

**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

MATTHEW B. WHITE

ON BEHALF OF

QWEST CORPORATION

FEBRUARY 20, 2004

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17

I. IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, EMPLOYER, AND BUSINESS ADDRESS.

A. My name is Matthew White. I am a Staff Advocate, Policy and Law for Qwest Service Corporation, a unit of Qwest. My business address is 930 15th Street, Denver, Colorado 80202.

Q. ARE YOU THE SAME MATTHEW WHITE THAT FILED RESONSE TESTIMONY IN THIS DOCKET?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut a portion of the response testimony of Covad.¹

II. QWEST'S OSS PERMIT ORDERING OF DATA SERVICES

Q. COVAD CLAIMS THAT QWEST OSS PRECLUDES A CLEC FROM EFFICIENTLY AND ECONOMICALLY PROVIDING DATA SERVICES.² DO YOU AGREE?

A. No. In my response testimony (Exhibit MBW-1T) I explained that Qwest has addressed all of the operational concerns that Covad raised with regard to Qwest's

¹ Response Testimony of Megan Doberneck and Michael Zulevic on Behalf of Covad Communications Company, (Exhibit No. not provided), filed February 2, 2004 (“Covad Response”).

² *Covad Response* at page 4.

1 OSS. I will add that since that testimony was filed, the Change Management Process
2 (CMP) community has finished ranking Change Requests (CRs) for Release 16.0 of
3 Interconnect Mediated Access (IMA). In my response testimony, I discussed a CR,
4 initiated by Qwest, designed to address Covad's concern regarding submitting a single
5 Local Service Request (LSR) for line splitting and loop splitting conversions. The CMP
6 community ranked this CR second out of a total 50 CRs eligible for inclusion in IMA
7 Release 16.0. This CR will likely be implemented with IMA 16.0 in October 2004.

8 **Q. WILL TRO-RELATED OSS CHANGES SQUEEZE NON-TRO-RELATED**
9 **CHANGES OFF THE LIST FOR RELEASE 16.0?**

10 A. No. Qwest estimates it will take 6,000 to 10,000 of the 30,000 developer hours
11 dedicated to Release 16.0 to implement the Batch Hot Cut Process (BHCP)-related
12 IMA changes Qwest is proposing, leaving an additional 20,000 to 24,000 hours for
13 non-BHCP-related, prioritized systems changes.

14 **Q. IS IT APPROPRIATE FOR COVAD TO CONTINUE TO ARGUE THAT**
15 **DATA ISSUES SHOULD BE CONSIDERED IN THIS DOCKET?**

16 A. No. As I stated in my response testimony, in the Triennial Review Order (TRO) the
17 Federal Communications Commission (FCC) explicitly instructed parties to bring such line
18 splitting issues to the change management process, and not to include them in the already
19 crowded nine-month mass market switching docket. Once again, Covad ignores these

1 instructions.³

2 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

3 A. Yes, it does.

³ “As the Commission did before, we encourage incumbent LECs and competitors to use existing state commission collaboratives and change management processes to address OSS modifications that are necessary to support line splitting.” *TRO* ¶252.