

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE CONTINUED)
COSTING AND PRICING OF UNBUNDLED)
ELEMENTS, TRANSPORT AND) Docket No. UT-003013
TERMINATION, AND RESALE)
FOR U S WEST COMMUNICATIONS, INC.)
_____)

SUPPLEMENTAL DIRECT TESTIMONY

OF

BARBARA J. BROHL

June 9, 2000

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I.IDENTIFICATION OF WITNESS

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Q1PLEASE STATE YOUR NAME, EMPLOYER, POSITION, AND BUSINESS

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ADDRESS.

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A1 My name is Barbara J. Brohl. I am employed by U S WEST Communications, Inc.

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(U S WEST) as a Director in the Information Technologies Wholesale Systems

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Regulatory Support Group. My business address is 1999 Broadway, 10th Floor,

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Denver, Colorado 80202.

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II.DISCUSSION

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A. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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A1 The purpose of my testimony is to further explain the nature of U S WEST's

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Operational Support System (OSS) cost recovery, and to explain the results of

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splitting the OSS development costs between the IMA GUI, IMA EDI and Shared

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development projects. This testimony should illustrate that U S WEST has complied

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fully and accurately with the Commission request to separate these costs.

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A. WHY IS U S WEST REVISITING ITS ALLOCATION OF IMA GUI, IMA EDI,

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AND SHARED PROJECT DEVELOPMENT COSTS?

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A1 In its 25th Supplemental Order, the Commission asked U S WEST to revisit the

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allocation of costs among Interconnect Mediated Access - Electronic Data Interface

1 (IMA EDI), Interconnect Mediated Access - Graphical User Interface (IMA GUI) and
2 'shared' systems development projects.¹ The CLECs have suggested to the
3 Commission that there should be significant differences between the functions that
4 the IMA EDI and IMA GUI enable them to perform, and that there should be a
5 significant difference in the cost associated with using these interfaces.²

6 **Q1WHY ARE THE CLECS ASSUMPTIONS REGARDING THE ALLOCATION**
7 **OF COSTS INCORRECT?**

8 A1 First it is important to remember that what U S WEST is seeking in this docket is the
9 recovery of the costs of developing OSS access for the CLECs. This is a pool of
10 money that has already been spent by U S WEST to provide CLECs with access to
11 U S WEST's Operational Support Systems (OSSs). There is no transaction or usage
12 cost being requested in association with the use of the OSS. U S WEST is not
13 seeking to assess a charge for use of either interface, so it does not make sense in this
14 context to say that it should cost more or less to use a graphical user interface versus
15 an electronic data interface. U S WEST is trying to recover the costs associated with

¹ *In the Matter of Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale*, WUTC Docket No. UT-960369, and *In the Matter of Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for U S WEST*, WUTC Docket No. UT-960370, and *In the Matter of Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for GTE Northwest Incorporated*, WUTC Docket No. UT-960371 ¶ 27 (rel. May 19, 2000), (25th Supplemental Order: Order Accepting, Rejecting, and Authorizing Refiling of Compliance Filings).

² The 25th Order cites AT&T Comments pages 4-5.

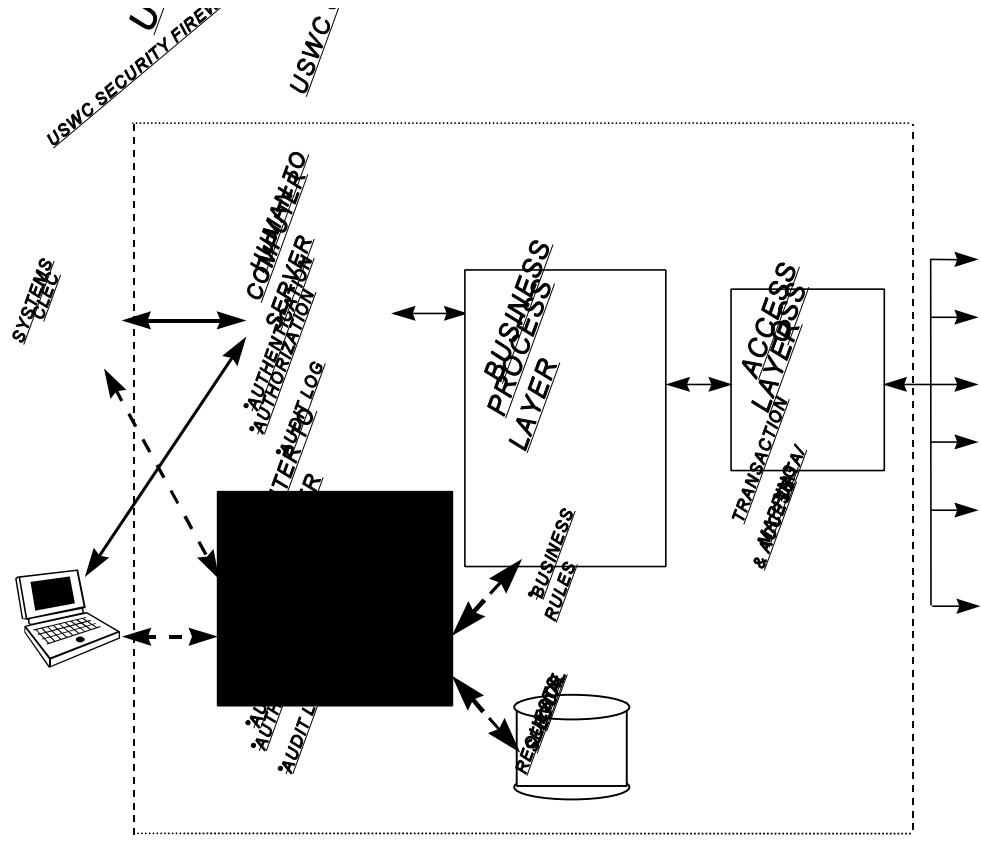
1 building these interfaces as well as all the functionality that allows the CLECs to
2 access U S WEST's downstream OSS applications.

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4 Second, it does not follow that it should cost more or less to build a graphical user
5 interface versus an electronic data interface. The cost to develop an interface depends
6 on the complexity of the interface and the functions it is required to perform. Nor does
7 it follow that shared applications should comprise a small share of the total cost. To
8 explain this, shared applications should be better defined. A shared application is a
9 computer program or set of computer programs that can be used by many other computer
10 programs. Its functions can be shared. It is the goal of every systems development
11 organization to create programs that can be used and re-used by many different computer
12 systems. It is cheaper to build one program to be used multiple times than to build
13 multiple versions of the same program. This process also helps to establish standards
14 and uniformity in system architecture, and it makes future changes to systems easier to
15 accomplish. With re-usable programs, changes to one program can impact all the other
16 programs that use it. With this kind of architecture, a systems development organization
17 can respond more quickly and efficiently to requests for changes to its systems. This is
18 a goal of the U S WEST systems development organization.

1 Q1DOES THE IMA SYSTEM (GUI & EDI) FOLLOW U S WEST'S GOAL OF
2 SHARED/RE-USEABLE ARCHITECTURE?

3 Yes. The architecture of the IMA system as a whole follows this systems development
4 methodology. From the beginning, it was understood that CLECs would require different
5 entry points into U S WEST's systems. These entry points are referred to as front-end
6 interfaces. Once a CLEC has submitted a transaction via one of these front-end
7 interfaces, the transaction must then be processed and transmitted to U S WEST's
8 downstream systems. When IMA was created, the intent was to make as much of the
9 program code as possible that performs this processing and transmission useable by both
10 the GUI and EDI front-end interfaces. As a result, future changes would impact fewer
11 programs over all. The result is that only the programs directly related to the specific
12 functions of each front-end interface are different. All of the programs that connect the
13 front-end interfaces to the downstream OSS applications are the same hence they are
14 shared. The following diagram illustrates the architecture of the IMA application.³

1 ³ This diagram is also included on page 17 of the direct testimony submitted by Barbara J. Brohl on January
2 31st under the new docket for this proceeding, UT-003013.



1 As illustrated by this diagram, a CLEC may enter a transaction either via a Human to
2 Computer front-end (the IMA GUI front-end interface) or a computer to computer front-
3 end (the IMA EDI front-end interface). The starting point for the CLEC is one of these
4 front-end interfaces. Once a transaction has passed through the interface it enters the
5 Business Process Layer (BPL). From this point forward, through the OSS Access Layer,
6 and on to the downstream systems, the programs that are used to process a CLEC
7 transaction are the same. The systems development projects that were conducted to
8 create the Business Process Layer, the OSS Access Layer, the interfaces with the
9 downstream systems, and to perform the changes needed to the downstream systems are
10 all considered shared projects. These programs written as a result of these projects are
11 shared by the IMA GUI and IMA EDI front-end interfaces.

12 **Q2HAS U S WEST SEPARATED ITS COSTS BETWEEN THE IMA GUI AND**
13 **THE IMA EDI APPLICATIONS?**

14 Yes. At this Commission's request, U S WEST separated the costs of the projects that
15 were undertaken to develop the IMA GUI and IMA EDI front-end interfaces.⁴ The
16 Commission identified transactions submitted via a 'manual' process as those using the
17 IMA GUI application, transactions that are submitted via fax, and transactions that are
18 submitted manually. The IMA EDI application was included in this Commission's

¹ ⁴ 17th Supplemental Order: Interim Order Determining Prices; Notice of Prehearing Conference, ¶ 112.

1 assessment of 'electronic' systems.⁵ As the commission requested, U S WEST identified
2 the costs of the projects associated with the development of the IMA GUI front-end
3 interface and the IMA EDI front-end interface. Given U S WEST's systems
4 development philosophy, the results should and did establish that a high proportion of
5 the development costs were associated with projects that deal with processing
6 transactions after they have been entered through the front-end interfaces, the so-called
7 shared projects.

8 **Q3DOES THIS CONCLUDE YOUR TESTIMONY?**

9 A1 Yes, it does.

¹ ⁵ Id.