

BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE )  
COMPLAINT AND REQUEST FOR )  
EXPEDITED TREATMENT OF AT&T ) DOCKET NO. UT-991292  
COMMUNICATIONS OF THE PACIFIC )  
NORTHWEST, INC. AGAINST )  
U S WEST COMMUNICATIONS, INC. )  
REGARDING PROVISIONING OF )  
ACCESS SERVICES )

**REBUTTAL TESTIMONY OF**

**PERRY W. HOOKS, JR.**

**ON BEHALF OF**

**U S WEST COMMUNICATIONS, INC.**

**JANUARY 11, 2000**

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1           **WITNESS INTRODUCTION AND PURPOSE OF REBUTTAL TESTIMONY**

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3           PLEASE STATE YOUR NAME.

4           Perry W. Hooks Jr.

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6           **ARE YOU THE SAME PERRY W. HOOKS JR. WHO PRE-FILED**

7                   **TESTIMONY ON NOVEMBER 17, 1999 IN THIS CASE?**

8           Yes, I am.

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10          **Q.     WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

11          I am filing this testimony in response to parts of the Direct and Rebuttal  
12                    Testimony of Kenneth L. Wilson on behalf of AT&T Communications  
13                    of the Pacific Northwest, Inc. relating to subject matter discussed in  
14                    my Direct Testimony.

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16                           **SUMMARY OF REBUTTAL TESTIMONY**

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18          **WOULD YOU PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY?**

19          Yes. My Rebuttal Testimony notes that contrary to the position taken in Ms.  
20                    Field's Direct Testimony, AT&T, through Mr. Wilson's testimony, has  
21                    now acknowledged that U S WEST is only required to provide  
22                    access service consistent with its tariffs. I then respond to Mr.  
23                    Wilson's review of my testimony regarding whether AT&T seeks  
24                    more than U S WEST's tariff provides; I renew my contention that  
25                    AT&T seeks more than the U S WEST tariffs describe. Finally, I  
26                    respond to Mr. Wilson's comments regarding the relationship  
27                    between processes and performance measurements; Mr. Wilson  
28                    does not deny that the U S WEST measurements reflect the U S  
29                    WEST process, but instead desires new measurements and targets

1 for a new access service.

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**U S WEST OFFERS “TARIFFED” ACCESS SERVICES**

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DOES U S WEST PROVIDE THE ACCESS SERVICES DESCRIBED IN  
ITS TARIFFS?

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A, Yes it does. This is significant because AT&T does not seek U S  
WEST’s tariffed access services. Instead, it continues to appear that  
AT&T seeks to have access service on demand, availability of which  
is confirmed and guaranteed within twenty-four hours of U S WEST’s  
receipt of each AT&T service request.

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**HOW DOES AT&T RESPOND TO US WEST’S CONTENTION THAT U S  
WEST IS ONLY REQUIRED TO PROVIDE THE TARIFFED  
ACCESS SERVICE?**

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On page 27, line 10 through page 28, line 4, of his Direct and Rebuttal  
testimony, AT&T witness, Ken Wilson, claims that AT&T is not  
seeking “special treatment.”

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**DO YOU AGREE THAT AT&T IS NOT SEEKING ”SPECIAL  
TREATMENT”?**

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No, AT&T is seeking “special treatment.” For example, Mr. Wilson  
contends on page 12, lines 8-12 of his Direct and Rebuttal  
Testimony that U S WEST has no excuse for not providing facilities  
when AT&T desires. Obviously, however, U S WEST anticipated  
that it might not always have facilities available as noted in its tariffs  
and Service Interval Guide. Notwithstanding those facts, AT&T  
erroneously insists that it only seeks what the U S WEST tariffs  
require.

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**DOES MR. WILSON MISUNDERSTAND WHEN THE FIRM ORDER  
CONFIRMATION (FOC) SHOULD BE PROVIDED TO AT&T?**

Yes, it appears that he does. On page 22, lines 3-15 of his Direct and Rebuttal Testimony, Mr. Wilson explains that he believes that the FOC should be returned “immediately following the DLR.” In fact, U S WEST’s process is intended to have the Service Delivery Center return the FOC the day following the Record Issuance Date (RID) which also should take place on the same day that the Design Layout Record (DLR) is developed by engineering personnel. Mr. Wilson appears to assume that the same organizations provide the DLR, the RID, and the FOC. That assumption is incorrect, however, and to allow transmission of all relevant records, the FOC is issued the day following the DLR and RID completion.

**DOES AT&T SEEK SPECIAL TREATMENT WITH RESPECT TO THE  
FOC ISSUANCE DATE?**

Yes, AT&T has been seeking the FOC prior to the engineering work being completed. This is contrary to the process contemplated in the U S WEST tariffs and related Service Interval Guide, and is different than the date when other access customers receive their FOCs.

**DOES RECEIVING THE FOC FOLLOWING THE REQUIRED  
ENGINEERING WORK IMPROVE THE CHANCES OF  
INSTALLATION COMMITMENTS BEING MET?**

Yes. When FOCs are provided prior to the engineering work being completed, U S WEST can only provide an expected commitment date based upon the assumption that facilities are available. By contrast, when an FOC is provided following a more thorough

1 records examination by engineering personnel, the likelihood of  
2 determining whether facilities are available to provide a service  
3 improves.

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5 **MEASUREMENTS AND PROCESSES**

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7 **DOES MR. WILSON'S TESTIMONY REGARDING PERFORMANCE**  
8 **MEASUREMENTS SUPPORT HIS CONTENTION THAT AT&T**  
9 **SEEKS ONLY WHAT IS DESCRIBED IN THE TARIFFS?**

10 No. On page 23, lines 5-13, of his Direct and Rebuttal Testimony,  
11 Mr. Wilson argues in support of AT&T's new measures and new  
12 targets to support process changes for U S WEST's access services.  
13 Mr. Wilson acknowledges that AT&T suggests new measures and  
14 targets which support what AT&T desires, not the U S WEST tariffed  
15 access services.

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17 **CONCLUSION**

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19 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

20 A. Yes, it does. Thank you.