

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

**IN THE MATTER OF THE INVESTIGATION)
INTO U S WEST COMMUNICATIONS, INC.'S)
COMPLIANCE WITH §271(C) OF THE)
TELECOMMUNICATIONS ACT OF 1996)**

DOCKET NO. UT-970300

**DIRECT TESTIMONY OF
LORI A. SIMPSON
ON BEHALF OF
U S WEST COMMUNICATIONS, INC.**

MARCH 22, 2000

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

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

4 A. My name is Lori A. Simpson. I am employed by U S WEST as Director –
5 Interconnection. My business address is 301 West 65th Street, Minneapolis,
6 Minnesota, 55423.

7 **Q. PLEASE REVIEW YOUR WORK EXPERIENCE, PRESENT**
8 **RESPONSIBILITIES, AND EDUCATION.**

9 A. I have been employed by U S WEST for 27 years. I am a director in the Wholesale
10 Markets division of U S WEST. In this position, I supervise a group of managers
11 responsible for providing technical and other information to support U S WEST's
12 271 checklist filings. Immediately prior to assuming my current position, I worked
13 in the area of legal and regulatory compliance. I have also held positions in the
14 residence, small business, and large business retail divisions of U S WEST, and in
15 the carrier and operator services divisions.

16 I have a Bachelor of Arts degree in Child Psychology from the University of Minnesota
17 and a Juris Doctor degree from William Mitchell College of Law in St. Paul,
18 Minnesota. I was admitted to the Minnesota bar in 1992, and am currently licensed
19 to practice law in Minnesota.

20 **Q. HAVE YOU PREVIOUSLY TESTIFIED?**

21 A. Yes, I appeared as a witness for U S WEST in the 271 checklist areas of Resale,
22 Directory Assistance Service, Operator Services, and White Pages Directory
23 Listings in the state of Nebraska, and on Directory Assistance Services, Operator
24 Services, and White Pages Directory Listings in the state of Arizona. I also
25 participated in an ex parte meeting with the FCC Staff in Washington, D.C., where
26 we discussed the 271 checklist areas noted above.

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

28 A. The purpose of my testimony is to describe how U S WEST has satisfied the
29 elements of three checklist items contained in Section 271 of the
30 Telecommunications Act of 1996 ("Telecom Act"): items 7(ii) and 7(iii), directory
31 assistance service and operator services, and item 8, white pages directory listings.

32 I will also explain that U S WEST currently provides directory assistance service,

1 operator services, and white pages directory listings to CLECs in Washington.

2 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

3 A. My testimony establishes that U S WEST has satisfied the requirements of the
4 Telecom Act for providing access to directory assistance service, operator services,
5 and white pages directory listings, which are prerequisites for U S WEST's entry into
6 the interLATA long distance market in Washington.

7 U S WEST meets the requirement in Washington that it be legally bound to provide
8 these checklist items through the Statement of Generally Available Terms and
9 Conditions for Interconnection (SGAT) and through its 63 Commission-approved
10 interconnection/resale agreement and 25 Commission-approved resale-only
11 agreements. The SGAT, which was submitted to the Commission on March 22,
12 2000, establishes legally binding obligations under which U S WEST offers directory
13 assistance service, operator services, and white pages directory listings. As shown
14 in this testimony, U S WEST currently provides, and will continue to provide, the
15 services described herein under concrete and binding terms and conditions that
16 comport with the requirements of the Telecommunications Act of 1996, FCC orders,
17 and Washington Commission orders.

18 First, U S WEST provides nondiscriminatory access to directory assistance and
19 operator services in Washington. Specifically, CLECs may: 1) purchase directory
20 assistance and operator services from U S WEST; 2) provide their own services;
21 or, 3) purchase the services from a third party. U S WEST currently provides
22 directory assistance and operator services to 25 reseller CLECs. Additionally,
23 U S WEST provides directory assistance service to eleven facility-based CLECs,
24 and provides operator services to eleven facility-based CLECs in Washington. As
25 demonstrated in my testimony, these services are provided on a nondiscriminatory
26 basis as between U S WEST and CLECs, and as between CLECs.

27 U S WEST notes that the FCC recently issued its order on unbundled network
28 elements and found that directory assistance service and operator services are
29 competitive and that CLECs have opportunities to purchase these services from
30 providers other than U S WEST.¹ Accordingly, the FCC held that directory assistance
31 and operator services are not network elements that ILECs must unbundle under section

¹ Third Report and Order and Fourth Further Notice of Proposed Rulemaking, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 99-238 ¶¶ 446-64 (Nov. 15, 1999).

1 251.² U S WEST continues to be obligated to provide directory assistance and operator services
2 under Section 271(c)(2)(B)(vii) of the Telecom Act, and U S WEST does so.

3 Second, U S WEST provides white pages directory listings for CLECs in
4 Washington. U S WEST's listing service includes: 1) updating U S WEST's
5 directory assistance database to include CLEC end user listings; 2) updating
6 U S WEST's listings database to include CLEC end user listings records; and
7 3) furnishing directory publishers with CLEC end user listings contained in
8 the U S WEST listings database for publication in local white pages
9 directories. U S WEST has successfully processed more than 25,700 white
10 pages directory listings for 31 reseller and facility-based CLECs in
11 Washington. As demonstrated in my testimony, U S WEST provides
12 nondiscriminatory white pages directory listings service to CLECs and
13 provides listings for CLECs' end users with the same accuracy and reliability
14 as provided for U S WEST's retail end users.

15 In summary, U S WEST is committed to providing and is providing
16 nondiscriminatory access to directory assistance services, operator services,
17 and white pages directory listings. As this testimony describes in detail,
18 U S WEST provides extensive assistance and support to CLECs so they may
19 provide access to directory assistance services, operator services, and white
20 pages directory listings, for their end users. Further, U S WEST measures its
21 performance in providing these services to CLECs on a nondiscriminatory
22 basis. The results of those performance measures demonstrate that
23 U S WEST provides these checklist items in a nondiscriminatory manner. As
24 this testimony demonstrates, U S WEST satisfies the checklist and the
25 Telecom Act in these three checklist areas.

26 **PLEASE DESCRIBE HOW YOUR TESTIMONY IS ORGANIZED.**

27 A. I will discuss areas unique to directory assistance service, then areas unique to operator
28 services; next, I will discuss areas common to directory assistance and operator services.
29 Last, I will discuss white pages directory listings.

1 2 ld.

1 **II. CHECKLIST ITEM 7(II) – DIRECTORY ASSISTANCE SERVICE**

2 **Q. PLEASE DESCRIBE HOW U S WEST IS LEGALLY OBLIGATED TO PROVIDE**
3 **CLECS WITH NONDISCRIMINATORY ACCESS TO DIRECTORY**
4 **ASSISTANCE SERVICE, CHECKLIST ITEM 7(II), IN WASHINGTON.**

5 A. Section 271(c)(2)(B)(vii) of the Telecom Act requires local exchange carriers, such as
6 U S WEST, to provide to CLECs:

7 Nondiscriminatory access to . . . (II) directory assistance services to allow the other
8 carrier’s customers to obtain telephone numbers . . .

9 U S WEST satisfies this checklist item via its SGAT. Under the provisions in the SGAT,
10 U S WEST specifically and concretely offers to provide CLECs with nondiscriminatory
11 access to U S WEST’s directory assistance service. The following language from the SGAT
12 demonstrates this point:

13 10.5.1.1 Directory assistance service is a telephone number, voice information
14 service that U S WEST provides to its own end users and to other telecommunications
15 carriers. U S WEST provides CLEC non-discriminatory access to U S WEST’s
16 directory assistance centers, services and directory assistance databases.

17 The SGAT further obligates U S WEST to provide directory assistance service to CLECs
18 according to the same methods, practices and standards U S WEST uses to provide service
19 to its end users:

20 10.5.2.4 U S WEST will perform Directory Assistance Services for CLEC in
21 accordance with operating methods, practices, and standards in effect for all
22 U S WEST end users. U S WEST will provide the same priority of handling for
23 CLEC’s end user calls to U S WEST’s Directory Assistance service as it provides for
24 its own end user calls. Calls to U S WEST’s directory assistance are handled on a first
25 come, first served basis, without regard to whether calls are originated by CLEC or
26 U S WEST end users.

27 **Q. HOW IS DIRECTORY ASSISTANCE SERVICE ACCESSED?**

28 A. Directory assistance service is accessed using a simple dialing arrangement, for example,
29 “411.” All callers to U S WEST’s directory assistance can obtain the telephone number of
30 any telephone subscriber contained in the directory assistance database, regardless of the
31 telephone subscriber’s local service provider. U S WEST includes CLEC end users’ listings
32 in its directory assistance database; this ensures that all callers to the U S WEST directory

1 assistance service will be able to obtain telephone numbers assigned to CLEC end users.

2 **Q. PLEASE DESCRIBE WHAT IS INCLUDED IN U S WEST'S DIRECTORY**
3 **ASSISTANCE SERVICE.**

4 A. U S WEST directory assistance service consists of several elements, some or all of which
5 may be used by a CLEC:

6 **Directory Assistance Listings** – include the name, address and telephone number of a
7 telephone subscriber.

8 **Directory Assistance Listings Updates** – are required whenever a telephone subscriber
9 changes a telephone number or address.

10 **Directory Assistance Database** – contains directory assistance listings. The directory
11 assistance database is accessed by directory assistance operators during a directory assistance
12 call.

13 **Operators and Operator Positions** – receive requests from callers and, after searching
14 the directory assistance database, provide the caller with the requested listing.

15 **Directory Assistance Trunking** – provides the connection between an end user's end
16 office switch and the directory assistance platform. Directory assistance operator-type trunking
17 connects both U S WEST and CLEC end office switches to the U S WEST directory assistance
18 platform.

19 For those CLECs using U S WEST's directory assistance service, their end users' calls may be
20 branded with the identity of the CLEC, where technically feasible.

21 **Q. DOES U S WEST CURRENTLY PROVIDE DIRECTORY ASSISTANCE**
22 **SERVICE TO CLECS IN WASHINGTON?**

23 A. Yes. U S WEST currently provides directory assistance service to reseller and facility-based
24 CLECs in Washington. U S WEST provides directory assistance services over more than
25 28,100 lines resold by 25 reseller CLECs, and for end users of eleven facilities-based CLECs
26 in Washington. Proprietary Exhibit LAS-2 identifies those CLECs.

27 Furthermore, U S WEST has processed more than 25,700 CLEC end user listings and included
28 them (except for nonpublished listings, which are not available through directory assistance)
29 in U S WEST's directory assistance database in Washington.

1 Additionally, U S WEST currently provides its Directory Assistance List service, which is a file
2 of all available listings in U S WEST's directory assistance database, to two active CLECs
3 in Washington.

4 U S WEST meets the current demand for directory assistance service, and is prepared to meet
5 reasonable and foreseeable future demand for directory assistance service.

6 **Q. PLEASE DESCRIBE THE INCLUSION AND APPEARANCE OF CLECS'**
7 **LISTINGS IN U S WEST'S DIRECTORY ASSISTANCE SERVICE.**

8 A. The following provision of the SGAT obligates U S WEST to place CLECs' listings in
9 U S WEST's directory assistance database.

10 10.4.2.4 CLEC grants U S WEST a non-exclusive license to incorporate CLEC's
11 end user listings information into its directory assistance database. U S WEST will
12 incorporate CLEC end user listings in the directory assistance database.
13 U S WEST will incorporate CLEC's end user listings information in all existing
14 and future directory assistance applications developed by U S WEST.

15 CLECs enjoy exactly the same options for the appearance of their end users' listings as
16 U S WEST's end users. These options include primary, premium, and privacy (i.e.,
17 nonpublished and nonlisted) listings.

18 **Q. IF A CLEC WANTS TO PROVIDE ITS OWN DIRECTORY ASSISTANCE**
19 **SERVICE, HOW CAN THE CLEC OBTAIN U S WEST'S DIRECTORY**
20 **ASSISTANCE LISTINGS, OR ACCESS U S WEST'S DIRECTORY LISTINGS**
21 **DATABASE, TO DO SO?**

22 A. CLECs may provide access to their own directory assistance service for their end
23 users, or they may provide access to a third party's directory assistance service.
24 These options are available to a CLEC regardless whether the CLEC resells
25 U S WEST's retail services, uses U S WEST's switching through purchase of
26 unbundled network elements, or serves its end users through its own switch.

27 In conformance with the FCC's rules,³ U S WEST offers direct access to its directory
28 assistance database to CLECs that choose to provide their own directory assistance service.

1 ³ Third Report and Order and Fourth Further Notice of Proposed Rulemaking, Implementation of the
2 Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 99-238
3 ¶¶446-64 (Nov. 15, 1999).

1 U S WEST will allow a CLEC's operators to directly access the U S WEST directory assistance
2 database on a real-time, "per-dip" basis. The CLEC's operators may make dips into the database for
3 individual listings on a read-only basis, just as is done by U S WEST's operators.

4 The SGAT provides as follows:

5 10.5.1.1.3 Directory Assistance Database Service -- U S WEST shall provide
6 CLEC non-discriminatory access to U S WEST's Directory Assistance Database
7 or "Directory1" database, where technically feasible, on a "per dip" basis.

8 U S WEST has not received a request for this service from any CLEC in Washington as of the
9 date of this filing. However, U S WEST has developed initial deployment guidelines for the
10 Directory Assistance Database Service. A CLEC that uses this service would be required
11 to deploy a system for use by its operators that is the same as the system used by
12 U S WEST's operators. Given the requirement for identical CLEC and U S WEST systems,
13 access to the directory assistance database would also be identical; that is, CLECs operators
14 would experience the same access times and opportunity to access the database as
15 experienced by U S WEST operators.

16 Also in conformance with the FCC's rules,⁴ U S WEST provides files containing directory
17 assistance listings for telephone service subscribers in its fourteen states to CLECs via
18 U S WEST's Directory Assistance List service for CLECs that choose to provide their own
19 directory assistance service. CLECs can use these listings to populate their own directory
20 assistance databases and to provide their own directory assistance services, with their own
21 operators. Listings are provided in an electronic format, on magnetic tape, or by such other
22 medium as may be agreed upon between U S WEST and a CLEC. A CLEC may also obtain
23 listings from a third party provider, as U S WEST does for national listings. For those
24 CLECs that wish to obtain U S WEST's Directory Assistance List service, the SGAT
25 provides as follows:

26 10.5.1.1.2 Directory Assistance List Service -- Directory Assistance List Service
27 is the bulk transfer of U S WEST's directory listings for subscribers within
28 U S WEST's 14 states under a non-exclusive, non-transferable, revocable license
29 to use the information solely for the purpose of providing Directory Assistance
30 Service to its local exchange end user customers subject to the terms and conditions
31 of this SGAT. See Section 10.6 for terms and conditions relating to the Directory
32 Assistance List Services.

1 4 Id.

1 **Q. HOW DOES U S WEST HANDLE NONPUBLISHED LISTINGS?**

2 A. U S WEST's Directory Assistance Database service and Directory Assistance List
3 service includes end user name, address, area code, and a "placeholder" indicator
4 that the telephone number is nonpublished; the telephone number is not provided.
5 This is exactly the same information available to U S WEST's directory assistance
6 operators. This information allows both U S WEST's and a CLEC's operators to
7 identify an end user correctly and know the end user has a nonpublished number,
8 and to so advise a caller to directory assistance.

9 U S WEST has established methods and procedures for contacting end users with
10 nonpublished numbers in urgent or emergency situations. To activate this
11 procedure, U S WEST's and CLECs' end users, or CLEC representatives, call
12 U S WEST's "nonpublished bureau." The caller provides his/her name and call-
13 back number and the name and address of the end user with the nonpublished
14 number. U S WEST will determine the nonpublished number and will call the end
15 user at the nonpublished number, inform him/her that a caller urgently wishes to
16 reach him/her, and provide the caller's name and call-back number. If asked to do
17 so, U S WEST will provide a status call back to the original caller to the
18 nonpublished bureau.

19 The SGAT provides for this as follows:

20 10.6.2.10 U S WEST will provide a nondiscriminatory process and
21 procedure for contacting end users with nonpublished telephone numbers
22 in emergency situations for nonpublished numbers that are included in
23 U S WEST's directory assistance database. Such process and procedure
24 will be available to CLEC for CLEC's use when CLEC provides its own
25 directory assistance and purchases U S WEST's Directory Assistance List
26 product.

27 **III. CHECKLIST ITEM 7(III) – OPERATOR SERVICES**

28 **PLEASE DESCRIBE HOW U S WEST IS LEGALLY OBLIGATED TO PROVIDE**
29 **CLECS WITH NONDISCRIMINATORY ACCESS TO OPERATOR SERVICES,**
30 **CHECKLIST ITEM 7(III), IN WASHINGTON.**

31 A. Section 271(c)(2)(B)(vii) of the Telecom Act requires that local exchange carriers,
32 such as U S WEST, provide to CLECs:

33 Nondiscriminatory access to . . . (III) operator call completion services.

1 U S WEST satisfies this checklist item via its SGAT. Under the provisions in this
2 document, U S WEST is specifically and concretely bound to provide CLECs with
3 nondiscriminatory access to U S WEST's operator services. The following
4 language from the SGAT recognizes this obligation.

5 10.7.1.1 Toll and assistance operator services are a family of offerings that
6 assist end users in completing EAS/local and long distance calls.
7 U S WEST provides nondiscriminatory access to U S WEST operator
8 service centers, services and personnel.

9 **Q. PLEASE DESCRIBE HOW OPERATOR SERVICES ARE ACCESSED.**

10 A. Callers access operator services by dialing "0" or "0" plus a phone number. Callers
11 to operator services can request operator assistance to complete local and
12 intraLATA long distance calls, including person-to-person calls, collect calls, third
13 party billing calls, and calls to verify or interrupt busy lines.

14 **Q. PLEASE DESCRIBE WHAT IS INCLUDED IN OPERATOR SERVICES.**

15 A. Operator services consists of several primary functions:

16 **Local Assistance.** Assists end users requesting help or information on placing
17 or completing local calls; connects end users to home NPA directory assistance, and
18 provides other information and guidance, as may be consistent with U S WEST's
19 customary practices for providing end user assistance.

20 **IntraLATA Toll Assistance.** Assists end users requesting help or information on
21 placing or completing intraLATA toll calls.

22 **Emergency Assistance.** Assists end users who are attempting to place local or
23 intraLATA toll calls to emergency agencies, including but not limited to, police, sheriff,
24 highway patrol and fire.

25 **Busy Line Verification.** Permits an end user to request assistance from the
26 operator bureau to determine if the called line is in use. The operator will not complete
27 the call for the end user initiating the BLV inquiry.

28 **Busy Line Interrupt.** Permits an end user to request assistance from the
29 operator to interrupt a telephone call in progress. The operator will interrupt the busy
30 line and inform the called party that a call is waiting.

31 CLECs enjoy several options for providing operator services to their end users. CLECs

1 that serve their end users from U S WEST end office switches, such as resellers
2 and purchasers of unbundled switching, may use the same trunking used by
3 U S WEST to reach the operator services switch. A facility-based CLEC that serves
4 its end users from its own end office switch also can obtain access to U S WEST's
5 operator services. Such a CLEC must obtain dedicated operator-type trunks to
6 connect its end office switch to the U S WEST operator services platform. CLECs
7 access the same operators and operator positions used by U S WEST.

8 CLECs that use U S WEST operators to provide operator services can obtain branded
9 or unbranded service where technically feasible. Branded operator services include
10 a message such as "Thank you for using [CLEC's name]" at the beginning or end
11 of each operator services call.

12 CLECs may choose to provide their own operator services and operators. In this
13 instance, CLECs that use U S WEST end office switches to serve their end users,
14 such as resellers and purchasers of unbundled switching, must establish dedicated
15 operator-type trunks from the U S WEST end office switch to the CLEC's operator
16 services platform.

17 **Q. DOES U S WEST CURRENTLY PROVIDE OPERATOR SERVICES TO CLECS**
18 **IN WASHINGTON?**

19 A. Yes. U S WEST currently provides operator services to 25 reseller CLECs over
20 more than 28,100 lines and to end users of eleven facility-based CLECs in
21 Washington. The CLECs using U S WEST's operator services in Washington are
22 identified in Proprietary Exhibit LAS-2.

23 U S WEST meets the current demand for operator services, and is prepared to meet
24 reasonable and foreseeable future demand for operator services.

25 **III. AREAS COMMON TO DIRECTORY ASSISTANCE AND OPERATOR**
26 **SERVICES**

27 **Q. WHAT ARE THE PRICES FOR DIRECTORY ASSISTANCE AND OPERATOR**
28 **SERVICES FOR CLECS?**

29 A. The prices for directory assistance and operator services are included in the SGAT,
30 Exhibit A. For reseller CLECs, the price is the retail price less the wholesale
31 discount approved by the Commission. For facility-based CLECs, the prices are
32 under development and will be market-based.

1 **Q. HOW DOES U S WEST PROVIDE BRANDING FOR DIRECTORY ASSISTANCE**
2 **SERVICE AND OPERATOR SERVICES?**

3 A. In conformance with the FCC's rules,⁶ U S WEST provides CLEC branding on calls to
4 U S WEST's directory assistance service and operator services, where technically feasible.
5 "Branding" is the practice of identifying the CLEC as the directory assistance or operator
6 services caller's local service provider. An example of branding is the message "thank you
7 for using [CLEC's name]," which would be played for the CLEC's end users' who call
8 directory assistance or operator services, either at the "front" of the call, at the "back" of the
9 call, or both.

10 The SGAT provides for directory assistance branding as follows:

11 10.5.1.1.1.3 Call Branding Service – Allows CLEC's end users to receive the
12 service options listed in 10.5.1.1.1.1 and 10.5.1.1.1.2 branded with the brand of
13 CLEC, where technically feasible or with a generic brand. Call Branding
14 announces CLEC's name to CLEC's end user at the start and completion of the
15 call. Call Branding is an optional service available to CLEC.

16 Front End Brand -- Announces CLEC's name to CLEC's end user at the
17 start of the call. There is a nonrecurring charge to setup and record the
18 Front End Brand message.

19 Back End Brand -- Announces CLEC's name to CLEC's end user at the
20 completion of the call. There is a nonrecurring charge to setup and
21 record the Back End Brand message.

22 The SGAT provides for operator services branding as follows:

23 10.7.2.10 Call Branding is an optional service available to CLEC. Call Branding
24 announces CLEC's name to CLEC's end user at the start of the call and at the
25 completion of the call. If CLEC selects the Call Branding option, U S WEST will
26 provide Call Branding to CLEC where technically feasible.

27 a) Front End Brand – Announces CLEC's name to CLEC's end user at the
28 start of the call. There is a nonrecurring charge to setup and record the
29 Front End Brand message.

1 6 47 C.F.R. § 51.217(d).

1 b) Back End Brand – Announces CLEC’s name to CLEC’s end user at the
2 completion of the call. There is a nonrecurring charge to setup and record
3 the Back End Brand message.

4 U S WEST will provide branded directory assistance service or operator services to CLECs that
5 resell or use unbundled switching, where technically feasible, through use of customized
6 routing and dedicated trunks. Customized routing allows a CLEC’s calls to be directed
7 to the CLEC’s dedicated trunks. The use of dedicated trunks allows the CLEC’s
8 directory assistance and operator services traffic to be recognized by the directory
9 assistance or operator services platform and branded with the CLEC’s unique
10 brand.

11 In order to ensure that U S WEST’s processes and procedures for preordering, ordering, provisioning, and
12 maintenance produce efficient and reliable customized routing to dedicated trunks, U S WEST performed
13 a “bench” test of these services, as well as CLEC branding, for directory assistance and operator services
14 calls. This test was conducted during May and June, 1999. To complete this test, U S WEST performed all
15 activities and functions required by a CLEC and by U S WEST for providing and maintaining customized
16 routing, dedicated trunks, and a CLEC brand on directory assistance and operator services calls. A dedicated
17 operator services type-trunk group and customized routing to the trunk group were established between the
18 end office switch and the directory assistance and operator services switch, and a CLEC branding message
19 was put in place. Test calls were made using the various dialing patterns for accessing directory assistance
20 and operator services.

21 The test was successful, and on each type of call the CLEC brand message was played. This test demonstrates
22 U S WEST’s capability to provide customized routing to dedicated trunks and CLEC branding.

23 A facility-based CLEC’s traffic to U S WEST’s directory assistance or operator services platform may also be
24 branded. In this instance, the dedicated trunks that deliver CLEC traffic from a CLEC’s end office switch
25 identify the CLEC’s traffic so that it may be uniquely branded. U S WEST is currently branding its operator
26 services for five CLECs in Washington.

27 **Q. HOW DOES U S WEST PROVIDE FOR DIALING PARITY REGARDING**
28 **DIRECTORY ASSISTANCE AND OPERATOR SERVICES?**

29 A. U S WEST provides dialing parity for CLEC access to U S WEST’s directory assistance and
30 operator services. An end user of a CLEC that resells U S WEST’s local exchange services
31 or uses unbundled switching accesses U S WEST’s directory assistance services by dialing
32 the same number (e.g., “411”) as a retail end user of U S WEST, and accesses U S WEST’s
33 operator services by dialing the same number as a retail end user of U S WEST, specifically
34 “0” or “0” plus a phone number.

35 The end user of a facility-based CLEC dials a number selected by the CLEC to access
36 U S WEST’s directory assistance service or operator services. The facility-based CLEC may
37 choose the same numbers used by U S WEST or a different number.

1 For directory assistance, the SGAT provides for this as follows:

2 10.5.2.8 A reseller CLECs' end user customers may use the same dialing pattern
3 to access directory assistance service as used by U S WEST's end user customers
4 (i.e., 411, 1+411, or 1+NPA+555-1212).

5 10.5.2.9 A facility-based CLEC may choose to have its end users dial a unique
6 number or use the same dialing pattern as U S WEST end users to access
7 U S WEST Directory Assistance operators.

8 For operator services, the SGAT provides for this as follows:

9 10.7.2.13 CLEC's end users may dial "0" or "0+" to access U S WEST operator
10 services. A facility-based CLEC may choose to have its end users access
11 U S WEST operators by dialing a unique number or by using the same dialing
12 pattern as U S WEST end users.

13 Thus, U S WEST provides CLECs with dialing parity for access to directory assistance services
14 and operator services.

15 **Q. HOW CAN A CLEC PROVIDE ACCESS TO ITS OWN OR A THIRD PARTY'S**
16 **DIRECTORY ASSISTANCE SERVICE AND OPERATOR SERVICES FOR ITS**
17 **END USERS?**

18 A. As previously noted, in addition to having the option of using U S WEST's directory
19 assistance service or operator services, CLECs have the option to provide their own directory
20 assistance service or operator services for their end users, or they can provide access to the
21 directory assistance service or operator services of a third party provider.

22 A reseller CLEC can provide its own, or a third party's, directory assistance service or operator
23 services by purchasing customized routing, and routing its end users' directory assistance or
24 operator services traffic from U S WEST end offices to the CLEC's own directory assistance
25 or operator services platform, or to the platforms of third party providers. These scenarios
26 also apply to CLECs that purchase unbundled switching from U S WEST. As noted above,
27 U S WEST has successfully tested its ability to provide customized routing and dedicated
28 trunks as those services are used with directory assistance and operator services.

29 A facility-based CLEC can provide its own directory assistance service or operator services by
30 routing its directory assistance or operator services traffic directly from its end office switch
31 to its directory assistance or operator services platform, or to the platforms of third party
32 providers. A facility-based CLEC that uses its own switch to route its end users' directory

1 assistance or operator services calls to a provider other than U S WEST does not require the
2 involvement of U S WEST, unless the CLEC obtains transport from U S WEST. U S WEST
3 is aware of at least two CLECs in Washington that provide their own or a third party's
4 directory assistance service to their end users.

5 **Q. HOW DOES U S WEST ENSURE THAT IT PROVIDES NONDISCRIMINATORY**
6 **ACCESS TO ITS DIRECTORY ASSISTANCE AND OPERATOR SERVICES?**

7 A. As discussed earlier in this testimony, the Telecom Act and the FCC's rules require
8 U S WEST to provide nondiscriminatory access to directory assistance service and
9 operator services.

10 For directory assistance service, the SGAT obligates U S WEST to use the above first-
11 come, first-served procedures:

12 10.5.2.4 U S WEST will perform Directory Assistance Services for CLEC
13 in accordance with operating methods, practices, and standards in effect
14 for all U S WEST end users. U S WEST will provide the same priority of
15 handling for CLEC's end user calls to U S WEST's Directory Assistance
16 service as it provides for its own end user calls. Calls to U S WEST's
17 directory assistance are handled on a first come, first served basis, without
18 regard to whether calls are originated by CLEC or U S WEST end users.

19 For operator services, the SGAT obligates U S WEST to use "first-come, first-served"
20 procedures:

21 10.7.2.7 U S WEST will perform Operator Services in accordance with
22 operating methods, practices, and standards in effect for all its end users.
23 U S WEST will respond to CLEC's end user calls to U S WEST's operator
24 services according to the same priority scheme as it responds to
25 U S WEST's end user calls. Calls to U S WEST's operator services are
26 handled on a first come, first served basis, without regard to whether calls
27 are originated by CLEC or U S WEST end users.

28 **DOES U S WEST MEASURE TIMELINESS AND ACCURACY OF UPDATES TO**
29 **THE DIRECTORY ASSISTANCE LISTINGS DATABASE?**

30 U S WEST is in the process of implementing two new measurements for accuracy and
31 timeliness of updates to its listings database (see below under Checklist Item 8, White
32 Pages Directory Listings). The listings database is the source for directory assistance
33 listings updates, which are made mechanically on a nightly basis, as shown in Exhibit
34 LAS-1. Therefore, the measurements of accuracy and timeliness of updates to the

1 listings database also effectively measure the accuracy and timeliness of updates to
 2 the directory assistance listings database.

3 **Q. DOES U S WEST HAVE OTHER MEASUREMENTS FOR DIRECTORY**
 4 **ASSISTANCE AND OPERATOR SERVICES?**

5 A. There are two performance indicators for directory assistance service and operator
 6 services. The first indicator (DA-1 and OS-1), "Speed of Answer," measures the
 7 average time for the U S WEST directory assistance and operator services systems
 8 to answer calls. The second indicator (DA-2 and OS-2), "Calls Answered Within 10
 9 Seconds," measures the percent of directory assistance and operator services calls
 10 that the U S WEST directory assistance system or operator services system
 11 answers within ten seconds. U S WEST measures these indicators on an
 12 aggregated basis for U S WEST and CLECs.

13 **Q. WHAT ARE THE RESULTS OF U S WEST'S PERFORMANCE**
 14 **MEASUREMENTS?**

15 A. For directory assistance service, the results for the months of December, 1999,
 16 through February, 2000, are as follows:

	Dec/99	Jan/00	Feb/00
18 DA-1:Speed of Answer (in seconds):	7.2	6.8	7.5
19 DA-2:Calls Answered w/in 10 Seconds:	92.8%		92.5%

20 For operator services, the results for the months of December, 1999, through February,
 21 2000, are as follows:

	Dec/99	Jan/00	Feb/00
23 OS-1:Speed of Answer (in seconds)	6.8	7.5	7.3
24 OS-2:Calls Answered w/in 10 Seconds	93.2%		92.7%

25 **Q. WHY ISN'T THIS DATA DISAGGREGATED FOR U S WEST AND CLECS?**

26 A. In its second Louisiana 271 application, BellSouth proposed directory assistance
 27 and operator services measures similar to those that U S WEST developed. In its
 28 response to that application, the FCC required BellSouth to either disaggregate
 29 directory assistance and operator services performance data between BellSouth

1 and CLECs, or to explain why disaggregation is not feasible or is unnecessary to
2 show nondiscrimination.⁷ In U S WEST's case, disaggregation is not feasible given the
3 structure of the directory assistance and operator services systems. Moreover, disaggregation
4 is not necessary to show nondiscrimination because the underlying directory assistance and
5 operator services platforms and procedures are nondiscriminatory by design, and ensure that
6 U S WEST and CLECs receive identical directory assistance service and operator services.

7 U S WEST's directory assistance and operator services systems are designed to handle calls on
8 a first in, first out, basis. This design assures the nondiscriminatory treatment of CLECs.
9 As calls from any and all callers to U S WEST's directory assistance and operator services
10 platforms are delivered to the platform, they are delivered to a queue, and then delivered
11 to an operator. Calls are delivered to the queue based on the order in which the calls
12 reached the directory assistance or operator services platforms, and calls are distributed to
13 the operators based on the order in which they entered the queue.

14 U S WEST makes an exception to its queue design when required to meet end users' needs.
15 Exceptions include: separate queues for Spanish-speaking callers (so such calls may be sent
16 to Spanish-speaking operators); separate queues according to the service being accessed
17 (for example, calls for national directory assistance and calls for local directory assistance
18 go into different queues); and, a separate queue for calls from coin phones (for technical
19 reasons involving billing). Within each of these queues, calls are answered on a first-come,
20 first-served, basis. And, in no case does a separate directory assistance or operator services
21 queue exist based on the identity of the end user's individual local service provider.

22 **Q. WHAT OTHER MEASURES OR FEATURES OF U S WEST'S PROVISION OF**
23 **DIRECTORY ASSISTANCE AND OPERATOR SERVICES ENSURES THAT**
24 **U S WEST PROVIDES NONDISCRIMINATORY ACCESS?**

25 A. In addition to the fact that the design of U S WEST's directory assistance and operator
26 services platforms eliminate any opportunity to discriminate in the handling of calls, any
27 such opportunity is also not possible due to the fact that the majority of directory assistance
28 and operator services traffic handled by U S WEST on behalf of CLECs originates from
29 resold services, and this directory assistance and operator services traffic, as well as traffic
30 from unbundled switching, is delivered to the directory assistance and operator services
31 systems via trunks that CLEC end users' share with U S WEST's retail end users. CLEC and

1 ⁷ Memorandum Opinion and Order, Application of BellSouth Corporation, BellSouth
2 Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA
3 Services in Louisiana, Memorandum Opinion and Order, CC Docket No. 98-121, 13 FCC Rcd 20599, ¶
4 245 (October 13, 1998) (Second BellSouth Order).

1 U S WEST retail end users access these shared trunks on a “first-come, first-served” basis.
2 There is no capability to separate or identify CLEC traffic from U S WEST traffic riding over
3 these shared trunks, and all calls look exactly the same to the directory assistance and
4 operator services platforms, and all calls are treated exactly the same by the platforms,
5 namely, first in, first out. Furthermore, even in those situations where a dedicated CLEC
6 trunk delivers the calls to the directory assistance or operator services platform, the calls are
7 placed in queue based on the order in which the calls arrive at the directory assistance or
8 operator services platform.

9 As noted above, when any directory assistance or operator services call has been placed in
10 queue, the call feeds to an operator based on a call’s order in the queue. Further, operators
11 have no capability to influence the way calls feed to them from the queue. Operator
12 positions are automatically polled to determine operator availability to receive a call. Calls
13 feed automatically and mechanically into “open” operator positions; each call is delivered
14 to an available operator based on the call’s place in the queue and the length of time that an
15 operator has been without a call. The operator takes no action to receive a call; rather, if an
16 operator is without a call, the next call in queue is automatically fed to the operator and he
17 simply hears a tone that alerts him to the presence of a call.

18 Finally, listings in the directory assistance database are not marked with the identity of the listed
19 party’s local service provider, so the U S WEST directory assistance operator has no
20 opportunity to discriminate in the delivery of CLEC and U S WEST listings.

21 **Q. SHOULD U S WEST BE REQUIRED TO PROVIDE DISAGGREGATED**
22 **PERFORMANCE DATA ANYWAY?**

23 A. Because U S WEST’s design of its directory assistance and operator services systems
24 prevents any opportunity for discrimination among or between CLECs’ end users’ calls and
25 U S WEST’s end users’ calls, there is no need to disaggregate the current directory assistance
26 and operator services performance measures to separately measure CLEC and U S WEST
27 speed of answer. Nevertheless, it may be useful to review the steps U S WEST would have
28 to take to create such disaggregated measures.

29 First, U S WEST would have to create parallel networks for each CLEC’s directory assistance
30 and operator services calls by requiring each CLEC to deliver its calls to the directory
31 assistance and operator services platforms over separate trunks. Second, once the CLEC’s
32 directory assistance and operator services calls arrive at the U S WEST platforms,
33 U S WEST would have to place each CLEC’s calls into separate queues. Third, U S WEST
34 would require additional software for additional queues, and could require additional
35 operators because multiple queues create significant call-handling inefficiencies. After these

1 steps are taken, U S WEST could then create measures of the speed of answer for each
2 CLEC's directory assistance and operator services traffic. Paradoxically, however, upon
3 completion of these steps, U S WEST would then be exposed to criticism for having
4 directory assistance and operator services networks that are capable of discrimination. That
5 is, the steps taken to separately identify and route CLEC traffic destroy the first-come, first-
6 served nature of the existing U S WEST networks and would create the possibility of slower
7 speed of answer for CLEC directory assistance and operator services traffic.

8 Because U S WEST's directory assistance and operator services procedures and systems are
9 nondiscriminatory by design and afford U S WEST no opportunity to discriminate between
10 callers, it is not necessary to have separate measurements for CLEC and U S WEST access
11 to directory assistance and operator services. Further, the existing systems' design makes
12 separate measurements technically infeasible. Adding the functionality to gather separate
13 measurements for CLEC and U S WEST access to directory assistance service and operator
14 services would not only be costly and introduce inefficiencies, but ironically, would create
15 the very conditions necessary to engage in the discriminatory handling of calls.

16 **Q. HOW ARE DIRECTORY ASSISTANCE AND OPERATOR SERVICES BILLED**
17 **TO CLECS?**

18 A. U S WEST provides monthly bills to CLECs detailing the number of calls the CLECs' end
19 users make to U S WEST's directory assistance service and operator services.

20 For directory assistance, the SGAT obligates U S WEST to issue bills in the following manner:
21

22 10.5.5.1 U S WEST will track and bill CLEC for the number of calls placed
23 to U S WEST's Directory Assistance service by CLEC's end users as well as for
24 the number of requests for Call Completion Link.

25 For operator services, the SGAT obligates U S WEST to issue bills in the following manner:

26 10.7.5.1 U S WEST will track usage and bill CLEC for the calls placed by
27 CLEC's end users and facilities.

28 10.7.5.2 U S WEST will compute CLEC's invoice based on both Option A
29 (Price Per Message) and Option B (Price Per Work Second and Computer Handled
30 Calls). U S WEST will charge CLEC whichever option results in a lower charge.

1 PLEASE DESCRIBE THE SUPPORT AND ASSISTANCE U S WEST PROVIDES TO
2 CLECS IN THE AREAS OF DIRECTORY ASSISTANCE AND OPERATOR
3 SERVICES.

4 A. First, U S WEST provides support for CLECs by assigning an individual account manager
5 from U S WEST's Wholesale Markets organization to each CLEC once the CLEC signs an
6 interconnection or resale agreement or adopts the SGAT with U S WEST. There are more
7 than 60 account managers dedicated to supporting CLECs. Account managers are a single
8 point of contact to answer questions and facilitate a CLEC's interactions with U S WEST.
9 Account managers also provide updated and new information to CLECs on a regular basis.
10 This includes information about new or changed product and service offerings.

11 U S WEST also makes its "Interconnection and Resale Resource Guide" (IRRG) on the internet
12 at <http://www.uswest.com/com/customers/carrier/interconnect/index.html>.

13 U S WEST regularly updates the IRRG on the internet. The IRRG contains product and service descriptions,
14 objective intervals for provisioning services, preordering and ordering information, maintenance, repair, and
15 billing information, U S WEST contact telephone numbers, and schedules for training classes, as well as other
16 information.

17 Additionally, U S WEST publishes its Interconnect Mediated Access (IMA-GUI) guide and provides CLECs with
18 access to it. U S WEST regularly updates the IMA-GUI, and the schedule for updates is provided to CLECs.
19 The IMA-GUI guide contains an IMA-GUI user guide, IMA-GUI training schedules, answers to frequently
20 asked questions, and IMA-GUI future release information.

21 U S WEST also publishes an EDI guide and provides CLECs with access to it. An EDI coordinator is also available
22 by phone to provide assistance and information about EDI.

23 Finally, U S WEST has help desks for CLECs. The EDI help desk is referenced above. An IMA-GUI help desk
24 is available and provides answers to questions and assistance for CLECs using IMA-GUI. The Interconnect
25 Service Center is also available to answer questions and help CLECs process orders.

26 HAVE THERE BEEN ANY COMPLAINTS CONCERNING DIRECTORY
27 ASSISTANCE OR OPERATOR SERVICES BY CLECS IN WASHINGTON?

28 A. I am not aware of any complaints concerning directory assistance or operator services by
29 CLECs in Washington.

30 Q. IS U S WEST ABLE TO PROVIDE DIRECTORY ASSISTANCE AND
31 OPERATOR SERVICES ACROSS ITS WASHINGTON TERRITORY?

32 A. Yes.

1 **Q. PLEASE SUMMARIZE YOUR TESTIMONY CONCERNING CHECKLIST**
2 **ITEMS 7(II), DIRECTORY ASSISTANCE SERVICE, AND 7(III), OPERATOR**
3 **SERVICES?**

4 A. U S WEST's SGAT establishes specific and concrete terms which ensure it
5 provides nondiscriminatory access to directory assistance service and operator
6 services as required under the Telecom Act. U S WEST is providing numerous
7 CLECs in Washington nondiscriminatory access to directory assistance and
8 operator services and has established processes and procedures to ensure that it
9 will meet the reasonably foreseeable future demands of Washington CLECs.
10 Accordingly, the Commission should find that U S WEST satisfies these checklist
11 items.

12 **IV. CHECKLIST ITEM 8 – WHITE PAGES DIRECTORY LISTINGS**

13 **Q. PLEASE DESCRIBE HOW U S WEST IS LEGALLY OBLIGATED TO PROVIDE**
14 **CLECS WITH NONDISCRIMINATORY ACCESS TO WHITE PAGES**
15 **DIRECTORY LISTINGS, CHECKLIST ITEM 8, IN WASHINGTON.**

16 A. Section 271(c)(2)(B)(viii) of the Telecom Act requires local exchange carriers, such
17 as U S WEST, to provide to CLECs:

18 Access or interconnection provided or generally offered by a Bell operating company
19 to other telecommunications carriers . . . includ[ing] . . . (viii) White pages directory
20 listings for customers of the other carrier's telephone exchange service.

21 Further, Section 251(b)(3) requires local exchange carriers, including U S WEST, to:

22 . . . permit all such providers [competitive local exchange carriers] to have
23 nondiscriminatory access to telephone numbers, operator services, directory
24 assistance, and directory listing [sic], with no unreasonable dialing delays.

25 U S WEST provides nondiscriminatory access to white pages listings through the terms
26 and conditions of the SGAT and its Commission-approved resale and
27 interconnection agreements. The SGAT states:

28 10.4.2.24 U S WEST represents and warrants that any arrangement
29 for the publication of white pages directory listings with an affiliate (including
30 without limitation, U S WEST Dex, Inc.) (an "Affiliate") requires such Affiliate
31 to publish the directory listings of CLEC contained in U S WEST's listings
32 database so that CLEC's directory listings are nondiscriminatory in
33 appearance and integration, and have the same accuracy and reliability that

1 such Affiliate provides to U S WEST's end users.

2 **Q. WHAT OPTIONS DO CLECS HAVE FOR WHITE PAGES DIRECTORY**
3 **LISTINGS?**

4 A. U S WEST offers several types of white pages directory listings to CLECs, including
5 primary, premium, and privacy listings, which are exactly the same listings options
6 provided to its retail end users. A primary listing includes a telephone subscriber's
7 name, address, and telephone number. The white pages of the local telephone
8 directory contains primary listings and such listings are also included in U S WEST's
9 directory assistance database. U S WEST provides primary listings at no charge
10 to CLECs. For example, the SGAT states:

11 10.4.2.1 CLEC will provide in standard, mechanized format, and U S WEST
12 will accept at no charge, one primary listing for each main telephone number
13 belonging to CLEC's end users. Primary listings are defined in U S WEST
14 general exchange tariffs.

15 Premium listings include, but are not limited to, additional listings for other household
16 or business members, cross reference listings, and listings from other cities. Such
17 listings are also included in white pages directories, and in U S WEST's directory
18 assistance database.

19 Privacy listings include nonlisted and nonpublished listings. Nonlisted listings are
20 available on U S WEST directory assistance records, but are not published in white
21 pages directories. Nonpublished telephone numbers are omitted from U S WEST's
22 directory assistance database and are not published in white pages directories.
23 U S WEST treats CLEC end user listings with the same level of confidentiality as
24 U S WEST end user listings.

25 U S WEST offers premium and privacy listings to CLECs at the retail rate, less the
26 applicable wholesale discount. The SGAT states:

27 10.4.2.2 CLEC will be charged for premium and privacy listings (*e.g.*,
28 additional, foreign, cross reference) at U S WEST's General Exchange listing
29 Tariff rates, less the wholesale discount, as described in Exhibit A.

30 U S WEST integrates CLEC end user listings with U S WEST, other CLEC, and
31 independent telephone company listings in U S WEST's listings database.
32 U S WEST provides these integrated listings to U S WEST DEX, U S WEST's
33 official directory publisher, and to other directory publishers for the purpose of
34 publishing white pages directories.

1 **Q. DOES U S WEST CURRENTLY PROVIDE WHITE PAGES DIRECTORY**
2 **LISTINGS TO CLECS IN WASHINGTON?**

3 A. Yes. U S WEST has entered more than 25,700 for 31 Washington facility-based
4 reseller CLECs into U S WEST's listings database. U S WEST submits daily files
5 containing all new or modified, nonprivate, CLEC, independent company, and
6 U S WEST listings to its directory publishers for inclusion in white pages directories.
7 Proprietary Exhibit LAS-2 identifies the CLECs to which U S WEST provides white
8 pages directory listings in Washington.

9 **Q. WHAT ARE THE PRICES FOR WHITE PAGES DIRECTORY LISTINGS FOR**
10 **CLECS?**

11 A. There is no charge for primary listings. The price for premium and privacy listings
12 is the retail price less the wholesale discount which was approved by the
13 Commission. The SGAT states:

14 10.4.2.2 CLEC will be charged for premium and privacy listings (e.g.,
15 additional, foreign, cross reference) at U S WEST's General Exchange listings
16 Tariff rates, less the wholesale discount, as described in Exhibit A.

17 **Q. HOW IS U S WEST BOUND TO SATISFY THE REQUIREMENT THAT IT**
18 **PROVIDE WHITE PAGES LISTINGS FOR CLECS THAT ARE**
19 **NONDISCRIMINATORY IN APPEARANCE AND INTEGRATION?**

20 A. In order to satisfy the white pages directory listings checklist item, the FCC requires
21 a BOC to provide CLECs with white pages listings that are nondiscriminatory in
22 appearance and integration.⁸ U S WEST provides CLECs with listings that comply with
23 this requirement. For example, U S WEST's SGAT states:

24 10.4.2.8 U S WEST provides non-discriminatory appearance and integration of white
25 pages listings for all CLEC's and U S WEST's end users. All requests for white pages
26 directory listings, whether CLEC or U S WEST end users, follow the same processes
27 for entry into the listings database.

28 The FCC further requires U S WEST to provide CLEC listings in the same font and size as
29 U S WEST listings, without any separate classification for CLEC listings.⁹ U S WEST
30 satisfies this requirement in its SGAT:

1 8 Second BellSouth Louisiana Order, ¶ 256.

1 9 Second BellSouth Louisiana Order, footnote 803.

1 10.4.2.10 CLEC white pages listings will be in the same font and size as listings for
2 U S WEST end users, and will not be separately classified.

3 **Q. HOW IS U S WEST BOUND TO SATISFY THE REQUIREMENT THAT IT**
4 **PROVIDE ACCURATE, RELIABLE, AND NONDISCRIMINATORY**
5 **PROVISIONING OF WHITE PAGES DIRECTORY LISTINGS FOR CLECS?**

6 A. The FCC requires U S WEST to provide CLECs with white page listings that are as accurate
7 and reliable as the white pages listings U S WEST provides to its own end users.¹⁰ The FCC
8 also requires U S WEST to have procedures that minimize the potential for errors in the
9 listings provided to CLECs.¹¹

10 U S WEST provides CLECs' white pages listings with the same accuracy and
11 reliability with which it provides its own end users' listings. U S WEST
12 accomplishes this requirement by using the same procedures for U S WEST
13 and CLEC listings. U S WEST's SGAT declares:

14 10.4.2.5 CLEC end user listings will be treated the same as U S WEST's end user
15 listings. . .

16 The SGAT also provides:

17 10.4.2.11 U S WEST processes for publication of white pages directory listings will
18 make no distinction between CLEC and U S WEST subscribers. CLEC listings will
19 be provided with the same accuracy and reliability as U S WEST's end user listings.
20 U S WEST will ensure CLEC listings provided to U S WEST are included in the
21 white pages directory published on U S WEST's behalf using the same methods and
22 procedures, and under the same terms and conditions, as U S WEST uses for its own
23 end user listings.

24 **Q. PLEASE DESCRIBE HOW U S WEST PROVIDES LISTINGS THAT ARE**
25 **NONDISCRIMINATORY IN APPEARANCE AND INTEGRATION, AND THAT**
26 **ARE ACCURATE, RELIABLE, AND PROVISIONED IN A**
27 **NONDISCRIMINATORY MANNER FOR CLECS.**

28 A. U S WEST's processes and procedures for white pages directory listings ensure that listings
29 provided for CLECs are as accurate and reliable as listings provided for U S WEST's retail

1 10 Second BellSouth Louisiana Order, ¶ 257.

1 11 Id.

1 end users. Attached as Exhibit LAS-1 is “Flow Chart for White Pages Directory Listings”
2 and associated Task List. This flow chart and task list show that CLEC and U S WEST end
3 user listings are processed in a nondiscriminatory manner using the same or similar processes
4 and procedures that result in accurate and reliable listings.

5 To ensure nondiscriminatory treatment of CLEC listings, the same personnel, systems,
6 databases, and methods and procedures are used for U S WEST and CLEC listings.
7 U S WEST personnel apply manual edits to CLEC and U S WEST end user listings;
8 U S WEST’s systems apply mechanical edits to CLEC and U S WEST all listings when they
9 are entered into U S WEST’s service order processor and listings database. CLEC and
10 U S WEST end user listings are commingled in the U S WEST listings database.

11 U S WEST submits a single daily listings file containing commingled listings to its official
12 directory publisher, U S WEST Dex (Dex), for inclusion in white pages directories. Dex
13 publishes CLEC and U S WEST end user listings under the terms and conditions of the
14 contract between U S WEST and Dex.

15 In addition to the processes and procedures described above that ensure nondiscriminatory,
16 accurate and reliable listings, CLECs are given opportunities to review their own listings for
17 accuracy as they appear in U S WEST’s listings database. To allow CLECs to conduct these
18 reviews, U S WEST provides monthly “verification proofs” to CLECs. The proofs show all
19 listings that have been changed or added during the prior month. These proofs give the
20 CLEC an opportunity to review and correct their listings, if necessary. In January and
21 February, 2000, for example, U S WEST provided verification proofs to 21 reseller CLECs
22 and 14 facility-based CLECs in Washington. The SGAT provides:

23 10.4.2.19 U S WEST will provide monthly listing verification proofs that provide the
24 data to be displayed in the published white pages directory and available on directory
25 assistance. Verification proofs containing nonpublished and nonlisted listings are also
26 available upon request on the same monthly schedule.

27 10.4.2.20 U S WEST will provide CLEC a reasonable opportunity to verify the
28 accuracy of the listings to be included in the white pages directory and directory
29 assistance.

30 10.4.2.21 CLEC may review and if necessary edit the white page listings prior to the
31 close date for publication in the directory.

32 In addition, CLECs may request “on-demand” listings reports of all their listings in a state, or
33 they may check individual listings at any time. U S WEST provided four on-demand listings
34 reports to CLECs in Washington in January and February, 2000.

1 U S WEST provides CLECs with white pages directory closing schedules by mail or facsimile.
2 Neither U S WEST nor CLECs can make changes to listings for incorporation in the next
3 directory after these dates. The SGAT provides:

4 10.4.2.3 . . . Directory publishing schedules and deadlines will be provided to CLEC.

5 **Q. UNDER WHAT TERMS DOES U S WEST DELIVER DIRECTORIES TO CLEC**
6 **END USERS AND ARE THOSE TERMS CONSISTENT WITH WASHINGTON**
7 **LAW?**

8 A. U S WEST provides for delivery of directories to CLEC end users on the same terms and
9 conditions as directories are delivered to U S WEST end users, and in compliance with the
10 requirements for delivery of directories found in Washington statute WAC 480-120-042. For
11 example, U S WEST's SGAT states:

12 10.4.2.12 U S WEST shall ensure its third party publisher distributes appropriate
13 alphabetical and classified directories (white and yellow pages) and recycling services
14 to CLEC end users at parity with U S WEST end users, including providing
15 directories a) upon establishment of new service; b) during annual mass distribution;
16 and c) upon end user request.

17 **DOES U S WEST MEASURE ITS PERFORMANCE IN PROVIDING LISTINGS?**

18 A. U S WEST is implementing two measurements for white pages directory listings that will
19 measure the accuracy and the timeliness of listings for CLECs and for U S WEST.
20 Measurement DB-1 is "Time to Update Databases," and it is planned to measure the average
21 time required to complete updates to the directory listings database. Measurement DB-2 is
22 "Percentage of Accurate Database Updates," and is planned to measure the percentage of
23 database updates completed without errors. Performance results are expected to be available
24 as early as May, 2000, via a manual process, and as soon as technically possible, a
25 mechanical process for collection of the data will be implemented.

26 **Q. PLEASE DESCRIBE THE TRAINING AND ASSISTANCE U S WEST PROVIDES**
27 **TO CLECS IN THE AREA OF WHITE PAGES DIRECTORY LISTINGS.**

28 A. To ensure that CLECs can submit accurate and complete listings orders to U S WEST,
29 U S WEST provides extensive, detailed, in-person listings training for CLECs, at no charge.
30 Multiple directory listings training sessions have been held in Phoenix, Portland, Seattle,
31 Denver, and Minneapolis, among other cities. Representatives from the following CLECs,
32 among others, have attended these sessions: AT&T, Nextlink, ECI Communications, KMC
33 Telecom, Lakedale, Otter Tail Telcom, U S Link, CommChoice, Crystal Communications,

1 Goldfield Access Network, FiberCom, Phone Solutions, Inc., MCI, GTE, GST, ELI,
2 Compass, Touch America, Eclipse, McLeod, FirsTel, InfoTel, Washington Dialtone, Inc.,
3 Dakota Telecom Group, and Winstar.

4 In addition, detailed training materials are provided to CLECs at no charge. These materials,
5 titled "U S WEST Facility-Based Co-Provider Directory Listings User Document," and
6 "U S WEST Reseller Co-Provider Directory Listings User Document," are several hundred
7 pages in length, and provide listing details, including: the identity of U S WEST departments
8 responsible for listings, types of listings, process for electronic and manual entry of listings,
9 instructions for drafting listings, listings process flow, process for problem resolution, and
10 schedules for verification proofs.

11 Furthermore, CLECs may call their account team representative or they may call their listings
12 representative to discuss or question the listings process or to ask questions about specific
13 listings.

14 **Q. PLEASE DESCRIBE HOW CLECS MAY OBTAIN LISTINGS FOR**
15 **PUBLICATION OF THEIR OWN DIRECTORIES.**

16 A. U S WEST licenses listings to CLECs that wish to publish their own white pages
17 directories. Such listings are available in electronic format, on magnetic tape, or by
18 other medium as may be agreed to between the parties. The SGAT states:

19 10.4.2.23 Pursuant to Sec. 222 (a), (b), (c), (d), and (e) of the
20 Telecommunications Act, U S WEST will provide subscriber lists information
21 gathered in U S WEST's capacity as a provider of local exchange service on
22 a timely and unbundled basis, under nondiscriminatory and reasonable rates,
23 terms and conditions to CLEC upon request for the purpose of publishing
24 directories in any format.

25 **Q. HAVE THERE BEEN ANY COMPLAINTS CONCERNING WHITE PAGES**
26 **DIRECTORY LISTINGS BY CLECS IN WASHINGTON?**

27 A. I am not aware of any complaints concerning white pages directory listings by
28 CLECs in Washington.

29 **Q. PLEASE SUMMARIZE YOUR TESTIMONY CONCERNING WHITE PAGES**
30 **DIRECTORY LISTINGS.**

31 A. U S WEST's SGAT establishes specific and concrete terms that bind U S WEST
32 to provide white pages directory listings in the manner required by the Telecom Act

1 and the FCC's orders. U S WEST does, in fact, provide Washington CLECs with
2 directory listings that are nondiscriminatory in integration and appearance, and that
3 are as accurate and reliable as U S WEST's retail listings. U S WEST has
4 established processes and procedures to ensure that it can meet the reasonably
5 foreseeable demand of Washington CLECs. Accordingly, the Commission should
6 find that U S WEST satisfies this checklist item.

7 **V. SUMMARY**

8 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

9 A. As I have described in this testimony, U S WEST is legally and concretely bound to
10 provide nondiscriminatory access to directory assistance service, operator services,
11 and white pages directory listings. Furthermore, U S WEST in fact successfully
12 provides these services in substantial quantities to CLECs in Washington, and is
13 capable of, and committed and bound to, continue to meet reasonable demands for
14 these services in the future. Accordingly, U S WEST satisfies these three checklist
15 items.

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

17 A. Yes, it does.

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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IN THE MATTER OF THE INVESTIGATION)
INTO U S WEST COMMUNICATIONS, INC.'S)DOCKET NO. UT-970300
COMPLIANCE WITH §271(C) OF THE)
TELECOMMUNICATIONS ACT OF 1996)

EXHIBITS OF
LORI A. SIMPSON

MARCH 22, 2000

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TABLE OF EXHIBITS

**1. Exhibit LAS-1 - White Pages Directory Listings - Checklist Item 8
Listings Process for CLECs and U S WEST Retail Operations**

**Exhibit LAS-2 – Proprietary and Confidential Exhibit of Individual
CLEC Use Levels of U S WEST’s Directory Assistance Service,
Operator Services, and White Pages Directory Listings**