

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

IN THE MATTER OF THE INVESTIGATION)
INTO QWEST CORPORATION'S)
COMPLIANCE WITH §271(C) OF THE)
TELECOMMUNICATIONS ACT OF 1996.)

DOCKET NO. UT-003022

SUPPLEMENTAL DIRECT TESTIMONY

OF

LORI A. SIMPSON

RE: CHECKLIST ITEM NO. 14

ON BEHALF OF

QWEST CORPORATION

August 30, 2000

Table of Contents

I. INTRODUCTION, QUALIFICATIONS AND PURPOSE OF TESTIMONY 1

II. COMMISSION QUESTIONS 1

III. SGAT AND INTERCONNECTION AGREEMENT REFERENCES 4

IV. CONCLUSION 4

1 **I. INTRODUCTION, QUALIFICATIONS AND PURPOSE OF TESTIMONY**

2

3 **Q. PLEASE STATE YOUR NAME.**

4 A. My name is Lori A. Simpson. I am employed by Qwest Corporation as a Director -
5 Interconnection. I submitted direct testimony in this docket on August 7, 2000.

6 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?**

7 A. The purpose of my supplemental testimony is to provide the Commission with specific
8 information regarding Checklist Item No. 14, Resale, as requested in the Supplemental
9 Interpretive and Policy Statement issued in Docket No. UT-970300 and adopted by Order
10 dated March 21, 2000.

11 **II. COMMISSION QUESTIONS**

12 **Q. DOES YOUR DIRECT TESTIMONY DATED AUGUST 7, 2000 PROVIDE ANSWERS TO THE**
13 **QUESTIONS THE COMMISSION ASKED IN THE SUPPLEMENTAL AND INTERPRETIVE POLICY**
14 **STATEMENT?**

15 A. Yes. In Appendix A, Section V, Subsections A and O, the Commission asked ten generic questions
16 and twelve specific questions regarding the requirements of Section 271(c)(2)(B)(xiv) of the Act. My
17 direct testimony addressed Generic Questions 1 through 10, as well as Specific Questions 1 through
18 6, 8, 11, and 12. I have prepared Exhibit LAS-17 which is a matrix of the questions and the location
19 in my direct testimony, and the exhibits attached thereto, where the answers to those questions can
20 be located.

1 **Q. ARE THERE QUESTIONS ASKED BY THE COMMISSION WHICH HAVE NOT BEEN ADDRESSED**
2 **IN YOUR DIRECT TESTIMONY?**

3 A. Yes. I would like to address Specific Questions 7, 9, and 10 at this time.

4 **Q. SPECIFIC QUESTION 7: WHAT HAS BEEN QWEST'S OPERATIONAL EXPERIENCE (OTHER**
5 **THAN ORDER PROCESSING) IN PROVIDING EACH SERVICE FOR RESALE?**

6 A Qwest has operational experience in providing numerous types of services for resale in Washington.
7 As described in my direct testimony, Qwest provides thousands of resold lines for reseller CLECs;
8 specifically, as of the date of this supplemental testimony, Qwest provides 36,316 resold business and
9 residence lines to reseller CLECs in Washington. In addition, Qwest provides resold Megabit, ISDN,
10 DS0, DS1, DS3, Frame Relay, and other services in Washington. The fact that Qwest currently
11 provides these resold services demonstrates that we have operational experience in providing services
12 for resale.

13 **Q. SPECIFIC QUESTION 9: DOES QWEST PROVIDE ALL OPERATOR FUNCTIONS (I.E.,**
14 **OPERATOR BILLING OPTIONS, RATE QUOTES) ON RESOLD OPERATOR CALL**
15 **COMPLETION SERVICES?**

16 A. Yes. As described in my direct testimony filed March 22, 2000 in Docket No. UT-
17 970300, concerning Checklist Items 7(II) - Directory Assistance Service, and 7(III) -
18 Operator Services, all operator services functions provided to Qwest retail end

1 users are provided to reseller CLEC's end users that use Qwest's directory
2 assistance and operator services.

3

4 **Q. SPECIFIC QUESTION 10: DOES QWEST ROUTE, AT A RESELLER'S REQUEST,**
5 **OPERATOR AND DIRECTORY ASSISTANCE CALLS TO THE RESELLER'S OWN**
6 **FACILITIES?**

7 A. Yes. A reseller CLEC may use its own, or a third parties', operator services and directory
8 assistance services to provide these services for its end users. I describe this option in
9 my direct testimony filed March 22, 2000 in Docket No. UT-970300, concerning Checklist
10 Items 7(II), Directory Assistance Service, and 7(III), Operator Services.

11 Concerning completion of a Washington reseller CLEC's end users' local and
12 intraLATA toll calls by Qwest operators, if a reseller CLEC chooses to use Qwest's
13 operator services for its end users, local and intraLATA calls will be completed using
14 Qwest facilities.

1 **III. SGAT AND INTERCONNECTION AGREEMENT REFERENCES**

2 **Q. PLEASE PROVIDE A MATRIX WHICH CROSS-REFERENCES CHECKLIST ITEM #14**
3 **AND THE SECTIONS IN THE SGAT AND THE INTERCONNECTION AGREEMENTS IN**
4 **EFFECT IN THE STATE OF WASHINGTON WHERE THIS ITEM CAN BE FOUND.**

5 A. I have prepared Exhibit LAS-18 which details the locations in the SGAT and the various
6 interconnection agreements in effect in the state of Washington where Interconnection and
7 Collocation are provided for.

8 **IV. CONCLUSION**

9 **Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY.**

10 A. My supplemental testimony addresses the questions raised by the Commission in the Supplemental
11 Interpretive and Policy Statement.

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

13 A. Yes, this concludes my testimony.

14

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TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE INVESTIGATION)
INTO QWEST CORPORATION'S)
COMPLIANCE WITH §271(C) OF THE) DOCKET NO. UT-003022
TELECOMMUNICATIONS ACT OF 1996.)**

**EXHIBITS OF
LORI A. SIMPSON
RE: CHECKLIST ITEM NO. 14
ON BEHALF OF
QWEST CORPORATION**

August 29, 2000

INDEX OF EXHIBITS

DESCRIPTION

EXHIBIT

Checklist Item #14 Matrix of Testimony and Exhibit References LAS-17

271 Checklist References LAS-18

**CHECKLIST ITEM #14
RESALE**

QUESTION

**TESTIMONY AND/OR
EXHIBIT REFERENCE**

Generic Questions

1. Describe how Qwest has fully implemented this checklist item as required by section 271 of the Act.
Exhibit LAS-10T, generally,
and
Page 1, line 9 to
Page 2, line 8
2. What performance standards must Qwest meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?
Exhibit LAS-10T
Page 16, line 25 to
Page 19, line 12
3. To whom is Qwest presently providing, on a commercial basis, this checklist item?
Exhibit LAS-14C
Exhibit LAS-15C
4. Describe how the quality and reliability of checklist items provided to competitors by Qwest are comparable to the quality and reliability of such items Qwest provides itself or its own customers.
Exhibit LAS-10T
Page 12, line 3 to
Page 13, line 7
5. What technical standards and/or business rules is Qwest providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.
Exhibit LAS-10T
Page 9, line 8 to
Page 11, line 21
6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?
SGAT, Section 6 and
Exhibit A
7. If Qwest is not currently providing this checklist item, is Qwest offering the item? If so, how is it offering the item and under what terms, conditions and rates? Describe how the checklist item is readily available and easily obtained by competitors.
Qwest is providing this checklist item. This question is not applicable.
8. If Qwest is not currently offering this checklist item, is Qwest capable of commercially providing it? What is Qwest's anticipated schedule to provide the item? Has any CLEC requested the checklist item?
Qwest is providing this checklist item. This question is not applicable.

QUESTION

9. Has Qwest received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did Qwest take to avoid recurrences?
10. Is Qwest able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.

Specific Questions

1. How is Qwest providing telecommunications resale services in accordance with the requirements of sections 251(c)(4) and 252(d)(3)?
2. What services are offered for resale to CLECs? What services are not?
3. What is the level of wholesale discount for each service offered for resale?
4. Which vertical features are offered for resale to CLECs? Which are not?
5. What nonrecurring charges, if any, does Qwest impose on resellers?
6. Does Qwest impose changeover charges? If so, under what circumstances?
7. What has been Qwest's operational experience (other than order processing) in providing each service for resale?

TESTIMONY AND/OR EXHIBIT REFERENCE

- No.
Exhibit LAS-10T
Page 41, lines 17 to 19
- Yes.
Exhibit LAS-10T
Page 1, lines 17 to 20
- Exhibit LAS-10T
Page 1, line 1 to
Page 2, line 8
And
Page 5, line 4 to
Page 8, line 30
SGAT, Section 6.2
- General: 14.69% (14.74%)
Operator Services and
Directory Assistance:
7.97%
SGAT, Section 6 and
Exhibit A
SGAT, Section 6.2
- SGAT, Section 6.3
- Yes.
SGAT, Section 6.2 and
Exhibit A
Exhibit LAS-16T
Page 2, lines 6 to 16

QUESTION

8. Will Qwest brand resold operator call completion and directory assistance services at the reseller's request, or are those services offered on an unbranded basis only? What limitations does Qwest impose on branding?

9. Does Qwest provide all operator functions (i.e., operator billing options, rate quotes) on resold operator call completion services?

10. Does Qwest route, at a reseller's request, operator and directory assistance calls to the reseller's own facilities?

11. Have all retail services (including Centrex and other central-office based switching services) offered by Qwest after January 1, 1996, been made available for resale? If not, describe any restrictions, including the "grandfathering" of such services.

12. Per discussions in the Bell South/ South Carolina Order, is Qwest offering Contract Service Arrangements (CSAs) at discount rates? With CSAs, does Qwest use cancellation penalties? What written complaints, if any, has Qwest received about CSAs? What resolution has been reached, if any, for CSA complaints?

**TESTIMONY AND/OR
EXHIBIT REFERENCE**

SGAT, Sections 6.2.9, 10.5
and 10.7

Exhibit LAS-16T

Page 2, line 17 to

Page 3, line 5

Direct Testimony dated
03/22/00, generally, and

Page 6, line 9 to

Page 7, line 5; and

Page 13, line 21 to

Page 15, line 15

Exhibit LAS-16T

Page 3, lines 7 to 18

Direct Testimony dated
03/22/00, generally, and

Page 8, line 14 to

Page 10, line 25; and

Page 19, line 11 to

Page 20, line 9

Yes.

Exhibit LAS-10T

Page 5, line 4 to

Page 6, line 7

AND

Except as stated at Exhibit
LAS-10T,

Page 7, line 19 to

Page 8, line 30

Exhibit LAS-10T

Page 5, line 26 to

Page 6, line 23

271 Checklist References to SGAT and Corresponding Interconnection Agreement Sections in Washington

	SGAT	AT & T	Covad	MCIW	MFS	Sprint	TCG	Version	Version	Version	Version	Versio
Resale	6.0	52,	11	52, Attch-2	XXX	31	IX	B	B	B	XI	11