

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

RTW _____ 1

DATE PREPARED: November 12, 2009

DOCKET: UT-090842

REQUESTER: Verizon/Frontier

WITNESS: Robert T. Williamson

RESPONDER: Robert T. Williamson

TELEPHONE: (360) 664-1288

REQUEST NO. 11: On page 7 of his testimony, Mr. Williamson describes both the Hawaiian Telecom and FairPoint transactions as “disasters for the states and customers involved.” Is it Mr. Williamson’s conclusion that the outcomes of those transactions are predictive of the success of the current transaction? If so, please explain why.

RESPONSE: It is not Mr. Williamson’s conclusion that the outcome of those transactions is necessarily predictive of the success of the current transaction. It is Mr. Williamson’s opinion that the failures in those two transactions are indicative of the complexity of the OSS conversion process and the risks to customer service in the current case. Mr. Williamson stated on page 18 of his testimony that “the use of replicated systems should prove to be less risky than a cut-over to new untried systems as in Hawaii and the New England states,” however, he does not believe that this transaction is without risk. Given the failures in the last two sales of access lines by Verizon and the complexity of the OSS conversion plan in this transaction, it is prudent to hold the companies to reasonable precautionary measures and reporting requirements.