

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

**SUPPLEMENTAL  
DIRECT TESTIMONY  
OF  
MICHAEL G. WILLIAMS  
ON BEHALF OF QWEST CORPORATION  
RE: PERFORMANCE DATA**

**DECEMBER 5, 2001**

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1 I. IDENTIFICATION OF WITNESS

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

3 A. My name is Michael G. Williams. My business address is 250 Bell Plaza, Room 1603-  
4 B, Salt Lake City, Utah, 84111. I am employed by Qwest Corporation (“Qwest”) as  
5 Director, Wholesale Service Quality.

6 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

7 A. Yes. In these dockets, I submitted direct testimony (Exhibit MGW-T1) on November  
8 16, 2001 regarding Qwest’s performance data. On November 7, 2001, my comments  
9 responding to AT&T’s, WorldCom’s and Covad’s comments and testimony regarding  
10 Qwest’s performance pleadings were also filed with the Commission. Lastly, my  
11 declaration was appended to Qwest’s first monthly performance pleading (summarizing  
12 July 2000 – June 2001 data) filed on September 7, 2001.

13 II. PURPOSE OF TESTIMONY

14 Q. DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

15 A. The purpose of my testimony is to respond to the Commission’s request, in  
16 paragraphs 11 and 12 of its 21<sup>st</sup> Supplemental Order, to provide supplemental direct  
17 testimony (for each month’s data beginning with the September 2001 performance  
18 results) identifying “each instance where Qwest failed to meet the parity or  
19 benchmark standard...[along with ] a narrative as to why the company failed to meet  
20 the measure and identify[ing] the steps being taken to ensure future compliance.” My

1 testimony shows that in virtually every instance, the performance lapses in September  
2 were either minor or an aberration when viewed in the context of Qwest's  
3 performance over several months.

4 **III. PERFORMANCE DATA**

5 **Q. DID QWEST MISS MEETING ANY BENCHMARK OR PARITY STANDARDS IN**  
6 **SEPTEMBER IN WASHINGTON?**

7 A. Yes, but only a very few. Based on the data depicted in the October 2000 –  
8 September 2001 data report (the “September data report”) which was appended as  
9 Exhibit 1 to Qwest’s Performance Data for Washington [October 2000-September  
10 2001] pleading, Qwest missed only 31 individual metrics, which equates to only 5.4%  
11 of the 579 individual performance submeasurements tracked in total each month.<sup>1</sup>  
12 Attached hereto as Exhibit MGW-4 and incorporated herein by this reference is a  
13 matrix isolating those 31 misses.

14 **Q. SINCE QWEST MISSED SOME OF THE BENCHMARK OR PARITY STANDARDS**  
15 **IN SEPTEMBER, DOES THAT MEAN THE WASHINGTON COMMISSION**  
16 **SHOULD DECLINE TO SUPPORT QWEST’S 271 APPLICATION?**

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<sup>1</sup> Qwest actually tracks data on 786 separate submeasurements (not 579) each month and, for 109 of those, it offers two views of the data (bringing the total number of tracking graphs to 895). However, 207 of the 786 submeasurements relate to measures which are either simply diagnostic (i.e., neither evaluated under a parity or benchmark standard and for informational purposes only) or offer merely extraneous information (e.g., submeasurements that offer only historical data relating to outdated methods of tracking data). For the sake of a fair comparison of the “total” number of submeasurements showing parity/benchmark problems, I have excluded these 207 from the total number of submeasurements tracked as a whole (bringing the total down to 579) and, later in my testimony, from the “total” number of submeasurements relating to individual services.

1 A. Absolutely not. In my November 7, 2001 comments in these dockets, I quoted two  
2 paragraphs from the FCC's recent Pennsylvania Order, which succinctly set forth the  
3 legal standard for evaluating a BOC's performance data. In that order, the FCC  
4 makes clear that perfect performance is not necessary and that a BOC's miss on one  
5 measurement, by itself, does not necessarily provide a basis for finding  
6 noncompliance with the corresponding checklist item. For the ease of Commission  
7 review, I will re-insert those paragraphs here as well.

8  
9 8. The Commission has explained in prior orders that parity and  
10 benchmark standards established by state commissions do not  
11 represent absolute maximum or minimum levels of performance  
12 necessary to satisfy the competitive checklist. Rather, where these  
13 standards are developed through open proceedings with input from  
14 both the incumbent and competing carriers, these standards can  
15 represent informed and reliable attempts to objectively approximate  
16 whether competing carriers are being served by the incumbent in  
17 substantially the same time and manner, or in a way that provides them  
18 a meaningful opportunity to compete. Thus, to the extent there is no  
19 statistically significant difference between a BOC's provision of  
20 service to competing carriers and its own retail customers, the  
21 Commission generally need not look any further. Likewise, if a  
22 BOC's provision of service to competing carriers satisfies the  
23 performance benchmark, the analysis is usually done. Otherwise, the  
24 Commission will examine the evidence further to make a  
25 determination whether the statutory nondiscrimination requirements  
26 are met. Thus, the Commission will examine the explanations that a  
27 BOC and others provide about whether these data accurately depict the  
28 quality of the BOC's performance. The Commission also may examine  
29 how many months a variation in performance has existed and what the  
30 recent trend has been. The Commission may find that statistically  
31 significant differences exist, but conclude that such differences have  
32 little or no competitive significance in the marketplace. In such cases,  
33 the Commission may conclude that the differences are not meaningful  
34 in terms of statutory compliance. Ultimately, the determination of  
35 whether a BOC's performance meets the statutory requirements  
36 necessarily is a contextual decision based on the totality of the  
37 circumstances and information before the Commission.

38  
39 9. Where there are multiple performance measures associated  
40 with a particular checklist item, the Commission would consider the  
41 performance demonstrated by all the measurements as a whole.  
42 Accordingly, a disparity in performance for one measure, by itself,  
43 may not provide a basis for finding noncompliance with the checklist.

1           The Commission may also find that the reported performance data is  
2 affected by factors beyond a BOC's control, a finding that would make  
3 it less likely to hold the BOC wholly accountable for the disparity.  
4           This is not to say, however, that performance discrepancies on a single  
5 performance metric are unimportant. Indeed, under certain  
6 circumstances, disparity with respect to one performance measurement  
7 may support a finding of statutory noncompliance, particularly if the  
8 disparity is substantial or has endured for a long time, or if it is  
9 accompanied by other evidence of discriminatory conduct or evidence  
10 that competing carriers have been denied a meaningful opportunity to  
11 compete.<sup>2</sup>

12   **Q.     THE COMMISSION'S 21<sup>ST</sup> SUPPLEMENTAL ORDER REQUESTS AN**  
13   **EXPLANATION OF SINGULAR PERFORMANCE MISSES FOR THE MONTH OF**  
14   **SEPTEMBER. IS THIS HOW THE FCC EVALUATES PERFORMANCE?**

15   **A.**    No. In each 271 application that the FCC has approved, it has focused in on four  
16 months of performance data.<sup>3</sup> It is for this reason that Qwest appended to my  
17 November 16, 2001 direct testimony a demonstrative exhibit (Exhibit MGW-2) that  
18 graphically depicts each aspect of Qwest's performance over a four month span. That  
19 document also focuses on Qwest's performance through the month of September  
20 2001. Thus, Exhibit MGW-2 and this testimony concern the exact same performance  
21 data. In fact, most of the items in attached Exhibit MGW-4 are described in Exhibit  
22 MGW-2. The principle difference between this testimony and Exhibit MGW-2 is that  
23 the prior Exhibit presents the data in the manner that the FCC evaluates it, while this  
24 document only presents a partial picture.

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<sup>2</sup>       *In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania*, CC Docket No. 01-138 ("Verizon Penn. Order"), App. C, ¶¶ 8-9 (Sept. 19, 2001) (footnotes omitted).

<sup>3</sup>       *See, e.g., In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York*, Memorandum, Opinion and Order, CC Docket No. 99-295 ("Bell Atlantic New York Order") at ¶¶ 69, 156, 219, 221, 223, 224, 284, 300, 301 and 323 (Dec. 1999).

1 Q. THE COMMISSION'S 21<sup>ST</sup> SUPPLEMENTAL ORDER REQUESTS QWEST TO  
2 EXPLAIN WHY QWEST MISSED ON PARTICULAR MEASUREMENTS AND  
3 WHAT, IF ANYTHING, IT INTENDS TO DO TO ENSURE FUTURE COMPLIANCE.  
4 CAN YOU PLEASE RESPOND TO THIS PART OF THE COMMISSION'S  
5 REQUEST?

6 A. Yes. At the outset and in summary, the 31 sub-measurement misses can be grouped  
7 into the following 8 categories (the line number references correspond to the line  
8 numbers depicted on Exhibit MGW-4):

- 9 • Statistically Similar Performance: 6 of the 31 PID misses (lines 4, 5,  
10 6, 23, 25 and 26 of MGW-4) were actually at parity when the revised  
11 September data depicted in the November 2000 – October 2001  
12 performance data report (the “October data report”) is examined.
- 13 • LIS Trunks: 2 of the 31 PID misses (lines 1 and 2) related to LIS  
14 trunks.
- 15 • Billing: 1 of the 31 PID misses (line 3) related to billing.
- 16 • UNE-P: 1 of the 31 PID misses (line 7) related to UNE-P.
- 17 • Unbundled Loops: 11 of the 31 PID misses (lines 8-18) related to  
18 unbundled loops.
- 19 • DS1 UDIT: 1 of the 31 PID misses (line 19) related to DS1-capable  
20 transport.
- 21 • Number Portability: 2 of the 31 PID misses (lines 20 and 21) related  
22 to LNP.
- 23 • Resale: 7 of the 31 PID misses (lines 22, 24, and 27- 31) related to  
24 resale.

25 I will discuss each of these 8 categories in turn.

26

1 **Statistically Similar Performance (Lines 4, 5, 6, 23, 25 and 26)**

2 As noted above, the 31 “misses” outlined in Exhibit MGW-4 are based solely on the  
3 September data report. The October data report, which is available on Qwest’s public  
4 web site but has not yet been filed with the Commission, contains revisions to the  
5 September 2001 performance results depicted in the September data report. Among  
6 the more significant revisions was the disaggregation and movement of performance  
7 data regarding UNE-P-POTS (Centrex 21)<sup>4</sup> and UNE-P (Centrex) from resale  
8 categories of the PIDs to UNE-P-POTS and UNE-P (Centrex)<sup>5</sup> categories,  
9 respectively. This was done to reflect the fact that these UNE-P product varieties  
10 now exist with volumes significant enough to be measured separately from resale. As  
11 a result of these data revisions, it can be seen that Qwest’s wholesale performance  
12 was at parity with retail performance in September on the following measurements  
13 which appear as being out of parity in the September data report: (1) UNE-P delayed  
14 days for non-facility reasons, no dispatch (OP-6A) [Exhibit MGW-4 at line 4]; (2)  
15 UNE-P out of service cleared within 24 hours, dispatch within MSAs (MR-3) [*Id.* at  
16 line 5]; (3) UNE-P all troubles cleared within 48 hours, dispatch within MSAs (MR-  
17 4) [*Id.* at line 6]; (4) business resale repair repeat report rate (MR-7) [*Id.* at line 23];  
18 (5) DSL resale new service installation quality (OP-5) [*Id.* at line 25]; and (6) DSL  
19 resale trouble rate (MR-8) [*Id.* at line 26]. I have excerpted from the October data  
20 report and attached hereto as Exhibit MGW-5, true and correct copies of the pages  
21 relevant to these six measurements and two others discussed below with regard to

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<sup>4</sup> Centrex 21 is a “POTS” or “non-complex” version of Centrex. Thus, UNE-P (Centrex 21) is considered part of UNE-P POTS.

<sup>5</sup> Centrex is “non-POTS” or “complex” and is therefore reported in its own category, separate from UNE-P POTS.





1 CLECs with new trunk installations at parity with retail results, but the modified Z-  
2 score (2.57) at first blush indicates a lack of parity. While in the circumstances of this  
3 particular measurement the parity score is the accurate measure of parity,<sup>6</sup> I have  
4 included this PID in response to the Commission's request out of an abundance of  
5 caution. That said, OP-5 for LIS trunks was at parity in September.

6  
7 With regard to MR-8, the overall trouble rate for CLECs in September was 0.02%.  
8 That means 2 of 10,000 trunks in service experienced trouble. The retail result for  
9 Feature Group D trunks was 0.01%. While this result is not at parity with retail  
10 results for the same period, the CLEC trouble report rate has since February 2001  
11 been 0.03% or less, which clearly constitutes excellent performance. This is a case  
12 where the Commission should consider whether a .02% trouble rate impairs the  
13 CLECs' ability to compete and should also consider the remaining repair measures  
14 for LIS trunks. Qwest met the parity standard for 7 of the 8 repair PIDs for LIS  
15 trunks in September. Qwest cleared 92% of CLEC troubles in Zone 1 within 4 hours  
16 and over 93% of CLEC troubles in Zone 2 within 4 hours. The mean time to restore  
17 service was 2 hours, 11 minutes in Zone 1 and 1 hour, 42 minutes in Zone 2. All of  
18 these results were at parity with retail performance. In totality, Qwest provided  
19 CLECs with outstanding interconnection (checklist item 1) performance in  
20 September.

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<sup>6</sup> The parity score, in this case (as well as in other cases where volumes are relatively small), is a function of statistical proportions testing which is particularly used where volumes are relatively low and where results are reported as percentages. This type of statistical analysis, along with permutation testing (which is applied where results are reported as intervals, rather than percentages), has been recognized by the ROC TAG in the statistical analyses used in Qwest's results reports, in analyses of the results by the ROC OSS test administrator, and in workshops on performance assurance plans (PAPs). The effect of applying proportions and permutation tests is the equivalent of adjusting the critical z-score upward. Thus, a z-score higher than typically seen in a modified z-test can represent a difference that is not statistically significant.

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**Billing PID (Line 3)**

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Of the five PID measurements relating to billing, Qwest did not achieve parity in September on one: billing completeness (BI-4A). This measure found Qwest's bills complete 89.95% of the time, which was below retail parity. Qwest has prioritized correction of billing delays, is working to attain parity in future months, and has already drastically improved its performance from July (20.87%) and August (70.94%).

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**UNE-P PID (Line 7)**

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Of the 29 PID measurements relating to UNE-P, in September Qwest failed to meet the retail parity standard on only one: out of service troubles cleared within 24 hours in instances when the repair required a technician dispatches outside of an MSA (MR-3). Qwest's miss on this measurement was anomalous (as Qwest was at parity on this measurement each month between March and August and was back to parity in October) and most likely a result of low volumes. In September (based on the September data report), Qwest had only 8 out of service troubles requiring dispatches outside an MSA; it cleared 5 of the 8. This is compared to 2,411 equivalent troubles on the retail side. In terms of Qwest's efforts to ensure future compliance, because the volume of CLEC trouble reports for UNE-P services is so low, Qwest monitors trouble ticket status on such reports on an hourly basis.

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**Unbundled Loop PIDs (Lines 8- 18)**

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Of the 126 measurements relating to unbundled loop installation, repair, cutovers and conditioning, Qwest did not meet the benchmark or parity standards on 11: one for analog loops (OP-4, Zone 2); one for non-loaded 2-wire loops (MR-3, Zone 1); two for loop conditioning (OP-3, viewed under two different formulas); four for DS1-

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1 capable loops (OP-3, Zone 1; OP-6B, Zone 2; MR-7, Zone 2; and MR-8); and three  
2 for ISDN-capable loops (MR-3, Zone 1; MR-4, Zone 1; and MR-6, Zone 1).

3  
4 Analog Loop PID. The ROC determined that the provisioning of certain types of  
5 unbundled loops do not have a retail analogue; therefore, it set a performance  
6 benchmarks to evaluate Qwest's performance. The ROC determined that an average  
7 installation interval (OP-4) of 6.0 days or less for analog loops provided CLECs a  
8 meaningful opportunity to compete. Unlike retail parity, performance benchmarks  
9 are absolute standards that Qwest must achieve. In September, the average  
10 installation interval for analog loops in Zone 2 was 6.08 days, just above the  
11 benchmark. Qwest met 98.74% of its installation commitments in Zone 2 for  
12 unbundled loops, but fell slightly short on OP-4. In Zone 1, the average installation  
13 interval was 5.83 days. Because there are substantially more loops ordered in Zone 1,  
14 throughout the state (combining Zones 1 and 2) the average interval was 5.84 days.  
15 Nonetheless, to ensure future compliance, Qwest monitors each unbundled loop order  
16 as soon as practical to determine what work must be completed on the facility to meet  
17 the installation PID standards. Rapid recovery processes are set in motion when  
18 facility issues arise. This should help foster future compliance. Qwest's steady  
19 improvement on this measurement is a clear sign that these processes are effective.

20  
21 2 Wire, Non-Loaded Loop PID. Unlike loop provisioning, repair of unbundled loops  
22 is always tracked using a retail parity standard. For 2-wire non-loaded loops  
23 (basically DSL loops), Qwest missed one repair measure (MR-3), which requires  
24 Qwest to clear out of service troubles within 24 hours. In September, Qwest cleared  
25 26 of 27 CLEC out of service troubles within 24 hours, yet the results show a lack of

1 parity because, on the retail side, Qwest successfully cleared all 233 reports within 24  
2 hours. This is another example of low volumes and outstanding performance for both  
3 retail and wholesale customers alike affecting the end result. The Commission,  
4 therefore, should look at the outstanding level of performance and Qwest's overall  
5 performance in repairing CLEC 2-wire non-loaded loops. Qwest met the parity  
6 standard for every other repair metric in September. Nevertheless, Qwest will  
7 continue to closely monitor trouble ticket status to ensure future compliance.

8  
9 Unbundled Loop Conditioning PID. CLECs can request that Qwest "condition"  
10 loops on their behalf so they can utilize the loop for DSL or some other specialized  
11 service. As of September, Qwest began tracking unbundled loop conditioning  
12 performance. One of those PIDs -- installation commitments met (OP-3) -- utilizes a  
13 ROC benchmark of 90% on time. The PID disaggregates the data into Zone 1 and  
14 Zone 2. In Zone 1, Qwest met 89.55% of its commitments, with an average interval  
15 of 5.84 days (OP-4), well below the 16.5 day benchmark. In Zone 2, Qwest met 35 of  
16 40 installation commitments or 87.5%, in average interval of 6.73 days. Because this  
17 is the first month this PID has been reported, Qwest is still reviewing what steps it  
18 can take to ensure future compliance. Qwest has begun to monitor each unbundled  
19 loop with conditioning order as soon as practical to determine what work must be  
20 completed on the facility to meet the installation PID standards. Rapid recovery  
21 processes are set in motion when facility issues arise. Qwest also utilizes an 11-step  
22 process to identify alternative facilities not in need of conditioning to help speed this  
23 process along. These steps should help foster future compliance.

24

1        DS1-Capable Loops PIDs. Qwest provided parity service for DS-1 loops on 12 of 16  
2        PIDs in September. Two installation PIDs (installation commitments met in Zone 1  
3        (OP-3) and delayed days for facility reasons in Zone 2 (OP-6A)) and two repair PIDs  
4        (repeat troubles in Zone 2 (MR-7) and the trouble rate (MR-8)) failed to meet the  
5        retail parity standard.

6  
7        The number of DS1 loop installation commitments missed in Zone 1 in September is  
8        troubling to Qwest. Nonetheless, this performance should be placed in the proper  
9        context. Even though Qwest missed several commitments, the average interval that  
10       CLECs experienced for these installations was shorter than retail customers  
11       experienced. Moreover, this measure was at parity from April through July. In  
12       October, Qwest's performance improved, and the metric was at parity again. To  
13       ensure that this improved level of performance will be sustained, Qwest is  
14       researching the issue, and will supplement the record when further information is  
15       available.

16  
17       Qwest does not only track its commitments, it also tracks the average length of delay  
18       beyond the due date when the circuit is provisioned late. Qwest differentiates  
19       between delays for facilities reasons and delays for other reasons. In Zone 2, a CLEC  
20       experienced one long delay (48 days) in the month of September due to a facility  
21       reason. This was the only circuit delayed for facility reasons. September was the first  
22       time in the last 12 months that this measure was not at parity. Qwest does not  
23       currently foresee future problems with this PID.

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1 On the repair side, Qwest tracks a number of measures, one of which is repeat  
2 trouble. This measure (MR-7) tracks the percentage of repairs that Qwest does not  
3 properly fix in the first instance. For DS1-capable loops in Zone 2, 6 of the 12  
4 troubles reported (50%) experienced repeat trouble. September was the time in the  
5 last 12 months that Qwest did provide service at parity with retail performance.  
6 Qwest does not currently foresee future problems with this PID. This is principally  
7 because Qwest documents the DS1 installation testing process to minimize  
8 subsequent repair activity. If a trouble is due to Qwest performance, Qwest revisits  
9 the installation documentation to determine what steps it could have taken to prevent  
10 the trouble. When repeat troubles occur, Qwest supervisors review the steps taken to  
11 see what could have been done differently to prevent repeat reports. Qwest is  
12 confident this process will help foster continued compliance.

13  
14 Finally, the overall CLEC DS1 trouble rate was 3.23% (based on 1,950 circuits) while  
15 the retail result was 1.78% (based on 46,541 circuits). While this result is not at  
16 parity with retail results for the same period, the CLEC trouble report rate has been  
17 3.3% or less each month since April 2001. The lack of parity is again driven in part  
18 by the significant difference in volumes of DS1 circuits in service for CLECs as  
19 compared to those in service for retail customers. This is also a case where the  
20 Commission should consider all other September repair data for DS1 circuits. Qwest  
21 met the parity standard for 6 of the 8 repair PIDs for DS1 circuits in September.  
22 Qwest cleared 78.43% (40 of 51 reports) of CLEC troubles in Zone 1 within 4 hours,  
23 and 58.33% (7 of 12 reports) of CLEC troubles in Zone 2 within 4 hours. The mean  
24 time to restore service was 2 hours, 55 minutes in Zone 1, and 3 hours, 35 minutes in  
25 Zone 2. These results were at parity with retail performance. Moreover, DS1 loops

1 are but a small fraction (3.8%) of the total loops in service in Washington. In its  
2 recent Pennsylvania decision, Verizon's performance around high capacity loops was  
3 consistently below standard yet the FCC found the performance adequate.

4  
5 We recognize, however, that Verizon's performance with respect to  
6 other performance measures for high capacity loops has been poor in  
7 Pennsylvania. Verizon's installation intervals for competitive LECs  
8 are consistently longer than those for its retail customers, and Verizon  
9 has missed a significant percentage of appointments to provision high  
10 capacity loops for competitors. High capacity loops, however,  
11 represent a small percentage of all loops ordered by competitors in  
12 Pennsylvania. Given the relatively low volume of orders for high  
13 capacity loops compared to all loop types, we cannot find that  
14 Verizon's performance for high capacity loops warrants a finding of  
15 checklist noncompliance for all loop types.<sup>7</sup>

16  
17 Specifically, "Verizon missed approximately 30 percent to 40 percent of competitive  
18 LEC's provisioning appointments for every month between February and June, 2001,  
19 and it takes Verizon approximately five to ten days longer to install high capacity  
20 loops for competitive LECs."<sup>8</sup> As for Verizon, Qwest's DS1 loops constitute a small  
21 portion of the Qwest's overall wholesale loop volume. Moreover, Qwest provides all  
22 aspects of other high capacity loops (DS3 and 4-wire non-loaded) as well as 75% of  
23 the measures for DS1 loops at parity with retail. Lastly, when trouble tickets for  
24 which no trouble was found are excluded, the difference between CLEC and retail  
25 trouble rates decreases, indicating that such "no trouble" reports contribute to the  
26 apparent lack of parity.

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<sup>7</sup> *Verizon Penn. Order* at ¶ 90.

<sup>8</sup> *Id.* at ¶ 90, n.309.



1        ISDN-Capable Loops PIDs. Qwest's performance in installing and repairing ISDN-  
2        capable loops is all tracked according to a retail parity standard. Of the 18 PIDs  
3        concerning ISDN-capable loops, Qwest failed to provide parity service on three in  
4        September. All three PIDs were repair measures (out of service troubles cleared  
5        within 24 hours in Zone 1 (MR-3); all troubles cleared within 48 hours in Zone 1  
6        (MR-4); and mean time to restore in Zone 1 (MR-6)). These repair PIDs are  
7        interrelated and it is appears that one trouble report drove the disparity for all three  
8        results. But for this one repair, Qwest would have provided parity service for all  
9        three repair PIDs.

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**DS1 UDIT PID (Line 19)**

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**Number Portability PIDs (Lines 20 and 21)**

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Unlike many UNEs, Qwest does not control all aspects of the number portability process. As a result, the current PIDs only track whether Qwest has preset the circuit for number portability in a timely manner. Since Qwest does not provide number portability for itself, the ROC set a performance benchmark (95%) to determine

1 whether Qwest is meeting its performance objectives. As a general rule, Qwest  
2 presets circuits for number portability at or above the ROC 95% benchmark like  
3 clockwork. In September, however, Qwest missed on both number portability  
4 standards by a few percentage points. Qwest preset 92.81% of circuits when the  
5 CLECs were also obtaining a Qwest unbundled loop (OP-8B) and 93.7% of circuits  
6 when the CLEC as providing its own loop facility (OP-8C). It appears that these  
7 results were anomalous, as Qwest previously met the 95% benchmark on both  
8 number portability timeliness (OP-8B) and percentage of LNP triggers set prior to the  
9 frame due time (OP-8C) in each month since February 2001. Moreover, Qwest's  
10 October performance is back above benchmark. Nonetheless, given that Qwest has  
11 not experienced this concern in many months, Qwest will analyze why it missed these  
12 benchmarks in September and will supplement the record if additional information  
13 becomes available. Qwest does not currently foresee future difficulties in meeting its  
14 performance objective going forward.

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**Resale PIDs (Lines 22, 24 and 27-31)**

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For obvious reasons, all resale performance is measured against the retail parity  
standard. Of the 282 measurements relating to resale installation and repair, in  
September Qwest met the parity standard on all but seven. Qwest missed 2  
installation metrics and 7 repair metrics. These metrics were spread over five of the  
12 resale categories for which Qwest tracks its data. There was one residential resale  
metric (installation interval without a technician dispatch (OP-4)), one Centrex resale  
metric (trouble rate (MR-8)), three metrics around resale of DS0 circuits (troubles  
cleared in 4-hours in Zone 1 (MR-5); mean time to restore service in Zone 2 (MR-6);  
and repeat troubles in Zone 2 (MR-7)), one metric around the resale of DS1 circuits

1 (new installation troubles (OP-5)); and one metric on resale of DS3 circuits (repeat  
2 troubles in Zone 2 (MR-7)). Just as with high capacity loops, only 2% of all resold of  
3 all resold circuits are high capacity circuits. Thus, the Commission should afford  
4 performance misses around DS0, DS1 and DS3 circuits less weight.<sup>9</sup>

5  
6 Residential Resale PID. Of the 29 installation and repair measures surrounding  
7 residential resale, Qwest missed one in September. The average installation interval  
8 for orders not requiring a technician dispatch (OP-4) was statistically longer than  
9 retail. The CLEC interval was 2.72 days as compared to a retail interval of 2.31 days.  
10 It is important to note that Qwest met 100% of the CLEC installation commitments  
11 for non-dispatched orders and the difference in the interval was only 0.41 days.  
12 Qwest has had difficulty meeting this parity standard in Washington, but continues to  
13 emphasize that it meets virtually all committed intervals to CLECs. Qwest has met  
14 over 99% of its CLEC installation commitments for resold residence service in each  
15 month since February 2001. This is clearly a case where the Commission should  
16 consider the slight disparity in interval (.41 days) in conjunction with and in light of  
17 Qwest's overall performance for the remaining installation metrics. Qwest met all  
18 other residence resale installation PID standards in September, as it did in July and  
19 August.

20  
21 Centrex Resale PID. Of the 29 installation and repair measures surrounding Centrex  
22 resale, Qwest missed just one in September. According to the September data  
23 depicted in the September data report, the overall trouble rate (MR-8) for CLEC

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<sup>9</sup> See footnote 7.

1 Centrex lines was statistically higher than for retail customers. CLECs experienced a  
2 Centrex trouble report of 0.51% (5.1 troubles in 1000 lines), while retail customers  
3 experienced troubles on 0.36% of their lines (3.6 troubles in 1000 circuits). While  
4 this apparent result is not at parity with retail results, the CLEC trouble report rate has  
5 been less than 1% since February 2001 and the trouble rate has been dropping. This  
6 is clearly a case where the Commission should consider the low trouble rate, the  
7 apparent slight disparity in trouble rates, and the 11 remaining repair measurements  
8 for Centrex service. Qwest met all other 11 Centrex resale repair PID standards in  
9 September. In addition, the existence of a disparity is in dispute upon close  
10 examination of the data. In August, Qwest began tracking the number of troubles  
11 reported by CLECs that actually resulted in no trouble found. Qwest tracks the  
12 trouble rate (MR-8) and the repeat trouble rate (MR-7) in this fashion. This data is  
13 always provided one month in arrears. The October data report shows that, in  
14 actuality, the repair trouble rate on Centrex resale was only 0.33% (“MR-8\*”) in  
15 September. This result was at parity with Qwest’s retail performance. See Exhibit  
16 MGW-5.

17  
18 DS0 Resale PIDs. Of the 18 installation and repair measures surrounding resale of  
19 DS0 circuits, Qwest missed three in September. The three PIDs missed all concerned  
20 Qwest repair performance. First, Qwest cleared troubles on 1 of 3 circuits in Zone 1  
21 (MR-5). Qwest could not have missed the objective by much as the mean time to  
22 restore these circuits was at parity with retail and less than 4 hours. The low volumes  
23 appear to drive the disparity. Moreover, there has been no other statistical miss on  
24 this measure in Washington in the last 12 months. Therefore, Qwest does not  
25 currently foresee future problems with this PID.

1

2 Second, in Zone 2 Qwest cleared troubles on DS0 circuits in mean time of 6 hours, 6  
3 minutes, as compared to retail performance of 2 hours, 9 minutes. It would appear  
4 that the dramatic difference in volumes of DS0 circuits drove the disparity. CLEC  
5 data was based on five trouble reports, while the retail data was based on 332 trouble  
6 reports.

7

8 The third and final DS0 apparent disparity in September occurred around repeat  
9 troubles in Zone 2. There, preliminary data shows that 60% of the CLEC troubles  
10 experienced a repeat problem. This number is misleading, however. As mentioned  
11 above with reference to Centrex resale, in August, Qwest began tracking the number  
12 of troubles reported (including repeat trouble reports) by CLECs that actually resulted  
13 in no trouble found. This data is always provided one month in arrears. The October  
14 data report shows that, in actuality, only 33% of the CLEC circuits actually  
15 experienced a Qwest caused repeat trouble (“MR-7\*”) in September. This level of  
16 repeat troubles was at parity to Qwest performance. See Exhibit MGW-5.

17

18 DS1 Resale PID. Of the 18 installation and repair measures surrounding resale of  
19 DS1 circuits, Qwest missed only one in September. Qwest failed to install new DS1  
20 circuits without trouble at parity with retail (OP-5). There was one DS1 circuit  
21 installed in September and it experienced trouble. Qwest is reviewing this single  
22 order to determine what it could have done to prevent this trouble report.

23

24 DS3 Resale PID. Of the 18 installation and repair measures surrounding resale of  
25 DS3 circuits, Qwest missed only one in September. CLECs experienced a

1 statistically higher percentage of repeat troubles for DS3 and higher resold services in  
2 Zone 2 (MR-7). In September, Qwest repaired to CLEC circuits and they both  
3 experienced a repeat trouble. The disparity in performance appears to result from the  
4 extremely low volumes of repairs CLECs experience on DS3 circuits. Volumes are  
5 so low that in Washington the data shows 0% repeat troubles or 100% repeat troubles  
6 in each month.

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

8 **A. Yes, it does.**

9