EXHIBIT NO. _____ LB-3T

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**

REBUTTAL TESTIMONY OF

LORRAINE BARRICK

ON BEHALF OF

QWEST CORPORATION

February 17, 2004

Q. WHO IS SPONSORING THIS TESTIMONY?

A. This testimony is sponsored by Lorraine Barrick.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes. I filed direct testimony on January 23, 2004.

Q. ARE THERE ANY UPDATES YOU WOULD LIKE TO MAKE TO YOUR REPORT (EXHIBIT NO. LB-2)?

A. Yes. As stated in my report, the second round of live testing was completed on January 19, 2004 and therefore the quality of new installation could not be reported for this test. As of February 13, 2004, no troubles had been reported on any of the 52 telephone numbers included in these two batches.

Q. MCLEOD SUGGESTS THAT THE FOUR BATCHES INVOLVED IN THE TEST DESCRIBED IN YOUR DIRECT TESTIMONY USED TWO DIFFERENT PROCESSES. IS THAT TRUE?

A. As I described in my direct testimony (Exhibit No. LB-1T), Qwest and McLeod tested the BHC process that was proposed by Qwest at the time. In the first test, Qwest proposed performing both the pre-wire and lift and lay work on the Due Date. After the first round of testing and after significant input from CLECs in the BHC Forum, Qwest modified its proposed BHC process to perform pre-wire on an earlier DVA Date. Qwest also agreed to perform DT/ANI testing on the DVA

Date. And, as noted by Ms. Lynott of McLeod, "Qwest implemented the dial tone check after the pre-wire, which eliminated the quality error in Trial 1."[1]

Q. MCLEOD SUGGESTS THAT ITS INTERPRETATION OF THE BHC TESTING IS THAT QWEST CAN ONLY COMPLETE 50-60 CUTS PER CENTRAL OFFICE ("CO") IN A DAY. IS THIS CORRECT?

A. No. According to Ms. Lynott:

> "One key data point that we tracked very closely involved the length of time it took Qwest to convert each batch of 25 lines. Qwest had one team of 2 central office technicians (COTs) located on both Boise and Burlington working our 25-line orders. For each 25-line Order, it took Qwest the following lengths of time to perform these 3 key functions to complete the orders:
>
> 1. Pre-wiring took approximately 2 hours.
> 2. Lift and Lay and completing out orders in WAFA took approximately 1 hour, 20 minutes.
> 3. Disconnect the Jumpers took 15 minutes."[2]

As my direct testimony explains in detail, Hitachi personnel were present at all trials and were responsible for measuring the length of time it took to complete each aspect of Central Office work. The times required to perform each of these steps, according to the Hitachi Consulting teams located in each of the offices are documented in my report and are reproduced here:

[1] Direct Testimony of Patty Lynott on Behalf of McLeod USA Telecommunications Services, Inc. Regarding Batch Hot Cut Process, January 23, 2004 (Exhibit No. not provided) ("Lynott"), at page 16, lines 350 to 351.

[2] *Id*., at pages 15 to 16, lines 325 to 335.

Elapsed Times for the Second Round Live Trial

Date/ Location	Volume of TNs Included in Batch	Elapsed Work Time for Pre-Wire Procedures	Elapsed Work Time for Due Date Procedures	Total Elapsed Work Time for CO BHC Procedures	Total Elapsed Time for CO BHC Procedures; Question and Answer with COT
January 19, 2004 (CO #3)	26	1 hour 22 minutes	54 minutes	2 hours 16 minutes	2 hours 48 minutes
January 19, 2004 (CO #2)	26	1 hour 56 minutes	1 hour 11 minutes	3 hours 7 minutes	3 hours 14 minutes

This data as well as the data provided by McLeod shows that Qwest can readily perform 100 cuts in a day. The only work completed on Due Date is the lift and lay which McLeod estimates will take approximately 1.33 hours for each batch of 25. Thus even based on McLeod's times, a batch of 100 can be completed in 5 hours and 20 minutes, well within the eight-hour window from 3:00 am to 11:00 am.

Q. MCLEOD FACTORS IN THE PRE-WIRE WORK IN ESTIMATING THAT QWEST CAN ONLY PERFORM 50-60 CUTS PER DAY. WHY IS THIS AN INCORRECT AND INCOMPLETE WAY TO ANALYZE QWEST'S CAPABILITIES?

A. McLeod fails to consider that the pre-wire work will be completed by Qwest for future BHCs on days 2-3 of the standard 7-day interval. Qwest will therefore have two days to complete the pre-wire work for future batches. Qwest has a variety of

options available for completing pre-wire. For example, the rest of the 3:00 am to 11:00 am shift could be devoted to pre-wire activities, as could portions of the other daily shift as necessary. During periods of high activity, pre-wire could even begin at 3:00 am with a third technician on the ICDF. This is the type of work that Qwest can readily fold into its current workload requirements as demand for unbundled loops requires.

Q. SHOULD THE DISCONNECT OF THE LINE DISCUSSED BY MS. LYNOTT BE FACTORED INTO THE COMMISSION'S THINKING ON SCALABILITY FOR THE BHC PROCESS?

A. No. I am assuming that by "Disconnect the Jumpers" Ms. Lynott is referring to removal of the wires. It is my understanding that Qwest will leave the jumpers until Frame Due Time (6:00 pm), which means this would not be performed as part of the 3:00 am to 11:00 am shift in any event. According to Qwest personnel, this activity can be deferred until down time is experienced. It is not part of the "critical path" for the CLECs.

Q. ACCORDING TO MS. LYNOTT, "MCLEODUSA RECENTLY CONVERTED 75 LINES PER DAY IN THE BURLINGTON CO UNDER THE CURRENT UNE-L PROCESS WITH A 5-BUSINESS DAY INTERVAL. THIS WOULD LEAD TO THE CONCLUSION THAT THE CURRENT PROCESS IS MORE SCALEABLE THAN THE PROPOSED BHC

PROCESS."[3] PLEASE COMMENT ON MS. LYNOTT'S CONCERN.

A. Ms. Lynott is correct that Qwest has demonstrated the ability, using the current hot cut process, to cut high volumes per day. My report documents many such instances across many COs.

This does not mean the current hot cut process is more scaleable than the proposed BHC process. It merely shows that the current hot cut process is already successful. My report identifies the key process changes between the current hot cut process and the proposed BHC process. Each of these either automates a currently manual process, or creates efficiencies by performing manual process in batches. Based on review of the proposed process alone, it is obvious that the BHC process is more efficient.

To validate this, I performed a comparison of the time required to perform several key components of the hot cut under the current hot cut process and the proposed BHC process. These comparisons are documented in my report and show a substantial savings in time when using the proposed BHC process.

Q. IN ADDITION, MS. LYNOTT EXPRESSES A CONCERN THAT "QWEST SUPPOSEDLY QUERIED AN ACCESS DATA BASE EVERY 30 MINUTES, BUT MCLEODUSA DID NOT RECEIVE UPDATES EVERY 30 MINUTES ON THE STATUS OF THE BATCH."[4] PLEASE COMMENT ON THIS SITUATION.

[3] *Id*., at page 16, lines 343 to 346.
[4] *Id*., at page 14, lines 296 to 298.

A. When the "lift and lay" for the first telephone number is completed, the COT updates the database. This will be captured in the next query of the database. When the "lift and lay" for the last telephone number is completed, the COT will again update the database, and this result will be captured. Under the proposed process, the CLEC will be notified only of these two events. Under Qwest's original proposal, the CLEC would not be notified every 30 minutes of the status of the project unless either of these two key events had taken place during the time since the last update. Therefore, the system performed as designed. However, it is my understanding that based on CLEC feedback, Qwest has agreed to perform the query every 15 minutes, and to provide updates for every 25 telephone numbers in larger batches, in order to get feedback to the CLEC faster. This should alleviate Ms. Lynott's concern.

Q. MS. LYNOTT EXPRESSED CONCERN ABOUT AN PROCESSING ERROR EXPERIENCED IN THE FIRST BATCH OF THE PRELIMINARY ROUND OF LIVE TESTING. PLEASE COMMENT.

A. As Ms. Lynott noted, during the preliminary round live trial *"the Qwest technician incorrectly sorted the spreadsheet by cable pair, which resulted in redoing the pre-wiring."*[5] This incident is also covered in my report, and was the result of unfamiliarity with the software. This is an example of a process improvement opportunity identified in the first round of live testing. Qwest automated the sorting

[5] *Id*., at page 14, lines 294 to 296.

of the spreadsheet and the COT now only needs to print it out. Therefore the possibility of this error recurring was eliminated by the second round of live testing.

Q. ACCORDING TO MS. LYNOTT'S TESTIMONY, "QWEST NOTIFIED MCLEODUSA AT THE BEGINNING AND END OF THE BATCH CUTS, BUT NOT WHEN INDIVIDUAL LINES WERE COMPLETED. THE RESULT OF NOT RECEIVING REAL TIME NOTIFICATION THAT THE CUT WAS COMPLETED WAS THAT CUSTOMERS WERE UNABLE TO RECEIVE INCOMING CALLS FOR UP TO 90 MINUTES."[6] IS THIS A CONCERN?

A. No. Qwest's BHC process offers a CLEC two options to determine when lines have been cut over to the CLEC. First, a CLEC can employ trap and trace which will provide the CLEC with an electronic real time notification of cutover. Second, the CLEC can use the online status tool. The CLEC can assess its customer base and the time of the cut, and make a decision about which tool to implement.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS.

A. The BHC process introduces significant efficiencies over the current hot cut process through front-end edit checks, process automation and streamlining of manual processes. Hitachi Consulting has measured the benefit of several of these differences. The results indicate that the process is substantially faster than the

[6] *Id*., at page 14, lines 298 to 302.

current process and the differences we measure save many hours per day at the projected volumes.

We have tested the BHC process with live data and the process works. Our testing to date has included four batches of approximately 25 telephone numbers per batch. In all cases, all commitments were met and no troubles were reported for the first round of testing within the first 30 days. As of February 13, 2004, no troubles had been reported for the second round of live testing (Due Date January 19, 2004). Qwest met 100% of its commitments and based upon the benchmarks set by the FCC of an on-time hot cut performance at 90%, Qwest demonstrated an ability to meet and exceed this benchmark.

Extrapolation of the Due Date activities of the COs for each of the live trials indicates that a team of two technicians should be able to complete them in the course of an eight-hour shift. Any remaining time in the shift, plus other shifts could be used for pre-wire activity for other batches.

The process improvements not available for testing will only serve to expedite the process and create additional efficiencies. Therefore, actual performance should be better than that experienced in our testing.

In my opinion, based on the above, the BHC process as proposed represents significant improvements in efficiency with similar levels of quality compared to

the existing hot cut process. Nothing has come to my attention to suggest that this process will not scale to the forecasted volumes.[7]

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

[7] For more information regarding my opinions, please refer to Exhibit No. LB-2.