

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST
Communications, Inc.'s Statement of
Generally Available Terms Pursuant to
Section 252(f) of the Telecommunications
Act of 1996

Docket No. UT-003040

**DIRECT TESTIMONY
OF
ROBERT L. STRIGHT,
LIBERTY CONSULTING GROUP**

RE: OCTOBER 2001 - JANUARY 2002 PERFORMANCE DATA

MARCH 13, 2002

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

3 A. My name is Robert L. Stright. I am a principal and founder of The Liberty
4 Consulting Group. My business address is 65 Main Street, Quentin, PA, 17083.

5

6 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS.**

7 A. I have had lead roles for Liberty in telecommunications consulting engagements
8 conducted for many state public utility commissions including Delaware,
9 Maryland, Pennsylvania, New Jersey, New York, Oklahoma, and Virginia. These
10 assignments have involved rate cases, management audits, financial evaluations,
11 performance metrics, affiliate transactions, interconnection arbitrations, and
12 consulting to commissioners and administrative law judges. I have also consulted
13 in the energy industry. A resume that includes some of my consulting experiences
14 is attached as Exhibit RLS-2.

15

16 **Q. DID THE REGIONAL OVERSIGHT COMMITTEE RETAIN LIBERTY**
17 **TO PERFORM WORK AS PART OF ITS OSS TEST?**

18 A. Yes. Initially, the Regional Oversight Committee (ROC) retained Liberty to
19 conduct an audit of Qwest's wholesale performance measures as part of the OSS
20 test. I served as the project manager for that assignment. The scope of Liberty's
21 audit is set forth in the final audit report. The audit had three primary elements:
22 an examination of the business processes related to the performance measures;

1 tracking data through the process to performance results reporting; and,
2 independently calculating performance results.

3

4 Liberty issued a final audit report on Qwest's performance measures in September
5 2001. However, several performance measures were changed or added during and
6 after Liberty's audit. The ROC requested Liberty to audit those changed and new
7 measures. Liberty's work in that area is ongoing.

8

9 **Q. DID LIBERTY REACH ANY CONCLUSIONS IN ITS PERFORMANCE**
10 **MEASUREMENT AUDIT?**

11 A. Yes. While we included several recommendations for improvement and ongoing
12 monitoring of performance measures, Liberty concluded that the audited
13 performance measures accurately and reliably report Qwest actual performance.

14

15 **Q. DID THE ROC THEN ASK LIBERTY TO CONDUCT DATA**
16 **RECONCILIATION WORK AS AN EXTENSION OF THE**
17 **PERFORMANCE MEASUREMENT AUDIT?**

18 A. Yes. In August 2001, the ROC asked Liberty to conduct data reconciliation as an
19 extension of the performance measures audit. Liberty is performing "data
20 validation to resolve any debates concerning the accuracy of performance data
21 emanating from particular ROC PIDs" (ROC Change Request #20). Certain
22 CLECs have expressed concerns about the accuracy of Qwest's reported

1 performance results as they relate to service that they have been receiving. The
2 ROC decided to conduct this data reconciliation work in order to test those
3 concerns. Three CLECs – AT&T, WorldCom, and Covad Communications –
4 participated in the data reconciliation to help determine whether the data Qwest
5 inputs into its systems are accurate and reliable. The data reconciliation process
6 was designed to determine whether any of the information provided by CLECs
7 demonstrated inaccuracy in Qwest’s reported performance results as these
8 measures were defined in the PID. The ROC requested that Liberty use the
9 Observation and Exception process for indicating any concerns with Qwest’s
10 data.

11

12 **Q. PLEASE DESCRIBE THE DATA RECONCILIATION WORK THAT**
13 **LIBERTY HAS COMPLETED TO DATE.**

14 A. Liberty issued its first data reconciliation report, which used data from Arizona,
15 on December 3, 2001 (*See* Exhibit 7 to the Supplemental Direct Testimony of
16 Michael G. Williams, dated March 8, 2002). The second report, on data from
17 Colorado, was issued on January 3, 2002 (*See* Exhibit 8 to the Supplemental
18 Direct Testimony of Michael G. Williams, dated March 8, 2002). Liberty issued
19 the third report, which provided the results of the review of data from Nebraska,
20 on January 28, 2002 (*See* Exhibit 9 to the Supplemental Direct Testimony of
21 Michael G. Williams, dated March 8, 2002). On February 2, 2002, Liberty issued
22 an update to the Colorado report, which provided the status of observations and

1 the exception issued as a result of all of the data reconciliation work (*See* Exhibit
2 10 to the Supplemental Direct Testimony of Michael G. Williams, dated March 8,
3 2002). On March 1, 2002, Liberty issued a report on the results of its
4 reconciliation of data from the state of Washington (*See* Exhibit 11 to the
5 Supplemental Direct Testimony of Michael G. Williams, dated March 8, 2002).
6 While reconciliation work is ongoing in the states of Oregon, Utah, and
7 Minnesota, I expect that the data reconciliation work completed by Liberty to date
8 is representative of what Liberty will find in these remaining states.

9

10 **Q. HAS LIBERTY REACHED ANY CONCLUSIONS AS A RESULT OF ITS**
11 **DATA RECONCILIATION.**

12 A. It is still somewhat premature to reach final conclusions from the data
13 reconciliation as work continues in three states. However, at this point Liberty
14 has begun to identify the same issues over and over again. These issues were
15 documented in one Exception report, eleven Observation reports, and various
16 findings where Liberty found Qwest's data collection practices appropriate.
17 Liberty has since closed the Exception, and nine of the Observations. Liberty
18 continues to evaluate data on the remaining two Observations.

19

20 Liberty has evaluated several thousand orders and trouble tickets on an item-by-
21 item basis. With one exception, and considering all of Liberty's work in both
22 auditing and reconciling Qwest's performance measures and data, I believe a

1 Commission may rely on Qwest's performance results as representative of the
2 level of performance that Qwest delivers in the marketplace to CLECs.

3
4 The condition placed on the above statement is that Liberty has found errors and
5 inconsistencies in the way Qwest has treated service orders with respect to
6 customer-caused problems in meeting due dates and causing delays. This matter
7 is the subject of Liberty's Observation 1031. Qwest has provided information to
8 show that it has improved its procedures and processes to minimize the likelihood
9 of these types of errors. Liberty understands that Qwest will be providing more
10 information in this regard. In addition, Liberty and Qwest are working to review
11 specific examples of apparent errors to ensure that such improvements will be
12 effective.

13

14 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

15 A. Yes.