

3.5 NATIONAL POLICY-BASED REQUIREMENTS L.34.1.3.5

In times of emergency, Agencies must be assured that their critical communications services are protected or restored as soon as possible. Qwest has provided National Security and Emergency Preparedness services through an active Telecommunications Service Priority program process since the program's origin. Qwest is dedicated to providing the most robust National Capital Region architecture as possible and protecting our infrastructure to ensure that our services comply with all applicable Government regulations for accessibility.

Qwest's more than 122-year reliable and dependable history of comprehensive and progressive planning ensures that we can meet the continuity of service expectations of the U.S. Government. During the past 10 years, Qwest has become a full-service vendor to the U.S. Government, gaining experience in meeting or exceeding all of the Networx procurement National Policy Based Requirements. We support several existing major Government contracts. Qwest's National Security and Emergency Preparedness (NS/EP) program is an integral part of Corporate Risk Management and is supported at the highest levels of the corporation.

Qwest has shared its information security best practices with the President's National Security Telecommunications Advisory Committee (NSTAC) as a member of the committee. Our practices became a model that others have adopted.

Qwest is currently supporting several Agencies that rely and depend on the reliability and multiple layers of security provided by Qwest's network architecture, products, services, and employees. Since the terrorist attacks of September 11, 2001 raised the stakes significantly, it is evident that

telecommunications networks are the conduit that connect and protect the essential sectors of the nation’s economy. With a large percentage of U.S. Internet traffic riding on the Qwest network, our mission is to keep both our internal and external networks safe and continuously operational even when faced with critical emergencies. Qwest’s planning function is the first in a succession of process elements to ensure our ability to meet NS/EP responsibilities for both day-to-day activities and long-term contingency plans.

Figure 3.5-1 provides an easy reference to correlate narrative requirements to our proposal response.

Figure 3.5-1. Responses to Narrative Mandatory Service Requirements

Req_ID	RFP Section	RFP Requirement	Proposal Response
2693	C.5.2.2	Part A of the NS/EP FRIP shall include technical systems, administration, management, and operational areas in the contract addressing how the 14 basic functional requirements will be supported for the above services (See Section C.7 for format).	3.5.3
7722	C.5.2.7	Because of the high concentration of traffic into and out of the National Capital Region, the contractor shall use at least two geographically separate network switches/routers to serve the National Capital Region and loss of one of these switches/routers shall not result in a loss of more than 15 percent of total network traffic.	3.5.3
7721	C.5.2.7 (1)	If the National Capital Region is covered in the contract, the contractor shall: 1. Provide Part B of the NS/EP FRIP addressing the strategy for assured service in the National Capital Region.	3.5.3
2671	C.5.2.7 (2)	If the National Capital Region is covered in the contract, the contractor shall: 2. The NS/EP FRIP Part B shall address technical systems and administration, management, and operations requirements for the National Capital Region.	3.5.3

3.5.1 National Security/Emergency Procedures (L.34.1.3.5(a), C.5.2.1, C.5.2.2, C.5.3.1, C.5.2.8)

Qwest uses a structured multi-layered approach to supporting NS/EP that is designed to address each required function. Qwest has organizationally and strategically integrated risk management and security to encompass Information Technology (IT) and physical security. Our priorities are to protect our customers from the physical layer up through the entire Open Systems Interconnection stack, including all facets of cyber security.

Our approach ensures that Qwest complies with and provides priority for the Government's telecommunications requirements for NS/EP survivability, interoperability, and operational effectiveness during an emergency threat whether caused by natural hazards, manmade disasters, infrastructure failures, or cyber events. Our approach consists of multiple levels of NS/EP support, including the assignment of a full-time dedicated liaison, established Telecommunications Service Priority (TSP) policies and procedures, implementation of the 14 basic NS/EP telecommunications functional requirements, and our robust redundant network architecture in the National Capital Region (NCR).

[REDACTED]

He will be on-site to support the Networx PMO within four hours of receiving telephone and/or email notification of a disaster/emergency [REDACTED] will have the ability to draw on the expertise of many professionals within the corporation such as the corporate director for NS/EP and the executive-level officials throughout Qwest.

President Bush's appointment of Richard C. Notebaert, Chairman and Chief Executive Officer of Qwest Communications, to the NSTAC in April 2003 continued Qwest's focus on national security and emergency preparedness. Ms. Diana Gowen, Senior Vice President and General Manager of Qwest Government Services, represents Mr. Notebaert at the Industry Executive Subcommittee meetings. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Qwest's implementation of the telecommunications policies and procedures established by the NCS is in accordance with Executive Order 12472. Qwest's approach ensures that critical key official users at Federal Agencies can communicate with other key officials at Federal Agencies; state, local, and tribal Governments; and industry organizations when faced with actual or potential emergencies that threaten the security or the economic capabilities of the United States of America locally, nationally, or internationally.

Specifically, Qwest follows the recommendations and complies with approved applicable NCS, Convergence Task Force, American National Standards Institute (ANSI), International Telecommunications Union Emergency Telecommunications Service (ITU-TSS), 3rd Generation Partnership Project (3GPP), Internet Engineering Task Force, Federal Communications Commission, Alliance for Telecommunications Industry Solutions, and Telecom Management and Operations Committee standards listed in Request for Proposal (RFP) Section C.5.1. Qwest understands the importance of staying informed and keeping current with ANSI T1, ITU-TSS, and 3GPP standards, particularly to ensure the interoperability of NS/EP services during emergencies. Qwest's NS/EP liaison will notify the Networx PMO of the status of upcoming standard adoptions, industry acceptance, commercial availability, Qwest's technology refreshment schedules, and the implementation of related services or network elements.

Basic Functional Requirements (C.5.2.1)

Qwest supports the following 14 basic functional requirements for NS/EP telecommunications and IT services. These are identified by the NCS

and the Office of Science and Technology Policy for NS/EP telecommunications services as follows:

1. Enhanced Priority Treatment. (C.5.2.1(1))

During times of national emergency, Qwest has established policies, plans, and procedures for provisioning and restoring Government data and voice services (VS) according to NCS TSP priority levels. After TSP, Qwest prioritizes fire, life, safety, and the remainder of any multi-customer impacting faults. Where appropriate and feasible, Qwest deploys multiple teams to assess, analyze, and restore services.

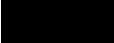
[REDACTED]

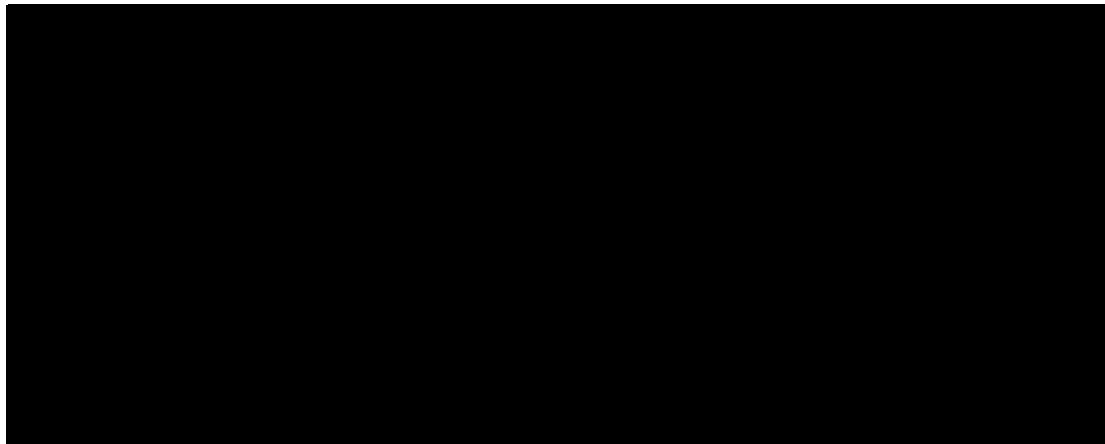
[REDACTED] The circuit was turned up, tested, and ready for service at 4:00 a.m. on October 11. Even after service turn-up, the Qwest Team remained on standby until the Bureau installed its SED later that morning and successfully tested to ensure service was fully operational.

[REDACTED]

[REDACTED] Qwest will set up,

configure, and provide access for users who require preferential and priority transmissions during emergencies.

Figure 3.5.1-1 highlights in green cells the required services for which Qwest will support Enhanced Priority Treatment at contract award. 



Qwest's current networks provide both traditional services (e.g., VS) and data services (e.g., Asynchronous Transfer Mode Service (ATMS), Frame Relay Service (FRS), Internet Protocol Service (IPS), Network Based Internet Protocol Virtual Private Network Service (NBIP-VPNS)) and are fully capable of providing priority treatment of NS/EP traffic. This is done using guaranteed Quality of Service (QoS) mechanisms, standard for FRS and ATMS, as well as new mechanisms that are becoming available for Multi-Protocol Label Switching (MPLS)-based data networks. For traditional Time Division Multiplexing (TDM) VS (e.g., Public Switched Telephone Network), Qwest will provide the appropriate handoff of NS/EP calls to GETS providers.

Qwest uses its internal Operational Support Systems (OSS) systems and procedures to deploy/support TSP for our switched and routed services and connections. [REDACTED]

[REDACTED]

[REDACTED]

The [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] also will support NS/EP prioritization requirements. However, it should be noted that the Qwest standards and approach for providing these capabilities have not yet been adopted as industry standards. Our technical approach and our ability to support the required Enhanced Priority Treatment of IP-based services are discussed above.

2. Secure Networks (C.5.2.1(2))

Qwest's priority for providing secure network services is to focus on prevention, detection, response, and event mitigation. Qwest regularly schedules vulnerability assessments and updates survivability plans accordingly. All data and VS are designed with security control mechanisms. Active fraud detection and prevention is designed into voice products, and all systems supporting services are designed with access and audit control features.

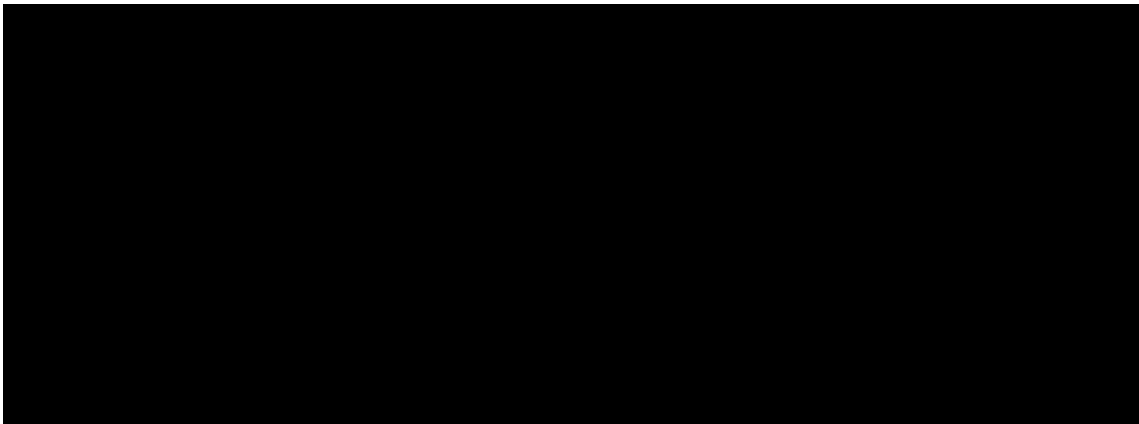
[REDACTED]

All Qwest data network operations support systems require encryption and two-factor (two independent ways to establish identity and privileges) authentication for router access:

[REDACTED]



Figure 3.5.1-2 highlights in green cells services that support NS/EP Secure Networks functions. Qwest's standard engineering processes encompass support for secure networks as a part of service design and implementation. Services ordered by the Government with particular security requirements will be engineered and managed to include expanded encryption techniques and user authentication.



3. Non-Traceability. (C.5.2.1(3))



Qwest supports non-traceability across multiple services for Federal Agencies today. The technical solution to implementing non-traceability for selected users varies based upon the services and protocols involved. Qwest's standard engineering processes encompass support for non-traceability as a part of service design and implementation for selected users.

Services ordered by the Government with non-traceability will be engineered and managed to prevent usage from being traced to inhibit user or location identification.

Figure 3.5.1-3 highlights in green cells services that support NS/EP Non-Traceability functions.



[REDACTED]

[REDACTED]

[REDACTED]

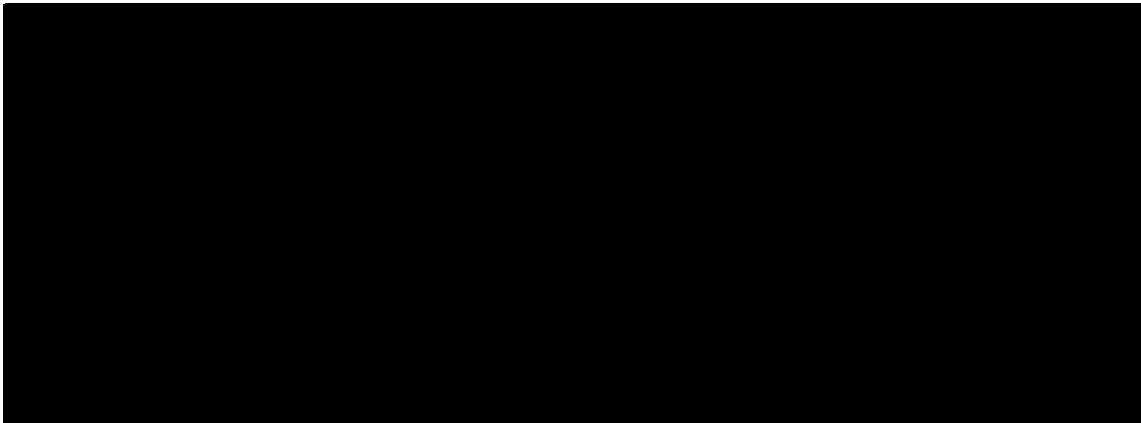
The Qwest Inter-exchange Network is designed to honor the setting of the Calling Party Presentation Indicator. The Qwest Inter-Exchange Carrier (IXC) network will not alter the Presentation Indicator, but deliver it as received to the terminating LEC. The Qwest IXC network utilizes [REDACTED] [REDACTED] switching equipment that has been designed to meet the standards set forth by ANSI and Bell Core documentation.

4. Restorability (C.5.2.1(4))

Qwest complies with all applicable requirements of the NCS Directive 3-1, TSP System for NS/EP and NCS Manual 3-1-1, "Service User Manual for the TSP System." Qwest has established policies and procedures in place to manage the restoration of services according to TSP restoration priority levels.

The Disaster Recovery/NS/EP liaison administers the TSP program for Qwest, and the Dedicated Qwest Director for NS/EP, a Principal on the National TSP Oversight Committee, will directly coordinate with the Qwest Network Contractor Program Office (CPO) to ensure that the Network PMO has immediate awareness of service disruptions that affect Agencies. Please note that Qwest's standard network inventory and fault management systems and business processes manage restoration according to TSP policy. The Director provides an oversight role to ensure that NS/EP service restoration is completed according to TSP priority levels.

Figure 3.5.1-4 highlights in green cells Qwest's support for NS/EP restorability according to TSP priority levels. Qwest's standard engineering processes encompass support for restorability as a part of service design and



implementation. Services ordered by the Government with TSP will be engineered and managed to provide restoration priority.

5. International Connectivity (C.5.2.1(5))

Qwest supports international access and egress (origination and termination) for all required services today as a standard operating procedure. For example, Qwest has numerous connection points to international carriers for circuit provisioning, traditional data products such as Asynchronous Transfer Mode (ATM) and FR, private IP services, and Internet access. [Redacted]

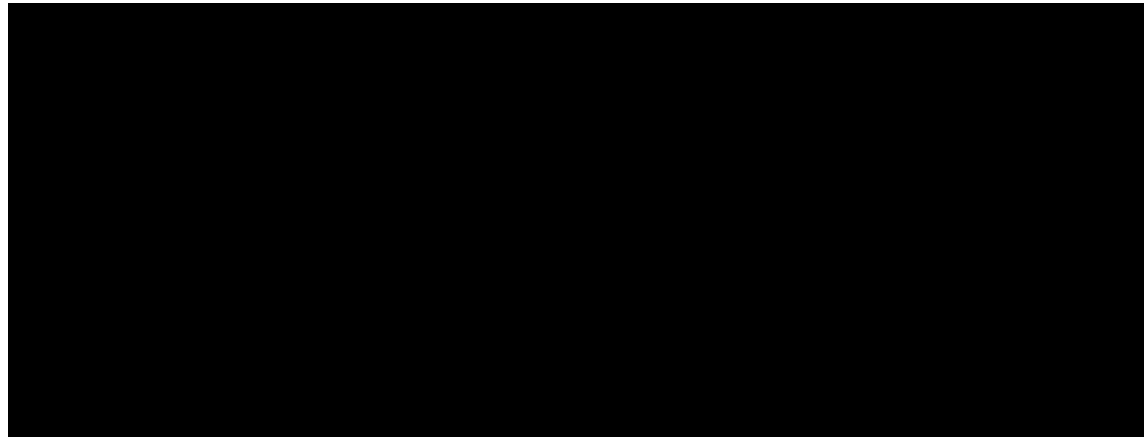


Qwest's IP network interconnects with the domestic [Redacted]



[Redacted] Qwest also provides connectivity to off-net locations using IP Security over dedicated IP interfaces from any service provider around the world.

Figure 3.5.1-5 highlights in green cells the service connectivity that Qwest provides internationally. Qwest's standard engineering processes encompass international connectivity as a standard part of service design and



implementation. For example, Qwest continues to actively participate in standards bodies working to develop international interoperability for L2VPNS (e.g., Virtual Private Local Area Network Services and Network to Network Interfaces). As such standards are developed, Qwest will implement accordingly.

6. Interoperability (C.5.2.1(6))

Qwest offers a rich collection of interconnects and interconnect types, all standards based. Our *any access* approach to network architecture includes access tandems, as well as private and public peering arrangements to enable interoperability with Government and other private facilities. Qwest can interconnect to existing Government or private networks using [REDACTED]



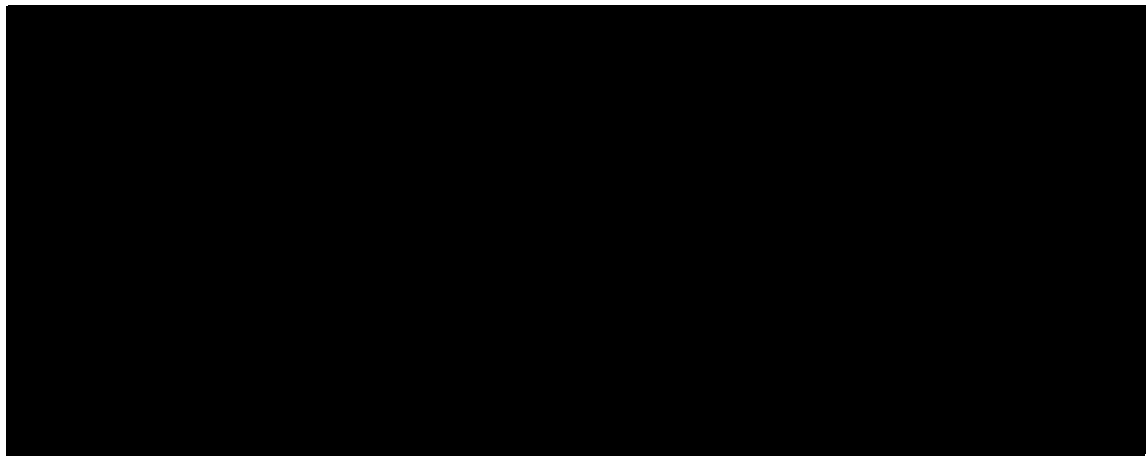
For example, Qwest has more than [REDACTED], as well as private peering with the leading international Internet Service Providers (ISPs) to improve global Internet performance. Qwest provides services to the world's largest [REDACTED] as well as numerous Federal Agencies and Fortune 500 companies. Qwest already provides IP services to several Federal Agencies, including the [REDACTED]





Qwest’s standard engineering processes encompass support for interconnections and interoperability as a part of service design and implementation. Services ordered by the Government with requirements to interconnect to other Government or private networks will be designed and implemented using defined interoperability standards.

Figure 3.5.1-6 highlights in green cells Qwest’s support for interoperability.



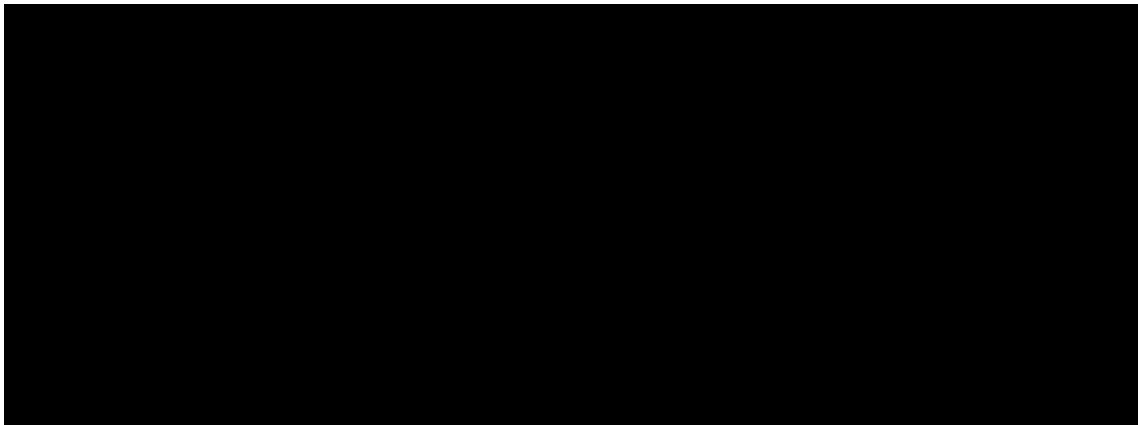
7. Mobility (C.5.2.1(7))

Qwest’s CPCS is provided through our partnership with Sprint and supports the mobility of Agency users who require data and VS through nationwide and non-domestic Mobile Virtual Network Operators arrangements services using leading-edge Code Division Multiple Access technology and 1xRTT (Radio Transmission Technology) and Evolution Data Only data services. The 1x in 1xRTT refers to 1x the number of 1.25MHz channels. Qwest also provides 802.11 roaming and dial-up Internet services to enable VPN access virtually anywhere in the world. Qwest provides mobile

satellite access through the use of transportable/deployable VSATs interfacing via earth stations to Qwest's Points-of-Presence (POPs).

Further, interoperability with other mobile devices (e.g., high frequency radio) has been demonstrated for a range of standard voice and data services—for example, under the GETS program. Qwest's standard engineering processes include support for mobile services and special engineering of mobility interconnections as a part of service design and implementation. Services ordered by the Government with requirements for mobility will be designed and implemented to comply fully with General Services Administration (GSA) and Agency requirements.

Figure 3.5.1-7 highlights in green cells services that support NS/EP's requirements for mobility.

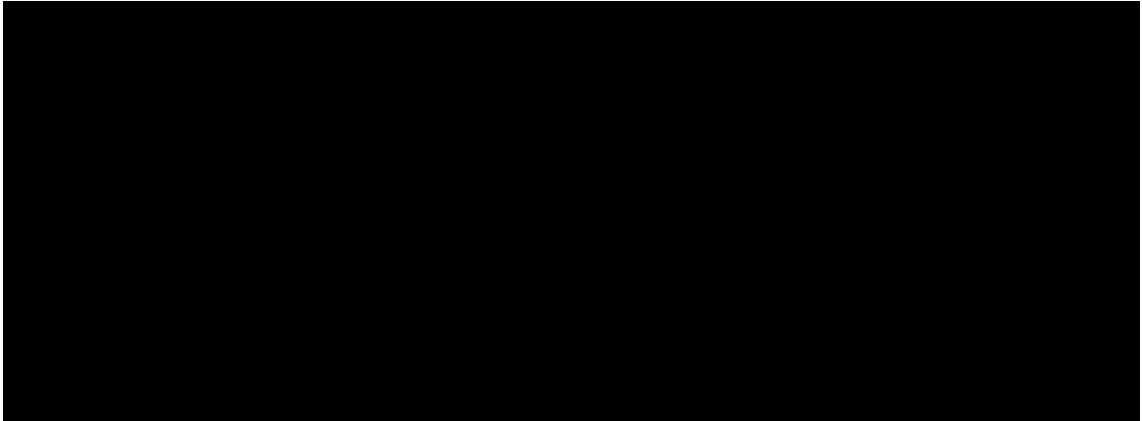


8. Nationwide Coverage (C.5.2.1(8))

Voice and data services are available to all local access transport areas nationwide to support national security leadership and inter- and intra-Agency telecommunications during emergency operations. Qwest also has established connectivity to Outside Continental United States U.S.



Figure 3.5.1-8 highlights in green cells access for Networkx users to Qwest's services. Qwest's standard service footprint fulfills all mandatory Networkx requirements for geographic coverage.



9. Survivability/Endurability (C.5.2.1(9))

Qwest's voice and data services have been engineered with redundant equipment and circuit links in each POP. Backup power and seismic-tolerant facilities (where appropriate) also support this function. Qwest's fiber network is primarily buried more than a meter below ground along railroad rights-of-way to significantly reduce the chances of natural or manmade disasters affecting services.

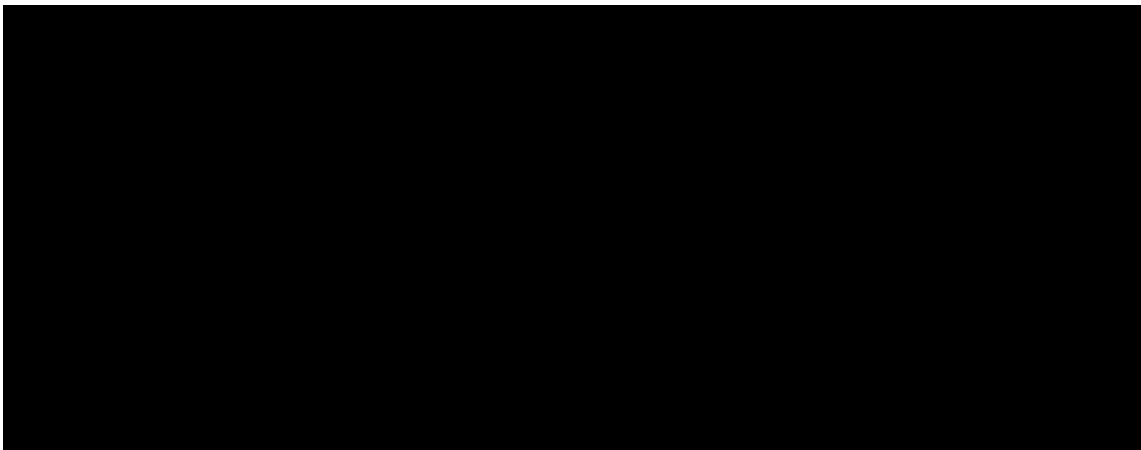
Our primary backbone transport network is made up of SONET Four-Fiber Bi-directional Line-switched Rings (4F-BLSRs) that have no single points of failure. Network facilities have back-up generators, dual battery systems, and redundant Heating Ventilation and Air Conditioning. Field operations staff performs regular preventative maintenance to ensure normal optimal operations. In the event of an emergency, the same staff would perform the emergency maintenance required to re-establish normal operations. In seismically active areas, facilities are engineered to reduce damage in the event of an earthquake. Qwest's network can re-route traffic around failed network components and facilities with full transparency to the

end user. This re-route occurs in less than 100 milliseconds. We also utilize comprehensive monitoring and alarming of infrastructure components for status notification of the network.

Agencies can order services with dual access arrangements across physically diverse paths between Agency Service Delivery Point (SDP) locations, LECs, Competitive LECs (CLECs), other communications providers, and Qwest POPs. [REDACTED]

[REDACTED] Specific to Networx, Qwest supports all critical Acceptable Quality Levels (AQLs) (e.g., for SDP-to-SDP high availability) as required. Services ordered by the Government with requirements for critical availability will be designed and implemented to fully comply with GSA and Agency requirements.

Figure 3.5.1-9 highlights in green cells Qwest's services that are designed, operated, and maintained meeting NS/EP survivability and endurance requirements.

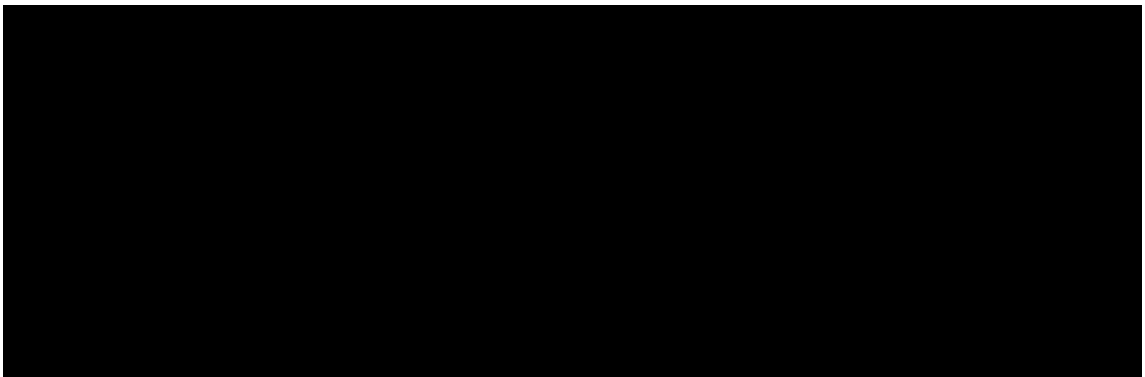


10. Voice Band Service. (C.5.2.1(10))

Qwest offers a facilities-based network to support presidential voice band communications. Our Networx Customer Support Office (CSO) will respond to presidential travel requirements and will be tied directly to our

Network CPO. Qwest's standard engineering processes include support for VS requests supporting presidential communications requirements. Services ordered by the Government with requirements for presidential VS support will be designed and implemented to fully comply with GSA and Agency requirements.

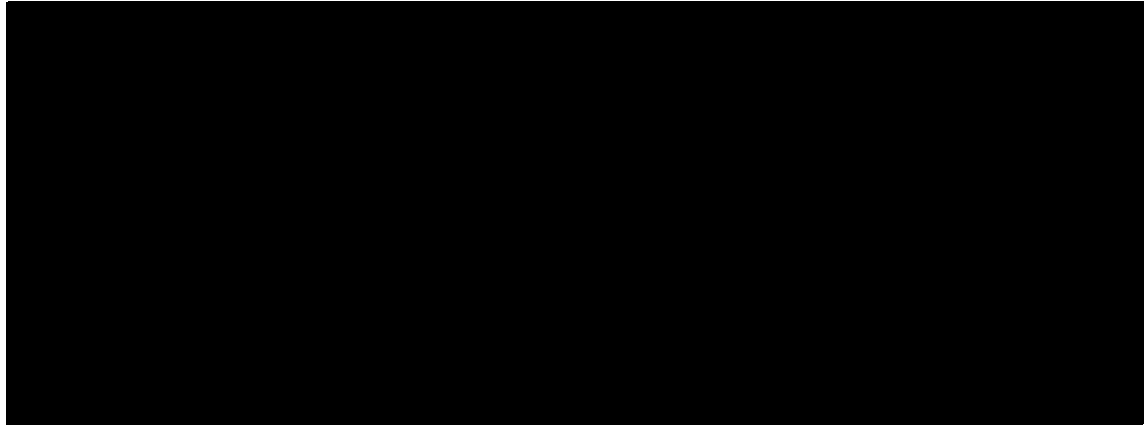
Figure 3.5.1-10 highlights in green cells VS and CPCS that will support this functional requirement.



11. Broadband Service (C.5.2.1(11))

Qwest provides a nationwide Macro high-performance fiber optic backbone that supports broadband VS and data requirements ranging from 64Kbps (DS-0) to multi-gigabit private MPLS networks, as well as Dense Wave Multiplexing wavelength services and dark fiber to the end user. Qwest's QoS mechanisms enable real-time applications over our converged data network. Qwest offers all mandatory Network broadband services and, as noted above, can perform special NS/EP or TSP related handling as ordered by Agencies. Qwest's standard engineering processes include support for broadband services as a part of service design and implementation. Broadband services ordered by the Government will be designed and implemented to fully comply with GSA and Agency requirements.

Figure 3.5.1-11 highlights in green cells Networkx services that operate over Qwest's broadband service.



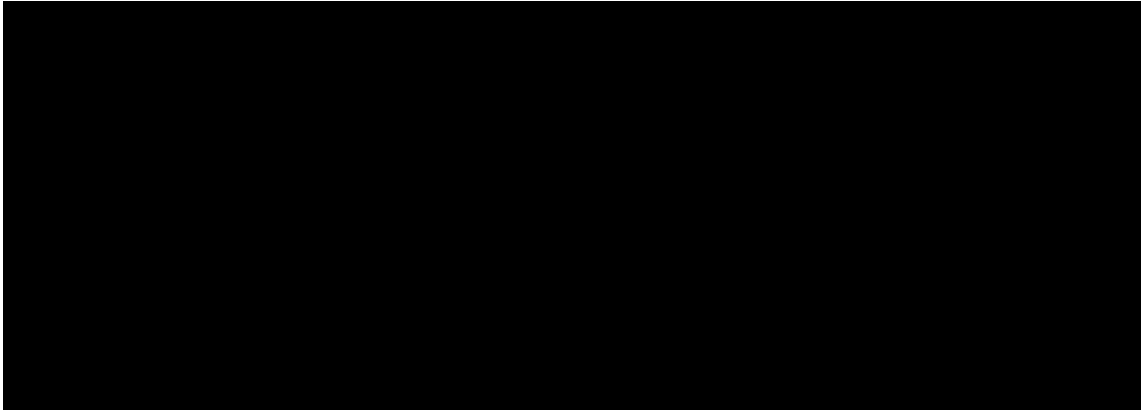
12. Scalable Bandwidth (C.5.2.1(12))

Qwest has a wide range of transport and data services that provide capabilities from 64Kbps up to 10Gbps. Using Qwest's Customer Network Management (CNM) solution, NS/EP users are able to manage the capacity of their communications services to support variable bandwidth requirements. NS/EP users can create circuits from T1 to 10Gbps and add additional bandwidth capacity very quickly when needed through automated processes ("point-and click" features) under their control. Additional features of CNM solutions include:

- 1) Customer-centric partitioned view of the network down to the device, port, and tributary.
- 2) Full control of their network including setting up, modifying, and tearing-down circuit connection
- 3) Real-time notification of alarms and performance reports

Figure 3.5.1-12 highlights in green cells services that have the capability for variable bandwidth user management.

13. Affordability (C.5.2.1(13))

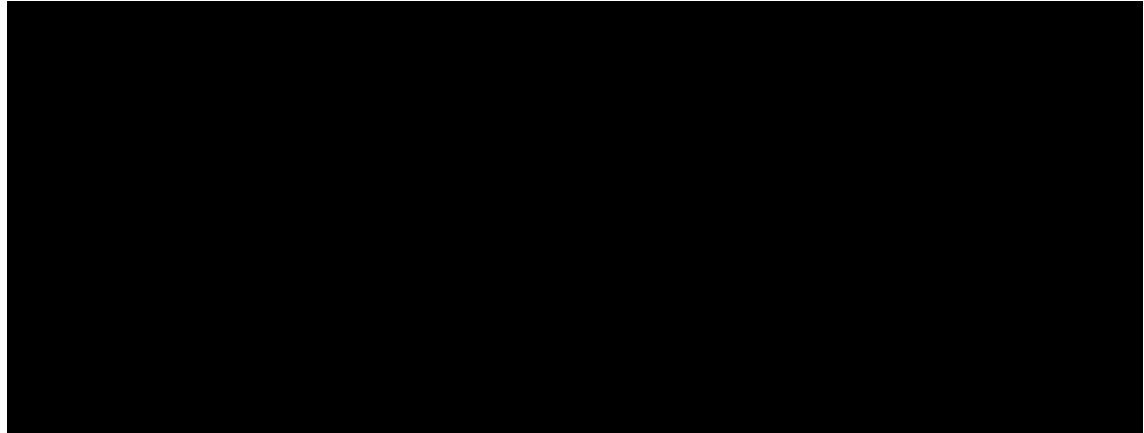


Qwest leverages and optimizes its commercial assets and deploys commercial-off-the-shelf technologies rigorously tested in our integration and test laboratory to reduce implementation risk and minimize cost to the end user. Qwest has also integrated its data network infrastructure by combining traditional data networking with IP-based services



Qwest's ability to automate the management of multiple network domains with multiple security policy rule sets implemented in multiple systems also helps to minimize costs by increasing efficiency.

Figure 3.5.1-13 highlights in green cells the fact that Qwest supports NS/EP requirements for cost effectiveness in its Networx services.



14. Reliability/Availability

Qwest's product development, engineering, and operations approaches optimize services to ensure conformance with design requirements and specifications. Qwest's engineers who design Networkx services also recommend and design solutions for additional reliability and availability to meet Agency-specific needs. Qwest is a performance-based service provider, offering all required Networkx KPIs/AQLs to Agencies.



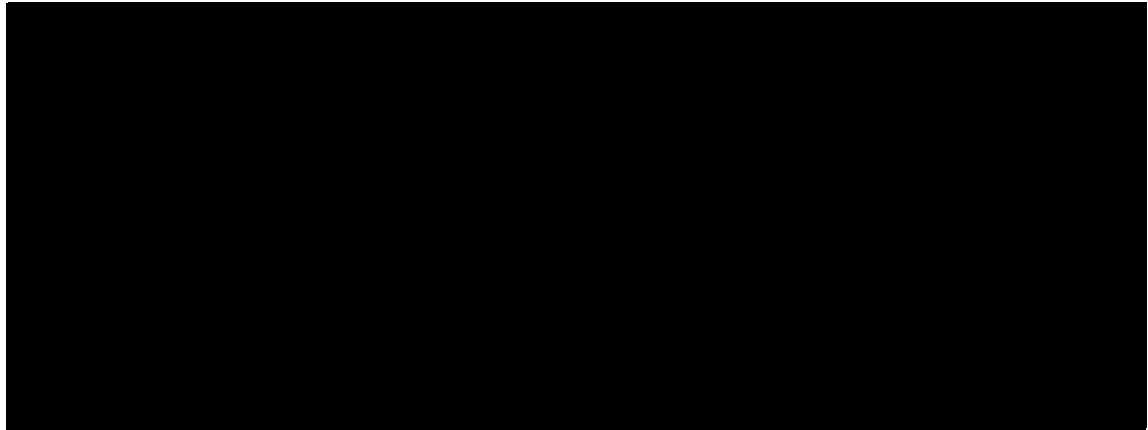
Qwest maximizes availability of POP-to-POP services through the use of a range of transport solutions that include SONET ring protection, , , and automatic ATM and FR Permanent Virtual Circuit remapping. In addition, as discussed above, Qwest offers a full range of routine and critical availability access options to ensure that Agency reliability and availability requirements are fulfilled.

Figure 3.5.1-14 highlights in green cells the fact that Qwest can ensure Networkx NS/EP users that services will be available and reliable whenever they need them. Qwest's standard engineering processes support fulfillment of both routine and critical services as ordered by an Agency.



Qwest's NS/EP Functional Requirements Implementation Plan (FRIP) Part A includes support for the above 14 requirements in accordance with RFP Section C.7.16.

3.5.2 Protection of SS7 and Satellite (L.34.1.3.5(b), C.5.2.5)

Protection of SS7 Signaling System



Protection of Satellite Command Link

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.5.3 NCR Network Architecture (L.34.1.3.5(c))

As discussed in Section 3.2, Qwest provides network services in the NCR with a robust network architecture designed and engineered to ensure service continuity in the event of significant facility failures or catastrophic impact. Qwest will continue to engineer critical services to meet each Agency’s requirements to eliminate potential single points of failure or overload conditions that may affect their network service performance.

Qwest has an active compliant NS/EP plan and has been providing TSP services with an excellent track record of meeting our customers’ critical and emergency requirements locally and nationally for more than five years. Qwest also provides functionality that enables GETS priority calling mechanisms. Mr. Snee supports the NCS full-time for Qwest. His dedication to the program enables Qwest to provide full coordination with the Government’s requirements in times of emergency.

Qwest will provide full NS/EP FRIP documentation upon contract award when requested to proceed with plan delivery. Qwest will update plans, including Part B, addressing our strategy for supporting Agency NCR requirements in accordance with RFP Section C.7.16.

Qwest understands the Government’s requirement to ensure performance of network services in and around the NCR. Qwest has POP diversity in the NCR with two major gateways located in Baltimore, MD and Washington, D.C. Each of these gateways provides complete redundancy to

access Qwest nationwide and international network capabilities as well as regional voice and data services. Qwest also has a third provisioning POP in Sterling, VA, which serves as an access POP, IP services node, and high-availability collocation and hosting center.

[REDACTED]

[REDACTED]

[REDACTED]

Qwest has multiple [REDACTED]. For visual simplicity, [REDACTED]. Additionally, [REDACTED].

[REDACTED] This configuration enables these three locations to participate in the routing of access and backbone traffic, providing significant load-balancing and reconfiguration options in the event of a switch, router, or complete POP failure. In effect, this means that [REDACTED].

[REDACTED] As presented in Section 3.2.2, Qwest connects to several major ILEC POP locations through SONET-ring protected networks to ensure multiple access paths to ILECs' services including voice termination and fiber access. The use of CLECs, who provide infrastructure that is generally separate from the ILECs, gives another level of resiliency to the architecture because these services would not be affected by an ILEC facility failure.

[REDACTED]

Using Qwest diverse access infrastructure, this affords the maximum protection for an Agency in the event of the loss of a switch or transport system failure. In Section 3.2.3, Qwest demonstrates how network planning examines all failure modes and determines network capacity and switch or router redundancy placement to ensure performance during failures.

The route-diverse SONET backbone and access networks that service the NCR enable the transport of services to any Qwest POP nationwide. For simplicity, [REDACTED] shows the regional major data (ATM/frame relay and IP service) POPs outside of the [REDACTED]. As with VS, critical Qwest customers can be dual-homed to ensure extremely high availability of their data services—again protected from any single point of failure in the NCR.

[REDACTED]. Qwest peers with the largest ISPs at seven private peering locations geographically distributed through the United States, and the loss of a single peering point has virtually no effect on our ability to provide high-quality access to the Internet. [REDACTED] to improve international peering performance. In total, Qwest can dual-home critical customer connections with complete route diversity to all of Qwest's data networking services to have complete resiliency from facility failures in the NCR.

[REDACTED]

services are 508 compliant, Qwest continues tests and evaluations with industry and specific Assistive Technology (AT) vendors to assess interoperability with text telephones (TTY) and AT devices.

Qwest has enlisted a single toll-free number for 24x7x365 access: 1-866-GSA-NETWorx (1-866-472-6389) that will provide Agencies with direct access to our CSO, which will also be 508 compliant—enabling accesses by email, fax, TTY, telecommunications display devices, text messaging, or other methods as required. Qwest customer service support will be accessible around the clock for all Agency users, wherever they may be located. To ensure this, the Qwest Control Networx Portal, the gateway to Qwest Networx support systems, will also be 508 compliant. This portal will serve as the primary conduit for daily status pertaining to ongoing projects and other service delivery activities for the Agencies.

The following describes Qwest's approach for maintaining compliance with Section 508. Our approach for 508 compliance starts at lifecycle initiation and flows through transition, testing, and operations.

Step 1: Discovery and Scoping

As part of Qwest's Networx deliverables, **Figure 3.5.4-1** lists the voluntary product accessibility templates (VPATs) developed for each applicable product and service as required. The VPATs, including the relevant provisions of Subparts B, C, and D listed in Figure 3.5.3-1, are included in the Technical Volume Appendices.

- 1194.21 Software Applications and Operating Systems
- 1194.22 Web-Based Internet Information and Applications
- 1194.23 Telecommunications Products
- 1194.31 Functional Performance Criteria
- 1194.41 Information, Documentation, and Support

Figure 3.5.4-1. Qwest's Networkx Services Comply with Section 508 Technical Requirements. *Disabled federal employees and citizens will be able to use Qwest's Networkx Services as described in the following VPAT section.*

Section 508 Provisions Applicable to Networkx Services	1194.21	1194.22	1194.23	1194.31	1194.41
Call Center/Customer Contact Center Services (CCS)	✓	✓	✓	✓	✓
Cellular/PCS (CPCS)	✓	✓	✓	✓	✓
Collaboration Support Services (CoSS) - Opt. Not Proposed					
Converged IP Services (CIPS)	✓	✓	✓	✓	✓
IP Telephony Services (IPTelS)	✓	✓	✓	✓	✓
Managed E-Authentication Services (MEAS)	✓	✓		✓	✓
Multi-Mode Wireless LAN Service (MWLANS)	✓			✓	✓
Paging (PagS) - Opt. Not Proposed					
TeleWorking Solutions (TWS)	✓	✓	✓	✓	✓
Unified Messaging Services (UMS) - Opt. Not Proposed					
Web Conferencing Service (WCS)	✓	✓		✓	✓
Incident Response Service (INRS)		✓		✓	✓
Internet Facsimile Service (IFS) - Opt. Not Proposed					
IP Video Transport Services (IVTS) - Opt. Not Proposed					
Managed Tiered Security Services (MTSS)		✓		✓	✓
Secure Managed Email Service (SMES)		✓		✓	✓
VOIP Transport Service (VOIPTS)		✓	✓	✓	✓
Combined Services (CS)			✓	✓	✓
Land Mobile Radio Service (LMRS) - Opt. Not Proposed					
Voice Services (VS)			✓	✓	✓
Toll-Free Service (TFS)			✓	✓	✓

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The purpose of this evaluation is to identify and resolve compliance gaps in existing requirements or products. This information will also be used to develop future releases of Qwest products/services to ensure compliance with Section 508.

Qwest's Section 508 Project Manager is responsible for the testing and integration of product/services with AT in a lab environment. The Project Manager will also work with SED manufacturers and service providers to ensure that Section 508 compliance is an integral part of the design process for all new and future hardware and software releases.

The 508 Project Manager will report to Qwest's Program Director every month, providing any updated VPATS and Technical Reports as required by Section C.7 and C.6.5 of the RFP. These will be made available to GSA's Networkx PMO monthly.

Step 2: Publish Design Guidelines

This step focuses on developing accessibility design guidelines for use and reference by its internal software development teams, Qwest consultants, and team members. The guidelines will be updated as tools are identified for developers and implementers to use in the design, development, and testing of the business application. This form will be reviewed and updated at least monthly and will be addressed as part of each project's monthly review with the Networx PMO.

The Qwest 508 Project Manager will be responsible for managing the development of Qwest-offered Networx products and services training, documentation, manuals, user guides, audio/visual tapes, CD ROMS, and DVDs for disabled users in response to Agency task order requirements. The Project Manager will also be responsible for managing the provisioning of training assistance for disabled users at meetings, seminars, and classroom training in response to advance notice provided by Agency task orders.

Step 3: Ensure Future Releases are Compliant

Compliance gaps identified in the discovery and scoping step will be reported to the development organization, where they will be treated the same as programming errors, which receive a high level of attention until resolution. Qwest is evaluating several automated compliance testing software options to speed up the compliance verification process. Compliance checks, which include automated software checks, will be ultimately integrated into the Qwest software development lifecycle as standard procedures.

Qwest has been and will continue to explore ways to participate in programs focused on accessibility and to sponsor programs offered by universities, organizations, and institutions that are actively involved in the field of software accessibility and Section 508 compliance.

Subpart C, Functional Performance Criteria

We are committed to ensuring that the services offered work together with disabled employees and citizens' AT to meet their needs and satisfaction with Qwest's services.

Agencies will have a variety of disabled users using many Networx services and accessing many types of systems, equipment, and applications. Qwest determined that the following principles are important guidelines to ensure satisfaction for disabled users with our products and services:

- Support specific Agency requirements for users
- Provide equivalent access to auditory and visual content based on specific Agency requirements
- Provide interoperability and compatibility with AT and include complete keyboard access when applicable
- Provide context and system orientation information when needed and where required
- Follow Section 508 specifications and guidelines to ensure compliance and confirm that products and services meet requirements

VPATs for each offered service are included in the Technical Volume, Appendix 1 Section 508 Forms. The VPATs include responses for Subpart C, Functional Performance Criteria, paragraph 1194.31.