

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of Qwest
Corporation for Arbitration with Eschelon
Telecom, Inc. Pursuant to 47 U.S.C. Section
252 of the Federal Telecommunications Act of
1996**

Docket No. UT-063061

**DIRECT TESTIMONY OF BONNIE J. JOHNSON
ON BEHALF OF ESCHELON TELECOM, INC.**

SEPTEMBER 29, 2006

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Bonnie Johnson and my business address is 730 2nd Avenue South, Suite
3 900, Minneapolis, Minnesota 55402.

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

6 A. I am employed by Eschelon Telecom, Inc., where I currently serve as Director - Carrier
7 Relations. In that capacity, my responsibilities include managing relations between
8 Eschelon and other telecommunications carriers, including Qwest and other Incumbent
9 Local Exchange Carriers (“ILECs”) and Competitive Local Exchange Carriers
10 (“CLECs”). For example, I have a scheduled weekly call with Qwest service
11 management to discuss operational issues, including provisioning, network, and billing
12 issues, between the companies. I also participate in scheduled monthly network and
13 scheduled monthly service delivery meetings with Qwest service management. I am also
14 involved in escalation of service delivery issues as needed and regularly communicate
15 with Qwest service management on day-to-day issues. I regularly participate in Qwest’s
16 Change Management Process meetings as Eschelon’s representative. For example, I was
17 personally involved in the lengthy CMP development of loss and completion reports and
18 Pending Service Order Notifications (PSOs). I also participate in interconnection
19 agreement (“ICA”) negotiations with Qwest for six states, including Washington. I have
20 served in this position since September 2003.

1 Since joining Eschelon, I have held four separate positions (including my current
2 position), each with increasing responsibility. From July 2000 to November 2001, I held
3 the position of Manager - Network Provisioning where I was responsible for the direction
4 of a Service Delivery team provisioning services to end user customers and handling
5 customer escalations. I held the position of Senior Manager - Customer Operations
6 Process from November 2001 to March 2002, where I was responsible for developing
7 and implementing ordering and provisioning processes. And from March 2002 until
8 September 2003, I held the title of Senior Manager - ILEC Relations, where I was
9 responsible for managing relations between Eschelon and other telecommunications
10 carriers. I participated in CMP activities throughout these positions.

11
12 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE PRIOR TO JOINING**
13 **ESCHELON TELECOM, INC.**

14 A. I have more than 15 years of experience in the telecommunications industry. Prior to
15 joining Eschelon Telecom, Inc., I was employed by US West/Qwest (“Qwest”) in a
16 number of different capacities. For a brief time until I joined Eschelon in July of 2000, I
17 worked in Qwest’s Wholesale Markets division as a Service Manager, responsible for
18 organizing and facilitating Competitive Local Exchange Carrier (“CLEC”) collocation
19 build-outs and Unbundled Network Element (“UNE”) facilities network implementation.
20 From October 1998 until May 2000, I held the position of Process Analyst - Performance

1 Measures, where I analyzed Qwest's service delivery performance and performed root
2 cause analyses.

3 I served as a Qwest Service Delivery Coordinator in Qwest wholesale service
4 vendor services from August 1996 until October 1998, where I was responsible for
5 implementing and delivering services ordered by vendors on behalf of Qwest retail end
6 user customers and ordered by CLEC Centrex resellers. During that time, Qwest selected
7 me for President's Club honors based on my performance. From January 1994 to May
8 1996, I was in the Qwest retail Home and Personal Services ("H&PS") organization,
9 where I assisted H&PS residential customers with their service requests, including
10 responding to ordering, billing, and other Qwest retail customer issues. Before that, I
11 worked as a directory assistance operator in the Qwest Operator Services organization.

12 Prior to joining Qwest, I was employed for a number of years by Mountain Bell,
13 where I held various positions including positions addressing retail customer service
14 issues. While employed by Qwest, I participated in at least 20 separate seminars and
15 other training sessions, many of which pertained to network facilities, operational
16 processes and service delivery methods and procedures for both wholesale and retail
17 customers.

18
19 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION OR ANY**
20 **OTHER REGULATORY AGENCY?**

1 A. I have not testified before any regulatory agency yet. I recently provided written direct
2 testimony before the Arizona Corporation Commission in Docket Nos. Docket No. T-
3 03406A-06-0257 and Docket No. T-01051B-06-0257 and before the Minnesota Public
4 Utilities Commission in Docket No. P-5340,421/IC-06-768.

5
6 **Q. ON WHOSE BEHALF WAS THIS TESTIMONY PREPARED?**

7 A. This testimony was prepared on behalf of Eschelon Telecom, Inc. (“Eschelon”).
8

9 **Q. PLEASE IDENTIFY THE EXHIBITS TO YOUR TESTIMONY.**

10 A. As part of my testimony, I have included the following exhibits:

- 11 BJJ-1 Qwest CMP Document
- 12 BJJ-2 No Build Held Order (Delayed Order) Chronology
- 13 BJJ-3 Chronology of Qwest CMP Changes Relating to Expedites & Qwest RPD
14 – “Due Dates – POTS/Non-Design – All States Bus Res”
- 15 BJJ-4 Documented Facts Matrix Relating to Expedites
- 16 BJJ-5 Jeopardy Classification and Firm Order Confirmation Chronology
- 17 BJJ-6 Jeopardy Classification and Firm Order Confirmation:
18 Examples of Qwest’s Failure to Provide a Timely FOC
- 19 BJJ-7 Secret TRRO PCAT Chronology
- 20 BJJ-8 Summary Of Examples For Issues 12-64, 12-65 and 12-66
- 21 BJJ-9 DS1 CRUNEC Chronology
- 22 BJJ-10 CRUNEC Level 3 Notice
- 23 BJJ-11 CRUNEC Qwest-Eschelon Email exchange
- 24 BJJ-12 Qwest Retail Letter to Eschelon End User Customer
- 25 BJJ-13 Qwest Retail Letter Supporting Documentation (Qwest-Eschelon Email
26 exchange relating to BJJ-12; Qwest Retail Letter Chronology; and Qwest
27 Retail Letter – Qwest Service Management 8-31-06 E-mail)
- 28 BJJ-14 Qwest CMP Documentation, EDI/XML, S&E section, PSON (9/15/06)
- 29 BJJ-15 Non-CMP Notification of Revisions to the EDI Implementation
30 Guidelines (9/15/06)

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1 **Q. DID YOU PREPARE THESE EXHIBITS OR HAVE THEM PREPARED UNDER**
2 **YOUR DIRECTION?**

3 A. Yes, with respect to Exhibits BJJ-2 through BJJ-9 and BJJ-13 (chronologies and
4 summaries).¹ I have personal knowledge of these facts. With respect to Exhibits BJJ-11
5 and BJJ-13² (email exchanges), I was personally involved and in many cases copied on
6 these emails. The facts set forth in these Exhibits to my testimony are true to the best of
7 my knowledge. Exhibits BJJ-1, BJJ-10, BJJ-12, BJJ-14, and BJJ-15 were prepared by
8 Qwest. These are true and correct copies. Exhibits BJJ-1,³ BJJ-10⁴ BJJ-14⁵ and BJJ-15⁶
9 are available on Qwest's wholesale web site.
10

11 **Q. MR. STARKEY REFERS AT MANY POINTS IN HIS TESTIMONY TO YOUR**
12 **TESTIMONY AND ITS EXHIBITS. HAVE YOU REVIEWED THAT**
13 **TESTIMONY, AND IF SO, DID HE TAKE ANY STATEMENT OR EVENT OUT**
14 **OF CONTEXT?**

¹ Eschelon includes excerpts from documents in its chronology exhibits in an attempt to avoid submitting lengthy exhibits. Eschelon has provided URLs to documents that are on Qwest's website that can be used to access and download entire documents in which the excerpts reside.

² Exhibit BJJ-13 (Qwest Retail Letter Supporting Documentation) contains a chronology as well as email exchanges related to Qwest's Retail Letter (Exhibit BJJ-12).

³ http://www.qwest.com/wholesale/downloads/2006/060130/QwestWholesaleChangeManagementDocument_01_30_06_1_.doc

⁴ <http://www.qwest.com/wholesale/cnla/uploads/PROS%2E04%2E30%2E03%2EF%2E01071%2ECRUNEC%5FV4%2Edoc>

⁵ http://www.qwest.com/wholesale/cnla/uploads/PROS.09.15.06.F.04160.LSOG_PCAT_IMA_R_20.doc

⁶ <http://www.qwest.com/wholesale/cnla/uploads/SYST%2E09%2E15%2E06%2EF%2E04194%2EIMAXMLImpGuideRpst%2Edoc>

1 A. I have reviewed that testimony and, no, Mr. Starkey did not take any statement or event
2 out of context.

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4 **Q. MR. WEBBER REFERS AT MANY POINTS IN HIS TESTIMONY TO YOUR**
5 **TESTIMONY AND ITS EXHIBITS. HAVE YOU REVIEWED THAT**
6 **TESTIMONY, AND IF SO, DID MR. WEBBER TAKE ANY STATEMENT OR**
7 **EVENT OUT OF CONTEXT?**

8 A. I have reviewed that testimony and, no, Mr. Webber did not take any statement or event
9 out of context.

10
11 **Q. WHEN DESCRIBING YOUR BACKGROUND, YOU INDICATED THAT YOU**
12 **RAISE ISSUES WITH QWEST SERVICE MANAGEMENT IN SCHEDULED**
13 **WEEKLY AND MONTHLY CALLS AND THAT YOU PARTICIPATE IN THE**
14 **ICA NEGOTIATIONS WITH QWEST. IS ESCHELON RAISING ALL OF THE**
15 **UNRESOLVED ISSUES FROM THOSE COMMUNICATIONS IN THIS**
16 **ARBITRATION?**

17 A. No, not even close. I communicate regularly with Qwest service management on day-to-
18 day issues and will continue to do so. Eschelon didn't raise all of these types of issues in
19 ICA negotiations, and we withdrew even some of the ones we did raise to limit the
20 number of issues.

21

1 **Q. YOU SAID EXHIBIT BJJ-1 IS THE CMP DOCUMENT. ARE YOU FAMILIAR**
2 **WITH QWEST’S CMP, AND WHAT IS THE CMP DOCUMENT?**

3 A. Yes, I am familiar with CMP. Mr. Starkey describes CMP accurately in his testimony.
4 As described with respect to my background above, I have participated in Qwest’s CMP
5 on behalf of Eschelon since at least 2001. Currently, I am the lead participant for
6 Eschelon.

7 The “CMP Document” (Exhibit BJJ-1) outlines the rules and procedures
8 governing conduct of Qwest’s CMP. It is available on Qwest’s web site. It is also
9 Exhibit G to the proposed ICA and to the SGAT. I have consulted the CMP Document in
10 the course of my participation in CMP.

11
12 **Q. PLEASE DESCRIBE EXHIBIT BJJ-2 RELATING TO HELD ORDERS (15).⁷**

13 A. Exhibit BJJ-2 to my testimony is the No Build Held Order (Delayed Order) Chronology.
14 Mr. Starkey summarizes these events in his testimony in his discussion of CMP. This is
15 the second of the four examples he provides on that topic.

16
17 **Q. PLEASE DESCRIBE EXHIBITS BJJ-3 AND BJJ-4 RELATING TO EXPEDITED**
18 **ORDERS (31).**

19 A. Exhibit BJJ-3 to my testimony is the Chronology of Qwest CMP Changes Relating to
20 Expedites with excerpts from the RPD attached. Exhibit BJJ-4 to my testimony is the

⁷ The number in parentheses indicates the Subject Matter Number on the Issues by Subject Matter List.

1 Documented Facts Matrix Relating to Expedites. In Exhibit BJJ-4, facts outlined in the
2 chronology in Exhibit BJJ-3 are listed in the “Fact” column and, in the corresponding
3 “Documentation” column, documentation supporting that fact or event is identified. As
4 an example, in Exhibit BJJ-3 (chronology), under the heading “7. CLEC Objections,
5 Qwest Denials, and Dispute Resolution,” Eschelon states:

6 Although the CMP Document is not part of Eschelon’s ICA with Qwest,
7 Eschelon voluntarily followed the CMP objection, escalation, and dispute
8 resolution processes to attempt to resolve this matter. Eschelon also
9 complied with the ICA’s dispute resolution provisions before bringing this
10 matter to the Commission.”

11
12 Documents supporting this statement in Exhibit BJJ-3 are listed in rows 2-14 of Exhibit
13 BJJ-4. For example, in support of the statement that Eschelon followed the “escalation”
14 and “objection” CMP processes, the content of the escalation (by McLeodUSA) is quoted
15 in row 2 of Exhibit BJJ-4, and an email from Qwest’s then CMP Process Manager
16 indicating that Eschelon joined that McLeodUSA escalation is quoted in row 3 of Exhibit
17 BJJ-4. Row 9 of Exhibit BJJ-4 contains a quotation from Eschelon’s objection in CMP
18 stating that the “change Qwest is proposing is discriminatory to CLECs and their
19 customers.” Eschelon provides the URL to Eschelon’s CMP comments in row 9, so the
20 entire comments (including those of other CLECs) can be found as well.

21 Together, Exhibits BJJ-3 and BJJ-4 are intended to readily identify documents
22 supporting facts in the chronology of events. For many of the facts, the supporting
23 documentation is posted on Qwest’s web site and a URL is provided. Mr. Webber
24 discusses these events in his testimony in connection with Issue 12-67 and subparts.

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Q. PLEASE DESCRIBE EXHIBITS BJJ-5 AND BJJ-6 RELATING TO JEOPARDIES AND FIRM ORDER CONFIRMATIONS (30).

A. Exhibit BJJ-5 to my testimony is the Jeopardy Classification and Firm Order Confirmation Chronology. Mr. Starkey summarizes these events in his testimony in his discussion of CMP. This is the first of the four examples he provides on that topic. Exhibit BJJ-6 to my testimony is the Jeopardy Classification and Firm Order Confirmation Chronology: Examples of Qwest's Failure to Provide a Timely FOC. Exhibit BJJ-6 is a spreadsheet containing examples of the circumstances accurately described in the testimony of Mr. Webber relating to Issues 12-71 through 12-73.

Q. PLEASE DESCRIBE EXHIBIT BJJ-7 RELATING TO SECRET TRRO PCATS (I).

A. Exhibit BJJ-7 to my testimony is the Secret PCAT TRRO Chronology. Mr. Starkey summarizes these events in his testimony in his discussion of CMP. This is the fourth of the four examples he provides on that topic.

Q. PLEASE DESCRIBE EXHIBIT BJJ-8 RELATING TO ROOT CAUSE ANALYSIS AND ACKNOWLEDGEMENT OF MISTAKES AND COMMUNICATIONS WITH CUSTOMERS (29 & 30).

1 A. Exhibit BJJ-8 to my testimony is a Summary of Examples for Issues 12-64, 12-65 and
2 12-66 (Root Cause Analysis and Acknowledgement of Mistakes and Communications
3 With Customers). These issues are discussed in the testimony of Mr. Webber regarding
4 these issue numbers.

5
6 **Q. PLEASE DESCRIBE EXHIBITS BJJ-9 THROUGH BJJ-11 RELATING TO**
7 **CRUNEC (I).**

8 A. Exhibit BJJ-9 to my testimony is the DS1 CRUNEC Chronology. Exhibit BJJ-10 is the
9 CRUNEC Level 3 notice. Exhibit BJJ-11 is a CRUNEC Qwest-Eschelon email
10 exchange. Mr. Starkey summarizes these events in his testimony in his discussion of
11 CMP. This is the third of the four examples he provides on that topic.

12
13 **Q. PLEASE DESCRIBE EXHIBITS BJJ-12 AND BJJ-13 RELATING TO**
14 **COMMUNICATIONS WITH CUSTOMERS (29 & 30).**

15 A. Exhibit BJJ-12 to my testimony is a Qwest Retail letter to a Customer switching to
16 Eschelon's service received by the Customer while the conversion order is pending.
17 Exhibit BJJ-13 contains a Qwest-Eschelon email exchange relating to the letter provided
18 as Exhibit BJJ-12; a chronology of events related to and following the Qwest retail letter
19 provided as Exhibit BJJ-12; and a Qwest (wholesale) e-mail to Eschelon providing root
20 cause analysis of this incident that is referenced in the chronology. Mr. Webber discusses

1 these events in his testimony in connection with Issues 12-64 and subparts, 12-65 and 12-
2 66.

3
4 **Q. PLEASE DESCRIBE EXHIBIT BJJ-14 RELATING TO THE PSON AND A**
5 **CHANGE TO THE SERVICE & EQUIPMENT LANGUAGE IN THE PSON**
6 **PREPARATION GUIDE (32).**

7 A. Exhibit BJJ-14 contains Qwest's recent CMP notification dated 9/15/06 (effective date
8 10/16/06) with the subject line of "CMP – Local Service Ordering Guidelines (LSOG)
9 and Product Catalogs (PCATs) Updates Associated with IMA 20.0 Systems Release." In
10 the notification, Qwest stated: "In addition, specific descriptions for LSOGs and PCATs
11 that have changes over and above the EDI to XML change are found in the attachment to
12 this notification titled: LSOG/PCAT Updates Associated with IMA 20.0 System
13 Release." Following the notice, Exhibit BJJ-14 contains excerpts from the PSON LSOG
14 6 Preparation Guide Version 13.0 (redlined). Section 3.3 shows that Qwest deleted the
15 following sentence: "This section of the PSON represents the S&E section of a Qwest
16 service order." Following the PSON Preparation Guide pages, Exhibit BJJ-14 contains
17 an excerpt from <http://www.qwest.com/wholesale/cnla/uploads/PSON> that provides
18 additional information about the PSON Version 13.0.

1 The purpose of the systems release is to recognize an upcoming move from one
2 application-to-application method of delivering information (EDI) to another (XML).⁸
3 The change for Section 3.3 (Service & Equipment) is not related to the EDI to XML
4 change.⁹ The change that Qwest made to Section 3.3 is to delete the sentence quoted
5 above, and Qwest describes this change as “Updated descriptive information.” In
6 Qwest’s notice, Qwest recognizes that not all of the changes are “strictly related to the
7 EDI to XML change.”¹⁰ If they are not related to the EDI to XML change, however, they
8 should stem from a change request being implemented in the IMA 20.0 Systems Release.
9 There is no change request being implemented in the IMA 20.0 Systems Release related
10 to the content of PSONs generated from service orders. Qwest provided no explanation
11 for the change before the notice was issued. Deletion of the sentence was not discussed
12 in CMP. Mr. Webber references this exhibit in his direct testimony regarding Issue 12-70
13 “Pending Service Order Notification.”
14

15 **Q. PLEASE DESCRIBE EXHIBIT BJJ-15 RELATING TO IMA¹¹ GUIDELINES (43).**

⁸ As indicated on the Qwest’s web site, EDI will be retired in October of 2007.
(http://www.qwest.com/wholesale/cmp/cr/CR_SCR090606-01.htm).

⁹ The same appears to be true of the change to the listings section. *See* Exhibit BJJ-14. Other than indicating it added “descriptive information,” Qwest provided no explanation for the change to the listing section.

¹⁰ Exhibit BJJ-14, p. 1.

¹¹ Interconnect Mediated Access OSS interface.

1 | A. Exhibit BJJ-15 is Qwest's 9/15/06 non-CMP notification of a change to the IMA XML
2 | Implementation Guidelines (previously known as IMA EDI Implementation Guidelines).
3 | The change to the guidelines was effective "immediately." This document is related to
4 | Issue 12-87 "Controlled Production" discussed by Mr. Webber in his direct testimony.

5 |
6 | **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

7 | A. Yes, at this time.