

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE PRICING )  
PROCEEDING FOR INTERCONNECTION, )  
UNBUNDLED ELEMENTS, TRANSPORT ) Docket Nos. UT-  
960369; UT-960370; )  
AND TERMINATION, AND RESALE ) UT-960371  
[FOR U S WEST COMMUNICATIONS, INC.] )  
[FOR GTE NORTHWEST INCORPORATED] )**

**REBUTTAL**

**TESTIMONY OF**

**BARBARA J. BROHL**

**ON BEHALF OF**

**U S WEST COMMUNICATIONS**

**FEBRUARY 7, 2000**

**IDENTIFICATION OF WITNESS**

**1**

**2**

**3 PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

1 My name is Barbara J. Brohl. My business address is 1999 Broadway, 10<sup>th</sup> Floor, Denver,  
2 Colorado 80202.

3

4 **BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 I am employed by U S WEST Communications, Inc. (U S WEST) as a Director in the  
6 Information Technologies Wholesale Systems Regulatory Support Group.

7

8 **HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

9 Yes. I provided testimony in this Docket No. UT-960369 pertaining to UNE loop  
10 deaveraging.

11

12 **PURPOSE OF TESTIMONY**

13

14 **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 The purpose of my testimony is to discuss the Operating Support System (OSS) processing  
16 implications of the wholesale deaveraging schemes proposed in the reply testimony of  
17 Mr. William Page Montgomery on behalf of Advanced TelCom Group, Inc., Electric  
18 Lightwave, Inc., GST Telecom Washington, Inc., NewEdge Networks, Inc., and Nextlink  
19 Washington, Inc. Mr. Montgomery proposes two methodologies for the CLECs to  
20 choose from. While one of his methods is manageable from a processing perspective,  
21 I will explain how his second alternative, due to the high degree of manual processing

1 and strong probabilities for errors, is completely impractical.

2

3 **RESPONSE TO MR. MONTGOMERY'S DEAVERAGING PROPOSAL**

4

5 **CAN YOU SUMMARIZE YOUR UNDERSTANDING OF MR.**

6 **MONTGOMERY'S PROPOSAL?**

7 Yes. Mr. Montgomery proposes that each CLEC would have a choice of de-averaging  
8 methods: 1) using an "average" loop cost for each of two zones, or 2) using a distance  
9 delimited price within each of the two zones, consisting of 6 distance bands within each  
10 zone.<sup>1</sup>

11

12 **CAN YOU EXPLAIN MR. MONTGOMERY'S FIRST ALTERNATIVE?**

13 Yes. The first option Mr. Montgomery puts forth segregates the U S WEST loops into two  
14 zones. This option is conceptually similar to the methodology U S WEST recommends,  
15 and, depending on the specifics of implementation, may not result in significant  
16 incremental OSS modifications or significant increases in U S WEST manual order  
17 processing.

18

19 **CAN YOU EXPLAIN MR. MONTGOMERY'S SECOND ALTERNATIVE?**

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<sup>1</sup> Reply Testimony of William Page Montgomery, p. 11.

1 Yes. Mr. Montgomery proposes the industry use one of what he considers to be the many  
2 “off-the-shelf” software products that measure distances based on latitudes and  
3 longitudes, or street addresses.<sup>2</sup> Under this alternative, the ILEC would bill the CLEC  
4 based on the statewide average loop cost. Then the CLEC would calculate an  
5 “adjustment” to the ILEC bill to reflect the variance in cost based on the length of the  
6 loop. He sees no reason the existing system could not be efficiently extended to the  
7 billing adjustments required by the distance based loop UNEs. His testimony, however,  
8 is silent with respect to specifically how he would relate the “off-the-shelf” software  
9 distance measurement to each loop.

10

11 **CAN YOU GIVE AN EXAMPLE OF THE PROCESSES INVOLVED UNDER MR.**  
12 **MONTGOMERY’S “OFF-THE-SHELF” PROPOSAL?**

13 Yes. Following Mr. Montgomery's proposal, a loop would be processed as follows:

14 The CLEC would access end user data from the ILEC OSS to get the end user’s address  
15 and the wire center from which that end user’s loop originates.

16 The CLEC would determine the wire center’s geographical location.

17 The CLEC would, if necessary for the off-the-shelf package, convert the geographical  
18 data from the U S WEST OSS into Latitude and Longitude data with the appropriate  
19 degree of accuracy. Expect this degree of accuracy to be a source of dispute, since  
20 there is no indication that the software will be capable of validating the Latitude and

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1 <sup>2</sup> Reply Testimony of William Page Montgomery, p. 11.

1 Longitude entries made.

2 The CLEC would then enter this information into the off-the-shelf software packages  
3 to calculate the distance. Somehow the off-the-shelf software package will know the  
4 right-of-way path from the wire center to the end user and therefore calculate the  
5 correct loop length. It is not clear from Mr. Montgomery's testimony if the length  
6 will represent the actual loop length, or if it will be a measure of distance in air  
7 miles. Since no software packages were identified in the testimony, it was not  
8 possible to evaluate the capabilities of the software Mr. Montgomery has in mind.

9 The CLEC would then look at Mr. Montgomery's table and find the distance-deaveraged  
10 rate from the correct zone column.

11 The CLEC would then calculate the difference between the U S WEST state wide  
12 average loop rate and the rate the CLEC found in Mr. Montgomery's table.

13 Then, each month, the CLEC will subtract (or add) this amount from (or to) the billed  
14 amount and pay the amount the CLEC determined.

15 So, on the CLEC end of this transaction, Mr. Montgomery has recommended a multi-step  
16 and on-going manual process, with numerous opportunities for error for each and every  
17 unbundled loop.

18

19 **COULD A CLEC'S PRE-ORDER PROCESS BE IMPACTED BY THIS**  
20 **PROCEDURE?**

21 Yes. It is conceivable that the CLEC would have to perform the steps listed above during

1 the pre-order process for every UNE loop in order to quote a rate that appropriately  
2 reflects the cost of the finished product.

3

4 **UNDER MR. MONTGOMERY’S “OFF-THE-SHELF” ALTERNATIVE, DOES**  
5 **HE RECOGNIZE THE NEED FOR THE ILECS TO HAVE THE OPPORTUNITY**  
6 **TO REVIEW THE CLEC CALCULATION OF THEIR OWN REDUCTION IN**  
7 **LOOP PRICE?**

8 A. Yes. Mr. Montgomery states “Each ILEC would, of course, have the right to fully review  
9 the CLEC’s calculations against the ILEC’s own data...”<sup>3</sup> Since Mr. Montgomery  
10 believes this process requires no system modification by the ILECs, U S WEST would  
11 duplicate the CLEC’s manual process to “fully review” each CLEC calculation. Every  
12 month U S WEST would have to:

13 Use the proposed software to validate the calculated loop length for each loop  
14 ordered by each CLEC.

15 Validate the new rate provided by the CLEC.

16 Work through any disputes with each CLEC. Any disputes that cannot be resolved  
17 may ultimately end up at the Commission for resolution.

18 Post the payment made by the CLEC.

19 Issue adjustments on the agreed-to differences. These adjustments are manual.

20 Manual adjustments are system exceptions that add time to the billing

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<sup>1</sup> <sub>3</sub> Reply Testimony of William Page Montgomery, p. 12.

1 process.

2

3 **IS THERE A STRONG POSSIBLITY FOR ERRORS IN MR. MONTGOMERY'S**  
4 **"OFF-THE-SHELF" ALTERNATIVE?**

5 A. Yes. As illustrated above, Mr. Montgomery's process is very manual, with minimal  
6 mechanization, other than the distance calculation provided by the off-the-shelf software  
7 package. As such, it will be difficult, if not impossible to validate loop distances. It is  
8 not clear that software exists which will be able to reflect true loop distance, or if this  
9 software is simply going to measure air miles. There is a potential for each loop distance  
10 to be disputed under this methodology, and these disputes may find their way to the  
11 Washington Commission for resolution.

12

13 **PLEASE SUMMARIZE YOUR TESTIMONY.**

14 Mr. Montgomery has proposed a loop-length based deaveraging process that uses  
15 unspecified "off-the-shelf" software to calculate loop lengths. The process is very un-  
16 mechanized, providing numerous opportunities for errors and disputes. It will also slow  
17 down the CLEC pre-order process as well as U S WEST's billing process. It is my  
18 recommendation that the Commission discard this proposal as unmanageable.

19

20 **DOES THIS CONCLUDE YOUR TESTIMONY?**

21 Yes it does.