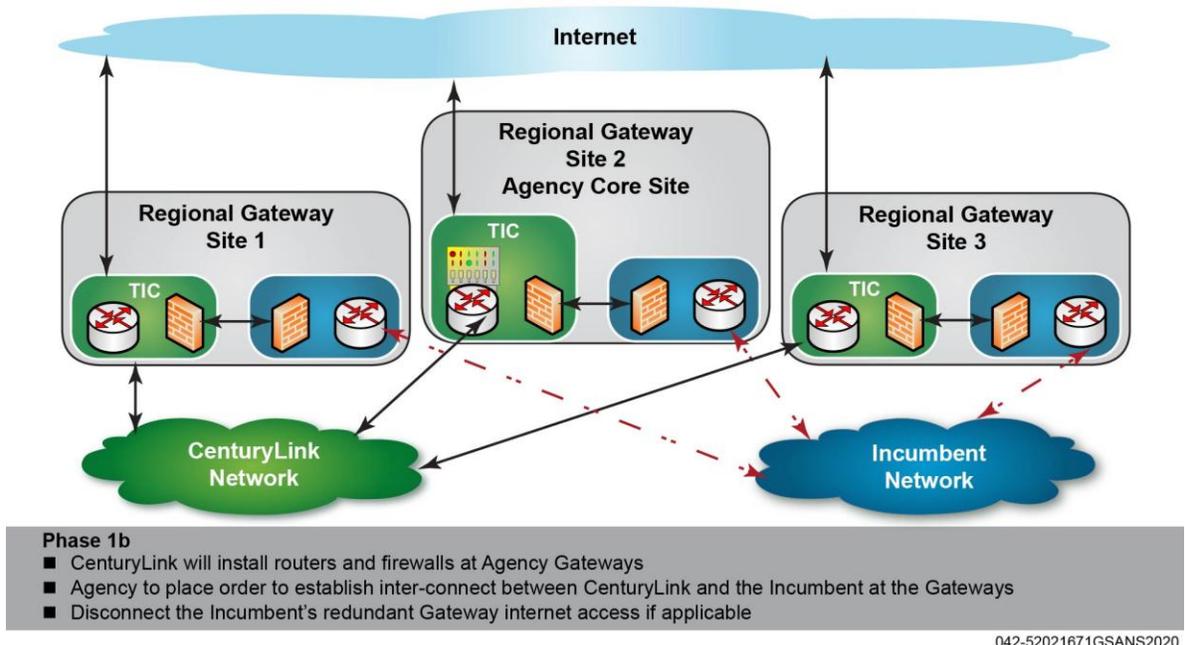


Figure 4.4.1-2. Phase 1b: Remaining Agency Gateway Transitions

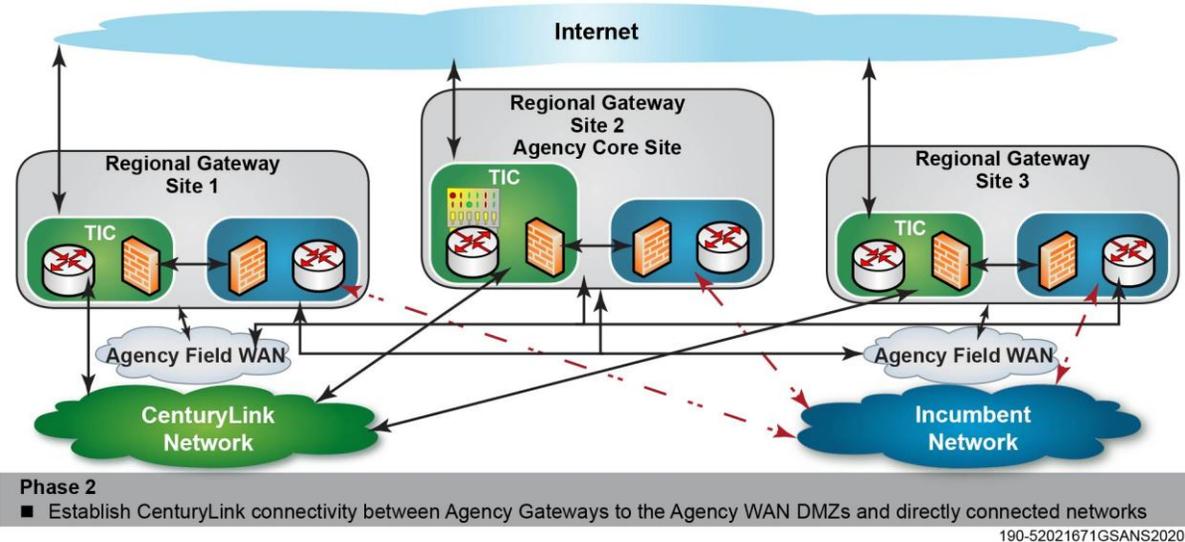


Figure 4.4.1-3. Phase Two: Agency Core to Agency Field WAN Connections

Phase Three: Connect Individual Agency Locations to the Network (WAN). In general, agency field location connection activities follow a repeatable process tailored to each site. The ETOT will work with the agency and the LGC to determine site specific requirements. If necessary, the ETOT will perform a site transition at a designated pilot site(s) to fulfill the EIS Service Acceptance Testing requirements.

Upon successful pilot site testing, the remaining sites will be scheduled using a workflow process that integrates specific agency requirements and lessons learned.

CenturyLink will provide individual program support to each agency location during the installation.

Normally we will turn up each service instance with full dynamic routing already active. Until a site local area network (LAN) connection is switched over from the old router to the new SRE, that site will not be connected to the new WAN (**Figure 4.4.1-4**).

Phase Four: Full Operating Capability. With the completion of Phase Four the incumbent network will be disconnected from the agency core and full operating capability will be achieved (see **Figure 4.4.1-5**).

4.4.2 Small Agency and Limited Complexity Transport Transition

[REDACTED]

[REDACTED]

For existing services, CenturyLink will provision a new loop for each circuit order. The new loop will be installed by the LEC and will terminate to the new SRE. A cross-connect will be made between the new SRE and the LAN/premises service. We will install a complete new circuit for each order so it is installed in parallel with the existing connection. This approach offers a low-risk solution with a built-in fall-back.

Upon completion of the end-to-end test by CenturyLink's Operations Technicians, the circuit will be fully activated within the CenturyLink network and ready for agency use. When the service cutover is completed, a SOCN will be sent to GSA and the agency for the 72-hour verification and acceptance testing period. We will provide parallel services on both the incumbent and new CenturyLink service through completion of the acceptance period.

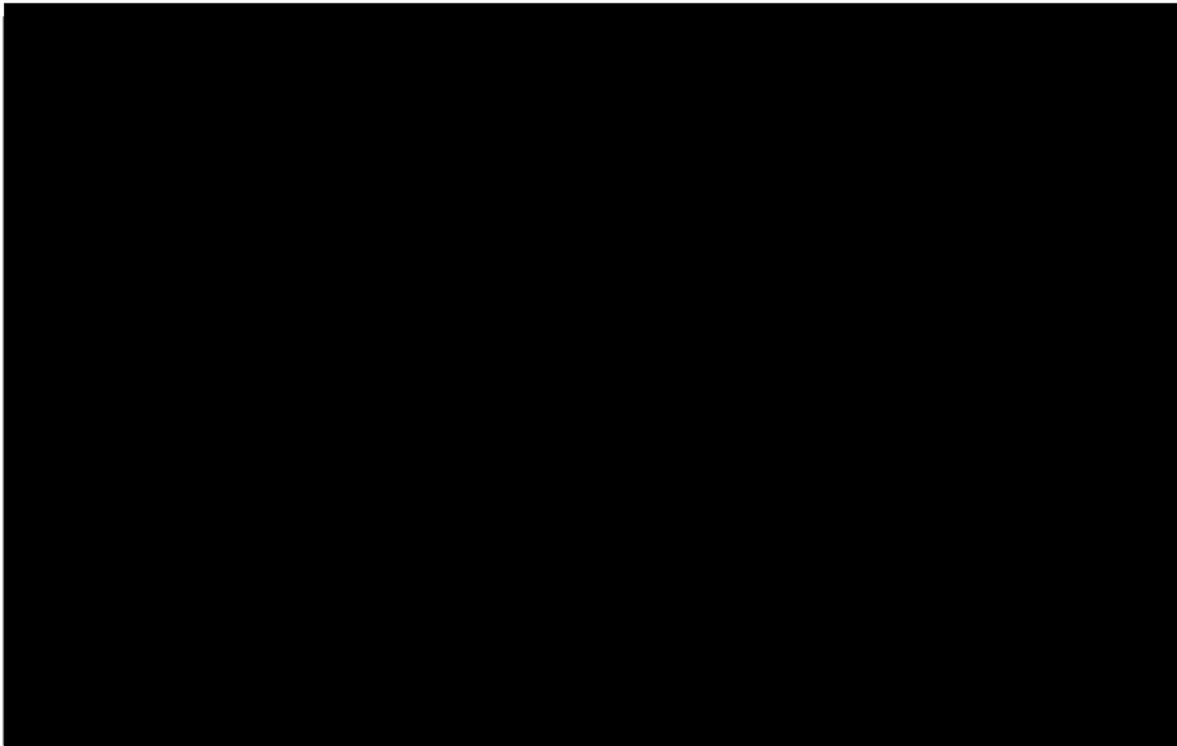


Figure 4.4.1-5. Agency Full Operating Capability on the CenturyLink Network

When the agency's equipment cannot support dual circuits; the cutover process for these services will be a "hot cut." The cable facility assignment hot cut is the quickest method to transfer service from the incumbent carrier to CenturyLink.

This process requires a transfer-of-use document since there are no LEC facilities terminating at a customer premise and a LEC build-out would take excessive time.

Close coordination between CenturyLink, the agency, and the LEC is critical. If a fall-back is necessary, the LEC technician will reconnect the cross-connects to their original state.

In the unlikely event an activation fails or must be rescheduled, the CenturyLink technician releases a “no-go memo,” stating the reason the activation must be rescheduled, and any other pertinent information. The technician initiates any fault isolation that must be completed prior to rescheduling. The technician continues to work any issues through to resolution and reports the status of the issue to the agency and the ETOT until resolution is reached. Upon issue resolution, the technician reissues a “go memo” with a new date, time, and conference bridge for the activation. Should a failure occur during the 72-hour customer acceptance period. CenturyLink will repair and retest the service. After the agency accepts the repaired service, another SOCN will be sent with updated information, restarting the 72-hour customer acceptance period.

4.4.3 Cloud and Colocation Transition Interconnection Plan

CenturyLink will use a five-phased approach to server consolidation and migration supporting Cloud and colocation services. This process is shown in **Figure 4.4.3-1**. Phases 1 through 5 identify the transition approach and planning phases. Phase 5 is the implementation and installation phase.

4.4.4 Transition Contingency Plan

[REDACTED]

[REDACTED]

4.5 TRANSITION OFF (C.3.3.1)

CenturyLink will fulfill all EIS requirements for transitioning services from EIS to a follow-on vehicle. Continuity of service is paramount to ensure unimpaired mission support for customers.

4.5.1 Planning and Implementation (C.3.3.2)

CenturyLink will work with GSA and the agencies to ensure that each agency is positioned to transition off the EIS contract. When the EIS contract is completed, and upon the CO's written notice, CenturyLink will, in concert with GSA, plan and develop a detailed transition-off strategy and schedule with the goal of conducting the transition with minimal impact. CenturyLink will perform primary interchange carrier (PIC)/local primary interchange carrier (LPIC) changes and will accept a GSA letter of authorization (LOA) that will allow a follow-on contractor to execute PIC/LPIC orders during transition. EIS services will be vital to the government and must be continued without interruption.

Upon the CO's written notice at contract expiration, CenturyLink will continue to perform under the existing terms and conditions (including price) for a period of up to twelve months as specified by the CO. During this extended period, the maximum contract limitation may be raised and new or improved services may be implemented.

4.5.2 Inventory (C.3.3.3)

As discussed in PMP, Section 2.3, CenturyLink will capture and validate service inventory data, perform capacity analysis, and create necessary EIS transition documentation to provide and maintain an inventory of services to be transitioned. During the final contract option period CenturyLink will perform service inventory revaluations at least every six months. For the last three years of the final contract option period (if exercised), CenturyLink's automated process will conduct monthly validations of the entire EIS inventory as of the date the invoices are created, retain the resulting snapshots, and archive them after three months.

At the GSA CO's request, CenturyLink will deliver a current inventory summary of active EIS services by agency that includes keying by agency bureau (AB) code, service, quantity, and location. CenturyLink's enhanced inventory reporting function will provide a complete audit trail of the SO from the placement of the initial order through

provisioning, billing, and inventory systems. With this enhancement, GSA and agency users will be able to quickly discern any discrepancies between their SOs and the CenturyLink-reported inventory or invoice.

4.5.3 Reporting (C.3.3.4)

CenturyLink is committed to satisfying all EIS reporting requirements. Should GSA exercises all EIS contract options, for the final three years CenturyLink will continue to provide robust transition reporting. CenturyLink will provide a program monthly status report with all the required information elements in a Microsoft Word, Microsoft Excel, or other mutually agreed upon format. The report will include:

- A file of amounts invoiced for the most recent billing period, listed by AB code
- Details of all transition issues experienced by the agency or CenturyLink since the last report and include corrective action(s) taken
- A current risk analysis and the CenturyLink mitigation and response plan

CenturyLink will continue to provide all required ongoing operation's CDRLs to assist in effective transition-off planning.

5.0 RESOURCE PLAN (L.30.2.1(5); G.9.4(5))

5.1 FINANCIAL RESOURCES

CenturyLink's Federal Business Unit provides support and resources in support of the Federal Government. In support of the EIS PMO, the Financial Control team supports basis of estimate (BOE) and budget development, as well as managing cost and reporting for federal contracts through a Federal Acquisition Regulation (FAR)/Cost Accounting Standards (CAS) compliant enterprise resource planning (ERP) system.

CenturyLink operates under the oversight of the Defense Contract Audit Agency (DCAA) and the Defense Contract Management Agency (DCMA). To date, DCAA has issued unqualified opinions for CenturyLink system audits, incurred cost claims, forward pricing rate agreements, and disclosure statements as they relate to accounting for costs on government contracts. CenturyLink maintains a compliant purchasing system under the purview of DCMA.

The format of the CenturyLink financial management report is found in Management Volume, 7. Financial Management Report.

5.1.1 Monthly Expense Analysis

The Financial Control team compares actual expenses incurred and project forecasts with the EIS and TO PMs to ensure total cost forecasts are in line with budgets. PMs and the Financial Control team review the following expenses:

- Labor: labor expenses and the monthly labor forecast to ensure that charges have been booked as expected
- Subcontractor/Material
 - Verify purchase order (PO) requests match the amount approved in the basis of estimate and are within current funding estimates
 - Review subcontractor and material expenses incurred and forecast monthly with the PM and project managers to ensure that charges are as expected
- Travel and other direct charges (ODCs) charged to projects from ancillary systems on a monthly basis; required corrections will be processed through the corporate accounting group as necessary
- Indirect burdens for labor fringe rates, overhead and selling, and general and administrative (GA) expenses driven off of financial management system tables maintained and audited under the purview of the Sarbanes–Oxley Act (SOX) of 2002; these procedures and controls are reviewed annually by DCAA

CenturyLink will support the government’s price management mechanism (PMM) as required. CenturyLink’s monthly financial report (RFP Section F.2.1, CDRL 80) will show the monthly total dollar activity by service types and services, the total billed charges for all agencies, and the dollars remaining under the contract limitation.

5.1.2 Cost monitoring

Costs are monitored for the life of a project. If anomalies are detected at any time they are discussed during monthly reviews and tracked until closure. For example, on cost-reimbursable tasks CenturyLink will:

- Notify the government when a project has reached 75% of its funding ceiling. At this threshold, the government will notify CenturyLink to proceed or stop work
 - CenturyLink is required to notify the government if the job cannot be completed with existing funding

- If overages are projected, the Financial Control team will work with the PMO to:
 - Identify causes (e.g., permitting delays, customer delays)
 - Identify cost growth or cost overrun
 - Identify corrective actions necessary to minimize impact
 - Compile an estimate-to-complete to document project status and issues
 - Request additional funding and/or period of performance modifications

System Controls: CenturyLink uses a FAR/CAS compliant ERP system providing:

- Labor charges: Work authorizations are assigned by the PM and managed by Financial Control team within the system to prevent mischarging to projects
- Subcontractor costs and associated ODCs are tracked and managed at the contract and CLIN/sub line item number (SLIN) level pursuant to the terms and conditions of the underlying contract
- Budgets and plans are established based on estimates provided by Program Management; a BOE is developed to align with the scope requirements
- Detailed reporting, enabling management to monitor budgeted vs. actual expenses
- Internal contract controls:
 - Notification of funding limitations based on requirements dictated in FAR 52.232-20 Limitation of Cost, to enable detection of approaching thresholds
 - Prevention of invoicing if funding is not sufficient; costs will be put on hold for review by analysts and management

5.2 HUMAN RESOURCES

CenturyLink's talent management processes, shown in **Table 5.2-1**, ensure that we hire fully qualified staff. We provide a robust benefits program to encourage retention of the most skilled and productive employees, and require continuous corporate and professional training. CenturyLink offers training opportunities for our employees to grow within the company. These processes flow down to our subcontractors as required at the TO level.

Table 5.2-1. Staff Security Screening, Retention Programs, and Training

Function	Processes
Staff Support Security Pre-screening	<ul style="list-style-type: none"> • Applicant tracking and pre-screening • Holding current U.S. Government public trust or had certification within the past 3 years • Department of Defense (DoD) or DHS security clearance: secret or above in the past 4 years • Initial drug screening on hire • Random drug screening throughout employment • Interagency background check • SF-85, SF 86 or DoD, DHS security clearance preparation • Strict subcontractor security and integrity requirements
Retention	<ul style="list-style-type: none"> • Recognition for individual, team, and corporate financial performance • Performance recognition • Management bonus plan, linking individual objectives with business results • Strong benefits, health, insurance, and 401k plan • Access to employee assistance and work-life services programs
Staff Training and Development	<ul style="list-style-type: none"> • In-person and online training • Mandatory annual corporate training courses • Mandatory professional training • Upward mobility training and mentoring • HR learning and development • Ongoing professional training supported and encouraged by CenturyLink • eLearning, a comprehensive resource collection of industry web-based courses ; courses and learning resources are at no-cost to CenturyLink employees and are access ble from both work and home • Access to Microsoft eLearning Library

5.3 EQUIPMENT MANAGEMENT

The CenturyLink property management team directly support our TO PMs, they maintain quality control over property records, facilitates regular physical inventories, and ensures discrepancies are addressed. The property management team is responsible for working property dispositions and maintaining supporting documentation for audit purposes.

Under the leadership of the CenturyLink property manager, our property management team manages government hardware, firmware, and software assets using our asset management system. This system and the CenturyLink processes for managing assets supporting government programs are fully compliant with FAR 45 and 52.245. The property management team currently manages assets valued in excess of one-half billion dollars, spanning multiple contracts, agencies, and global locations.

The CenturyLink asset management system operates in an ERP structure tailored to

comply with all FAR and CAS requirements. It provides a logistics management capability to ensure that command and control of assets are maintained from receipt throughout its lifecycle or until final disposition in accordance with requirements.

CenturyLink asset management system is able to capture both contractor-acquired property (CAP) and government furnished property (GFP). Tracking starts upon receipt; assets are inspected for damage, order accuracy, and completeness. CAP issues are resolved directly with the equipment vendor while issues with GFP are resolved directly with the government customer. After initial inspection, assets are bar-coded for tracking.

As assets are received, the system creates a property record for each bar-coded item. For CAP, some information in the record is auto-populated from the vendor PO with the logistics team completing the record. Asset records contain, at a minimum, the PO number, acquisition date, acquisition cost, part number, description, manufacturer, barcode, serial number, owning contract, and storage location.

When an asset needs to be relocated or shipped, a shipping request is generated in the financial control system by program personnel. This action creates the pick list for the warehouse to use to prepare assets for shipping. The requests are permanent records of movement for each asset. Completion of the shipping requests by the warehouse places the items in transit in the system, and receipt at the end destination will place the asset in service at its new location. CenturyLink will continue to track government property at this level of detail throughout its lifecycle.

The asset management system maintains historical tracking of every transaction, including user, date, and action performed.

6.0 QUALITY CONTROL (L.30.2.1 (6); G.9.4 (6) G.9.4 (2))

The goal of the CenturyLink's EIS quality control (QC) program is to formulate and enforce quality work standards, ensure compliance with contractual SLAs, and continuously review work in progress to positively manage service outcomes. This plan defines the CenturyLink EIS program QC approach and responsibilities, and provides processes used in carrying out QC activities.

CenturyLink's QC activities are performed continually by the PMO to verify that CenturyLink services and deliverables meet contractual quality standards. QC helps

uncover the causes of unsatisfactory results, and establishes lessons learned to improve and avoid repetition of issues.

6.1 QUALITY STANDARDS

The primary quality standards for EIS are documented as performance metrics or AQLs for all contracted services. The CenturyLink EIS PMO’s Program Quality and Risk Management lead and our EIS PM perform monthly reviews with GSA to ensure that products and services are meeting EIS AQLs and related KPIs. There are a number of functional organizations under the management of our EIS PM that support the government with ordering, service delivery, billing, network operations, and customer services capabilities. Each of these functional organizations has training, tools, processes, and procedures that are subject to update based on AQL achievement results. Management to the AQLs ensures that EIS QC is singularly focused on meeting the contract’s defined quality standards.

6.2 QUALITY TOOLS AND TECHNIQUES (G.9.4 (2))

CenturyLink’s continuous improvement process, shown in **Figure 6.2-1**, is the foundation that supports our quality program. This continuous improvement process operates as an iterative quality cycle commonly referred to as DMAIC (define, measure, analyze, improve, and control). Collectively, the five phases iteratively result in continuous improvement as an outcome. Under DMAIC we continually monitor performance and make course corrections as needed:

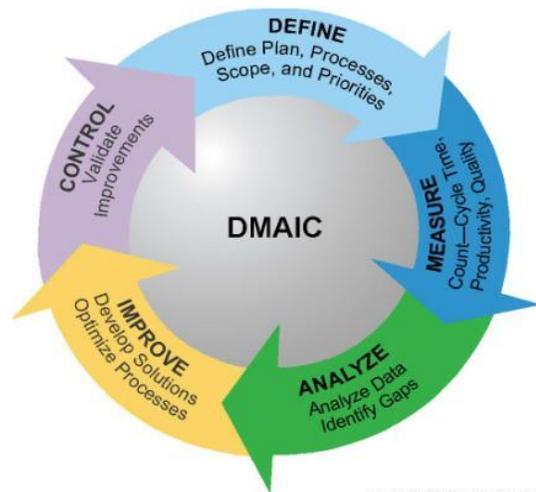


Figure 6.2-1. DMAIC Lifecycle

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- **Define** goals that are consistent with EIS and TO service requirements
- **Measure** current service outcomes with AQLs as the principal focus
- **Analyze** the AQL data to identify both negative trends and performance gaps or “misses,” to determine root causes for each AQL issue and to subsequently communicate identified trends and issues

- **Improve** continuously and optimize processes based upon data analysis
- **Control** to ensure any deviations from AQLs are corrected. Define individual improvements in training, processes, procedures, tools, and systems to address causes; set up pilot runs to establish improvements, monitor results, expand successful pilots, and validate improvements are having the desired effect.

CenturyLink's Quality Program
Based on the lessons learned from Network,
CenturyLink has integrated the Quality
Management and Risk Management
functions within our PMO.

Our EIS Program Quality and Risk Management lead will leverage SLA reporting produced by the PMO's service level management and reporting team as a primary mechanism for tracking and trend analysis of AQL performance. When negative AQL trends are identified, this leader works across the CenturyLink team to execute the DMAIC cycle as described above. We respond proactively; when a negative trend is identified program and TO risk management action is initiated to drive high visibility for management of needed improvements. This communication is managed in accordance with the processes described in PMP, Section 8.0 to drive corrective actions. Integration of the PMO Quality and Risk Management functions under our DMAIC continuous improvement process is intended to mainstream QC. Management of program and TO quality and risk management are service-focused on AQLs for the agencies.

6.3 ROLES AND RESPONSIBILITIES

Execution of this QC plan is the responsibility of the Program Quality and Risk Management lead. This PMO leader is a direct report to our EIS PM, and has the authority to access all program and TO services data. This includes all AQL data and reporting for all services including order management, technical performance management, billing, trouble ticket management, transition, and program management data. This data includes the program level risk register and all TO risk registers.

The Program Quality and Risk Management lead has the authority and responsibility to collect and gather data, review performance, perform root cause analysis, define required improvements, and report and submit findings from the various teams responsible for any given function. This provides an independent investigative and

analytical extension for the PM to verify and validate that CenturyLink services meet or exceed contract AQLs. **Table 6.3-1** details QC related roles and responsibilities.

Table 6.3-1. QC Roles and Responsibilities.

Roles	Responsibilities
Director Federal Programs (Charles Leinbach)	<ul style="list-style-type: none"> • Executive oversight of QC at the EIS and TO levels • Support the responsible PMs with resources and any necessary executive escalations
EIS PM (Tyler Montgomery)	<ul style="list-style-type: none"> • Supervision and guidance of the Program Quality and Risk Management (QM/RM) lead. • Provide QC oversight and support resolution of quality issues and risks • Ensure independence of the PMO QM/RM function; makes staff and other resources available to support QM/RM; reviews and audits QC reports • Management of QC issues and/or risks; escalate as required to meet agency and GSA requirements
TO PMs	<ul style="list-style-type: none"> • Retain operational responsibility for TO QC activities • Manage customer service dependencies • Support cross-team coordination; provide matrixed resources to enable root cause analysis and development of improvements under DMAIC • Identify and communicate TO QC priorities; manage TO resources and risks • Maintain effective stakeholder communications for status, issues, priorities and risks; escalate unresolved transition issues and/or risks • Provide reporting/status to agency representatives; QC and AQL tracking and reporting
EIS Program Quality and Risk Management lead	<ul style="list-style-type: none"> • Retain operational responsibility for EIS QC and risk management functions • Reports to the EIS PM; ensure current status of QC activities is reported, and unresolved QC issues are escalated as required for resolution by the PM and CenturyLink executives • Manage cross-team coordination for QC; provide standard frameworks for use by TO teams and execute the DMAIC continuous improvement cycle <ul style="list-style-type: none"> – Obtain AQL reporting from the PMO service level management and reporting team – Obtain EIS service testing results and transition status from the PMO Transition Management function, and TO PMs – Review network operations center (NOC) trouble management data and reports; obtain network management systems (NMS) performance management reports – Obtain program risk candidates from all team members; manage the risk register; obtain TO level risk registers from TO PMs (see PMP, Section 8.0 and Management Response Section 1.2.7) – Obtain vendor and subcontractor performance data from the PMO Operational Vendor/Subcontractor Management team – Integrate available data, document summarized AQL trends and misses – Lead root/cause analysis efforts and definition of potential improvements – Identify and communicate improvement priorities; manage resources and risks by leveraging the risk register management toolset • Maintain effective stakeholder communications for status, issues, priorities and risks; escalate unresolved QC issues and/or risks • Provide direct reporting/status to GSA representatives; program QC tracking and reporting

6.4 PERFORMANCE MANAGEMENT **(G.9.4 (2))**

The CenturyLink team uses a host of NMS tools for network monitoring and

reporting of AQL status, optimizing performance across all processes. Our EIS web interfaces will convey customer requests for SLA data into a request to the CenturyLink NMSs. We will provide data to appropriate secured websites for GSA and agency review. Our EIS PM will meet weekly and monthly with designated GSA representatives to review status of projects and the overall performance of the EIS program. **Table 6.4-1** provides a list of current CenturyLink tools used for performance management.

Table 6.4-1. CenturyLink Performance Management Tools.

Functional/Information	Tool Set	Capability Benefit
Fault Management	Netcool OMNibus/Precision	<ul style="list-style-type: none"> Automated fault detection and correlation
Network Topology	Netcool Precision	<ul style="list-style-type: none"> Comprehensive, dynamic discovery of elements
Root Cause Analysis	Netcool Precision	<ul style="list-style-type: none"> Enhanced availability by reducing problem resolution times
Customer Business Impact of Network Performance	Netcool Impact	<ul style="list-style-type: none"> Improved performance through prioritized service restorations
Web portal-based single screen interface to performance and configuration information	Netcool Web Portal	<ul style="list-style-type: none"> Improved visibility into environment
Help Desk Trouble Ticketing and Reporting	Remedy Help Desk	<ul style="list-style-type: none"> Web-based entry, query and reporting of agency users
Network Performance Monitoring/ Capacity Utilization	Concord Communications eHealth	<ul style="list-style-type: none"> Comprehensive access to agency performance statistics
Performance Management	BaseN	<ul style="list-style-type: none"> End-to-end network infrastructure monitoring and management service
Capacity Utilization	Concord Communications eHealth and NetScout NGenius Performance Manager	<ul style="list-style-type: none"> Web-based and email notification for daily, weekly, monthly and annual utilization reports
Regular and Ad-Hoc Reporting	Netcool Reporter	<ul style="list-style-type: none"> Online report available through CenturyLink Control™ EIS web interface
Configuration Management	Visionael Network Resource Manager	<ul style="list-style-type: none"> Robust configuration description for devices
Configuration Control	OpsWare Network Automation (previously Rendition Network TrueControl)	<ul style="list-style-type: none"> Continual configuration control and monitoring for all infrastructure elements
Layer 2 Encryption	SafeNet, SafeEnterprise, Security Management Center	<ul style="list-style-type: none"> Provisioning and monitoring for Layer 2 encryptors from a central Security Operations Center (SOC)
Security Monitoring – Collects, aggregates and analyzes data from a host of Cisco and non-Cisco sources and manages logs	Cisco Security Monitoring, Analysis, and Response System (MARS)	<ul style="list-style-type: none"> A third-generation security information management (SIM) system, providing comprehensive security monitoring and threat mitigation Administrators easily identify and respond to attacks Forensic analysis Identify “hot spots” on the network Display graphical attack patterns; high-performance,

Functional/Information	Tool Set	Capability Benefit
		<ul style="list-style-type: none"> active event correlation • False-positive tuning • Timely attack mitigation
Firewall Management – Consistently and efficiently apply firewall rules throughout the Enterprise. Network Internet protocol service (IPS) management and router-based IPS Management. Configure IPSec with group policies and manage signature sets centrally	CiscoWorks VPN/Security Management Solution (VMS)	<ul style="list-style-type: none"> • Operational management: allows network managers to build a complete network inventory, report on hardware and software changes, and manage software updates to multiple devices • Supports virtual private network (VPN) router management; centrally sets up and maintains a variety of Cisco VPN solutions • Performance monitoring: monitors and troubleshoots the health of security and VPN devices
Web-based utility that permits administrators to effectively respond to network incidents	ENIRA	<ul style="list-style-type: none"> • No clients, agents, or in-line devices are required • Isolates offending hosts by IP network, IP address, MAC • Rapidly quarantines any cybersecurity incident safely, effectively, and intelligently • Manages the complete response lifecycle, effectively automating an incident response plan with each quarantine action. Defined business process executed including authorization, notification, and automated documentation of response and configuration management details
Billing Adjustment Management	BAM – proprietary	<ul style="list-style-type: none"> • Record and report customer-billing adjustments for trend analysis and problem resolution
Customer Account Service Profile	CASPER – proprietary	<ul style="list-style-type: none"> • Provide online, real-time access to and management of customer account data to view completed order billing components, dates, and pricing
Facilities and SRE Inventory Management	F&E – proprietary	<ul style="list-style-type: none"> • Database that records CenturyLink's on-net facilities and all assigned available SRE (live or inactive)

6.5 QUALITY CONTROL PROCEDURES AND CUSTOMER SUPPORT SERVICES (G.9.4 (2))

The primary PMO QC element is the Program Quality and Risk Management function. This function is led by a PM-capable specialist who integrates the results of ongoing AQL reporting with program and cross-TO status reporting and risk management functions to ensure program quality is continually enhanced. The same function is responsible for ongoing maintenance and management of the EIS program risk register, as well as ongoing cyclical review of TO risk registers. Integration of SLA trend-driven QC with program and TO risk management enables more efficient and proactive integrated identification and management of program and service quality issues. Multiple PMO activities provide quality-related support, including:

Trouble Ticket Management/Network Operations Center (NOC): The NOC has overall responsibility for monitoring the health of EIS services. The NOC has established processes and procedures to detect anomalies and take proactive measures to eliminate them before they negatively affect the customer. The NOC responds to GSA and agency trouble reports and ensures that the government receives periodic status updates as required.

CSO: The CSO has responsibility for responding to customer inquiries related to ordering, billing, troubles, and general product and service questions. The CSO has established processes and procedures to provide agency and GSA customers with order and provisioning status, as well as status on billing issues and disputes.

6.6 MEASURING AND SAMPLING PROCEDURES (G.8.3.1, G.9.4 (2))

CenturyLink will measure all SLAs in accordance with the definitions provided in RFP Section G.8.2, and its subsections.

Service Performance SLA Measures and Sampling

CenturyLink's procedures for measuring and sampling service performance SLAs are supported by our integrated network and systems architecture. Our procedures leverage real time telemetry available from probes and simple network management protocol (SNMP) -capable devices including SREs and application service layer feeds.

CenturyLink's commercial NMS includes both internally developed and commercial systems that enable us to sample and collect network service measures (including availability, latency, jitter, and grade of service) and to sample and measure network services from multiple sources, including the trouble ticketing, inventory, and network alarm (fault management). The NMS identifies, processes, and calculates network events, resulting in aggregated service performance statistics for EIS SLA reporting.

To measure aggregated SLAs, CenturyLink captures performance management data that are then copied into a CenturyLink data warehouse called the production and analysis system (PANS). The data stored within PANS are used for planning, operations, and reporting. Several attributes correlate the data, including access type, product/service, date, customers, and locations. Generated reports are pushed to the web access point for access by authorized customers using Actuate's e.Reporting and

e. Spreadsheet.

CenturyLink will monitor performance of EIS services using the SLAs defined in RFP Section G.8.2. While AQLs vary between services, the methodology for performing the monitoring is the same from service to service.

Availability (Av(S))—Av(S) is time-bounded and uses the following formula:

$$Av(S) = \frac{RI(HR) - COT(HR)}{RI(HR)} \times 100$$

Unavailability is defined on a service-by-service basis and is the amount of time the service is unavailable to users (for VPNS, ETS, IPS, IPVS, CHS, IaaS, PaaS, SaaS, CDNS, UCS, and MSS), the amount of time the port is not available to users (for MTIPS), or when the service experiences measurable degradation to a point beneath the minimum acceptable performance threshold (e.g., quantity of consecutive severely errored seconds (SES) for OWS and PLS).

Unavailability duration will be measured in terms of trouble ticket duration (ticket opened to ticket closed). For the services where unavailability is defined by the incidence of consecutive SES, monitoring will capture the time duration that SES has exceeded the allowed allocation (ten consecutive SES) until the point where there are no SES outcomes for ten consecutive seconds.

Latency (S)—Latency measures the average round-trip transmission time between each agency's premises router and the other agency routers on the network being tested. For this measurement, Y.1731, ICMP or TWAMP protocols will be used to capture the latency between each site pair.

Jitter—Jitter is measured by variation in latency for a packet stream from one SDP to another for two services (ETS and IPVS). The jitter measurement is performed using Y.1731, ICMP, or TWAMP protocols to capture the jitter between each site pair. Measurements are analyzed to confirm that the variance of arrival time is equal to or less than 10ms in all cases.

Grade of Service (GOS)—Grade of service SLAs vary between EIS service types. CenturyLink will validate the individual service-specific AQLs for GOS.

- **ETS, IPS, IPVS, MTIPS GOS Measurements**—Frame or packet loss monitoring is accomplished with Y.1731 or Internet control message protocol (ICMP) and RFC 5357 Two-Way Active Measurement Protocol (TWAMP) measurements for Ethernet Transport and IP services. Analysis of the quantity of packets lost must confirm that at least 99.99% of the packets sent are returned to the sending location. In the case of IPVS, since there is only a routine service level, analysis of this data ensures that at least 99.6% of the packets sent to each CONUS location arrive
- **OWS GOS**—confirms that protection switching on 1+1 OWS service has occurred and that traffic has successfully rerouted within the required time (≤ 60 or ≤ 100 ms). Actual performance will be measured in accordance with specific agency requirements and the SRE selected in the TO
- **CDNS GOS**—confirms that content has been refreshed in five minutes or less
- **TIC Web Interface GOS**—There are four types of GOS measurements for the TIC web interface:
 - **Failover**—The time to successfully complete failover to an alternate TIC will be monitored, and confirmed to have occurred in one minute or less
 - **Monitoring and Correlation**—Agents in the SOC detect an event within four hours as evidenced by initiation of real time fusion
 - **Configuration/Rule Change**—occur successfully within five hours of initiation for normal priority and two hours for urgent priority. Elapsed time is measured by trouble ticket duration (ticket opened to ticket closed)
 - **Virus Protection Updates & Bug Fixes**—are successfully deployed within 24 hours for normal priority and two hours for urgent priority
- **MSS GOS**—Configuration/Rule Change—occur successfully within five hours of initiation for MPS normal priority and 24 normal priority for VSS. For urgent priority, all changes will be completed within two hours. Elapsed time is measured by trouble ticket duration (ticket opened to ticket closed)

Incident-based Time to Restore (TTR)—measures the time required to restore lost or degraded service. There are two basic variants of TTR: Without and with dispatch.

- TTR without Dispatch—measured from ticket open to ticket closed. CenturyLink has sufficient NOC staff trained to resolve these outages within four hours
- TTR with Dispatch—measured from ticket open to ticket closed. Our NOC and field operations staff are trained to resolve these outages within eight hours

Service related labor—SLAs for labor services will be TO-specific, and defined and implemented by CenturyLink in conformance with agency requirements.

Service Provisioning SLA Measures and Sampling

CenturyLink's automated procedures to measure and sample service provisioning SLAs, as required by RFP Section 8.2.2, use data housed in our ordering and provisioning systems. Service provisioning SLAs will be measured in work days from the day the SO is issued to the completion date in the SOCN (i.e., interval = number of days from the SO issuance to the SOCN). If no service order is issued, provisioning time will be calculated from the TO submission date (i.e., the interval = number of days from the TO submission to the SOCN).

Service provisioning tasks that do not have predefined provisioning intervals will be defined in the TO with an ICB delivery schedule and measured using an ICB SLA as required by RFP Section G.8.2.2.1.

Project provisioning SLAs (i.e., for orders that require special treatment due to the size, complexity, or importance of the services ordered), the performance objective will be based on the baseline completion dates in the TOPP agreed upon at the time orders are placed and documented by the customer and CenturyLink and confirmed by CenturyLink. The performance objective will be defined on an ICB basis with the required delivery schedule established in the TO. In the event that timeframes are not specified in the TOPP, standard provisioning SLAs will be used.

Rapid provisioning SLAs for cloud services are measured based upon receipt of a fully completed and accurate order. Rapid provisioned cloud services delivery times may vary, but delivery intervals are real time in nature and will meet or exceed the required KPI of 48 hours after first time customer set-up and on-boarding.

Rapid provisioning for ETS Bandwidth-on-Demand is achieved within 24 hours by using CenturyLink's internal ordering systems in conjunction with our NOC (available 24x7) for real time scheduling of port bandwidth increases. For all scalable access services where Bandwidth-on-Demand usage increases can be utilized, CenturyLink oversubscribes our Access loops accordingly.

Billing Accuracy SLA Measures and Sampling

CenturyLink measures and samples billing accuracy for SLA achievement based on unresolved error issues from our internal reporting, combined with government reported accuracy issues based on resolved billing disputes.

The foundation of CenturyLink's billing accuracy measures is information extracted from our billing system for a 100% sample of invoices during every billing cycle, after they are calculated and before they are rendered to federal customers. We measure a set of accuracy criteria for all federal invoices including: a) the number of line Items with no associated SOCN, b) the number of line Items that are not consistent with the SOCN, c) the number of line Items that have an incorrect price, d) the number of duplicate line records, e) the number of line Items with charges over 90 calendar days since services were rendered, and f) the total billing file errors (based on categories a through e.) Our billing analysts use production reports that contain the extracted billing system data for these categories and roll it into a "DBF SOCN SLA report" template that includes the full set of measures. They subsequently analyze this data in-cycle and seek to correct issues by auditing completed orders associated with probable line items in the billing report. This includes all of the categories identified above.

Government reported accuracy issues are generally identified during the billing dispute process. A billing dispute begins with the submission of the dispute and ends with a mutually agreeable resolution. Upon dispute resolution, CenturyLink will submit any necessary billing corrections on the next available bill and, if applicable, apply any credits on a BA within two billing cycles. Resolved dispute data is incorporated into our accuracy EIS billing accuracy SLA report on a monthly basis. By including both internally generated billing error reporting and government-identified errors (based on resolved disputes), CenturyLink's billing accuracy SLA measures and sampling provides complete insight into achievement of the accuracy SLA for EIS.

7.0 KEY PERSONNEL AND ORGANIZATIONAL STRUCTURE (L.30.2.1 (7); G.9.4 (7); H.10)

CenturyLink’s commitment to EIS contract success is enabled by our EIS PMO structure. CenturyLink’s EIS organizational structure is detailed in Management Response, Section 1.1. Our PMO is led by Mr. Montgomery, a fully qualified PM who will lead a mix of EIS contract-dedicated and matrixed professionals.

7.1 KEY PERSONNEL (H.10.1, CDRL 90)

CenturyLink’s EIS PM (key personnel) is Tyler Montgomery. Mr. Montgomery brings over 15 years of industry experience to EIS, including four years in our Networx Contractor Program Office (CPO). He currently serves as our Networx PM. Mr. Montgomery has been given the responsibility and authority to manage all program functions. He has direct access to CenturyLink executive management to ensure that GSA EIS has the requisite level of corporate visibility and support. As the CenturyLink EIS PM, Mr. Montgomery is the central point of contact for the government for all program-wide EIS-related issues. Mr. Montgomery has the management control, responsibility, and accountability within CenturyLink to ensure the highest level of service on the EIS program. He will have regular executive contact and the full backing of the entire corporation to enable program success. Mr. Montgomery has the ability and authority to reach back to all supporting functional elements of the corporation as requirements dictate.

<p>CenturyLink PM Contact Information Tyler Montgomery O: 703-363-8830; M: 571-481-8142 tyler.montgomery@centurylink.com</p>
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7.2 KEY PERSONNEL SUBSTITUTIONS AND ADDITIONS (H.10.2)

CenturyLink’s PM is the key personnel assignee for EIS. Any change to this key position will be communicated to GSA in accordance with RFP Section H.10.2, using a request for substitutions or additions. As required, CenturyLink will provide a detailed explanation of the circumstances requiring any proposed substitution or addition of key personnel and a complete resume for each proposed substitute or addition, with any other information requested by the GSA CO. CenturyLink will ensure and certify that any key personnel replacement is equally or better qualified than the individual to be replaced, and will make no requests for substitution or addition for any reason except

those permitted by the contract.

7.3 ORGANIZATIONAL STRUCTURE (H.10.3, CDRL 91)

Mr. Montgomery reports directly to Charles Leinbach, CenturyLink's Director Federal Programs, who reports directly to the Senior Vice President and General Manager, Tim Meehan. Mr. Meehan is the highest-ranking individual assigned to this contract, and is fully authorized to escalate any and all EIS issues as required to the senior CenturyLink corporate executive reporting hierarchy. CenturyLink's organizational structure for EIS is shown in **Figure 7.3-1**. A detailed description of this structure, including roles, responsibilities, escalation paths and contact information is provided in Management Response, Section 1.1. Updates to this organizational structure will be included in an updated PMP version within 30 days of any change.

8.0 RISK MANAGEMENT (L.30.2.1 (8); G.9.4 (8))

CenturyLink's approach to managing risk is structured to detect potential problems before detrimental impacts occur. Leveraging our past successes and lessons learned, CenturyLink is committed to offering the highest quality and lowest risk management approach to GSA and the agencies by providing a complete and thorough analysis and management of risk. CenturyLink's approach to risk management is based on the principles defined in the PMBOK.

CenturyLink manages risk using a continuous, iterative process applied across three risk management tiers. Each tier has a risk management owner who reviews, assesses, and manages identified risks: *TO tier owner*: TO PM; *EIS program tier owner*: EIS PM, Mr. Montgomery; *Federal Business Unit operational tier owner*: Director Federal Programs, Mr. Leinbach. Review and update of this risk management approach will be conducted after award by our EIS PM in full collaboration with the assigned GSA COR, as well as leadership within the CenturyLink PMO. Upon award of any EIS TO, the assigned CenturyLink TO PM will collaboratively finalize their TO risk management plans with responsible agency representatives.



Figure 7.3-1. CenturyLink EIS Program Organization

Throughout program execution, we will continue to identify and document additional risks and re-evaluate documented risks. All risks are captured in updated risk registers and monitored until they are no longer a threat. At the EIS program level, risks from subtending TOs will be monitored and investigated for commonality. Successful mitigation strategies from one TO will be evaluated for use with risks from another TO, and common risks that affect multiple projects or TOs will be managed on an integrated basis.

Lessons learned reports will be archived and made available for future reference to assist program and project personnel by making them aware of past risks that have been managed, as well as effective mitigation approaches. High-priority risks will be escalated for executive support on an ongoing basis. [REDACTED]

[REDACTED]

[REDACTED]

Input and Identification: All categories of risk are identified with a focus on those that derive from statement of work (SOW) requirements, the service design and ConOps, and the BOE. Risks are elicited from all program and project stakeholders. Each risk is evaluated and categorized based upon probability of occurrence and impact to either the agency TO or the EIS program. A color code is assigned based on the combination of impact and probability of occurrence, as shown in **Figure 8.0-2**.

- **Impact:** assigned to a category by the PM based on consultation with technical and operations support staff, and government stakeholders:

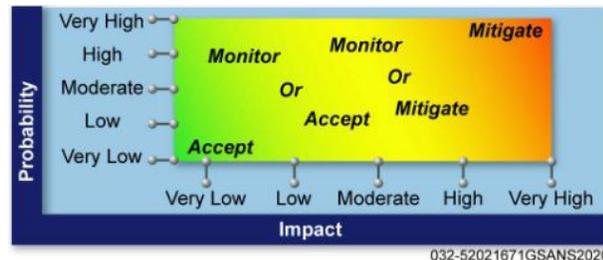


Figure 8.0-2. Program Risk Map

- Very High—Expected to prevent on-time or on-budget program completion, or to negatively impact achievement of program performance objectives
- High—Has potential to prevent program completion or success by negatively impacting program cost, schedules, scope, or performance
- Medium—Has potential to delay program completion or success by impacting cost, schedule, scope or performance
- Low—Has relatively little impact on program completion or success due to low impact on cost, schedule, scope, or performance
- Very Low—Negligible impact on program completion or success

- **Probability of occurrence:** assigned a category based on PM consultation with technical and operations support staff, and government stakeholders:

- Very High—Greater than or equal to 90% probability of occurrence
- High—Approximately 70% probability of occurrence
- Moderate—Approximately 50% probability of occurrence
- Low—Approximately 30% probability of occurrence
- Very Low—10% or less probability of occurrence

Develop and Implement Risk Mitigation Solutions: Risk mitigation requires collaboration between CenturyLink management, implementation teams and applicable customer representation. During risk mitigation CenturyLink analyzes solutions for reducing risks (quantify, analyze, and evaluate alternatives). Based on its matrix score, the responsible TO PM determines if a risk should be mitigated, monitored, or accepted and devises a mitigation strategy including all action items identified to mitigate the risk. Once the action items are completed, the risk owner evaluates whether the risk has been successfully mitigated.

Monitor and Report Status: Risks will be reviewed periodically by the PM based on their categorization:

Monthly—Risks that map green are reviewed at least monthly

Weekly—Risks that map yellow will be reviewed at least weekly and briefed to the CenturyLink EIS PM

Twice Weekly—Risks that map red will be reviewed at least twice weekly and briefed to the CenturyLink EIS PM

Assess Risk Mitigation Effectiveness: revises risk opportunity/mitigation plan to mitigate risks, monitors and controls risks and follows through on task/project completion. As risks are mitigated, they are closed if the risk is no longer a threat. If the risk still poses a threat, revised mitigation strategies are developed.

CenturyLink's current draft risk matrix for EIS, applied at both the TO and EIS program tiers, is provided in the Management Response Section 1.2.7.

9.0 INFORMATION SYSTEMS (L.30.2.1 (9); G.9.4 (9), G.5, G.5.3.1.1, G.5.6, G.5.6.1; J.2.10)

CenturyLink is committed to providing quality support systems and processes to the EIS contract. Our solution will apply systems we currently use for our large business customers, tailored to satisfy GSA's requirements and meet TO users' needs. Our past performance in delivering comprehensive support systems for Networx and other federal contracts will be leveraged to deliver the next generation of user-friendly, compliant, and efficient BSS for EIS. Our attention to detail and innovation throughout our performance on the predecessor contracts are evidence that CenturyLink understands the government's need for a secure, user-friendly, and web accessible BSS, while enforcing the security specifications defined by the contract. As defined in the BSS risk management framework plan (RMFP) submitted with this proposal and the BSS system security plan (SSP) that will be completed in accordance with NIST SP 800-18, Revision 1 (hereinafter listed as NIST SP 800-18) and other relevant guidelines, submitted within 30 days of the NTP, and include annual updates (Reference: NIST SP 800-53 R4: PL-2), the BSS security will be at the moderate impact level. CenturyLink will support government security/authorization efforts and will comply with all required FISMA, DHS, OMB, FIPS, NIST, and GSA policies, directives, and guidelines including

all compliance references listed in Section G.5.6.1 of the RFPs to include: FISMA guidance and directives, Federal Information Processing Standards (FIPS), NIST Special Publication (SP) 800 series guidelines (see <http://csrc.nist.gov/>), GSA IT security directives, policies and guides, and other appropriate government-wide laws and regulations for protection and security of government IT.

9.1 BUSINESS SUPPORT SYSTEMS OVERVIEW (G.5.1, G.9.4 (2))

CenturyLink will provide a BSS solution that reflects our experience in support of the Networkx contract and leverages commercially available tools and processes. Systems used to support large business customers already provide many of the management functions required by EIS. Building on proven CenturyLink applications will provide several advantages as the contract evolves, by enabling emerging technologies developed to support our business customers to be made available through ongoing service enhancements on EIS. Where necessary, we will augment these systems to meet government requirements that exceed those we currently offer. An overview of the BSS is provided in *Figure 9.1-1*.

9.2 TECHNICAL REQUIREMENTS (G.5.3)

This section describes CenturyLink's BSS infrastructure that will be used to support the EIS contract. This infrastructure will be available shortly after NTP to demonstrate operational functionality and security of the systems through the BSS verification testing. It will leverage the capabilities of our commercial systems as well as selected functionality that is currently provided in support of other federal contracts.

9.2.1 Web Interface (G.5.3.1; M.2.2)

CenturyLink will provide web-based access to our support systems through a public web page interface and an authorized user access point.

The public page provides information on CenturyLink EIS solutions including training courses, products and services information, POCs, access requests, voluntary product accessibility template (VPAT) compliance information, and the redacted contract. Prior to selecting CenturyLink, agency customers will be able to access information for use in analyzing our EIS products and services in preparation for the fair opportunity process.



Figure 9.1-1. CenturyLink's BSS Solution

Upon TO award, CenturyLink will coordinate customer account setup and definition of RBAC in collaboration with OCO, COR, or GSA representatives for access to the CenturyLink authenticated web interface. As further discussed in the Management Response Section 2.9.1, the secure interface will be used to link to the following functions for authorized users: order submission, pricing catalog, trouble ticketing, inventory management, as well as billing and payment management.

Technology Standards (G.5.3.1.2): CenturyLink's web interface solution adheres to common industry standards and does not require special software or plug-ins beyond standard web browsers with default built-in functionality. The web browsers identified in RFP Section G.5.3.1.2 are supported for all functions. Our web interface accommodates

these browsers in their current and immediate previous versions (N-1), as well as any successor products.

Accessibility (G.5.3.1.3): CenturyLink will make readily available a comprehensive list of all offered EIT products (supplies and services) that comply with Section 508 and the standards at 36 CFR 1194. During our BSS development, CenturyLink will perform Section 508 compliance testing for our government-facing web interfaces and identify and prioritize all accessibility errors, define the method for addressing issues, and document overall compliance with Section 508. Automated accessibility compliance tools will be used to define a baseline list of areas to be addressed.

As required, our BSS testing will take into account aspects of the Section 508 regulations that cannot be tested without human interaction and input.

9.2.2 Direct Data Exchange (G.5.3.2)

CenturyLink's BSS will include secure, automated mechanisms for direct transfer of detailed transactional data to the government's systems. This data will cover all elements detailed in RFP Section G.5.4.

9.2.2.1 Direct Data Exchange Methods (G.5.3.2.1)

CenturyLink's BSS will initiate and process automated exchange of management and operations data using the following methods:

- **Web Services:** push transactions over HTTPS through CenturyLink's B2B application program interfaces (APIs) for system-to-system data exchange between government systems and ours. CenturyLink will support XML over HTTPS using SOAP as the web services exchange mechanism
- **Secure File Transport Protocol (SFTP) Services:** push transactions for file-based data exchange between government and CenturyLink systems using government-provided File Transport Protocol (FTP) service

9.2.2.2 Direct Data Exchange Formats (G.5.3.2.2)

CenturyLink's BSS will accept data transfers from the government and submit data to the government in the formats specified in RFP Section J.2.9.

9.2.2.3 Direct Data Exchange Governance (G.5.3.2.3)

GSA will maintain and manage all approved data exchange format specifications,

data schemas, and method descriptions. Any changes or updates, to include timeframes for implementation, will be coordinated and negotiated between the government and CenturyLink. Once the BSS is operational, CenturyLink will not make any changes to the data exchange formats or methods without government approval through the established change control process described in RFP Section G.5.5.1.

9.2.3 Role-Based Access Control (RBAC) (G.5.3.3; J.2.3.1.2)

CenturyLink's web interfaces will ensure that requirements of the contract are consistent with security specifications for protection of sensitive government data and enforcement of RBAC to allow only authorized users with appropriate permissions access to its BSS order, billing, inventory, and performance information. CenturyLink uses a strong set of access controls and other defensive measures to protect our infrastructure, including proven perimeter security and remote access security features to protect our BSS from attacks through publicly accessible ports.

Following TO award, CenturyLink will collect user registration and RBAC information from the government customer. During the customer setup stages, designated users are granted access to the support functions required by the contract. All RBACs are defined within CenturyLink's user profile management tool at the time of user set-up. This tool is designed to adhere to security standards and references identified within the contract. It captures and stores the authorized users for restricted access and restricts all information to ensure that only the authorized users have access.

Once a user is authenticated within the web interface, that user is presented with menu items/navigation links to the support functions designated by agency officials during customer setup and identified within appropriately approved user access request forms or data sets. Our approach authenticates the user's identity, determines distinct data to which the user is granted access, validates the functional tools to which the user has access (e.g., ordering, billing, inventory, trouble ticketing, performance reports), as well as type of access granted (e.g., read/write, view only).

CenturyLink will add new users or adjust access privileges within seven days of receipt of an authorized access request and remove any user who is no longer authorized within one business day of notification from a designated agency authority.

9.2.4 Data Detail Level (G.5.3.4, J.2.10)

The data to be provided by CenturyLink’s BSS will be sufficiently detailed to provide all data elements relating to the services listed in RFP Section G.5.4 as addressed in RFP Section J.2.10, Data Dictionary.

All BSS deliverables and reports, prescribed in RFP Section J.2, will be submitted in at least the following formats:

- Human-Readable (PDF, Excel, HTML, etc.): made available through the web interface unless otherwise specified in the TO
- Machine-Readable (PSV, XML, etc.): as part of the direct data exchange described in RFP Section G.5.3.2

9.3 BSS COMPONENT SERVICE REQUIREMENTS (G.5.4)

As described in this PMP, at a minimum, the CenturyLink BSS will support the functionality required by RFP Section G.5.4.1 as shown in **Table 9.3-1**.

Table 9.3-1. CenturyLink BSS Component Service Proposal References

Service	Minimum Functionality	Specified in RFP Section(s)	Specified in Section(s)
Customer Management	<ul style="list-style-type: none"> • User Training • Trouble Management 	<ul style="list-style-type: none"> • Section g.10 Training • Section G.6.4.1 Trouble Ticket Management General Requirements 	<ul style="list-style-type: none"> • Management Response Section 2.8 • Management Response Section 2.5)
Financial Management	<ul style="list-style-type: none"> • Billing Management • Disputes • SLA Credit Management • Payment Management 	<ul style="list-style-type: none"> • Section G.4 Billing • Section G.8 Service Level Management 	<ul style="list-style-type: none"> • Management Response Section 2.2 • PMP Section 2.2 • Management Response Section 2.7
Order Management	<ul style="list-style-type: none"> • Order Submission • Order Tracking 	<ul style="list-style-type: none"> • Section G.3 Ordering 	<ul style="list-style-type: none"> • Management Response Section 2.1 • PMP Section 2.1
Inventory Management	<ul style="list-style-type: none"> • Inventory Management 	<ul style="list-style-type: none"> • Section G.7 Inventory Management 	<ul style="list-style-type: none"> • Management Response Section 2.6 • PMP Section 2.3
Service Management	<ul style="list-style-type: none"> • Service Assurance • SLA Management 	<ul style="list-style-type: none"> • Section G.6 Service Assurance • Section G.8 Service Level Management 	<ul style="list-style-type: none"> • Management Response Section 2.4.1 • Management Response Section 2.7
Program Management	<ul style="list-style-type: none"> • Administration • Project Management • Reporting • Service Catalog 	<ul style="list-style-type: none"> • Section G.9 Program Management • Section B.1.3 Catalog Pricing Requirements - General 	<ul style="list-style-type: none"> • Management Response Section 1.0 • Section B

9.4 BSS DEVELOPMENT AND IMPLEMENTATION PLAN (G.5.5; F.2.1, CDRL39)

New development is driven by sets of government requirements that are based on major agency-specific needs and governing federal guidelines and policies. New developments will include the expansion of commercial systems and the integration of specific capabilities evolved through Networx, DREN, and other federal contracts.

During our BSS development, CenturyLink will perform Section 508 compliance testing for our government-facing web interfaces and identify and prioritize all accessibility errors, define the method for addressing issues, and document overall compliance with Section 508. Automated accessibility compliance tools will be used to define a baseline list of areas to be addressed.

Consistent with the requirements in RFP Sections J.2 and G.5.3, CenturyLink has designed a logically integrated BSS architectural structure that will fully support the operational and security requirements of the EIS program. CenturyLink's EIS BSS, described in more detail in PMP Section 9.1 and throughout the management volume, offers the advantages of building upon existing government and commercial CenturyLink applications, and augmenting them with additional capabilities that support the full range of requirements outlined within the RFP.

When upgrades are made to commercial system components incorporated into the EIS BSS, those upgrades will become part of the BSS. Since these are CenturyLink commercial systems, these upgrades do not fall under the standards for change control as defined in RFP Section G.5.5.1 and will therefore not require government approval.

All BSS development and maintenance activities along with all associated costs will be the sole responsibility of CenturyLink.

9.4.1 Development Methodology and Timeline

CenturyLink will use the SCRUM software development model, which is a form of Agile. This method uses multiple small teams working across specific theme areas to quickly develop and supply usable code in intervals. Intervals in the SCRUM methodology are called sprints. Each sprint will ideally be 2-4 weeks and have 7-9 team members. Within the teams there are architects, developers, testers, scrum masters, and product owners. All teams use standard CenturyLink state-of-the-art tools. The

high-level timeline shown in **Figure 9.4.1-1** shows the development activities that will meet the GSA requirements.

The themed development teams report into a higher structure at the program level that pulls the teams together to coordinate overall work. This team consists of a chief product owner, release train engineer, and scrum of scrums. This higher-level team coordinates releases, defines and controls dependencies, and resolves issues.

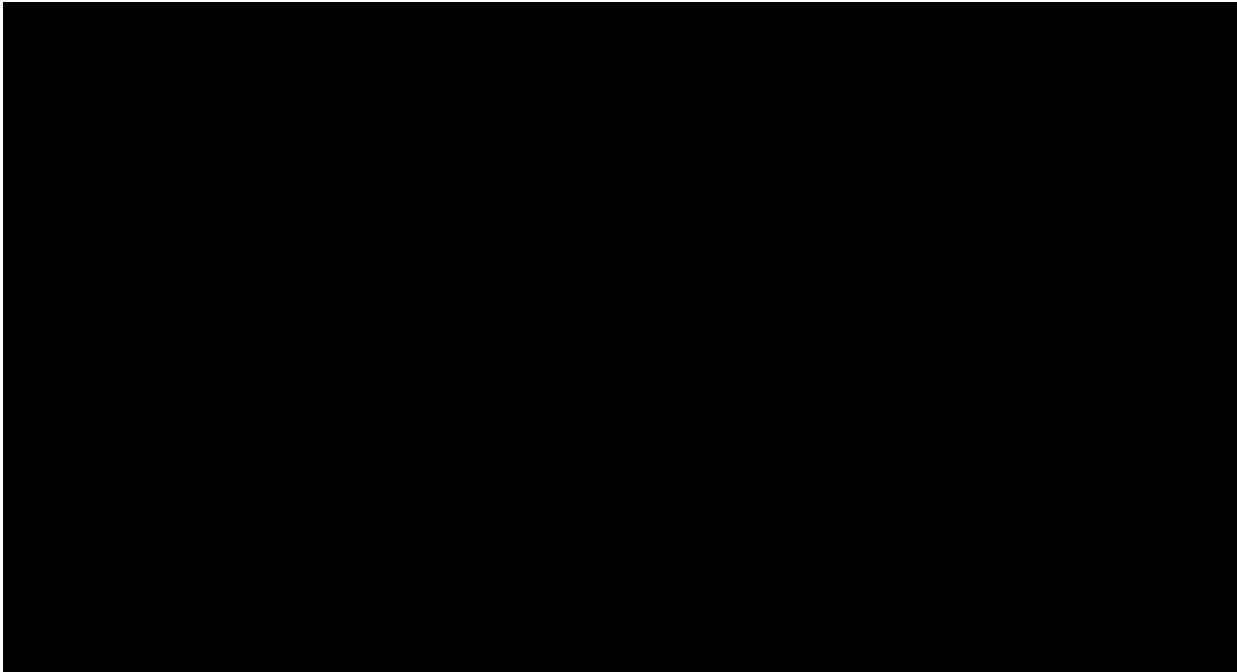


Figure 9.4.1-1. CenturyLink BSS Development Timeline.

The development teams work iteratively as self-contained units to prioritize, develop, and test all work. The test team members perform unit, system, and regression testing during the iterations. Prior to development teams delivering to production, full end-to-end, integration, user acceptance, and load and performance testing will be conducted in a dedicated test environment.

CenturyLink uses Dimensions, a state-of-the-art configuration management tool that controls code versioning and change management. CenturyLink also uses an industry standard SCRUM tool for prioritizing, coordinating, scheduling, and tracking of defects. CenturyLink will continue to use state-of-the-art tools for software development.

9.4.2 BSS Change Control (G.5.5.1)

CenturyLink's commercial and federal BSS undergo constant and regular

maintenance to ensure that the systems are operating efficiently as workloads and requirements change. In addition to this maintenance, CenturyLink will continue to foster BSS innovations through new services and process design enhancements.

The BSS change management process (CMP) will manage three categories of changes using industry-standard change control procedures: a) unplanned (emergency); b) planned CenturyLink changes; and c) GSA/agency-requested changes. CenturyLink will provide a BSS Change Control Notification to the government at least 30 days prior to all BSS changes regardless of their impact. In the event of an emergency change, CenturyLink will notify the government as soon as the required change is discovered. CMP applies to all changes impacting the government made to:

- Web interface user experience that impacts Section 508 compliance (see RFP Section G.5.3.1.3) or requires additional training of government personnel
- Direct data exchange (see RFP Section G.5.3.2.1)
- Ability of BSS to meet any specified requirements
- System security

All EIS BSS changes submitted by the government will be provided to the CenturyLink CSO and the CenturyLink process/systems team for consideration and evaluation. All changes submitted by the CenturyLink process/systems team must be evaluated and approved by the government. Once the changes are evaluated and approved, the CenturyLink process/systems team will sponsor the change request (CR). Following implementation, CenturyLink will provide any necessary training for government personnel, retest to ensure functionality meets the requirements, and, within seven days of completion, update all relevant documentation as necessary.

As shown in **Figure 9.4.1-2**, CRs to the CenturyLink BSS will be submitted by either GSA and the agencies or the CenturyLink Process/Systems team.

