

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of Qwest
Corporation to Initiate a Mass-Market
Switching and Dedicated Transport Case
Pursuant to the Triennial Review Order**

Docket No. UT-033044

RESPONSE TESTIMONY OF

MATTHEW B. WHITE

ON BEHALF OF

QWEST CORPORATION

FEBRUARY 2, 2004

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I. IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, EMPLOYER, AND BUSINESS ADDRESS.

A. My name is Matthew White. I am a Staff Advocate, Policy and Law for Qwest Service Corporation, a unit of Qwest. My business address is 930 15th Street, Denver, Colorado 80202.

Q. MR. WHITE PLEASE REVIEW YOUR EDUCATION, WORK EXPERIENCE, AND PRESENT RESPONSIBILITIES.

A. In 1994, I graduated from the United States Military Academy, West Point, NY, with a B.S. in Civil Engineering. Over the next five years, I held numerous leadership positions in the 1st Battalion, 66th Armored Regiment (4th Infantry Division) at Fort Hood, TX, rising to the rank of Captain. In 1999, I left the U.S. Army and took a position managing the vendors constructing 360Network's national long-haul and metro network. In 2001, I joined Qwest Communication's Wholesale Service Delivery as a Project Manager. In that capacity, I assisted in the development, redesign and implementation of the Qwest Wholesale Change Management Process. At the same time, I earned an MBA from the University of Denver. My current position is Staff Advocate of Policy and Law, in which I am responsible for managing and overseeing the implementation of various Qwest systems initiatives. I am currently completing my first year at the University of Denver School of Law.

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II. INTRODUCTION

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. This testimony responds to the general OSS issues raised in the direct testimony of Mr. Cox¹ and Mr. Cabe² on behalf of MCI. This testimony also responds to the direct testimony filed by Ms. Doberneck and Mr. Zulevic jointly on behalf of Covad,³ which asks the Commission to require Qwest to make certain OSS changes to implement line splitting regardless of whichever way the Commission decides the impairment question to which this docket is directed.

Q. AS A GENERAL MATTER, ARE THE OSS ISSUES THAT MCI AND COVAD RAISE RELEVANT TO THE IMPAIRMENT INQUIRY?

A. No. The MCI and Covad witnesses generally try to lump these issues in as “operational impairments.” But the FCC’s “operational impairments” inquiry is not a roving investigation into any network issue that a CLEC can think of. Rather, the *Triennial Review Order* (“TRO”) identifies the specific operational issues that state commissions should consider if the competitive triggers are not met, and OSS is not on that list.

¹ Direct Testimony of Cedric Cox on Behalf of WORLDCOM, INC. (“MCI”), Exhibit No. not provided, filed December 22, 2003 (“Cox Direct”).

² Direct Testimony of Richard Cabe on Behalf of WORLDCOM, INC. (“MCI”), Exhibit No. not provided, filed December 22, 2003 (“Cabe Direct”).

³ Direct Joint Testimony of Megan Doberneck and Michael Zulevic on Behalf of Covad Communications Company, Exhibit No. not provided, filed December 22, 2003 (“Covad Direct”).

1 The FCC rules laying out the roadmap for the nine-month mass-market switching
2 case specify exactly which network-related barriers are even potentially relevant:

3 (2) Operational barriers. The state commission also shall examine the role
4 of potential operational barriers in determining whether to find “no
5 impairment” in a given market. Specifically, the state commission shall
6 examine whether the incumbent LEC’s performance in provisioning loops,
7 difficulties in obtaining collocation space due to lack of space or delays in
8 provisioning by the incumbent LEC, or difficulties in obtaining cross-
9 connects in an incumbent LEC’s wire center render entry uneconomic for
10 requesting telecommunications carriers in the absence of unbundled
11 access to local circuit switching.⁴

12 The “Operational Barriers To Be Examined” section of the *TRO* likewise limits
13 the inquiry to just these three subjects (loop provisioning, collocation, and CLEC-
14 to-CLEC cross connects) and does not mention OSS. *See TRO* ¶¶ 507, 511.

15 Other state commissions have recognized that the “operational impairment”
16 inquiry is limited to these three subjects and not a catch-all for any network issue
17 that CLECs want to raise. The ALJs hearing the Oregon *TRO* cases, for example,
18 refused MCI’s and Covad’s request to amend that state’s formal issues list to
19 permit CLECs to raise operational issues beyond loop provisioning, collocation,
20 and CLEC-to-CLEC cross connects: “While there are several factors to be
21 considered within each of the three potential sources of operational impairment
22 identified by the FCC, *States have not been directed to embark upon a broader*

⁴ 47 C.F.R. § 51.319(d)(2)(iii)(B)(2).

1 *inquiry into other operational barriers.*⁵ MCI's and Covad's attempt to expand
2 the TRO's inquiry to include these general OSS issues is improper.

3 **Q. PLEASE COMMENT GENERALLY ON THE TESTIMONY OF MCI'S**
4 **WITNESSES.**

5 A. As I explain below, most of MCI's OSS complaints are not even directed toward
6 any particular practice of Qwest's. Instead, MCI raises generic complaints about
7 *industry-wide* practices across the country, or complains about what incumbent
8 LECs other than Qwest may be doing. There are several instances where Qwest
9 has already implemented the policies and practices that MCI argues are necessary
10 — strongly suggesting that MCI has not even attempted to examine Qwest's OSS
11 in particular or customize its nationwide template OSS testimony to Qwest.

12 This Commission and the FCC have already examined Qwest's OSS in detail in
13 the section 271 process and found them more than adequate. MCI's generic
14 complaints about *industry-wide* practices are simply irrelevant: the FCC was clear
15 that only "those barriers that are solely or primarily within the control of the
16 incumbent LEC" can potentially constitute an operational impairment.⁶ Likewise,

⁵ *In The Matter Of The Investigation To Determine, Pursuant To Order Of The Federal Communications Commission, Whether Impairment Exists In Particular Markets If Local Circuit Switching For Mass Market Customers Is No Longer Available As An Unbundled Network Element*, Docket UM 100, Before the Public Utility Commission of Oregon, Ruling, November 14, 2003, page 4.

⁶ TRO ¶ 91 ("Barriers Within the Control of the Incumbent LEC. We also examine those barriers to entry that are solely or primarily within the control of the incumbent LEC. We look to these barriers because it is within the control of the incumbent LEC to eliminate them or mitigate their effects, which could eliminate the need to unbundle network elements to overcome them.").

1 MCI's repeated calls for industry-wide collaboratives are beyond the scope of this
2 docket. The industry has standards bodies in place and mechanisms for dealing
3 with industry-wide issues. It is not necessary or appropriate to use a case specific
4 to Qwest as a platform for setting industry-wide standards.

5 **Q. PLEASE COMMENT GENERALLY ON THE TESTIMONY OF**
6 **COVAD'S WITNESSES.**

7 A. As I explain below, the line splitting OSS changes for which Mr. Zulevic and Ms.
8 Doberneck argue are beyond the scope of this proceeding. The *Triennial Review*
9 *Order* explicitly directs carriers to address these types of line-splitting OSS
10 implementation questions in the Change Management Process, not the nine-
11 month impairment cases.⁷ That is especially true here, where the very OSS
12 changes these witnesses advocate are already teed up for consideration in the
13 CMP.

14 **III. QWEST'S OSS IS CAPABLE OF PROCESSING REQUESTS FOR**
15 **UNBUNDLED LOOPS**

16 **Q. MCI CLAIMS THAT QWEST'S OSS POSES AN OPERATIONAL**
17 **IMPAIRMENT TO CLECS' ABILITY TO ORDER UNBUNDLED**
18 **LOOPS.⁸ DO YOU AGREE?**

⁷ See *Triennial Review Order* ¶ 252 ("As the Commission did before, we encourage incumbent LECs and competitors to use existing state commission collaboratives and change management processes to address OSS modifications that are necessary to support line splitting.").

⁸ *Cabe Direct* at page 73, and *Cox Direct* at page 2.

1 A. No. This contention is not accurate. MCI contends that the operational
2 impairment is caused in part by the more complex nature of unbundled loop
3 transactions versus UNE-P transactions.⁹ MCI also claims that these
4 complexities have not been fully tested.¹⁰ In particular, MCI expresses concern
5 that unbundled loop transactions are more likely to be manual than UNE-P
6 transactions.¹¹

7 However, during the extensive third party test of Qwest's OSS during the 271
8 approval process, unbundled loop conversions were thoroughly tested, and to the
9 same extent as UNE-P conversions. Based on these test results, both this
10 Commission and the FCC determined that Qwest's OSS satisfied the FCC's
11 requirements for providing unbundled loops to CLECs.¹²

12 **Q. MCI SUGGESTS THAT QWEST'S OSS SUPPORTING UNBUNDLED**

⁹ "The systems and processes involved in a UNE-L migration, as opposed to a UNE-P migration, are complex, manually intensive and cumbersome." *Cox Direct* at page 33.

¹⁰ *Cox Direct* at page 37.

¹¹ *Cox Direct* at page 34.

¹² See *In the Matter of the Investigation Into U S West Communications, Inc.'s Compliance With Section 271 of the Telecommunications Act of 1996*, Docket No. 003022, Before the Washington Utilities and Transportation Commission, 39th Supplemental Order; Commission Order Approving SGAT and QPAP, and Addressing Data Verification, Performance Data, OSS Testing, Change Management, and Public Interest, Issued July 1, 2002, ¶ 119 ("*WUTC 271 39th Order*"); See also *In the Matter of Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in Montana, Utah, Washington and Wyoming*, WC Docket No. 02-189, Comments of the Washington Utilities and Transportation Commission, Issued July 26th, 2002, page 13. ("*WUTC Comments to FCC*"); See for example *Application of Qwest Communications International, Inc. for Authorization To Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming*, 17 FCC Rcd 26303, 26310 ("*9 State Order*"). ¶¶ 41, 49 and 108

1 **LOOP MIGRATION IS NOT READY FOR MASS MARKET USE.¹³ IS**

2 **THIS CORRECT?**

3 A. No. Each of MCI's arguments was previously litigated at length during the 271
4 approval process, and in each case, this Commission disagreed with MCI and
5 found that Qwest's OSS is operationally ready to provide unbundled loop
6 migration.¹⁴ The FCC also found the Qwest OSS acceptable, stating, "Qwest
7 demonstrates that it provides timely and accurate status notifications. In addition,
8 the evidence demonstrates that Qwest accurately processes both manual and
9 mechanized orders."¹⁵

10 **Q. HAS QWEST CONTINUED TO DEMONSTRATE THAT ITS OSS IS**
11 **CAPABLE OF SUPPORTING UNBUNDLED LOOP ORDERING**
12 **SUBSEQUENT TO CERTIFICATION BY THIS COMMISSION AND BY**
13 **THE FCC?**

14 A. Yes. Qwest's commercial performance results in the state of Washington
15 demonstrate that Qwest's OSS adequately supports unbundled loop provisioning.
16 Electronic orders for unbundled loops that are eligible to flow through to Qwest's
17 downstream systems have consistently exceeded the benchmark flow-through rate

¹³ *Cox Direct* at page 36; *Cabe Direct* at page 73.

¹⁴ *WUTC 271 39th Order* at ¶ 375. See also *WUTC Comments to FCC* at page 19.

¹⁵ See *9 State Order* at ¶ 107.

1 of 85%.¹⁶

2 **Q. HAS QWEST’S OSS BEEN TESTED TO DETERMINE ITS ABILITY TO**
3 **HANDLE AN INCREASE IN ORDER VOLUME FOR UNBUNDLED**
4 **LOOPS?**

5 A. Yes. During the 271 approval process, a thorough capacity test was conducted to
6 demonstrate that Qwest’s OSS is scaleable and are capable of handling projected
7 future increases in order volumes. As part of the OSS Evaluation, KPMG
8 conducted a “Pre-Ordering, Ordering, and Provisioning Volume Performance
9 Test (Test 15).” This test measured Qwest’s system capacity for processing pre-
10 ordering queries and order transactions as well as verifying Qwest’s ability to
11 handle reasonably foreseeable future demands. The test was also designed to
12 identify potential choke points at projected future volumes of the graphical user
13 interface and computer-to-computer interface.¹⁷ The test consisted of three parts:
14 (1) a “normal volume” test, using anticipated transaction volumes; (2) a “peak”
15 test using volumes at 150% of the normal volume test; and (3) a “stress” test

¹⁶ See *Qwest Performance Results, Washington, December 2002 –November 2003*, PO-2B-1 and PO-2B-2, pages 42-43 (“Qwest PIDs”). Performance results are available at <http://www.qwest.com/wholesale/results/roc.html>.

¹⁷ The KPMG Final Report can be found in the record of this state’s 271 proceeding. See *In the Matter of the Investigation Into U S West Communications, Inc.’s Compliance With Section 271 of the Telecommunications Act of 1996*, Docket No. 003022, Before the Washington Utilities and Transportation Commission, Exhibit 1697 - Qwest Communications OSS Evaluation, Final Report, Version 2.0, KPMG Consulting, 5/28/02 placed on the record June 5, 2002 (“KPMG Final Report”). *KPMG Final Report*, table 15-6, page 252, shows that Qwest satisfied all evaluation criteria for this test.

1 using volumes at 250% of the normal volume test.¹⁸ This test was intended to
2 examine the performance of Qwest's production pre-ordering and ordering
3 systems and processes from the initiation of pre-order queries to the creation of
4 internal service orders and the return of an order confirmation.

5 In addition to the capacity test, there was a test of system scalability, called the
6 CLEC Forecasting Review (Test 2.4.). This was a test of Qwest's methods and
7 practices for managing CLEC facility and service forecasts. The objective of the
8 test was to evaluate Qwest's ability to scale its staff and systems based on
9 projected growth in demand.¹⁹ Qwest satisfied all the evaluation criteria for this
10 test as well.²⁰

11 **Q. DID QWEST'S OSS SUCCESSFULLY MEET THE CRITERIA OF THE**
12 **CAPACITY TEST?**

13 A. Yes. In its final report, KPMG determined that Qwest satisfied all of the criteria
14 of the three part capacity test.²¹ This Commission stated, "Where KPMG has
15 found that Qwest satisfied the test criteria, we find that Qwest provides the OSS
16 function in a nondiscriminatory manner, either in the same time and manner as it

¹⁸ "The objective of this test was to validate the performance of the wholesale interface systems at future projected transaction volumes...The projected transaction volume was determined by analyzing historical Competitive Local Exchange Carrier (CLEC) ordering behavior, CLEC forecasts, and Qwest's forecasts." *KPMG Final Report* page 256.

¹⁹ See *KPMG Final Report* page 557.

²⁰ See *KPMG Final Report*, Table 24.4-2, pages 559-565.

²¹ See *KPMG Final Report* pages 258-265.

1 provides to itself, or in a way that allows CLECs a meaningful opportunity to
2 compete.”²² The FCC stated, “We find that Qwest scales its system as volumes
3 increase, and demonstrates its ability to continue to do so at reasonably
4 foreseeable volumes.”²³ The FCC further stated in response to an MCI issue,
5 “Our determination that Qwest is able to scale its systems is based on third-party
6 tests that show that Qwest is able to process orders at projected future transaction
7 volumes.”²⁴

8 KPMG examined Qwest’s system responses and the timeliness of Qwest’s EDI
9 and GUI preorder and order responses. The test used projected transaction
10 volumes simulating peak (150 percent of normal) and stress (250 percent of
11 normal) transaction volume conditions. We reject commenters’ contentions that
12 Qwest has not proven that it can scale its system.”²⁵ Accordingly, MCI’s
13 arguments regarding Qwest OSS are erroneous.

14 Keep in mind that the same electronic ordering systems are used whether the
15 Local Service Requests (LSRs) are for UNE-P or for Unbundled Loops. Though
16 there may be an increase in new LSRs for Unbundled Loops, there will be an
17 associated decrease in new orders for UNE-P. So from the point of view of
18 Qwest’s electronic ordering systems, there will be no difference in the capacity

²² *WUTC 271 39th Order* ¶ 119.

²³ *9 State Order* ¶ 107 (footnote omitted).

²⁴ *9 State Order* ¶ 108 (footnotes omitted).

1 required of these systems. The capacity impact based on volumes of conversion
2 orders to transition existing customers from UNE-P to Unbundled Loop is
3 discussed in Qwest's Batch Hot Cut direct testimony submitted on January 23,
4 2004.

5 **IV. MCI'S CLAIMS CONCERNING DATABASES AND INDUSTRY-WIDE**
6 **OSS ISSUES ARE INACCURATE AND NOT RELEVANT**

7 **a. CSRs**

8 **Q. MCI WITNESS MR. COX EXPRESSES CONCERN REGARDING**
9 **CLECS' ABILITY TO OBTAIN ACCURATE CSR DATA ON A TIMELY**
10 **BASIS.²⁶ IS MR. COX'S CONCERN RELEVANT TO THIS CASE?**

11 A. No. Although Mr. Cox gives an extensive review of his general understanding of
12 the CSR process, citing several Qwest processes from the Qwest Wholesale
13 website, his primary concern is not with access to Qwest's CSR data, but rather
14 access to CSR data controlled by other carriers. In fact, Mr. Cox cites no
15 problems with Qwest's methods of providing CSR data.

16 MCI's complaints about other carriers' CSR practices are not relevant to the *TRO*
17 inquiry. As noted above, only "those barriers that are solely or primarily within

²⁵ 9 *State Order* ¶ 108 (footnotes omitted).

²⁶ *Cox Direct* at page 40.

1 the control of the incumbent LEC” can potentially constitute an operational
2 impairment.²⁷

3 **b. Trouble Handling**

4 **Q. DOES MR. COX DISCUSS QWEST’S MAINTENANCE AND REPAIR**
5 **OPERATIONS IN PARTICULAR?**

6 A. No. Mr. Cox does not discuss any issues specific to Qwest’s maintenance and
7 repair operations; instead, his discussion covers the entire industry. Mr. Cox
8 refers to the trouble handling process as a “world” process where “CLECs like
9 MCI need to obtain newer and more advanced test equipment as well as develop
10 internal processes to address this trouble handling and the anticipated volumes.”²⁸
11 (Qwest assumes Mr. Cox’s reference to “trouble handling” relates to maintenance
12 and repair functions.)

13 Because Qwest does not control the methods used by other carriers for
14 maintenance and repair, however, Cox’s discussion of “trouble handling” is
15 irrelevant. Again, the *Triennial Review Order* specifies that the only operational
16 barriers that are potentially relevant to the impairment inquiry are “those barriers

²⁷ TRO ¶ 91 (“*Barriers Within the Control of the Incumbent LEC*. We also examine those barriers to entry that are solely or primarily within the control of the incumbent LEC. We look to these barriers because it is within the control of the incumbent LEC to eliminate them or mitigate their effects, which could eliminate the need to unbundle network elements to overcome them.”).

²⁸ *Cox Direct* at page 47.

1 to entry that are solely or primarily within the control of the incumbent LEC.”²⁹
2 Since Mr. Cox has no complaints about the specific maintenance and repair
3 practices that are within Qwest’s control, his remaining complaints about
4 industrywide practices are not relevant.

5 **b. LFACS**

6 **Q. DOES QWEST PROVIDE CLECS WITH REAL-TIME LOOP**
7 **QUALIFICATION INFORMATION?**

8 A. Yes. Qwest provides real time loop make-up information via mediated access to
9 IMA. The Pre-order queries for loop make-up information are generated from the
10 Loop Qualification Database (LQDB), which uses LFACS as its underlying
11 source. Mr. Cox’s suggestion that “MCI may submit a loop qualification inquiry
12 (to LFACS) to determine loop make-up information”³⁰ is inaccurate.

13 **Q. MR. COX ARGUES THAT THE LFACS DATABASE AND LOOP**
14 **INFORMATION DATABASES MUST BE ACCURATE AND CURRENT.**³¹
15 **HAS THIS ISSUE BEEN RAISED BEFORE?**

16 A. Yes, it has. In both proceedings before this Commission as well as the FCC in
17 connection with Qwest’s 271 Application, the issues of access to and the accuracy

²⁹ *TRO ¶ 91.*

³⁰ *Cox Direct* at page 46.

³¹ *Cox Direct* at page 3.

1 of the loop information databases were exhaustively debated.³²

2 **Q. WHAT DECISIONS WERE MADE WITH REGARD TO ACCESS TO**
3 **LOOP INFORMATION DATABASES?**

4 A. Throughout Qwest's 271 workshop process and in some of Qwest's Section 271
5 Applications, CLECs alleged that Qwest did not meet the requirements of the
6 FCC's orders because it did not provide "direct" access to its LFACS database.
7 The FCC, however, rejected this argument and approved Qwest's provision of
8 mediated access to LFACS.³³ Every state in Qwest's region that considered this
9 issue in conjunction with a Section 271 proceeding also agreed that mediated
10 access to LFACS was adequate.³⁴

11 **Q. WHAT DETERMINATION HAS BEEN MADE IN PAST REGULATORY**
12 **PROCEEDINGS WITH REGARD TO THE ACCURACY OF LOOP**
13 **INFORMATION DATABASES?**

14 A. As with direct access to LFACS, CLECs have presented on numerous occasions
15 arguments about the accuracy and reliability of information in the loop
16 qualification databases both before this Commission and to the FCC. These
17 arguments have been soundly rejected. The FCC in the 271 proceedings

³² See 9 State Order ¶¶ 66-73.

³³ See 9 State Order ¶68.

³⁴ See Qwest IV OSS Declaration ¶ 131, n. 156 (describing the resolution of this issue in New Mexico, Oregon and South Dakota); Qwest II Declaration of William M. Campbell, Unbundled Loops ¶¶ 119-20 (describing the resolution of the issue in Montana, Utah, Washington and Wyoming); Qwest I Declaration of William M. Campbell, Unbundled Loops ¶ 129 (describing the resolution of the LFACS

1 specifically rejected that an RBOC is required to ensure the accuracy of the loop
2 make-up information it provides.³⁵ The FCC affirmed that,

3 To the extent the RLDT does contain inaccurate or incomplete
4 information, the Commission has previously held that any inaccuracies or
5 omissions in a BOC's database are not discriminatory to the extent they
6 are provided in the exact same form to both retail and wholesale
7 customers. Moreover, the Commission has declined to require incumbent
8 LECs to catalogue, inventory and make available to competitors loop
9 qualification information through automated OSS even when it has no
10 such information available to itself.³⁶

11 **Q. WHAT CAN CLECS DO IF THEY BELIEVE THE LOOP**
12 **INFORMATION RETURNED BY THE TOOLS MIGHT BE**
13 **INACCURATE?**

14 A. Qwest makes available a process that permits CLECs to obtain loop make-up
15 information in the unlikely event the tools provide incomplete or unclear loop
16 make-up information or if the CLEC believes that the returned loop data may be
17 inaccurate.³⁷ In any of these situations, Qwest will perform a search of its back
18 office records, systems and databases containing loop information to obtain the

issue in Colorado, Idaho, Iowa, Nebraska and North Dakota).

³⁵ See, e.g., *Alabama/Kentucky/Mississippi/North Carolina/South Carolina 271 Order* ¶69 (citing *UNE Remand Order*, 15 FCC Rcd at 3886 (¶ 429)); *Kansas/Oklahoma 271 Order* ¶ 126; *Massachusetts 271 Order* ¶ 66; *Virginia 271 Order* ¶ 34; *Qwest 9 State 271 Order* ¶ 69; *Qwest 3-State 271 Order* ¶ 42 (finding that Qwest provides loop qualification information to CLECs in a nondiscriminatory manner); *Qwest Minnesota 271 Order* ¶ 19 (finding of nondiscriminatory access to OSS); *Qwest Arizona 271 Order* ¶ 13 (finding of non-discriminatory access to OSS).

³⁶ See *9 State 271 Order* ¶ 69 (footnote omitted).

³⁷ In fact this Commission has addressed this specific issue. See SGAT § 9.2.2.8.6. The Washington UTC ordered Qwest to include specific language, which the UTC approved, committing Qwest to this manual process. See Washington UTC 39th Supplemental Order ¶ 21; Washington 37th Supplemental Order ¶¶ 85-88.

1 loop make-up information requested by the CLEC. If loop make-up information
2 is missing for a particular loop segment, Qwest will investigate its outside plant
3 engineering records for the cable and pair from the central office to the SAI and
4 from the SAI to the customer's serving terminal. Qwest has agreed to return the
5 loop make-up information to the CLEC electronically within 48 hours. Qwest also
6 will update the applicable databases with this loop make-up information.³⁸

7 **Q. DO QWEST'S LOOP QUALIFICATION TOOLS PROVIDE CLECS**
8 **INFORMATION ABOUT WHETHER A GIVEN LOOP IS PROVISIONED**
9 **OVER IDLC?**

10 A. Yes, Qwest's Raw Loop Data Tool (RLDT) provides all the required data a
11 CLEC needs to determine if it can serve the customer and provide a UNE-L loop
12 by telephone number or address. Specifically, the RLDT provides loop make-up
13 information including: address, telephone number or circuit ID, CLLI code,
14 terminal ID, load coils, bridged tap, wire gauge, pair gain devices (a form of
15 which is IDLC), cable and pair make-up, MLT distance, and actual loop length by
16 segment and sub-segment. CLECs may also obtain this information on a wire
17 center basis. Qwest also provides the same data by wire center to CLECs if they
18 desire to obtain this information on a batch basis. Qwest provides access to an
19 external website, outside of IMA, referred to as the Wire Center Raw Loop Data

³⁸ Information on this process can be found in Appendix D of the Loop Qualification and Raw Loop Data CLEC Job Aid which can be found at: http://www.qwest.com/wholesale/downloads/lqrld_clecjobaid.pdf

1 Tool.³⁹ This tool provides the CLECs the same fields of loop make-up
2 information as provided by the IMA RLDT. Information from this tool is
3 available in a comma-delimited format for all loops in a wire center.

4 **Q. MR. COX PROPOSES THAT QWEST'S LFACS DATABASE BE**
5 **AUDITED FOR ACCURACY.⁴⁰ DO CLECS IN THE STATE OF**
6 **WASHINGTON ALREADY HAVE THE ABILITY TO AUDIT THE LOOP**
7 **QUALIFICATION DATABASES?**

8 A. Yes, they do. Although Qwest provides access to its back office databases and
9 records through its loop qualification tools and manual process, CLECs requested
10 and received the right to audit Qwest's loop qualification tools and databases in
11 conjunction with Qwest's 271 approval. This Commission specifically addressed
12 the audit question⁴¹ and Qwest's SGATs in Washington include provisions
13 permitting CLECs to audit the loop qualification information Qwest provides, at

³⁹ This web-based tool requires CLECs to obtain a digital certificate to give them electronic access to Qwest confidential network information. LECs must request a digital certificate or permission for each LEC employee that will access Qwest confidential data.

⁴⁰ *Cox Direct* at page 46.

⁴¹ See Attachment 5, Appendix C, Washington Commission 28th Supplemental Order Addressing Workshop 4 Issues; Attachment 5, Appendix C, 31st Supplemental Order Addressing Petitions for Reconsideration; Attachment 5, Appendix B, WA SGAT § 9.2.2.8.

1 the CLEC's expense.⁴² The FCC stated that it is appropriate for CLECs to have
2 the ability to ensure they are receiving the loop qualification information that is
3 available in Qwest's loop qualification tools and databases; therefore no other
4 auditing requirement is needed.⁴³ So the relief requested by Mr. Cox requests is
5 already available to him.

6 **c. E911**

7 **Q. PLEASE EXPLAIN QWEST'S CURRENT PROCESS FOR E911**
8 **SERVICE.**

9 A. Enhanced 911 service incorporates an Automatic Number Identification (ANI)
10 feature to forward the end-user's emergency call and ANI to the appropriate
11 Public Safety Answering Point (PSAP). The PSAP then uses the ANI to retrieve
12 the end-user's name, telephone number, and street address from the Automatic

⁴² Washington SGAT §§ 9.2.2.8 and 18; The SGAT language provides:

Qwest offers five (5) Loop qualification tools: the ADSL Loop Qualification Tool, Raw Loop Data Tool, POTS Conversion to Unbundled Loop Tool, MegaBit Qualification Tool, and ISDN Qualification Tool. These and any future Loop qualification tools Qwest develops will provide CLEC access to Loop qualification information in a nondiscriminatory manner and will provide CLEC the same Loop qualification information available to Qwest. *CLEC may request an audit of Qwest's company records, back office systems and databases pertaining to Loop information pursuant to Section 18 of this Agreement.*

See WA SGAT § 9.2.2.8 (emphasis added) and §18.1.1 "Audit" shall mean the comprehensive review of the books, records, and other documents used in providing services under this Agreement. The term "Audit" also applies to the investigation of network databases supporting the Loop qualification tools. The term "Audit" also applies to the investigation of company records, back office systems and databases pertaining to Loop information.

1 Location Identification (ALI), or E911, database. Basic 911 service routes all
2 emergency calls made through a given central office (CO) to a single Public
3 Safety Answering Point (PSAP).

4 The ALI, or E911, database is managed for Qwest by a third party vendor,
5 Intrado, Inc. (Intrado) (formerly SCC Communications Corp.).⁴⁴ Intrado provides
6 E911 database management services for Qwest and other local exchange carriers.

7 **Q. MR. COX STATES THAT MCI FOLLOWS THE NENA STANDARD FOR**
8 **SENDING THE E911 ORDER AT THE TIME OF PORT AND THAT**
9 **QWEST SHOULD DO THE SAME.⁴⁵ DOES QWEST FOLLOW THIS**
10 **STANDARD?**

11 A. Yes, Intrado has instituted an industry-developed procedure for ensuring that
12 customer records are not removed from the ALI database. Rather than removing
13 the customer record when Qwest sends a disconnect (migrate) number portability
14 order indicating that an end-user has changed service providers, Intrado “unlocks”
15 the record in the ALI database. The “unlocked record” remains unchanged in the
16 database. The CLEC then sends a corresponding connect (migrate) order to
17 Intrado, which updates and “locks” the record and makes the CLEC responsible
18 for the record. These Intrado procedures are based on the NENA standards and

⁴³ See 9 State Order at ¶ 71.

⁴⁴ See SGAT § 10.3.2.14.

1 ensure that an end-user's information will not be removed from the E911 database
2 for any period of time when the end-user changes service providers. In addition,
3 these procedures ensure that future updates to the end-user's record can only be
4 generated by the CLEC.

5 **Q. MR. COX EXPRESSES CONCERN OVER TIMING AND ACCURACY OF**
6 **THE E911 DATABASE.⁴⁶ IS THIS A VALID CONCERN?**

7 A. No. It is important to understand that the industry process for migrate-type orders
8 was designed to ensure that no E911 record is removed from the E911 database if
9 a customer changes carriers. The process developed for "migrate" orders (a
10 customer transferring service from one carrier to another) does not remove the
11 customer's record from the E911 database. Rather, the former carrier "unlocks"
12 the E911 record so that the new carrier can update the record if any information
13 has changed and then "lock" the record with the new carrier's company ID. This
14 process does not affect an end-user's ability to dial 9-1-1 and reach the PSAP for
15 assistance.

16 **Q. MR. COX STATES THAT MCI NEEDS FURTHER INFORMATION ON**
17 **THIS PROCESS.⁴⁷ HAS QWEST PROVIDED THIS INFORMATION TO**
18 **THE CLECS?**

⁴⁵ *Cox Direct* at page 48

⁴⁶ *Cox Direct* at pages 49-50.

⁴⁷ *Cox Direct* at page 49.

1 A. Yes, documentation of this process was sent to CLECs by both Intrado and by
2 Qwest through its Change Management Process (CMP). The documentation is
3 also available to CLECs on Qwest's Wholesale Product Catalog website.⁴⁸

4 **Q. HAVE THE FCC AND THIS COMMISSION EVALUATED QWEST'S**
5 **PROCESSES FOR E911?**

6 A. This Commission and the FCC both determined that Qwest meets the
7 requirements for E911.⁴⁹

8 **Q. ARE THE ISSUES MR. COX RAISES RELEVANT TO THIS CASE?**

9 A. No. Qwest already follows the industry's NENA standards and in the manner
10 advocated by Mr. Cox. Mr. Cox "suggests that the states convene some type of
11 collaborative forum to ensure that the orders are coordinated."⁵⁰ This sort of
12 industry-wide forum does not fall within the scope of this case. Qwest does not
13 control the methods used by other carriers for E911. Again the TRO specifically
14 limits the discussion in this case to those issues that are under ILEC control.⁵¹

15 **d. Number Portability**

⁴⁸ Available on the Internet at www.qwest.com/wholesale/pcat/911.html . Exhibit MSB-911-3 is a copy of the E911 LNP unlock process documentation.

⁴⁹ See *9 State Order at E. Checklist Item 7 and WUTC 271 Order* ¶ 64.

⁵⁰ *Cox Direct* at page 51.

⁵¹ *TRO* ¶ 91.

1 **Q. MR. COX HAS CONCERNS REGARDING NUMBER PORTABILITY.⁵²**

2 **PLEASE EXPLAIN QWEST'S CURRENT PROCESS FOR A NUMBER**
3 **PORTABILITY REQUEST.**

4 A. To initiate a number portability request, a CLEC submits an LSR to port the end-
5 user's telephone number(s). The LSR can be submitted by facsimile or
6 electronically. When Qwest receives the LSR, Qwest processes the LSR and
7 returns a firm order confirmation (FOC) to the requesting CLEC. After the CLEC
8 receives the FOC, the CLEC is required to forward a subscription version (SV) to
9 the regional Number Portability Administration Center (NPAC) indicating its
10 intent to port a telephone number. The regional NPAC is managed by the FCC's
11 third party vendor NeuStar. Qwest also will create an NPAC SV that will match
12 the CLEC's NPAC SV to port the number.⁵³ The requesting CLEC activates its
13 NPAC SV on the due date designated in the CLEC's LSR. The NPAC then
14 broadcasts the telephone number(s) with the associated Location Routing Number
15 (LRN) routing information to all of the service providers' local number
16 portability databases.

17 **Q. MR. COX STATES THAT IT IS ESSENTIAL FOR THE NPAC PROCESS**
18 **TO BE COORDINATED SO THAT CONSUMERS DON'T EXPERIENCE**
19 **SERVICE PROBLEMS IF THERE IS A DELAY IN THE CLEC**

⁵² *Cox Direct* at page 52.

⁵³ These procedures are described in the NANC's Provisioning Process Flows. *NANC Technical and*

1 **TRANSACTION.⁵⁴ HAS QWEST ALREADY ACCOMMODATED THIS**
2 **NEED?**

3 A. Yes. At the request of this Commission, Qwest developed and implemented a
4 process to delay the removal of the switch translations (i.e. disconnect) to provide
5 CLECs additional time to complete their provisioning processes or provide
6 notification to Qwest that they need to delay the due date.⁵⁵ In June 2001, Qwest
7 implemented a mechanized process that delays the disconnection of the switch
8 translations until 11:59 p.m. the day after the CLEC's requested due date. This
9 modification allows CLECs sufficient time to take action to defer or cancel the
10 disconnection of the Qwest switch translations based upon a CLEC's notification
11 that the CLEC cannot complete its provisioning work on the scheduled due date
12 and needs to delay the due date or cancel the number portability service order.
13 This commitment and process is included in Qwest's SGAT⁵⁶ and is described in
14 Qwest's wholesale website Product Catalog (PCAT). Additionally, since that
15 time, the industry has also endorsed this process as one of the options for
16 coordinating number portability and it is included in the FCC's North American
17 Council's Local Number Portability Administration Working Group's guidelines.

Operational Task Force Report at App. E; see *Public Notice Regarding NANC LNP Recommendations*,
12 FCC Rcd 5003.

⁵⁴ *Cox Direct* at page 52.

⁵⁵ See *WUTC 271 Order* ¶ 229

⁵⁶ See *SGAT 10.2.5.3.1*

1 Thus the FCC and number portability standards group have both supported the
2 process first ordered by Washington and implemented region-wide by Qwest.
3 That process has indeed worked very well.

4 **Q. WHAT IS THE “10 DIGIT TRIGGER” REFERRED TO IN MR. COX’S**
5 **TESTIMONY?⁵⁷**

6 A. An Advanced Intelligent Network (AIN) trigger, the Line Side Attribute (LSA)
7 trigger, also called the "unconditional 10-digit trigger," causes a query to be
8 launched through the SS7 signaling network to the LNP databases to determine
9 the current routing address for the number. The SS7 signaling network then
10 routes the call to the switch that currently serves that telephone number for call
11 completion.

12 **Q. ARE THERE SPECIAL REQUIREMENTS FOR SETTING A TRIGGER?**

13 A. No. Qwest has expended considerable effort on switch and system development
14 and improved processes to mechanize and increase the pre-setting of LSA triggers
15 in its switches. Qwest pre-sets a trigger on each telephone number in a CLEC's
16 LSR for number portability. Pre-setting the LSA trigger allows the CLEC to
17 control the activation of number portability on the CLEC's designated due date.
18 In fact, the Regional Oversight Committee developed PID measures for the pre-

⁵⁷ *Cox Direct* at page 52.

1 setting of LSA triggers.⁵⁸

2 **Q. MR. COX STATED THAT IF AN NPAC TRANSACTION IS NOT**
3 **COMPLETED SUCCESSFULLY, THE CUSTOMER WILL NOT BE**
4 **ABLE TO RECEIVE ANY INCOMING TELEPHONE CALLS.⁵⁹ WHAT**
5 **DOES QWEST DO TO MINIMIZE SERVICE PROBLEMS IN THIS**
6 **SITUATION?**

7 A. It is accurate to say that the translation in the switch of an LSA trigger, referred to
8 as “setting a trigger,” causes the suspension of call termination within the original
9 “donor” switch to a specific line’s telephone number while a query is sent by the
10 SS7 signaling network to the LNP database for routing information. However, if
11 the information in the LNP database shows that the number has not yet been
12 ported, the call is terminated in the original switch as usual. If the information in
13 the LNP database shows that number portability has been activated for the
14 telephone number by the CLEC, the new routing information is returned and the
15 call is routed to the CLEC’s switch for call termination. When the LSA trigger
16 has been set on a telephone number prior to the Frame Due Time or prior to the
17 start time of an unbundled loop cutover, the CLEC controls the activation of
18 number portability. The LSA trigger process eliminates the need to coordinate

⁵⁸ See for example PID OP-8 B&C which addresses the timeliness of setting the LNP triggers prior to the frame due time.

⁵⁹ *Cox Direct* at page 52.

1 Qwest's switch disconnect translation with the new service provider's switch
2 provisioning and with any physical loop work that may be required. In short, by
3 pre-setting the LSA trigger, Qwest pre-provisions the capability to port a number
4 and the CLEC then controls the activation of number portability on the due date.
5 There are very few instances when the LSA trigger cannot be pre-set because of
6 technical infeasibility. When the LSA trigger cannot be pre-set, Qwest
7 recommends a coordinated conversion (i.e., a managed cut) for a CLEC-provided
8 loop cut-over.⁶⁰

9 **Q. ARE MR. COX'S NUMBER PORTABILITY ISSUES RELEVANT TO**
10 **THIS CASE?**

11 A. No. Qwest already handles number portability according to industry guidelines as
12 advocated by Mr. Cox. Once again Mr. Cox "recommends that the Commission
13 immediately open a collaborative discussion between Qwest, other ILECs,
14 CLECs, and the current NPAC administrator, Neustar, to determine NPAC's
15 actual capabilities and to develop metrics for the completion of number
16 portability tasks."⁶¹ The FCC's North American Numbering Council (NANC)
17 already has an industry working group, the Local Number Portability
18 Administration (LNPA), that develops industry guidelines for number portability.
19 The standards and guidelines developed by this group were included as part of the

⁶⁰ See SGAT §§ 10.2.5.3 - 10.2.5.4 for coordinated conversions, "Managed Cuts," associated with CLEC-provided loops, and SGAT §§ 9.2.2.9.3 through 9.2.2.9.4 and 9.2.2.9.7 for coordinated conversions with Qwest unbundled loops.

1 FCC's order implementing number portability.⁶² Qwest's processes for number
2 portability are in accordance with the FCC's orders and the industry's standards
3 and guidelines.

4 In addition, specific PIDs were already developed for LNP by the ROC during the
5 271 proceeding and those measures demonstrate Qwest has excellent LNP
6 performance. As with most of his operational concerns, Mr. Cox's assertions of
7 inadequate Qwest performance with respect to number portability are not
8 supported by any facts.

9 **e. Directory Listings**

10 **Q. MR. COX RAISED CONCERNS REGARDING PROCESSING OF**
11 **DIRECTORY LISTINGS.⁶³ PLEASE EXPLAIN THE PROCESS FOR**
12 **CLEC SUBMISSION OF LISTINGS TO QWEST.**

13 A. Facilities-based CLECs using their own switching facilities submit their listings-
14 only requests to Qwest using Ordering and Billing Forum (OBF) standard listings
15 forms sent via facsimile, IMA-EDI, or IMA-GUI. The "listings" database
16 mechanically updates those listings submitted via IMA-EDI and IMA-GUI

⁶¹ *Cox Direct* at page 54.

⁶² See *Telephone Number Portability, Second Report and Order*, CC Docket No. 99-116, FCC 97-289 (released August 18, 1997). See, also attached to order, Working Group Report, App. D, "Architecture and Administrative Plan for Local Number Portability."

⁶³ *Cox Direct* at page 54.

1 systems while facsimile listings are updated manually.

2 **Q. MR. COX HAS STATED THAT SUBSEQUENT CHANGES REQUIRE**
3 **REPEATING THE DIRECTORY LISTING FORM, AND THEREFORE IT**
4 **INCREASES THE LIKELIHOOD OF ERRORS.⁶⁴ WHAT PRACTICES**
5 **DOES QWEST HAVE IN PLACE TO SUPPORT ACCURACY OF**
6 **DIRECTORY LISTINGS?**

7 A. Initially, Qwest provides extensive, detailed, in-person listings training for
8 CLECs currently at no charge to ensure that CLECs understand how to submit
9 accurate and complete listing orders to Qwest. Qwest provides these training
10 sessions in various locations throughout the Qwest region.⁶⁵ To date,
11 representatives from approximately 53 different CLECs have attended training
12 sessions in Minneapolis, Minnesota; Seattle, Washington; Phoenix, Arizona;
13 Denver, Colorado; Portland, Oregon; Cedar Rapids, Iowa; and Fargo, North
14 Dakota.. Qwest also provides a detailed written manual, the “Qwest Facility-
15 Based CLECs and Unbundled Network CLECs Directory Listing User
16 Document” to CLECs at no charge. This document contains training, reference
17 and resource information. The manual is available on Qwest’s website⁶⁶ for
18 CLECs and is also provided

⁶⁴ *Cox Direct* at page 54.

⁶⁵ See Qwest's website at: http://www.qwest.com/wholesale/training/course_sched_reg.html#ilt.

⁶⁶ Available at: <http://www.qwest.com/wholesale/forms/dirlistuser.html>.

1 during the “live” training sessions.⁶⁷

2 **Q. ARE THERE ANY OTHER MEASURES IN PLACE TO ENSURE**
3 **LISTING ACCURACY?**

4 A. Yes, Qwest also provides a detailed written listings training, reference, and
5 resource manual to CLECs, currently at no charge. The manual is provided
6 during the “live” training sessions and is also available on Qwest’s website for
7 CLECs.⁶⁸ The manual is referred to as the “Qwest Facility-Based CLECs and
8 Unbundled Network CLECs Directory Listing User Document.” This manual
9 provides business rules for listing and other details including: the identity of
10 Qwest departments responsible for listings; types of listings; processes for
11 electronic and manual entry of listings; instructions for drafting listings; listings
12 process flow; process for problem resolution; and, schedules for verification
13 proofs.

14 **Q. DOES QWEST PROVIDE A CLEC WITH THE ABILITY TO REVIEW**
15 **DIRECTORY LISTINGS FOR ACCURACY?**

16 A. Yes, Qwest gives CLECs several options for reviewing the accuracy of their end-
17 user listings in Qwest’s listings database.

⁶⁷ This manual provides business rules for listing and other details including: the identity of Qwest departments responsible for listings, types of listings, processes for electronic and manual entry of listings, instructions for drafting listings, listings process flow, process for problem resolution, and schedules for verification proofs.

⁶⁸ Available at: <http://www.qwest.com/wholesale/forms/dirlistuser.html> .

1 First, Qwest provides the Directory Listing Inquiry System (DLIS), a web-based
2 access tool that allows CLECs to view their listings as they actually appear in
3 Qwest's listings database.⁶⁹

4 Second, Qwest provides monthly "verification proof" reports to CLECs. These
5 proof reports show all of a CLEC's listings that changed or added in the month
6 since the previous verification proof report was issued and, if requested, include
7 "non published" and "non listed" listings.⁷⁰

8 Third, CLECs may request "on-demand" listings reports of all their listings,
9 which provide print-outs or files of all of a CLEC's listings contained in Qwest's
10 listings database as of the date of the request. Qwest has no comparable process
11 for its retail listings. A CLEC can also call Qwest's Listings Group to check
12 individual listings.

13 Because neither Qwest nor a CLEC can make changes to listings for the next
14 white pages directory after the directory close date has passed, Qwest provides
15 CLECs and Qwest retail representatives with a white pages directory closing
16 schedule so the CLECs can meet the appropriate dates.⁷¹

⁶⁹ Qwest also provides a manual ("DLIS User Document") for CLECs on using DLIS.

⁷⁰ *Id.*

⁷¹ *Id.* § 10.4.2.3.

1 **Q. MCI STATES THERE CAN BE ERRORS IN A LISTING.⁷² DOES**
2 **QWEST HAVE A PROCESS TO ADDRESS ERRORS?**

3 A. Yes. In order to correct an error in a listing, a CLEC submits a Directory Listing
4 (DL) form to complete an LSR for correcting listings associated with resale,
5 stand-alone UBS, and UNE-P. Facilities-based CLECs use the batch listings
6 process to change an entry. With the exception of the batch listings process, this
7 is the same process that Qwest retail follows.

8 CLECs have the option of contacting the Qwest's Listings Operations Center
9 (LOC), or their Qwest Listing Account Team Representative to inquire about the
10 listings process or specific listings. In a time-sensitive situation, for example, a
11 directory close date is imminent, Qwest will attempt to correct the listing
12 manually, without requiring an electronic or written service request from the
13 CLEC but the CLEC must submit a service request making the correction to the
14 listing as soon as practicable so that Qwest's records are complete and accurate.
15 Such "emergency" procedures are the same for CLECs as for Qwest retail end-
16 users.

17 **Q. DOES QWEST OFFER AN OPTION THAT CARRIES OVER**
18 **DIRECTORY LISTINGS AS RECOMMENDED BY MR. COX?⁷³**

⁷² *Cox Direct* at page 55.

⁷³ *Cox Direct* at page 55.

1 A. Yes. When a CLEC is converting an account to an unbundled loop with
2 number portability, the directory listing information already on that account can
3 be retained. The CLEC must request a “conversion as specified, with no
4 directory listing changes” (an activity type of Z) on an unbundled loop with
5 number portability, so that the directory listings information will be retained in
6 the Qwest database. For all other conversion scenarios to the Unbundled Loop
7 (with an activity type of V), the listings information will not be retained.

8 **Q. MR. COX DOES NOT WISH TO HAVE TO RETYPE AN ENTIRE**
9 **LISTING WHEN SUBSEQUENT CHANGES ARE REQUIRED.⁷⁴ HOW**
10 **HAS QWEST ADDRESSED THIS ISSUE?**

11 A. On its own initiative, Qwest has sponsored a Change Request (CR) via the
12 Change Management Process (CMP).⁷⁵ This CR is to be voted on by the CLECs,
13 and depending on the priority the CLECs assign to this CR, it could be included
14 in IMA Release 16.0. It was not assigned a high enough priority by the CLECs to
15 be included in release 15.0 — suggesting that the issue is not as important to the
16 CLEC community as a whole as Mr. Cox suggests.

17 **Q. HAS QWEST'S OSS FOR DIRECTORY LISTINGS BEEN EVALUATED?**

18 A. Qwest's OSS for directory listings was thoroughly evaluated by KPMG in the

⁷⁴ *Cox Direct* at page 55.

⁷⁵ CMP SCR061203-01 Modify FBDL LSTR to Prepopulate Fields in Order to Allow for Improved Flow Through.

1 third party test.⁷⁶ Qwest's performance was found to be satisfactory. This
2 commission and the FCC both determined that Qwest meets the requirements for
3 directory listings OSS processes.⁷⁷

4 **Q. AS QWEST HAS ALREADY ADDRESSED ALL THE DIRECTORY**
5 **LISTINGS ISSUES RAISED BY MR. COX THAT ARE WITHIN ITS**
6 **CONTROL, IS THERE ANYTHING ELSE FOR THIS COMMISSION TO**
7 **CONSIDER?**

8 A. No. As I've stated already, the impairment inquiry considers only those issues
9 that are within the ILECs immediate control.⁷⁸ Mr. Cox has not identified any
10 issues that exist with Qwest's processes. Qwest has no control over the processes
11 other CLECs use to update directory listings. Therefore, there are no directory
12 listings issues that need to be dealt with in this case.

13 **f. CNAM and LIDB**

14 **Q. FINALLY, MR. COX RAISES ISSUES WITH THE LIDB/CNAM**
15 **DATABASE.⁷⁹ PLEASE PROVIDE A BRIEF DESCRIPTION OF**
16 **LIDB/CNAM DATABASE.**

⁷⁶ See *KPMG Final Report*, Table 14-5, page 182.

⁷⁷ See *9 State Order* ¶ 60 and *WUTC 271 Order* ¶ 375.

⁷⁸ *TRO* ¶ 91.

⁷⁹ *Cox Direct* at page 55.

1 A. The Calling Name (CNAM) Database enables a CLEC to obtain the listed name
2 information for a requested telephone number in order to deliver that
3 information to the CLEC's end-users for Caller ID services (Calling Name
4 Service). The LIDB stores customer information to provide screening and
5 validation on alternately billed services for operator handled calls, including
6 bill-to-third-party, collect, and calling card calls. The CNAM database is part
7 of the LIDB database; the network SS7 query type determines whether CNAM
8 or LIDB is retrieved. The LIDB/CNAM database uses the American National
9 Standard Institute (ANSI) CCS7 signaling protocol.

10 **Q. HOW IS LIDB/CNAM UPDATED?**

11 A. Qwest uses the Service Order Provisioning Interface (SOPI) system to update its
12 end-users' information in the database. SOPI is also used to update customer
13 information in the LIDB/CNAM database for reseller CLECs and CLECs that use
14 unbundled local switching. In so doing, the record updates of Qwest, reseller
15 CLECs, and CLECs that use unbundled local switching are commingled and
16 loaded into the Line Validation Administration System (LVAS) which then loads
17 and updates the customer information in the LIDB/CNAM database in the same
18 batch files. Facilities-based CLECs that use their own switching facilities can
19 update customer records in the CNAM database by transmitting additions,
20 changes, and deletions via an electronic dial-up interface, facsimile, or electronic

1 files for input into the LVAS to update the LIDB/CNAM database.⁸⁰ CLECs can
2 use this process for multiple updates daily.

3 **Q. MR. COX CLAIMS THAT CLECS SHOULD BE ALLOWED TO OBTAIN**
4 **A DOWNLOAD OF QWEST'S DATABASES (AT TELRIC RATES)**
5 **WHEN USING UNE-L.⁸¹ HAS THIS ISSUE BEEN ADDRESSED IN**
6 **PREVIOUS PROCEEDINGS?**

7 A. Yes. This Commission and the FCC evaluated the same issue, raised by MCI, in
8 July, 2002, when reviewing Qwest's 271 application. The FCC stated,

9 WorldCom (MCI) argued, and Qwest disagreed, that section 251(c)(3) of
10 the Act requires Qwest to provide access to the entire calling name
11 (CNAM) database, rather than providing access on a per-query basis. The
12 WUTC evaluated the parties' positions in an initial and a final order,
13 determining that Commission orders required access to call-related
14 databases only at the signaling transfer point, i.e., on a per-query basis.
15 We affirmed this decision in an order on reconsideration. Nothing in
16 Qwest's application causes us to change our recommendation.⁸²

17 In addition, this exact same issue, again raised by MCI, was again addressed by
18 the FCC in the *TRO*, and again the FCC rejected MCI's arguments.⁸³ This issue
19 has been exhaustively addressed by the FCC and state commissions, including
20 this

⁸⁰ *Local Competition First Report and Order*, 11 FCC Rcd at 15746, ¶ 494.

⁸¹ *Cox Direct* at page 56.

⁸² See *In the Matter of Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in Montana, Utah, Washington and Wyoming*, WC Docket No. 02-189, Comments of the Washington Utilities and Transportation Commission, Issued July 26th, 2002.

(“*WUTC Comments to FCC*”) H. Checklist Item No. 10

⁸³ *TRO* ¶ 558 and footnote 1725.

1 Commission. The *TRO* specifically does not require the bulk down load of
2 information from CNAM⁸⁴ and removes both LIDB and CNAM as unbundled
3 network elements, thus not subject to TELRIC pricing.⁸⁵

4 **Q. MR. COX SUGGESTS THAT VENDOR PROCESSES FOR ERROR**
5 **CHECKING AND REJECT HANDLING NEED TO BE TESTED SINCE**
6 **ONLY QWEST SYSTEMS WERE TESTED FOR UNE-P.⁸⁶ IS THIS**
7 **SUGGESTION APPROPRIATE TO THIS CASE?**

8 A. No. Once again, any issue that is not within Qwest's immediate control is not
9 appropriate for inclusion in this case.⁸⁷ Qwest has no control over the processes
10 other vendors use for databases they provide.

11 **V. COVAD'S DEMANDS FOR OSS CHANGES TO SUPPORT LINE**
12 **SPLITTING AND LOOP SPLITTING ARE BEYOND THE SCOPE OF THIS**
13 **DOCKET AND UNNECESSARY**

14 **Q. AS AN INITIAL MATTER, SHOULD THE ISSUE OF LINE SPLITTING**
15 **BE INCLUDED IN THE NINE MONTH CASE BEFORE THIS**
16 **COMMISSION?**

17 A. No. The FCC specifically directed carriers to raise any line splitting OSS
18 implementation issues they may have in the change management process, not in

⁸⁴ TRO ¶ 558 and 47 CFR § 51.319(d)(4)(i)(B).

⁸⁵ TRO ¶ 559.

⁸⁶ *Cox Direct* at page 56.

1 the already crowded nine-month mass market switching docket. The FCC's
2 instructions, which Mr. Zulevic and Ms. Doberneck do not mention, are
3 unambiguous: "As the Commission did before, we encourage incumbent LECs
4 and competitors to use existing state commission collaboratives and change
5 management processes to address OSS modifications that are necessary to support
6 line splitting."⁸⁸ The 485-page Triennial Review Order addresses a large number
7 of topics beyond the nine-month mass-market unbundled switching and batch hot
8 cut cases. Line splitting is never mentioned in the FCC's roadmap. Instead, line
9 splitting appears in an entirely different section of the Triennial Review Order
10 (the section on loop unbundling rather than the section on switching), and the nuts
11 and bolts of implementing line splitting do not turn on the issues being considered
12 here. Mr. Zulevic and Ms. Doberneck effectively admit as much: they seek to
13 require Qwest to make certain OSS changes regardless of how the Commission
14 decides the core "impairment" question to which this whole case is directed.⁸⁹

15 Other state commissions in Qwest's region have followed the FCC's clear
16 instructions and ruled that line splitting implementation questions like the ones
17 Mr. Zulevic and Ms. Doberneck raise may not be considered in the nine-month
18 cases. The Arizona ALJ hearing that state's TRO cases issued a procedural order

⁸⁷ *TRO* ¶ 91.

⁸⁸ *TRO* ¶ 252.

⁸⁹ See *Covad Direct* at page 12, "Thus, even if UBS is retained in this state, it is imperative that Qwest be required to correct these ordering and provisioning problems."

1 finding that the “FCC’s Triennial Review Order did not require line splitting to be
2 addressed in the nine-month docket,” and ruling accordingly that “line splitting
3 will not be addressed in this docket.”⁹⁰ Similarly, the ALJs hearing the Oregon
4 TRO cases found that “Paragraph 252 of the TRO clearly contemplates that OSS
5 modifications necessary to support line splitting will be considered primarily in
6 processes other than the nine-month mass market proceeding,” and they refused
7 to put line-splitting OSS changes on that state’s formal issues list for the nine-
8 month docket.⁹¹

9 As the FCC’s instructions make plain, the OSS changes that Mr. Zulevic and Ms.
10 Doberneck request should be considered as part of Qwest’s Change Management
11 Process, not here. This is especially true when those very changes have already
12 been teed up for formal consideration in the CMP, as I explain below.

13 **Q. DOES COVAD HAVE LEGITIMATE CONCERNS ABOUT QWEST’S**
14 **OSS CAPABILITIES FOR LINE SPLITTING IN ANY EVENT?**

15 A. No. As previously discussed, Qwest’s OSS provides CLECs the capability to
16 order line splitting and loop splitting on a UNE-P and UNE-L basis respectively.

17 Covad appears to be confused about Qwest’s current OSS capabilities for Line

⁹⁰ See *In the Matter of ILEC Unbundling Obligations as a Result of the Federal Triennial Review Order*, Before the Arizona Corporation Commission, Docket No. T-00000A-03-0369, Procedural Order, filed November 6, 2003, pages 5-6, 7.

1 Splitting (UNE-P) and Loop Splitting (UNE-L) LSRs. To add data capability of
2 either Line Splitting or Loop Splitting on an existing UNE-P or UNE-L account, a
3 CLEC currently submits a single LSR. If the account is new and the
4 CLEC/DLEC would like voice and data ordered at the same time, the CLEC of
5 record submits two LSRs, one for the voice service and a second for the data
6 (DLEC) service and relates the two LSRs by placing an indicator called an RPON
7 on the LSRs. The RPON indicates to Qwest that the voice and data order are to
8 be provisioned on the same loop. Additionally, the RPON eliminates any
9 requirement for the voice LSR to complete prior to the data LSR completion.
10 Migrations or conversions of products are handled in a similar manner with two
11 LSRs being required. Covad is incorrect in stating that the DLEC data order
12 cannot be submitted until the voice order is complete and the CSR is updated in
13 Qwest's systems.

14 **Q. CAN YOU EXPAND UPON PENDING OSS ENHANCEMENTS FOR LINE**
15 **SPLITTING (UNE-P) AND LOOP SPLITTING (UNE-L) PRODUCTS?**

16 A. Yes. Qwest added functionality in IMA Release 13.0 to provide the capability for
17 a CLEC to submit a single LSR for new voice and data service for Resale Qwest
18 DSL, UNE-P with Qwest DSL and Line Sharing products but not the single LSR
19 capability for new voice and data for Line Splitting and Loop Splitting products.

⁹¹ *In The Matter Of The Investigation To Determine, Pursuant To Order Of The Federal Communications Commission, Whether Impairment Exists In Particular Markets If Local Circuit*

1 However, the capability for a CLEC to continue to submit two LSRs and relate
2 them with the RPON indicator for these products, as explained above, is still fully
3 functional. Qwest is adding the single LSR capability for new voice and data for
4 Line Splitting and Loop Splitting product functionality in the next IMA Release,
5 15.0, scheduled for production on April 19, 2004.⁹² With that implementation, a
6 CLEC will be able to submit a single LSR for new voice and data service for Line
7 Splitting and Loop Splitting products.

8 **Q. ARE COVAD’S CONCERNS ABOUT THE NEW SINGLE LSR**
9 **FUNCTIONALITY BEING INCLUDED IN THE NEXT IMA RELEASE**
10 **VALID?**

11 A. No. This functionality has been committed to in the next IMA Release and is in
12 green status for deployment in April. Contrary to Covad’s claims, IMA Release
13 15.0 is unaffected by Qwest’s reduction in hours for 2004. Additionally, this
14 specific functionality is being treated as a software patch. Therefore, the
15 resources used to implement it are in addition to the “bucket” of hours committed
16 to by Qwest for that release. Therefore, Covad’s concerns about whether this
17 functionality will actually be included in the IMA Release 15.0 is misplaced.

18 **Q. DID COVAD OR ANY OTHER CLECS REQUEST THE IMA**
19 **ENHANCEMENTS ON THESE SHARED LOOP PRODUCTS?**

Switching For Mass Market Customers Is No Longer Available As An Unbundled Network Element,
Docket UM 100, Before the Public Utility Commission of Oregon, Ruling, November 14, 2003, page 6.

1 A. No. The DSL and the shared loop product systems enhancements implemented in
2 IMA Releases 13.0 and planned for IMA release 15.0 were initiated by Qwest
3 with CMP CRs. Covad's sudden contention that Qwest's OSS is inadequate and
4 discriminatory is confusing and inaccurate, especially considering Covad itself
5 never requested the enhanced functionality.

6 **Q. HAS QWEST PROPOSED ANY ADDITIONAL ENHANCEMENTS TO**
7 **THE LOOP SPLITTING (UNE-P) AND LINE SPLITTING (UNE-L)**
8 **PRODUCTS THROUGH THE CMP?**

9 A. Yes. On December 3, 2003, Qwest proposed a second enhancement for
10 submission of Line Splitting and Loop Splitting LSRs which will include
11 expanding the single LSR capability for product-to-product conversions.⁹³ The
12 CMP CR includes conversions with or without number portability (Qwest LSR
13 Activity Type of V) and conversions with listings (Qwest LSR Activity Type of
14 Z) with or without number portability. In each case this functionality will allow
15 re-use of the same facility. The inclusion of this enhancement in Qwest's IMA
16 Release 16.0 is dependent upon how the CMP community prioritizes the CR
17 following the January 22, 2004, Monthly Systems CMP meeting.

18 **Q. COVAD SUGGESTS THAT RELIANCE ON THE CMP IS**

⁹² CMP CR SCR030603-01.

⁹³ CMP CR SCR120303-01 is set for a prioritization vote at the next CMP meeting scheduled for the week of January 26, 2004. This CR could be included in the IMA Release 16.0 scheduled for production in October 2004 if the CLECs vote and prioritize it as such.

1 **INAPPROPRIATE BECAUSE ALL OSS CHANGES NEEDED TO**
2 **IMPLEMENT LINE SPLITTING MUST BE ADOPTED BY JULY 2004.⁹⁴**
3 **IS COVAD CORRECT?**

4 A. No. The FCC did not mandate July 2004 as the date “to have in place all
5 necessary systems and processes for UNE-L loop splitting,” as Covad suggests.⁹⁵
6 July 2004 is just the date for this Commission to decide whether CLECs would be
7 impaired without access to unbundled switching. The FCC did not set a particular
8 date by which all line-splitting related OSS changes must be made; on the
9 contrary, as noted above, it explicitly assigned line-splitting OSS implementation
10 issues to the normal workings of the ILECs’ change management processes.⁹⁶

11 Nor does Covad have any practical need for these OSS changes to be
12 implemented in July 2004, ahead of IMA Release 16.0’s scheduled October 2004
13 production date. As a practical matter, nothing changes in July 2004, even if this
14 Commission finds “no impairment.” Even after a “no impairment” finding,
15 CLECs may still order UNE-P until December 2004. Because Qwest will be
16 implementing CMP CR SCR030603-01 in April 2004 and could, as described
17 above, implement SCR120303-01 as early as October 2004, Qwest’s OSS will
18 provide the functionality Covad is concerned about in advance of its practical
19 need.

⁹⁴ *Covad Direct* at page 14.

1 for a mass-market switching case. Regardless, I demonstrate that Qwest's OSS
2 supports line splitting and loop splitting, and that Qwest is already planning to
3 make the OSS changes now considered important to Covad.

4 MCI and Covad are seeking to relitigate operational issues that were already
5 thoroughly covered by the by the many collaborative meetings, and the extensive
6 third party test that served as the basis for findings by this Commission and the
7 FCC that Qwest's OSS is capable of handling CLEC transactions. CLEC
8 arguments that further testing is needed to verify that Qwest's OSS can handle
9 increased order volumes are also without merit. A thorough capacity test
10 demonstrated that Qwest's OSS is capable of handling anticipated increases in
11 order activity. As a result, neither MCI nor Covad have demonstrated that any
12 OSS issues exist in this case.

13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

14 A. Yes, it does.

⁹⁶ TRO ¶ 252.