

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST
Communications, Inc.'s Statement of
Generally Available Terms Pursuant to
Section 252(f) of the Telecommunications
Act of 1996

Docket No. UT-003040

**DIRECT TESTIMONY
OF**

MICHAEL G. WILLIAMS

**ON BEHALF OF QWEST CORPORATION
RE: PERFORMANCE DATA**

NOVEMBER 16, 2001

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I. IDENTIFICATION OF WITNESS

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Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT POSITION.

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A. My name is Michael G. Williams. My business address is 250 Bell Plaza, Room 1603-B, Salt Lake City, Utah, 84111. I am employed by Qwest Corporation ("Qwest") as Director, Wholesale Markets.

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Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND WORK EXPERIENCE AND PRESENT RESPONSIBILITIES.

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A. I hold an MBA degree from the University of Utah, 1985, and a bachelors degree in electrical engineering from Brigham Young University, 1976. Since 1981, I have worked for Qwest or its predecessors in various management positions, including engineering, technical sales, regulatory, new technologies, international cellular joint venture leadership, and wholesale interconnection operations. I have held my current position as Director of Wholesale Service Performance since June 1997. I am responsible for negotiating wholesale performance measurements with competitive local exchange carriers ("CLECs") and others in the ongoing collaborative processes overseen by the Regional Oversight Committee ("ROC") and the Arizona Corporation Commission. My responsibilities also include recording and evaluating Qwest's performance results in light of the Telecommunications Act of 1996 (the "Act").

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Q. HAVE YOU EVER TESTIFIED ON BEHALF OF QWEST IN A STATE REGULATORY

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PROCEEDING?

1 A. Yes. I have actively participated in the state proceedings in which Qwest is seeking
2 approval to provide interLATA service within its 14 state region. I have submitted
3 comments or testimony and/or participated in workshops in every state with ongoing
4 proceedings. Recently, on November 7, 2001, I submitted comments in Docket Nos.
5 UT-003022 and UT-003040 in rebuttal to the comments and testimony filed by AT&T,
6 Covad and WorldCom regarding Qwest's Washington performance data filings.
7 Previously, on September 6, 2001, I signed a short declaration which was appended to
8 Qwest's first performance data filing (which is described below and was filed with the
9 Washington Commission on September 7, 2001).

10 **II. PURPOSE OF TESTIMONY**

11 **Q. DESCRIBE THE PURPOSE OF YOUR TESTIMONY.**

12 A. The purpose of my testimony is to briefly describe Qwest's performance data collection
13 and reporting process and to affirm that the current performance Qwest is providing to
14 CLECs in actual commercial settings in the state of Washington is consistently at or
15 above that necessary to satisfy the requirements of Section 271 of the Act as defined by
16 the Federal Communications Commission ("FCC").

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20 **III. PERFORMANCE DATA**

1 Q. GIVEN YOUR INVOLVEMENT IN QWEST'S TRACKING AND REPORTING OF
2 ACTUAL COMMERCIAL DATA, CAN YOU PLEASE BRIEFLY DESCRIBE THAT
3 PROCESS?

4 A. Of course. The performance data measurement process has been a collaborative
5 process over a period of nearly two years under the auspices of the ROC. That process
6 was summarized concisely by the Liberty Consulting Group on page 1 of its Final
7 Report on the Audit of Qwest's Performance Measures dated September 25, 2001. I
8 will quote the Liberty report here:

9 Prior to the start of the PMA [the Performance Measures Audit conducted by
10 Liberty at the request of the ROC], the stakeholders in the Qwest region
11 generally reached a consensus about how to measure the adequacy of Qwest's
12 service to CLECs, what role comparative and absolute measures should play in
13 those measurements, and what detailed measures would be used to evaluate
14 Qwest's fulfillment of its obligations to make the network available to CLECs.
15 This consensus was documented in the Performance Indicator Definitions, or
16 PID report. The PMA did not include an examination of the propriety of the
17 measurements required by the PID. It took them as a given, recognizing that
18 any process for changing them was a matter for the larger group that worked to
19 develop them. However, the audit work did include an assessment of whether
20 all requirements of the PID were objectively stated and not subjected to
21 multiple interpretations.

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23 Based on the measurements ultimately agreed to by consensus (i.e., the PIDs), Qwest
24 has tracked its commercial data on a regional and a state-by-state basis, both on a
25 CLEC-specific level (which is held confidential) and an aggregate (all CLECs) level.
26 Each month, two versions of each aggregate state and the regional report (one version
27 organized strictly by PID categories and one version organized by checklist item) are
28 posted for public inspection on Qwest's external website at
29 <http://www.qwest.com/wholesale/results/index.html>. During the process of the

1 performance measurement audits and OSS Testing, after the data is posted, comments
2 and questions from the auditors, test administrator, CLECs, and Commission Staffs are
3 received. Those from the auditors and test administrator come in the form of data
4 requests, observations, or exceptions. Qwest then thoroughly considers those
5 comments, as appropriate, and responds. Where necessary, corrective actions are taken
6 and reported. Where applicable to the performance measurement audit or OSS Test,
7 the auditor or test administrator re-examines or retests the affected audit or test items to
8 confirm that the corrective actions have resolved the issue. Throughout, CLECs and
9 Commission Staffs have access to and comment on both Qwest's responses and actions
10 and the auditor's/tester's responses and follow-ups. Where necessary, issues are
11 brought before the Technical Advisory Group (made up of Commission Staffs, CLECs,
12 and Qwest) for discussion and resolution. An escalation process for resolving impasses
13 on issues is in place, involving a Steering Committee (consisting of State Commission
14 Staff members) as the first level of review and an Executive Committee (consisting of
15 designated State Commissioners from the ROC) as an appeal authority.

16 **Q. IN YOUR PREVIOUS ANSWER, YOU QUOTED LIBERTY CONSULTING GROUP'S**
17 **FINAL AUDIT REPORT. DO YOU KNOW THE ULTIMATE RESULT OF LIBERTY'S**
18 **AUDIT?**

19 **A.** Yes. In summary, Liberty found (at pages 2 and 3 of its Final Audit Report) the
20 following – “Liberty has now concluded that the audited performance measures
21 accurately and reliably report actual Qwest performance. Therefore, the PMA resulted
22 in significant improvements to both the processes used by Qwest and the specificity

1 and clarity of the PID.” Liberty’s full audit findings were summarized in its 156-page
2 Final Audit Report, which was appended to Qwest’s performance filing for August
3 2000-July 2001 data.

4 **Q. WHAT PERFORMANCE DATA HAS QWEST FILED WITH THE WASHINGTON**
5 **COMMISSION AND SERVED ON THE OTHER PARTIES TO THESE PROCEEDINGS**
6 **TO DATE?**

7 A. To date, Qwest has made three performance data filings and one more will be filed on
8 November 16, 2001, contemporaneously with the filing of my direct testimony. On
9 September 7, 2001, Qwest filed and served a pleading entitled “Qwest Corporation’s
10 Performance Data for Washington [July 2000-June 2001].” Appended to the pleading
11 were my brief declaration and four exhibits: (1) the 144-page July 11, 2001 Report on
12 the Audit of Qwest’s Performance Measures by Liberty Consulting Group; (2) the 265-
13 page August 24, 2001 Qwest Performance Results report (Washington, July 2000-June
14 2001); (3) the 91-page May 31, 2001 Service Performance Indicator Definitions (PID)
15 ROC 271 Working PID Version 3.0 report; and (4) selected pages from the July 30,
16 2001 Qwest Performance Results report (Regional, July 2000-June 2001). On
17 September 28, 2001, Qwest filed and served a pleading entitled “Qwest Corporation’s
18 Performance Data for Washington [August 2000-July 2001].” Appended to the
19 pleading were three exhibits: (1) the 265-page August 28, 2001 Qwest Performance
20 Results report (Washington, August 2000-July 2001); (2) selected pages from the
21 August 28, 2001 Qwest Performance Results report (Regional, July 2000-June 2001);
22 and (3) the 156-page September 25, 2001 Final Audit Report on the Audit of Qwest’s

1 Performance Measures by Liberty Consulting Group. Finally, on October 30, 2001,
2 Qwest filed and served a pleading entitled “Qwest Corporation’s Performance Data for
3 Washington [September 2000-August 2001].” Appended to the pleading was one
4 exhibit: the 253-page October 2, 2001 Qwest Performance Results report (Washington,
5 September 2000-August 2001). As I stated above, Qwest’s next pleading (describing
6 and appending Qwest’s October 2000-September 2001 Washington performance data
7 and equivalent regional data) will be filed and served on November 16, 2001,
8 contemporaneously with this testimony.

9 **Q. ARE YOU ABLE TO TESTIFY TO THE ACCURACY OF THE ANALYSIS SET**
10 **FORTH IN AND THE DATA APPENDED TO THE PERFORMANCE DATA FILINGS**
11 **DESCRIBED ABOVE?**

12 **A.** Yes, I can testify to these matters and I will be available to discuss these matters with
13 the other parties and the Commission during the December 2001 hearings.

14 **Q. BASED ON YOUR REVIEW OF THE PERFORMANCE DATA FILINGS DESCRIBED**
15 **ABOVE AND YOUR INVOLVEMENT IN THE DATA COLLECTION, TRACKING**
16 **AND REPORTING PROCESS, HOW WOULD YOU DESCRIBE QWEST’S OVERALL**
17 **PERFORMANCE IN REFERENCE TO THE PERFORMANCE INDICATOR**
18 **DEFINITIONS ESTABLISHED BY THE ROC?**

19 **A.** Qwest is performing excellently on nearly every PID and, based on the FCC’s
20 standards for evaluating and assessing actual commercial performance (as was outlined
21 in detail and quoted in my November 7, 2001 comments), Qwest is providing
22 interconnection, unbundled network elements and resale to CLECs in a

1 nondiscriminatory manner throughout Washington and is offering CLECs a meaningful
2 opportunity to compete in the Washington marketplace. By way of further illustration
3 of this point, I have attached hereto as Exhibit MGW-2 and I incorporate herein by this
4 reference a color-coded chart visually demonstrating, on a checklist-item-by-checklist-
5 item basis, the extent to which Qwest is satisfying the applicable benchmark and/or
6 parity standards. The exhibit accurately summarizes Qwest's performance data for the
7 months of June, July, August and September 2001. A legend explaining the chart's
8 mechanics can be found on the first page of Exhibit MGW-2.

9 **Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?**

10 **A.** Yes, it does.

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