

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

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

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

RENÉE ALBERSHEIM

ON BEHALF OF

QWEST CORPORATION

APRIL 17, 2002

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

3 A. My name is Renée Albersheim. I am employed by Qwest Corporation (Qwest), as a
4 Staff Advocate for Policy and Law. My business address is 930 15th St., 10th Floor,
5 Denver, CO, 80202.

6 **Q. ARE YOU THE SAME RENEE ALBERSHEIM WHO FILED REBUTTAL**
7 **TESTIMONY IN THIS PROCEEDING?**

8 A. Yes, I am.

9 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

10 A. The purpose of this testimony is to rebut statements in the supplemental direct testimony
11 of Sidney L. Morrison filed on behalf of WorldCom, Inc.,¹ with regard to Qwest's
12 Operational Support Systems (OSS).

13 **Q. MR. MORRISON SUGGESTS THAT MANUAL WORK STEPS IN**
14 **QWEST'S NON-RECURRING COST STUDIES ARE NOT APPROPRIATE**
15 **IN A FORWARD LOOKING ENVIRONMENT.² DO YOU AGREE?**

16 A. No. It does not follow that a forward looking environment will always be
17

¹ See *In the Matter of Continued Costing and Pricing of Unbundled Network Elements, Transport, and Termination*, Docket No. UT-003013, Part D – Supplemental Direct Testimony of Sidney L. Morrison, WorldCom, dated February 14, 2002, received March 28, 2002 (*Morrison Supplemental Direct*).

² *Morrison Supplemental Direct* at page 7.

1 perfectly mechanized. In 15 years as a software consultant I did not encounter a
2 perfectly mechanized system. Generally, achieving such perfection will cost more than
3 the benefit to be realized by elimination of manual processes.

4 **Q. WHEN DISCUSSIONS OF OSS CENTER ON MECHANIZATION, OR**
5 **FLOW THROUGH, DO THEY GENERALLY APPLY TO THE ENTIRE**
6 **PROCESS OF ORDERING AND PROVISIONING UNES?**

7 A. No. Generally these discussions of mechanization center on the ordering process,
8 especially when applied to flow through of CLEC orders to ILEC back office systems.

9 **Q. WHY DO DISCUSSIONS OF FLOW THROUGH CENTER ON THE**
10 **ORDERING PROCESS?**

11 A. The reason flow through applies to the ordering process, is that CLECs are given
12 mediated access to ILEC back office systems. Qwest, like other ILECs has created
13 electronic interfaces such as IMA-EDI and IMA-GUI for CLECs to submit Local
14 Service Requests (LSRs) for ordering. These interfaces are created on the basis of
15 national standards for processing LSRs. CLEC LSRs are processed by these
16 electronic interfaces and passed on to Qwest's back office systems for provisioning.

17 **Q. ONCE CLEC ORDERS REACH QWEST BACK OFFICE SYSTEMS, ARE**
18 **THE SYSTEMS USED TO PROCESS CLEC ORDERS THE SAME AS**
19 **THOSE USED TO PROCESS QWEST ORDERS?**

1 A. Yes. Once CLEC orders pass through Qwest's electronic interfaces, they enter the
2 provisioning process. At this point, CLEC orders and Qwest orders use the same
3 systems and the same processes and personnel.

4 **Q. SO DOES MR. MORRISON USE AN APPROPRIATE EXAMPLE OF A**
5 **PROCESS THAT HAS TOO MANY MANUAL STEPS?**

6 A. No. First, Mr. Morrison refers to a WorldCom data request which requested detail
7 regarding the installation, in other words the provisioning, of UDIT with Multiplexing.³
8 This product is ordered via an Access Service Request (ASR) as opposed to a Local
9 Service Request (LSR). By its nature, the product is more complex, generally requiring
10 interconnection to facilities-based CLECs who have arranged for Collocation with
11 Qwest. While the technical nature of the UDIT product family can be better explained
12 by Qwest Witness Mr. Hubbard, suffice it to say that the ordering and provisioning
13 process is significantly more complex than for most other products.⁴

14 **Q. DOES THE COMPLEXITY OF THE PROVISIONING PROCESS REALLY**
15 **MATTER WHEN DISCUSSING THE MECHANIZATION OF OSS?**

16 A. No. Mr. Morrison is looking at the OSS from end-to-end. Mr. Morrison is not

³ See *Morrison Supplemental Direct at Page 7*, and *WorldCom Data Request WCI 02-282*.

⁴ The Qwest Product Catalog (known as the PCAT) refers CLECs to Technical Publication 77389, which contains all the specifications, interfaces, parameters, design requirements, Network Channel/Network Channel Interface Codes (NC/NCI) and references to applicable ANSI standards for the UDIT product family. See <http://www.qwest.com/wholesale/pcat/udit.html> .

1 distinguishing between the ordering and provisioning processes. Again, once the
2 CLECs request reaches Qwest's back office systems, the systems and processes for
3 provisioning are the same for CLECs as they are for Qwest. Thus, once an LSR has
4 successfully entered Qwest's back office systems, CLECs experience the same level of
5 automation as does Qwest. Even so, Qwest's cost studies as presented by Ms. Million
6 do take into account expected improvements in these shared back office systems and
7 processes.

8 **Q. IS THERE A BETTER EXAMPLE OF A PRODUCT THAT SHOULD AND**
9 **COULD HAVE A HIGHER LEVEL OF ELECTRONIC INTERFACE**
10 **MECHANIZATION?**

11 A. Yes. A good example is the UNE-P product. Qwest has made, and continues to
12 make, improvements to the flow through of UNE-P from the submission of the LSR
13 through to Qwest's back office systems. Even so, the non-recurring cost studies show
14 a level of flow through that is higher than Qwest has yet achieved. Here, Qwest agrees
15 that UNE-P LSRs should have a high level of electronic ordering flow through going
16 forward. This is a prime example of the forward looking nature of Qwest's non-
17 recurring cost studies.

18 **Q. WHAT IS QWEST REQUIRED TO DO FOR CLECS WITH REGARD TO**
19 **ITS OSS?**

20 A. The FCC has determined that Qwest, like all ILECs, must provide CLECs non-

1 discriminatory access its back office systems in substantially the same time and manner
2 as itself.⁵ And where there is no retail analog for a UNE, Qwest must grant access
3 which affords CLECs a meaningful opportunity to compete.⁶

4 **Q. MR. MORRISON IMPLIES THAT QWEST IS REQUIRED TO**
5 **“MINIMIZE OR ELIMINATE” MANUAL INTERVENTION IN THE**
6 **PROVISIONING OF CLEC UNE REQUESTS.⁷ IS HE CORRECT?**

7 A. No. His implication is that Qwest must provide CLECs with OSS that are superior to
8 its own. This is the “ideal electronic processing environment” that Mr. Morrison
9 referred to in his direct testimony.⁸ As I stated in my rebuttal, the 8th Circuit Court ruled
10 that the Telecommunications Act “subsection 251(c)(3) implicitly requires unbundled
11 access only to an incumbent LEC's existing network--not to a yet unbuilt superior
12 one.”⁹ The court stated further that the Act “does not mandate that incumbent LECs
13 cater to every desire of every requesting carrier.”¹⁰

14 **Q. DOES THIS MEAN QWEST DOES NOT INTEND TO IMPROVE ITS OSS?**

15 A. No, of course not. Qwest is constantly striving to enhance and improve its systems and
16 processes. As with most businesses, these efforts are on-going. This is true for the

⁵ See *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*, CC Docket No. 99-295, FCC 99-404, at ¶82.

⁶ *Id.* at ¶85.

⁷ See *Morrison Supplemental Direct* at page 8.

⁸ See *Morrison Direct* at page 18.

1 electronic interfaces used by CLECs to access Qwest's OSS as well as for the back
2 office systems that are used by Qwest and the CLECs. In the predecessor to this
3 docket, Ms. Million presented a table of expenditures over a 10 year period that
4 illustrates Qwest's significant and ongoing commitment to improvements to all of its
5 back office systems.¹¹

6 **Q. MR. MORRISON SUGGESTS THAT QWEST DOES NOT HAVE "A PLAN**
7 **CONTINUALLY TO UPGRADE SYSTEMS INTERFACES AND BUSINESS**
8 **PROCESSES".¹² IS THIS TRUE?**

9 A. No. It would be foolish for any business, especially one the size of Qwest to operate
10 without business plans, including plans for its systems. The details regarding such plans
11 are well beyond the scope of this proceeding. It is also well beyond the scope of a
12 proceeding to determine pricing for UNEs to make a determination, such as Mr.
13 Morrison suggests, that this commission should order Qwest to implement such a plan.

14 **Q. DOES THIS LEAVE WORLDCOM WITHOUT RECOURSE IF IT HAS A**
15 **NEED FOR QWEST TO MAKE IMPROVEMENTS TO ITS OSS?**

16 A. No. Mr. Morrison appears to be unaware of the Change Management Process

⁹ *Iowa Utilities Board v. FCC*, 120 F3d. 753, 813 (8th Cir. 1997).

¹⁰ *Id.*

¹¹ See *In the Matter of Pricing Proceedings for Interconnection, Unbundled Elements, Transport and Termination and Resale*, Docket No. UT-960369, et al., Exhibits of Teresa K. Million on Behalf of U S WEST Communications, Exhibit TKM-3.

¹² *Morrison Supplemental Direct* at page 8.

1 (CMP). While the CMP is to be covered in detail in the 271 proceeding before this
2 commission (Docket Nos. UT-003022, UT-003040), I would like to point out that the
3 CMP responds to Mr. Morrison's request.

4 **Q. WHAT IS THE CMP?**

5 A. The CMP is an industry team with membership representing Qwest and interested
6 CLECs. The CMP gives CLECs direct input regarding Qwest's systems development
7 plans. CLECs present their requirements to the CMP. The participants in the CMP
8 determine whether these change requests should be implemented, and then determine
9 the relative priority of these change requests. In fact the CMP itself is undergoing a
10 redesign with direct input from CLECs. In effect, Mr. Morrison's plan for system
11 improvements is already in place.

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

13 A. Yes, it does.