

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

IN THE MATTER OF THE INVESTIGATION)
INTO QWEST CORPORATION'S)
COMPLIANCE WITH §271(C) OF THE) DOCKET NO. UT-
003022)
TELECOMMUNICATIONS ACT OF 1996.)

SUPPLEMENTAL DIRECT TESTIMONY

OF

MARGARET S. BUMGARNER

RE: CHECKLIST ITEM NO. 11

ON BEHALF OF

QWEST CORPORATION

AUGUST 29, 2000

**NOTICE OF CONFIDENTIALITY: THE PORTIONS OF THIS DOCUMENT
IDENTIFIED BELOW HAVE BEEN FILED UNDER SEAL.**

Exhibit MSB-32C: List of CLECs.

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1 **I.INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. PLEASE STATE YOUR NAME, POSITION, EMPLOYER, BUSINESS ADDRESS,**
3 **AND QUALIFICATIONS.**

4 A. My name is Margaret S. Bumgarner. I am employed by Qwest Corporation ("Qwest",
5 formerly U S WEST Communications, Inc.) as a Director in the Policy and Law
6 organization. My business address is Room 2803, 1600 7th Avenue, Seattle,
7 Washington, 98191. I submitted direct testimony in this docket on August 7, 2000.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

9 The purpose of my supplemental testimony is to provide the Commission with specific
10 information regarding Checklist Item No. 11, Number Portability, as requested in the
11 Supplemental Interpretive and Policy Statement issued in Docket No. UT-970300 and
12 adopted by Order dated March 21, 2000.

13 **II.COMMISSION QUESTIONS**

14 **DOES YOUR DIRECT TESTIMONY DATED AUGUST 7, 2000 PROVIDE ANSWERS TO**
15 **THE QUESTIONS THE COMMISSION ASKED IN THE SUPPLEMENTAL AND**
16 **INTERPRETIVE POLICY STATEMENT?**

17 A. Yes. In Exhibit A, Section V, Subsections A and L, the Commission asked ten
18 generic questions and seven specific questions regarding the number portability
19 requirements of Section 271(c)(2)(B)(xi) of the Act. My direct testimony addressed

1 Generic Questions 1, 2, and 5 through 10, and Specific Questions 1 and 3 through
2 7. I have prepared Exhibit MSB-30 which is a matrix of the questions and the location
3 in my direct testimony, and the exhibits attached thereto, where the answers to those
4 questions can be found.

5 **Q. ARE THERE QUESTIONS ASKED BY THE COMMISSION WHICH HAVE NOT BEEN**
6 **ADDRESSED IN YOUR DIRECT TESTIMONY REGARDING NUMBER**
7 **PORTABILITY?**

8 A. Yes. I would like to address Generic Questions 3 and 4, and Specific Question 2 at
9 this time.

10 **Q. GENERIC QUESTION 3: TO WHOM IS QWEST PRESENTLY PROVIDING, ON A**
11 **COMMERCIAL BASIS, THIS CHECKLIST ITEM?**

12 A. Qwest has ported telephone numbers to twenty-one CLECs. Confidential Exhibit
13 MSB-32C is a list of CLECs with ported telephone numbers.

14 **Q. GENERIC QUESTION 4: DESCRIBE HOW THE QUALITY AND RELIABILITY OF**
15 **CHECKLIST ITEMS PROVIDED TO COMPETITORS BY QWEST ARE**
16 **COMPARABLE TO THE QUALITY AND RELIABILITY OF SUCH ITEMS QWEST**
17 **PROVIDES ITSELF OR ITS OWN CUSTOMERS?**

18 A. Both the Act and the FCC define number portability as the ability of customers to

1 retain, at the same location, existing telephone numbers when switching from one
2 service provider to another.¹ Thus, there is no comparison to Qwest providing number
3 portability to itself. The Regional Oversight Committee (“ROC”) has developed
4 performance indicators for number portability which are described in my direct
5 testimony and Exhibit MSB-26.

6 **Q. SPECIFIC QUESTION 2: TO WHICH CLECS IS QWEST PROVIDING INTERIM**
7 **NUMBER PORTABILITY, AND UNDER WHAT TERMS, CONDITIONS AND RATES?**

8 A. Qwest has ported telephone numbers to 5 service providers using interim number
9 portability (“INP”). Confidential Exhibit MSB-32C is a list of service providers that still
10 have numbers ported using INP. There is virtually zero demand for INP at this point
11 due to the significant deployment of LNP by Qwest in Washington. As stated in my
12 direct testimony, the FCC requires that when LNP has been deployed in an area, then
13 interim methods can no longer be used.² On October 2, 2000, LNP deployment will
14 be completed in all Qwest end office switches in Washington making LNP available
15 to 100 percent of Qwest’s access lines in Washington. The terms, conditions, and
16 rates for INP are described in Section 10.1 and Exhibit A of the SGAT.

17 **III.SGAT AND INTERCONNECTION AGREEMENT REFERENCES**

¹ See Section 3(a)(46) (47 U.S.C. 153) and 47 C.F.R. Section 52.1(k).
² See 47 C.F.R. Section 52.27(d).

1 **Q. PLEASE PROVIDE A MATRIX WHICH CROSS-REFERENCES CHECKLIST ITEM**
2 **NO. 11 – NUMBER PORTABILITY SECTIONS IN THE SGAT AND THE**
3 **INTERCONNECTION AGREEMENTS IN EFFECT IN THE STATE OF**
4 **WASHINGTON.**

5 A. I have prepared Exhibit MSB-31 which details the sections in the SGAT and the
6 various interconnection agreements in effect in the State of Washington where
7 number portability is provided for.

8 **IV.CONCLUSION**

9 **Q. PLEASE SUMMARIZE YOUR SUPPLEMENTAL DIRECT TESTIMONY REGARDING**
10 **CHECKLIST ITEM NO. 11 – NUMBER PORTABILITY.**

11 A. My supplemental direct testimony addressed the questions raised by the Commission
12 in the Supplemental Interpretive and Policy Statement.

13 **DOES THIS CONCLUDE YOUR TESTIMONY?**

14 A. Yes it does.

15

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INDEX OF EXHIBITS

DESCRIPTION

EXHIBIT

Checklist Item No. 11 Matrix of Testimony and Exhibit References MSB-30	
271 Checklist References	MSB-31
List of CLECs with Ported Telephone Numbers MSB-32C	[Confidential]