

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF CONTINUED)
COSTING AND PRICING OF) DOCKET NO. UT-003013
UNBUNDLED NETWORK ELEMENTS,) PART D
TRANSPORT, TERMINATION, AND)
RESALE)

SUPPLEMENTAL REBUTTAL TESTIMONY OF

KATHRYN MALONE

QWEST CORPORATION

APRIL 17, 2002

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IDENTIFICATION OF WITNESS

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

3 A. My name is Kathryn Malone. I am employed by Qwest as a Manager – Wholesale
4 Markets. My business address is 1801 California Street, Suite 2360, Denver, Colorado,
5 80202.

6

7 **Q. ARE YOU THE SAME KATHRYN MALONE WHO HAS FILED DIRECT AND**
8 **REBUTTAL TESTIMONY IN THIS PROCEEDING?**

9 A. Yes, I am.

10

11

PURPOSE

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

13 A. The purpose of my testimony is to address certain issues raised in the supplemental
14 testimony filed by Mr. Price on February 14, 2002. Specifically, I will address issues
15 relating to SS7 Signaling, Local Tandem Switching, and Local Switching Vertical
16 Features.

17

COMMON CHANNEL SIGNALING/SS7

18 **Q. MR. PRICE SUGGESTS THAT THE COMMISSION SHOULD REJECT QWEST'S**
19 **PROPOSED SS7 CHARGES BECAUSE HE DOES NOT UNDERSTAND THE**
20 **APPLICATION OF THE RATE ELEMENTS. DO YOU AGREE WITH MR. PRICE'S**
21 **SUGGESTION?**

1 A. No, I do not agree. Mr. Price's testimony offers no support for his suggestion that the
2 Commission should reject Qwest's proposed SS7 charges other than the fact that he
3 does not understand the application of the rates.
4

5 **Q. HAS QWEST PROVIDED A DETAILED DESCRIPTION OF SS7 SIGNALING IN ITS**
6 **PREVIOUSLY FILED TESTIMONY?**

7 A. Yes. In my direct testimony (Exhibit KM-T2), at page 11, I describe both the recurring
8 and nonrecurring rate elements applicable to SS7 signaling. My rebuttal testimony
9 (Exhibit KM-T3) at page 3, provides a further detailed description of all the rate
10 elements associated with SS7 signaling including an example of a simple use of
11 signaling.
12

13 **Q. DID QWEST ALSO PROVIDE A RESPONSE TO MR. PRICE'S DATA REQUEST**
14 **REGARDING SS7 PROPOSED RATE APPLICATION?**

15 A. Yes. The data request response to WorldCom data request 01-010 provided by Qwest
16 is attached as Exhibit KM-5 .
17

18 **Q. WHAT DOES QWEST RECOMMEND WITH REGARD TO ITS PROPOSED RATES**
19 **FOR SS7 SIGNALING?**

20 A. Qwest recommends that the Commission adopt the prices for SS7 Signaling proposed
21 by Ms. Million in Exhibit TKM-28 in this proceeding.
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LOCAL TANDEM SWITCHING

Q. MR. PRICE ALSO SUGGESTS THAT THE COMMISSION REJECT QWEST'S PROPOSED RATES FOR LOCAL TANDEM SWITCHING BECAUSE HE DOES NOT UNDERSTAND THE APPLICATION OF THE RATE ELEMENTS. DO YOU AGREE WITH MR. PRICE'S SUGGESTION?

A. No, I do not agree with Mr. Price's suggestion. Again Mr. Price's recommendation for the Commission to reject Qwest's proposed rates for local tandem switching is based solely on the fact that he does not understand the application of the rate elements.

Q. WHAT IS QWEST PROPOSING WITH REGARD TO LOCAL TANDEM SWITCHING IN THIS PROCEEDING?

A. Qwest proposes the nonrecurring installation and disconnection charges associated with the purchase of the DS1 Message Trunk Port, the first trunk group per order, and each additional trunk group per order used in providing local tandem switching.

Q. DID QWEST RESPOND TO A DATA REQUEST FROM MR. PRICE REGARDING LOCAL TANDEM SWITCHING?

A. Yes. The response to WorldCom's data request 01-008 is attached as Exhibit KM-6.

Q. WHAT DOES QWEST RECOMMEND WITH REGARD TO THE PRICING OF THE NONRECURRING RATES ELEMENTS FOR LOCAL TANDEM SWITCHING?

A. Qwest recommends that the Commission adopt the prices proposed by Ms. Million in Exhibit TKM-28.

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LOCAL SWITCHING

2 **Q. MR. PRICE STATES THAT THE VAST MAJORITY OF THE VERTICAL FEATURES**
3 **CHARGES PROPOSED IN THIS PROCEEDING ARE ASSOCIATED WITH**
4 **CENTREX. DO YOU AGREE?**

5 A. Yes, I agree with Mr. Price's statement; however, the following proposed features can
6 also be ordered with POTS as well as Centrex:

7 Audible Message Waiting;
8 Auto Callback;
9 Blocking of pay per call services;
10 Call Forwarding;
11 Call Waiting;
12 CLASS;
13 Custom Ringing;
14 Distinctive Ringing;
15 Music on Hold;
16 Speed Calling;
17 Three Way Calling;
18 Time and Date Display; and
19 Toll Restriction Service.

20

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

22 A. Yes, it does.