

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

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

REBUTTAL TESTIMONY OF

MARY M. RETKA

FOR

U S WEST COMMUNICATIONS, INC.

January 11, 2000

1 **Q. PLEASE STATE YOUR NAME, PRESENT POSITION AND PLACE OF**
2 **EMPLOYMENT.**

3 A. My name is Mary Retka. I hold the position of Director, Network Interconnection
4 Planning for U S WEST Communications (U S WEST). My business address is
5 700 W. Mineral, Littleton, CO 80120.

6

7 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS CASE?**

8 A. Yes, I filed direct testimony on behalf of U S WEST.

9

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

11 A. The purpose of my rebuttal testimony is to address issues raised in Mr. Wilson's
12 testimony relating to forecasting and call blocking.

13

14 **Q. MR. WILSON STATES THAT FORECASTS RECEIVED BY U S WEST FROM**
15 **AT&T ARE ADEQUATE FOR U S WEST TO BUILD IN THE NETWORK. IS**
16 **THAT AN ACCURATE STATEMENT?**

17 A. No. Mr. Wilson states that the purpose of forecasting is to insure that capacity
18 will be available when needed. While this is an accurate statement, the actual
19 forecast submitted by AT&T only identifies the originating end of the facility but
20 not the end user location to which the facility must terminate. This information is
21 not identified to U S WEST until the ASR is placed by AT&T. Essentially, the

1 AT&T forecast provides only half the information U S WEST engineers need to
2 adequately build the network.

3

4 **Q. DOES U S WEST IGNORE THESE INCOMPLETE OR INADEQUATE**
5 **FORECASTS?**

6 A. No, although these incomplete forecasts often cause delays. Complete
7 forecasts with end-to-end requirements would allow U S WEST to more
8 accurately plan for the required capacity, including the facility, before the ASR is
9 issued. However, because AT&T's forecasts do not make this identification,
10 U S WEST does not know where the facility is needed until the ASR is received.

11

12 **Q. PLEASE EXPLAIN U S WEST'S FORECASTING PROCESS.**

13 A. U S WEST receives forecast from both the wholesale and retail market units.
14 These forecasts are then sent to the strategies planning organization, where the
15 growth of the current network is forecasted. The growth of the current network is
16 combined with the forecasted need and network engineers issue the necessary
17 growth jobs to build the network. U S WEST allocates funds based on a number
18 of criteria including demand for service, number of customers impacted, quality
19 of service considerations and return on our investment. Finally, jobs that meet
20 the necessary criteria are completed to meet the projected need.

21

1 U S WEST is notified of the actual customer need by the ASR or receipt of an
2 order. At this time, the order is provisioned and the result is used capacity, or
3 customer service, with U S WEST recovering its investment over time. I have
4 attached Exhibit MMR-2 which pictorially shows this process.

5

6 **Q. MR. WILSON SUGGESTS THAT U S WEST INVESTMENT IN WASHINGTON**
7 **IS FLAT WHEN COMPARED TO GROWTH. IS THIS TRUE?**

8 A. No, it is not. While Network Access Line (NAL) growth in the state of
9 Washington has increased at an average of 5 percent annually since 1996, U S
10 WEST's Capital investment in the state of Washington has grown at an average
11 of 21 percent per year.

12

13 **Q. DOES U S WEST DESIGNATE OFFICES GOLD SILVER OR BRONZE AND**
14 **PROVISION ACCORDINGLY AS MR. WILSON STATES?**

15 A. No. U S WEST no longer designates wire centers as "Gold", "Silver", or
16 "Bronze". At one point, U S WEST did use such terms. Those offices/wire
17 centers identified as high growth and/or with the potential for other growth-
18 related significant activities were designated as Gold or Silver; Gold being those
19 with the highest growth, and Silver being those with high growth and/or the
20 potential for other growth-related significant activities. Other offices/wire centers
21 were designated as Bronze. Remote switches were included within the

1 designations of their hosts. The designations were open to reevaluation based
2 on growth-related changes. However, regardless of designation, U S WEST
3 remains committed to striving to modernize and maintain all offices/wire center
4 (irrespective of Gold, Silver or Bronze designation) at levels which meet or
5 exceed state service level requirements.

6
7 **Q. MR. WILSON CLAIMS THAT U S WEST IS NOT PROVIDING CIRCUITS TO**
8 **AT&T EVEN WHEN CAPACITY IS AVAILABLE. WILL YOU PLEASE**
9 **COMMENT ON MR. WILSON'S ANALYSIS FROM PAGE 13 OF HIS**
10 **TESTIMONY.**

11 **A.** For the most part, Mr. Wilson's analysis on page 13 of his testimony is irrelevant to the
12 complaint brought by AT&T. This is because Mr. Wilson's analysis deals solely with
13 capacity issues associated with Inter-Office Facilities (IOF) and the vast majority of
14 AT&T's orders that are held due to a lack of facilities, are held for Outside Plant facilities
15 and not IOF facilities.

16
17 Furthermore, even if Mr. Wilson's analysis were relevant, his logic in evaluating the IOF
18 capacity situation is wrong. Mr. Wilson is confusing the issue of facility capacity with
19 trunk utilization. Mr. Wilson bases his conclusions on page 13 of his testimony on
20 U S WEST's response to AT&T's discovery request 01-012-I. The response provided by
21 U S WEST was a listing of IOF facilities at 80% or greater utilization. What Mr. Wilson

1 fails to understand is the fact that this report indicates the percentage utilization of
2 facilities that are already in use by customers. For example, a customer utilizing only 12
3 trunks of a 24-trunk DS1 circuit would register as 50% utilization for that circuit, but this
4 does not mean that U S WEST has access to the unused portion of the circuit. Ultimately,
5 the data that Mr. Wilson references does not support his conclusions.

6
7 **Q. MR. WILSON CLAIMS THAT CALL BLOCKING IS OCCURRING IN**
8 **WASHINGTON IN WIRE CENTERS WHERE AT&T HAS HELD ORDERS AND**
9 **THIS MAY BE INDICATIVE OF CAPACITY PROBLEMS THAT CAN AFFECT**
10 **AT&T AND ITS CUSTOMERS. CAN YOU COMMENT ON THIS ASSERTION?**

11 A. First, it should be noted that AT&T's complaint in this matter involves only dedicated
12 circuits which have minimal call blocking on the switched network. Additionally, the
13 blocking percentages referenced by Mr. Wilson in his direct testimony on page 17, lines 7
14 to 12 do not involve AT&T trunk groups. Furthermore, call blocking on circuits that
15 involve more than one carrier should be closely examined to determine the root cause of
16 the blocking. It should not be a foregone conclusion, as Mr. Wilson asserts, that
17 U S WEST is responsible for all the call blocking situations referenced in his testimony.

18
19 For example, two of the trunk groups on the 10/4/99 blocking report, referred to by Mr.
20 Wilson, are blocking at 12.73 percent and 15.65 percent. These two trunk groups belong
21 to a 3rd party which is leasing the facilities from AT&T. U S WEST has sent this

1 company a Trunk Group Service Request (TGSR) notifying them of the blocking
2 condition. To date, U S WEST has not received a reply to the TGSR, or an order to
3 service the trunk groups from this customer. Consequently, U S WEST has no way to
4 mitigate the blocking on these trunk groups without cooperation from the carrier.

5

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

7 A. Yes.

8

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**EXHIBIT OF
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