EXHIBIT TKM-T57

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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

SUPPLEMENTAL REBUTTAL

TESTIMONY OF

TERESA K. MILLION

ON BEHALF OF

QWEST CORPORATION

APRIL 17, 2002

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IDENTIFICATION OF WITNESS

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

A. My name is Teresa K. Million. I am employed by Qwest Corporation (Qwest), as Director – Service Costs. My business address is 1801 California Street, Denver, CO.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes.

PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of this testimony is to rebut the supplemental testimonies of Mr. Sidney L. Morrison and Mr. Roy Lathrop of Worldcom, Inc. relating to Qwest's nonrecurring costs filed in Part D of this docket.

TESTIMONY OF MR. MORRISON

Q. WHAT ADDITIONAL CRITICISMS DOES MR. MORRISON MAKE OF QWEST'S DEVELOPMENT OF ITS NONRECURRING CHARGES?

A. On page 4 of his testimony Mr. Morrison discusses two issues that he identifies as problems with Qwest's data collection methods used to establish work times used in the development of nonrecurring charges (NRCs). First, he indicates that Qwest does not use a range of data to establish work times. Second, he states that Qwest uses the "unsubstantiated" opinion of subject matter experts (SMEs) to estimate times for work items.

Q. WHAT IS MR. MORRISON'S PROPOSED SOLUTION FOR THESE PURPORTED INADEQUACIES WITH QWEST'S NONRECURRING STUDIES?

A. Mr. Morrison proposes two possible solutions for the Commission. First, he suggests that the Commission require Qwest to use properly designed time and motion studies to establish the work times used in developing the nonrecurring charges (NRCs). He does not attempt to qualify in his testimony what he believes constitutes a "properly designed time and motion" study, nor does he explain how such studies conform with the FCC's forward-looking TELRIC rules.

Mr. Morrison's alternative solution is for the Commission to rely on his own unsubstantiated opinion, much of which he gained through years of experience working for Qwest's predecessor, U S WEST. However, it is important to remember that in

this proceeding Mr. Morrison is not a neutral participant reporting on his experience with Qwest. Mr. Morrison is an adversarial party advocating his client's desire to gain competitive advantage through nonrecurring rates that leave Qwest and its customers to bear the costs. In contrast, Qwest's SMEs are simply reporting to a cost analyst their estimates of the times and probabilities for specific work functions based on instructions that those estimates be forward-looking. Furthermore, Mr. Morrison is not currently performing any of the activities he evaluates, whereas, Qwest's SMEs have both current experience and knowledge of Qwest's forward-looking plans.

Q. IS MR. MORRISON CORRECT IN HIS CRITICISM OF QWEST'S DATA COLLECTION METHODS?

A. No. Mr. Morrison states that Qwest does not use a range of data to establish work times and that the opinions of its SMEs are unverified. He goes on to say that relying on one expert's opinion to determine tasks and times can be a problem. Apparently, Mr. Morrison does not believe that those rules apply to the time estimates that he has provided in this case.

Qwest has provided detailed backup that includes the estimates for each task of the time and probability of occurrence for every nonrecurring charge. As explained in my rebuttal testimony filed March 7, 2002, this backup often includes the name of the

person or persons providing the estimate, performing the work or supervising people who perform the work. Sometimes the backup contains only the name of the SME providing the information to the cost analyst. Nevertheless, Qwest explained to Mr. Morrison during a Qwest/New Mexico Technical Conference held on February 7 and 8, 2002, that its SMEs do not work alone in providing estimates for the cost studies. The explanations provided at the informal conference were confirmed in responses to formal data requests submitted subsequently by Mr. Morrison. (See the data requests and responses provided to New Mexico Staff in Exhibit TKM-58. The responses are equally applicable in Washington.). While the SMEs are typically experienced at performing the activities, or supervise people who perform the activities, they are instructed to obtain the information from experts who actually do the work, are proficient at performing the tasks, and have a minimum of one to two years experience performing the work. The SMEs and technicians collaborate to develop the documentation provided to the cost analyst for cost support. The experts' opinions of the estimates are determined based on key assumptions for the nonrecurring cost studies, including the requirement that the estimates be forward looking for 12 to 18 months. (See Exhibit TKM-58, New Mexico Staff Data Request #03-005).

Qwest has also explained to Mr. Morrison that the process of determining time and probability estimates, as mentioned above, is often a collaborative process wherein a

group of experts and technicians meet to discuss the tasks and work activities performed. (See Exhibit TKM-58, New Mexico Staff Data Request # 03-017 and 03-018). During that collaborative process each participant provides input, the estimates are determined, and the data resulting from the group's consensus is provided to the cost analyst. These discussions may result in both a range of times and averages agreed upon by the group to develop the final estimate in the collaborative process. The SMEs ultimately provide average times and probabilities to the cost analyst, but this does not mean that ranges are not examined in determining those averages.

Q. DO MR. MORRISON'S RECOMMENDATIONS PROVIDE QWEST OR THE COMMISSION WITH REASONABLE ALTERNATIVES TO QWEST'S OWN ESTIMATES OF TIMES AND PROBABILITIES?

A. Absolutely not. Mr. Morrison suggests that Qwest be required to perform time and motion studies to develop estimates for use in its nonrecurring studies. In fact, Mr. Morrison performed time and motion studies on behalf of U S WEST in 1980 and 1981. Thus, Mr. Morrison is well aware that Qwest discontinued its practice of conducting time and motion studies, years before the passage of the Telecommunications Act of 1996, in the face of pressures to reduce costs and eliminate activities that were viewed as not adding sufficient value. This is, in part, because time and motion studies are most effective in measuring repetitive, assembly-line type

functions. Qwest's work activities are often complex and variable; thus, difficult or impossible to measure through direct observation. For example, in Mr. Hubbard's Supplemental Rebuttal Testimony (at pages 2 to 7), referring to Dr. Cabe's testimony Mr. Hubbard describes a variety of circumstances in which the actual activities that take place during cooperative testing of a loop are very different from one test to another. Performance of time and motion studies for these activities would require a great deal of time to capture the variety of scenarios that arise during cooperative testing, and, even then, observations recorded during a snapshot in time might not provide an accurate reflection of the activities actually taking place in the real world. Therefore, Qwest believes that it is more reliable and cost-effective to use the forward-looking estimates provided by its experienced SMEs. Based on their experience, the SMEs are able to develop average times that more accurately reflect the overall result of a variety of tasks included in Qwest's nonrecurring cost studies than would be produced through time and motion studies. Evidently, Mr. Morrison believes that Qwest, or perhaps its customers, should bear the high cost of reinstating such studies with no assurance that Commissions will find the results to be more accurate or statistically valid than the estimates provided by SMEs who have responsibility for the processes.

Q. IS THERE ANOTHER FLAW WITH MR. MORRISON'S RECOMMENDATION TO USE TIME AND MOTION STUDIES?

A. Yes. Mr. Morrison fails to mention that time and motion studies are by definition backward looking and based only on practices and processes that have existed historically. Time and motion studies do not meet the FCC's requirement that TELRIC studies be forward-looking. In contrast, Qwest's methods develop nonrecurring costs based on forward-looking probabilities and time estimates. Qwest's SMEs base their estimates both on their considerable experience and their day-to-day work in the centers where the work steps are performed, as well as their involvement in evaluating and implementing future process and system improvements in their groups. The times estimated include anticipated process efficiencies and mechanization for a 12 to 18 month horizon, and are based on averages for particular functions.

Q. IS MR. MORRISON CORRECT TO RECOMMEND ADJUSTMENTS TO THE INTERCONNECT SERVICE CENTER (ISC) TIMES?

A. No. Qwest utilizes a time of six (6) minutes for ISC activities in its nonrecurring cost studies, pursuant to paragraph 473 of the Commission's Eighth Supplemental Order in Docket No. UT-960639, et al. for every nonrecurring element except the UNE-P elements which are separated between manual and mechanized processes. In those cases, Qwest uses its true estimates of ISC activities as a starting point for manual processes, and then applies the mechanized flow through rates to determine mechanized processing. This approach results in estimated times for manual processing above six

(6) minutes and for mechanized processing far below six (6) minutes. It would be inappropriate to use six (6) minutes as a starting point for manual processes because, as Qwest has explained previously, the six (6) minutes already manifests a reduction in the amount of time Qwest estimates that it takes to perform the activities necessary in the ISC. Except in the case of mechanized processing for UNE-P POTS and CTC, where Qwest uses 95% flow through for activities, Qwest continues to expect greater than six (6) minutes of ISC processing time for other unbundled elements. Nevertheless, Qwest's nonrecurring studies reflect six (6) minutes for ISC processing for remaining nonrecurring elements as required by the Commission. Under the circumstances, it is inappropriate for Mr. Morrison to reduce ISC times further.

Q. MR. MORRISON RECOMMENDS THAT THE COMMISSION REDUCE QWEST'S LOOP PROVISIONING CENTER (LPC) ACTIVITY TIME BY HALF, IS HE CORRECT?

A. No. Not only is there no support for his 50% reduction in Qwest's time estimate, clearly, Mr. Morrison does not understand the nature of the LPC activity he is suggesting the Commission reduce the time for. In addition, Mr. Morrison's discussion of the LPC appears to conflict with his criticisms of Qwest's nonrecurring studies in his direct testimony filed December 21, 2001. In that case, on page 25, he argues that his experience tells him that a level of detail that assigns times to each measured detail work

item is not realistic. Here, he criticizes Qwest for providing additional documentation of the process represented in the cost study because it does not include time estimates for the additional steps described, but instead provides support for the tasks that are chained together into a complete process represented by a single time estimate. It is unclear at this point whether Mr. Morrison expects Qwest to provide more detail about the work steps involved in the nonrecurring times or less. It should be noted that the data request to which Mr. Morrison refers asks Qwest to "[d]escribe in detail the work steps involved…." The data request does not ask Qwest to provide times for each of those work steps.

Nevertheless, the work activity "Avg Clearing Time per RMA" represents the average time Qwest estimates for an Assignment Consultant to clear or complete a Request for Manual Assistance, also known as a manual plant line assignment. This activity takes place only when an order cannot be automatically processed in Qwest's systems. As described in response to a New Mexico Staff Data Request, the time estimate is based on an assumption that an experienced Assignment Consultant completes 40 RMAs in a typical 7.5-hour day (i.e., 7.5 hours/40 = 11.25 minutes per RMA) (see Exhibit TKM-59, New Mexico Staff Data Request #03-027). In Washington, Qwest's nonrecurring study also assumes that an Assignment Consultant will only process RMAs 15% of the time (i.e., 11.25 minutes * 15% = 1.69 minutes). This 15% probability was determined

by the Commission in the prior cost docket and is discussed in my direct testimony (Exhibit TKM-T26), filed November 7, 2001, at page 15, line 3. The effect of Mr. Morrison's recommendation to reduce the 1.69 minutes by 50% would be to change Qwest's assumption from 40 to 80 as the number of RMAs an experienced Assignment Consultant could complete in a day. It should be clear from this example that Mr. Morrison's "adjustments" are nothing more than an attempt to reduce Qwest's NRCs by half, and are not supported by fact or reason.

Q. MR. MORRISON RECOMMENDS THAT QWEST IMPLEMENT A PLAN TO CONTINUALLY UPGRADE SYSTEMS INTERFACES AND BUSINESS PROCESSES. DOES QWEST HAVE SUCH A PLAN?

A. Yes. As explained by Ms. Albersheim, and as discussed in my rebuttal testimony (Exhibit TKM-T54) filed March 7, 2002, at pages 4 and 5, it is misguided of Mr. Morrison to suggest that Qwest utilizes anything other than sophisticated systems and interfaces that are continuously updated and upgraded. Documentation filed in Part A of this cost docket at Exhibit TKM-03 (attached hereto as Exhibit TKM-60), shows that from 1990 through 1999, Qwest's programming expenditures alone have ranged from $275 million to almost a billion dollars a year. For the years 1997 through 1999, of the $2.4 billion Qwest spent on programming costs, $153.7 million was related to year 2000 (commonly known as Y2K) issues faced by the entire world, $119.5 million

was related to providing CLECs access to Qwest's OSS, and the remaining $2.1 billion was spent upgrading Qwest's internal systems and business processes. These numbers do not take into account the capital dollars Qwest has expended for computer hardware upgrades. Thus, Mr. Morrison's suggestion that Qwest's manual processes are overstated and its nonrecurring cost studies are not forward-looking because its internal systems have not been continually upgraded is an empty argument with no basis in fact. In addition, as discussed in response to a New Mexico Staff Data Request, Qwest also performs routine reviews of its business processes in order to effect positive change (see Exhibit TKM-59, New Mexico Staff Data Request #03-025). Qwest's plans absolutely include continuous updates of systems and processes, updates that are reflected in Qwest's time estimates, and provide CLECs with the same provisioning capabilities that Qwest will experience in the real world on a forward-looking basis.

TESTIMONY OF MR. LATHROP

Q. MR. LATHROP SAYS THAT CHARGING CLECS TO INSPECT THE NETWORK AND UPDATE ITS RECORDS IS AN INCONSISTENT APPLICATION OF THE COST CAUSATION PRINCIPLES IN TELRIC. IS HE CORRECT?

A. No. At page 4 of his reply testimony, dated February 14, 2002, Mr. Lathrop states that it is not clear what benefit a CLEC or Qwest derives from the time included to

review the route in the database, since Qwest requires a field verification of the route. Mr. Lathrop misunderstands the nature of the activities related to inquiries and field visits. As explained in more detail by Mr. Hubbard, an inquiry is conducted when a CLEC submits a request in order to determine if the particular route being requested is available, although not whether space is available. If the route is not available, then the only charge to the CLEC is the inquiry fee for the work Qwest has performed to ascertain the route availability, and no field inspection occurs. If the route is available, a field inspection is conducted to determine physical condition of poles or manholes included in the route, as well as actual availability of space in the route. Physical inspection is necessary, in part, because during each intervening period between inspections, events could occur that Qwest would have no way of knowing about, and that would not be reflected in its databases. For example, the database would not necessarily contain the information that a municipality had recently paved over the opening of a manhole, or a fence had been constructed making access to a pole impossible. Thus, the field inspection is conducted to ascertain the condition and space available on the route. Both the inquiry and inspection are necessary functions of providing CLECs with access to requested routes.

Qwest performs such functions for itself and updates the information contained in the databases as necessary. Qwest does not propose to charge CLECs when it conducts a

field inspection or updates data for itself. Nevertheless, the information resulting from that activity is equally available for the benefit of the CLECs even though Qwest causes and bears the cost of that particular inspection. Likewise, when the inspection activity results from a request made by a CLEC, it is appropriate for the CLEC who causes the request to bear the cost. The fact that Qwest is able to update the information contained in its databases is irrelevant to the need to conduct an inspection.

Q. ON PAGE 5 OF HIS TESTIMONY DATED FEBRUARY 14, 2002, MR. LATHROP NOTES THAT QWEST DOES NOT CONSIDER THE NUMBER OF POLES VERIFIED PER JOB IN ITS TIME ESTIMATE FOR FIELD VERIFICATIONS OF POLES. IS HE CORRECT?

A. No. Qwest's time estimate for field verifications of poles does consider the number of poles verified per job. Qwest estimates the time to verify poles at an average of twenty minutes per pole, including the time to travel to the site, identify the pole number, street code and ownership, and document conditions. Depending on where the route is located, in proximity to the engineer's location, it could take anywhere from a few minutes to hours just to travel to the site. The twenty-minute-per-pole time estimate for these activities is an average that assumes ten poles per job and spreads the time for travel across the estimates for the multiple poles. Once at the job site, the engineer makes the appropriate identifications, notes physical conditions, space availability and

documents the information. The average also considers that the engineer encounters varying conditions on each field visit. While some routes may be easily accessible for inspection, others may require moving a vehicle and setting up traffic protection for each pole inspected.

Q. MR. LATHROP ALSO SUGGESTS, AT PAGE 7 OF HIS REPLY TESTIMONY THAT QWEST SHOULD SEPARATE THE ACTIVITIES PER JOB FROM THE ACTIVITIES PER MANHOLE IN ITS ESTIMATE OF TIME FOR FIELD VERIFICATION OF MANHOLES. PLEASE COMMENT.

A. Again, Mr. Lathrop incorrectly interprets Qwest's nonrecurring time estimate for field verifications of manholes. As explained in my rebuttal testimony (Exhibit TKM-T54), filed March 7, 2002, at page 13, the 90 minute assumption for Network Technician time is an average that takes into account the wide variety of circumstances that may exist in performing a field verification of manholes. The assumption also takes into account that functions such as loading the truck do not occur for each manhole, as well as taking into account that activities such as site set up and tear down do occur for each manhole. Mr. Lathrop acknowledges that Qwest assumes 15 manholes per job and then suggests that multiple jobs could be conducted per day, allegedly supporting a position that Qwest's 90 minute time assumption should be reduced to spread truck and

travel time over the average number of jobs per day. If Qwest assumes 15 manholes per job, and it takes 90 minutes on average to perform all of the necessary activities at each manhole, then it is likely that instead of completing multiple jobs in a day, a Network Technician will take multiple days to complete a single job. Nevertheless, Qwest's 90 minute time estimate assumes that the technician only loads the truck and travels to the site one time per job. Clearly, Qwest's estimate already incorporates economies of time that are not necessarily encountered by a technician performing the work.

Q. IN HIS SURREBUTTAL TESTIMONY, FILED APRIL 5, 2002, MR. LATHROP ADDRESSES SEVERAL OF QWEST'S NONRECURRING STUDIES AND JUSTIFIES ADJUSTMENTS BY PROPOSING NEW TIME REQUIREMENTS FOR NUMEROUS STEPS. DO YOU AGREE WITH MR. LATHROP'S ADJUSTMENTS?

A. No. Mr. Lathrop provides the Commission with a list of detailed work steps that Qwest provided to him in response to discovery requests and presents them with his own assumed times included. The times estimated by Qwest's SMEs were provided for the entire function at a less granular level. For example, Qwest estimates that on average the Collocation Project Management Center (CPMC) will spend two hours on Application Verification, Date Setting and Project Management activities. The SMEs

providing those estimates perform the work currently, or have responsibility for the people who perform the work, and are aware of system and process improvements planned for the future. Mr. Lathrop then takes additional information in Mr. Hubbard's testimony, where he describes the CPMC functions in more detail, assigns his own assumed times for the detailed work steps, and produces a one-hour estimate for CPMC activities. It would be inappropriate to give weight to the detailed times provided by Mr. Lathrop absent some evidence that he has any experience with the detailed work steps that he has provided estimates for, or any substantiation for the times he assigns beyond his own *guess* as to appropriate times. Again, it appears that when Qwest provides times at a detailed level in its nonrecurring studies the CLECs criticize that the time estimates are too detailed, and when estimates are provided for the entire function the CLECs criticize that the time estimates are not detailed enough. It defies logic to assume that because Mr. Lathrop has provided these detailed estimates in testimony, they are necessarily more correct than those provided by Qwest's SMEs.

Q. MR. LATHROP STATES AT PAGE 6 OF HIS SURREBUTTAL TESTIMONY THAT QWEST'S APPROACH TO CABLE RACKING ESTIMATES ASSUMES A SHORT RUN INCREMENTAL APPROACH. IS HE CORRECT?

A. No. In support of his position, Mr. Lathrop states that a forward-looking approach would be based on "best practices space planning and designed to incorporate a multi-tenant environment." He would have the Commission believe that that approach would mean never having to assume additional cable racking for CLEC to CLEC direct connections. However, even if Qwest rebuilt every one of its central offices from the ground up, there would still be instances where CLECs that wanted to connect to each other might not be located in adjacent collocation spaces with sufficient existing cable racking between them. Qwest does not control which CLECs decide to connect to which other CLECs, nor does it control when a CLEC decides to collocate in a particular central office. If one CLEC decides to collocate in an office in one year, and another CLEC collocates three years later after five other CLECs have collocated in the office there is no guarantee under any circumstance that they would be located next to each other or even on the same floor. If those CLECs then decided they wanted to connect their collocation spaces Qwest would likely need to place cable racking to accommodate their request. Qwest's study makes a reasonable forward-looking assumption that one additional foot of cable racking would be needed. This one foot of cable racking is assumed to be shared by three CLECs, and is included in the flat charge for CLEC to CLEC direct connection.

Q. MR. LATHROP SAYS THAT QWEST'S ASSUMPTION THAT CLECS COULD BE COLLOCATED ON MULTIPLE FLOORS IS INCONSISTENT WITH ITS OWN METHOD FOR DEVELOPING COLLOCATION RENT COSTS. IS HIS POINT RELEVANT?

A. No. Qwest's collocation rent costs are based on a study that begins with input assumptions from R.S. Means. R.S. Means provides a national standard from which the real estate industry develops rent costs. This study has no connection to a study for CLEC to CLEC direct connection, which tries to determine the costs for connecting one CLEC to another within a central office building. Nor do the assumptions used to develop collocation rent costs have any bearing on the way Qwest has developed any of its other collocation assumptions.

The discussion in my rebuttal testimony (Exhibit TKM-T54), and Mr. Hubbard's rebuttal testimony (Exhibit RJH-T10), was intended merely to provide an example of the reasons why two CLECs might not be located adjacent to each other in a central office, and additional cable racking would be required. It is irrelevant whether the CLECs are on the same floor, or different floors, or in building additions. Qwest's cost study assumes that, regardless of where they are collocated, CLECs will use shared cable racking for their direct connections 95% of the time. Shared cable racking is charged monthly on a recurring basis per foot of cable racking used per cable. For the

remaining 5% of the time Qwest assumes that it will provide additional dedicated cable racking to enable the CLECs to complete their connections between their collocation spaces. That assumption results in one additional foot of dedicated cable racking per direct connection, which is assumed to be shared by three CLECs. This is a reasonable assumption in a forward-looking central office environment.

Q. MR. LATHROP DISCUSSES OTHER INCONSISTENCIES IN QWEST'S APPROACH TO DIRECT CONNECTIONS WITH RESPECT TO FIBER CABLE RACKING. PLEASE COMMENT.

A. Mr. Lathrop says that because Qwest ignored the actual deployment of fiber to collocation arrangements in developing collocation costs, Qwest is inconsistent with its approach to developing cable racking costs. This, he says, is because Qwest ignored the central office model used to develop space rental costs when it developed the cable racking costs. However, as discussed above, the central office model used for collocation rent cost has no connection to the assumptions in the CLEC to CLEC direct connections costs for cable racking. Nor should it, since the development of costs for dedicated cable racking is entirely unrelated to space rent. It is not inconsistent for Qwest to include costs in the CLEC to CLEC direct connection study that are not included in its collocation study. Qwest's approach to these costs is both consistent,

and careful to include only those costs that have not been addressed elsewhere in Qwest's studies.

Mr. Lathrop also claims that Qwest provided new information in explaining that its collocation study did not contain assumptions for fiber cable racking. This information is not new. As Mr. Lathrop points out, Qwest's collocation study was filed in Part A of this proceeding and any participant in the cost docket has had ample opportunity to examine that study. Even if there was no discussion previously of the fact that no fiber cable racking was included in Qwest's collocation costs, the information was available in the proceeding and included in Qwest's previously filed evidence. That Qwest failed to include fiber cable racking costs in its study where CLECs have deployed fiber to their collocation arrangements is Qwest's misfortune. That does not make it inconsistent or inappropriate for Qwest to include costs in the elements submitted in Part D that were excluded from the elements reviewed in Part A.

Q. MR. LATHROP CONTINUES TO ASSERT THAT THE ENGINEERING PERFORMED IN CONNECTION WITH SPACE OPTIONING IN SOME WAY OVERLAPS WITH THE ENGINEERING PERFORMED FOR COLLOCATION. IS HE CORRECT?

A. No. Although the Space Option product is described with some specificity as to type of collocation being optioned, Mr. Lathrop is incorrect. The space optioned is not specifically assigned nor space designated to a specific CLEC within the central office. That is, there is no guarantee of specific space in a central office based on a CLEC having an option on space. The CLEC is merely guaranteed that an amount of desired space will be available if and when the CLEC is ready to collocate. Therefore, as other CLECs collocate in a particular office and space fills up, before Qwest would place a CLEC in the last available space, a CLEC that holds a space option is provided with a first right-of-refusal opportunity to decide whether to proceed with its collocation plans or give the space up to the other CLEC. Thus, means is that during the period of time between the request for a space option and the time a CLEC collocates in a central office, several years could pass, new collocation arrangements could be in place, and any information gathered originally for the space option would no longer be valid. Furthermore, although engineering for a generic, non-specific space may require some of the same tasks, the engineering conducted once Qwest receives a firm request for collocation is very specific to the circumstances of the request. Thus, it would be inappropriate for the Commission to credit any of the engineering time resulting from a space option request to the engineering time necessary for a collocation request.

CONCLUSION

Q. BASED ON YOUR SUPPLEMENTAL REBUTTAL TESTIMONY, WHAT ARE YOUR RECOMMENDATIONS TO THIS COMMISSION?

A. Once again, the Commission should resist the temptation to reduce the time estimates and probabilities provided by Qwest's SMEs, and contained in its nonrecurring studies, on the basis of conjecture and speculation by intervening witnesses without concrete evidence that adjustments are appropriate. Qwest's nonrecurring studies are based on Qwest's forward-looking OSS and reflect only the manual processes that Qwest must perform in conjunction with those systems on a forward-looking basis. Qwest has used a reasonable and well-documented approach to estimate the forward-looking times and probabilities used in its studies. Finally, although the intervenors suggest otherwise, the FCC does not require Qwest to provide capabilities to the CLECs beyond what Qwest is able to do for itself in the real world with respect to its OSS. It would be inappropriate for the Commission to require Qwest to perform all of the activities necessary to provision CLEC requests for UNEs, then follow their recommendations to reduce times and eliminate activities from the NRC study based on conjecture about what constitutes a forward-looking estimate.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

INDEX OF EXHIBITS

EXHIBIT	DESCRIPTION
TKM-58	Qwest responses to New Mexico Staff Data Requests Nos. 03-005, 03-006, 03-009, 03-010, 03-011, 03-017, 03-018, 03-022, 03-023, 03-024
TKM-59	Qwest response to New Mexico Staff Data Requests Nos. 03-025, 03-026, 03-027
TKM-60	Exhibit TKM-03 from Part A of this docket