

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of Qwest
Corporation for Arbitration with Eschelon
Telecom, Inc. Pursuant to 47 U.S.C. Section
252 of the Federal Telecommunications Act of
1996**

Docket No. UT-063061

EXHIBIT JW-2

TO THE

**DIRECT TESTIMONY OF JAMES WEBBER
ON BEHALF OF ESCHELON TELECOM, INC.**

SEPTEMBER 29, 2006

Qwest scheduled Maintenance/Qwest repair not notified

-----Original Message-----

From: McAlpine, Tom W. [mailto:[CONTACT INFORMATION REDACTED]]
Sent: Thursday, February 23, 2006 2:18 PM
To: Jean Novak (E-mail)
Cc: Boeke, Gerald A.; Johnson, Bonnie J.
Subject: Qwest Scheduled Maintenance/Yakima, WA SS7 Link

Jean,

Qwest is the SS7 provider for our SS7 links in our Yakima, WA switch. This is an ex-ATI switch. During the early morning hours of 2/22, 1 of 2 SS7 links went down. One of my techs spoke with your SS7 group, and they also saw the circuit go down, along with many others and they had opened NMA ticket BXCNZ. The Qwest tech had mentioned that Qwest had a fiber cutover happening which was the cause of the circuit being down. Eschelon did not receive notification of this, and the Qwest tech stated his group was also not made aware in advance.

During the early morning hours of 2/23, the same SS7 circuit went down again. My tech called the Qwest SS7 group again and was told again that maintenance was the cause of the circuit being down. The circuit was down for 30 minutes each night, and the Qwest tech stated that we will see a 30 minute outage on this circuit each night until 2/28. The new NMA ticket is BY9CB, and we also opened ticket WN003050.

Two items:

1. This relates to N29.0 on the issues log. Do you realize we are days away from that issue being 2 years old and still not resolved?
2. This circuit is 1 of 2 SS7 circuits, and I am not comfortable with a 30 minute outage for the next 5 nights straight, leaving my switch in a simplex condition. Please check to see if this circuit can be temporarily alt routed to avoid downtime over the next 5 nights. This circuit runs from our Yakima, WA switch to the Qwest STP in Spokane, WA. Circuit TSC is AP075986, and we do have ticket WN003050 open.

Thanks,
Tom

From: Novak, Jean [mailto:[CONTACT INFORMATION REDACTED]]
Sent: Thursday, February 23, 2006 2:37 PM
To: McAlpine, Tom W.; Jean Novak (E-mail)
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Nielsen, Joshua; Beck, Ken
Subject: Qwest Scheduled Maintenance/Yakima, WA SS7 Link

Tom

I have asked Josh to take the lead on this as I am leaving for vacation. Josh will be getting back to you.

I will answer question number 1. Yes, I am fully aware when this issue was opened. As status, the project has been funded and is in our IT department.

Thanks,
Jean

From: Novak, Jean [mailto:[CONTACT INFORMATION REDACTED]]
Sent: Friday, February 24, 2006 8:18 AM
To: Novak, Jean; McAlpine, Tom W.; Jean Novak (E-mail)
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Nielsen, Joshua
Subject: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Tom

I have passed the issue to Josh with details of contacts. Josh will provide a status to you today.
Thanks, Jean

From: McAlpine, Tom W.
Sent: Friday, February 24, 2006 4:07 PM
To: Nielsen, Joshua
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; 'Novak, Jean'; Jean Novak (E-mail); McAlpine, Tom W.
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Josh,

Any progress on seeing if our circuit can be alt routed as noted below?

Thanks,
Tom

From: Nielsen, Joshua [mailto:[CONTACT INFORMATION REDACTED]]
Sent: Friday, February 24, 2006 4:19 PM
To: McAlpine, Tom W.
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Novak, Jean; Jean Novak (E-mail)
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Tom,

After speaking with the CO, there is not an alternate route. There is a job now to provide another route, but it will not be complete until the end of April. The CO is aware and are watching for any more recurrences.

Joshua B. Nielsen
Qwest Communications
Service Manager
Phone: [CONTACT INFORMATION REDACTED]
Pager: [CONTACT INFORMATION REDACTED]
Fax: [CONTACT INFORMATION REDACTED]

From: McAlpine, Tom W.
Sent: Friday, February 24, 2006 4:22 PM
To: 'Nielsen, Joshua'
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Novak, Jean; Jean Novak (E-mail)
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Josh,

What do you mean by more recurrences?

Tom

From: Nielsen, Joshua [mailto:Joshua.Nielsen@qwest.com]
Sent: Friday, February 24, 2006 4:23 PM
To: McAlpine, Tom W.
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Novak, Jean; Jean Novak (E-mail)
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Outages like the one you mention below.

Josh

From: McAlpine, Tom W.
Sent: Friday, February 24, 2006 4:32 PM
To: 'Nielsen, Joshua'
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Jean Novak (E-mail); Jean Novak (E-mail)
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Josh,

Per your SS7 group in Denver, there is scheduled fiber maintenance activity that is due to continue through Feb 28. They told us to expect a 30 minute outage per night due to the fiber maintenance. Please confirm if that maintenance is still on the schedule, or if it is complete.

Thanks,
Tom

From: Nielsen, Joshua [mailto:[CONTACT INFORMATION REDACTED]]
Sent: Friday, February 24, 2006 4:33 PM
To: McAlpine, Tom W.
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Jean Novak (E-mail); Jean Novak (E-mail)
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

It is still on schedule.

Joshua B. Nielsen
Qwest Communications
Service Manager
Phone: [CONTACT INFORMATION REDACTED]
Pager: [CONTACT INFORMATION REDACTED]
Fax: [CONTACT INFORMATION REDACTED]

From: McAlpine, Tom W.
Sent: Friday, February 24, 2006 4:47 PM
To: 'Nielsen, Joshua'
Cc: Boeke, Gerald A.; Johnson, Bonnie J.; Jean Novak (E-mail); Jean Novak (E-mail)
Subject: RE: RQwest Scheduled Maintenance/Yakima, WA SS7 Link

Since the maintenance is still scheduled, we will expect to see recurrences of the 30 minute outage per night of that circuit and will not proceed with opening a new trouble ticket.

Qwest/Eschelon weekly issues call log entry update 3/19/06

3-19-06 This was not a Qwest maintenance event but a maintenance done by Qwest vendor. The Qwest vendor did not notify Qwest of maintenance. Qwest has action plan in place.

Qwest/Eschelon weekly issues call log entry update 3/27/06

3-27-06: Jean stated Qwest is moving away from this vendor.

Qwest/Eschelon monthly network meeting entry log update 4/5/06

4/5/06 At the network meeting Jean said the reason Qwest did not notice the event is because Qwest was not aware of the maintenance. Jean said there are other issues with this vendor doing work and Qwest will not use this vendor any longer. **Closed**

Attendees were: Attendees 4/5/06 meeting: Qwest Jean Novak, Ken Beck and Joshua Nielsen, Sue Cunningham, Marjorie Brown, Mark Rencotto, Michelle Stanik (all by phone), From Eschelon: Dave Kunde, Gerry Boeke (phone), Steve Kolar, Paul Hanser, Dan Wigger, Bonnie Johnson, Tom McAlpine (phone), Marcel Stanasel, Kim Isaacs.)

Jean Novak Comments about Qwest notifying Qwest repair personnel of outages

Network Tab of the Qwest issues log:

R60.0	11/3/2004	All	SS7 trunk repair tickets Qwest closes NTF when trunks are in lockout
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11/3/04 Tom said if we have trouble with Eschelon's SS7 provider Eschelon will go to Verisign. Tom opened tickets because Eschelon's trunks were in lock out and Qwest closed the tickets as NTF. Tom said the last one caused 6 minutes of off air time during business hours at 3:45 PM on a Wednesday.

12/1/04 Jean said that the reason the ticket was NTF was because the event was cleared 15 minutes after Eschelon opened the ticket. Jean said that Qwest does not notify the repair personnel of all events because their job is to work tickets. Jean said that is why Qwest notifies the CLECs. Jean said in this case Qwest sent the abnormal report too late. Gerry said that is often the case. Jean said she gets the reports and she does not agree. Jean will determine how many reports are and are not timely. For this one the event happened at 16:07, Qwest fixed at 16:13 Eschelon reported trouble about 16:30 and Qwest sent the notice at 16:49. Well after the trouble had been cleared and before Eschelon opened the ticket. if Qwest had issued the notice in a timely manner Eschelon would not have even opened the tickets, however, Bonnie asked if Jean could check on a possible Qwest process that would allow the Qwest repair center to call somewhere to determine if the issue is related to a problem that Qwest will be sending an abnormal notice on. What key words can Eschelon say or ask when opening the ticket so Qwest can make the call or give Eschelon a different number to call. Eschelon said it disagrees with Qwest on the basic concept of no trouble on the trunks when the trunks are in lock out, however, Eschelon needs to know if the problem is SS7 related. Jean said Eschelon wants a perfect process and there isn't. Gerry said these are sometimes a matter of minutes and the abnormal notices tell you there was a problem. Eschelon needs to know before that time or when we call. Jean will research further.

-----Original Message-----

From: Novak, Jean [mailto:[CONTACT INFORMATION REDACTED]]
Sent: Tuesday, December 07, 2004 2:47 PM
To: Boeke, Gerald A.
Cc: Johnson, Bonnie J.; McAlpine, Tom W.; Novak, Jean; Nielsen, Joshua; Beck, Ken
Subject: Matrix: N60.0 - Qwest Network Notifications

Gerry,

As we discussed in our last network meeting, Qwest sends ANCR (Abnormal Network Condition Report) to notify customers when Qwest is experiencing a network problem. Normally, the notifications are sent as soon as the problem begins, however, in the example below the report was sent after resolution. This generally does not occur, but there instance that may impact the release of a notification after resolution. The final resolution for the example below was a Qwest Central Office was isolated due to a malfunctioning card.

Qwest is providing a contact number to be called in the event a problem occurs on Qwest's network and a ANCR has not been issued. The number to the Qwest Network Management Center is 800-879-1200, Opt 2. This will give you the ability to talk with Qwest personnel to ask for updates on ANCRs that may not have been issued. It is Qwest's expectation in providing this telephone number that Eschelon will not call this number if the ANCR has been issued and Qwest is working to correct the network problem. Qwest will monitor and to determine compliance. Eschelon will use the final ANCR, which provides the resolution to the problem as the documented resolution of the problem. As discussed in our last network meeting, December 3, Eschelon explained that they do provide Qwest's ANCR to employees at Eschelon's network operations center on a real time bases.

Since I do not have the original email, I have cut and pasted from the issues matrix.

Thanks
Jean Novak
Sr. Service Manager