

**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**

**CEDRIC COX**

**ON BEHALF OF**

**WORLDCOM, INC. ("MCI")**

**February 20, 2004**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, EMPLOYER, AND TITLE.**

3 A. My name is Cedric Cox. I am currently employed by MCI as a Manager, Local  
4 Order Processing and Order/Billing Reconciliation Support.

5 **Q. ARE YOU THE SAME CEDRIC COX THAT FILED DIRECT**  
6 **TESTIMONY IN THIS DOCKET?**

7 A. Yes, I am.

8 **II. PURPOSE OF TESTIMONY**

9 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

10 A. This testimony is meant to respond to testimony of Qwest witness Matthew White  
11 that criticizes my direct testimony.

12 **III. OVERALL RESPONSE**

13 **Q. DO YOU HAVE AN OVERALL RESPONSE TO MR. WHITE'S**  
14 **CRITICISMS?**

15 A. Yes. Qwest generally responds to the problems that I raise in my direct testimony  
16 by claiming that the Section 271 process addressed my concerns. What this argument  
17 ignores is that the Federal Communications Commission ("FCC") reviewed Qwest's  
18 systems and processes during the Section 271 case in an environment where most  
19 residential customers were served by the unbundled network element platform  
20 ("UNE-P") and not in an environment where significant volumes of residential customers  
21 are served through unbundled loops ("UNE-L"). It is the latter environment that needs to  
22 be examined by the states in their impairment analysis.

1 **IV. RESPONSE TO SPECIFIC ISSUES**

2 **Q. MR. WHITE AT PAGES 9-10, ARGUES THAT THE SECTION 271**  
3 **TESTING OF QWEST'S SYSTEMS INCLUDED PROJECTED**  
4 **VOLUMES OF LOOP ORDERS AND THEREFORE YOUR CONCERNS**  
5 **ARE MERITLESS. DO YOU AGREE?**

6 A. No. Although the loop ordering tested in the 271 process tested "projected  
7 volumes," it did not include local number portability or directory listings or any of the  
8 other processes. And, again, that testing was performed in the context of limited loop  
9 orders and not in an environment where unbundled local switching was not available to  
10 competitive local exchange carriers ("CLECs"). "Projected volumes" in a UNE-P  
11 environment and "projected volumes" in an environment where local switching is not  
12 unbundled are two very different volumes.

13 **Q. AT PAGES 27-33, MR. WHITE DISCUSSES MCI'S CONCERNS ABOUT**  
14 **DIRECTORY LISTINGS, WHAT IS YOUR REACTION TO HIS**  
15 **ARGUMENTS?**

16 A. Mr. White argues that directory listings issues raised in my testimony are not  
17 important to CLECs since the CLECs did not prioritize a Qwest sponsored change  
18 request in the Change Management Process ("CMP") on directory listings. I disagree.  
19 The particular change request sponsored by Qwest was not prioritized by the CLECs at  
20 the time because CLECs were not generally using UNE-L to provide local service to their  
21 customers. In addition, Qwest had reduced the number of hours for CMP so CLECs were  
22 forced to prioritize change requests very carefully. Directory Listings issues relating to  
23 unbundled loops did not qualify at the time as a high priority compared to the other issues  
24 that existed for the CLECs.

1 **Q. MR. WHITE POINTS OUT AT PAGES 32-33 THAT THE KPMG TEST**  
2 **EVALUATED QWEST'S OSS FOR DIRECTORY LISTINGS. DO YOU**  
3 **AGREE THAT THE KPMG TEST EVALUATED YOUR CONCERNS?**

4 **A. No. The KPMG test did not evaluate the printed directory, only whether changes**  
5 **made it into the directory assistance system.**

6 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

7 **A. Yes, it does.**