**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

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| In the Matter of A Complaint By The Joint CLECs Against the Joint Applicants Regarding OSS For Maintenance And Repair |  Docket No. UT-111254 |
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**DIRECT TESTIMONY OF**

**ChristopHER HANSEN**

**ON BEHALF OF**

**MCLEODUSA TELECOMUNICATIONS SERVICES L.L.C.**

**D/B/A PAETEC BUSINESS SERVICES**

**October 14, 2011**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Christopher Hansen. My business address is 1 Martha’s Way, Hiawatha, Iowa 52233.

**Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

A. I am employed by PAETEC Communications, Inc., parent company of McLeodUSA Telecommunications Services, LLC, d/b/a PAETEC Business Services as Manager of OSS. My job duties include managing the software development resources for the PAETEC Trouble Management system and its integration points.

**Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL BACKGROUND.**

A. I earned a Bachelor of Science in Computer Engineering from Iowa State University in 1995. I started my career with ICONtrol as a software quality engineer. From 1997 to 2001 I was employed by Worldcom as a software quality engineer. I joined McLeodUSA Incorporated in 2001as a software quality engineer before becoming a software development manager.

**Q. AT VARIOUS TIMES, CENTURYLINK AND QWEST HAVE SUGGESTED THAT MEDIACC NEEDS TO BE REPLACED BECAUSE IT IS UNSTABLE. HAS PAETEC EXPERIENCED STABILITY PROBLEMS WITH MEDIACC?**

A. No, PAETEC has not experienced stability issues with either MEDIACC or CEMR that we consider to be outside the norm of system availability.

**Q. QWEST AND CENTURYLINK HAVE STATED THAT THEY ARE CONCERNED ABOUT THE LONG TERM VIABILITY OF MEDIACC AND THAT IT IS PRUDENT TO PROCEED WITH THE DEVELOPMENT OF MTG IN ORDER TO HAVE THAT SYSTEM AVAILABLE AS AN ALTERNATIVE IN THE EVENT THAT MEDIACC FAILS. PLEASE COMMENT.**

A. If MEDIACC were to fail without a backup in place, our day to day operations would be negatively impacted, and our IT team would be scrambling to create “work arounds.” Now that Qwest/CenturyLink has raised this concern, we have had to attempt to address it. Our discussions with CenturyLink/Qwest focused on the implementation of other options as a backup to MEDIACC rather than rushing development of our system to work with the proposed MTG.

**Q: COULD PAETEC DEVELOP ITS SYSTEMS TO WORK WITH THE PROPOSED MTG?**

**A:** Yes, but not without substantial effort on PAETEC’s part. As we told CenturyLink/Qwest, we estimate that it would take six -months to switch over to the MTG system provided that PAETEC stopped other IT projects and focused on this new project. However, dedicating resources to do that conversion now is not in PAETEC’s IT plan, and therefore, not a viable option. One of the expected benefits of the settlement we signed with the merging companies was that we believed that we could not be forced into quickly making unscheduled changes in our OSS. Because PAETEC’s automated systems are directly connected with MEDIACC, in order to utilize MTG to perform the same functions that MEDIACC performs today, PAETEC would have to develop its own systems to be able to “talk” to MTG in the same way that our systems do with MEDIACC. While we ultimately would be able to do so, we had expected that such development would occur in future years such that we could incorporate that work flow into our IT planning schedule.

**Q: DOES QWEST/CENTURYLlNK UNDERSTAND THE LEVEL OF AUTOMATION THAT PAETEC HAS IMPLEMENTED IN ITS INTERNAL OSS?**

**A:** Yes, our meeting with representatives of CenturyLink/Qwest in August was for that purpose - to make sure their IT experts understand the automation that our back office systems are able to perform due to the e-bonding of our system with various Qwest OSS and related databases, including MEDIACC.

**Q: ARE YOU CONCERNED THAT CENTURYLINK/QWEST IS PLANNING TO PROCEED WITH THE DEVELOPMENT OF MTG WITHOUT REQUIRING CLECS TO IMMEDIATELY ADOPT USE OF THE NEW SYSTEM?**

**A:** Yes. If CenturyLink/Qwest moves forward with development of MTG even if they continue to have MEDIACC available for our use, their moving forward with the development and implementation of MTG could still force us to expend IT resources to protect our interests that MTG will support our internal OSS automation. Once the MTG system is developed, we fear it would be harder to undo something that is already developed. Thus, we expect that we will be forced to monitor the development of MTG to make sure our interests are protected. Essentially, we would run the risk that CenturyLink/Qwest could later claim that it would be too costly to make subsequent changes to MTG once it becomes operational. That puts PAETEC in the position of having to weigh the risk of protecting our interests versus delaying or short circuiting other IT projects. Given the settlement agreement, PAETEC does not believe that is a risk that we should forced to take.

**Q: DO YOU HAVE CONCERNS IF CENTURYLINK/QWEST MOVES TO MTG FOR ITS OWN OPERATIONS WHILE MAKING THE TRANSITION TO MTG OPTIONAL FOR CLECs?**

A: Permitting Qwest to migrate to MTG under those circumstances is problematic since that puts the risk of a MEDIACC failure entirely on CLECs. CenturyLink/Qwest would have less incentive to fix a MEDIACC issue if their operations were not equally impacted by MEDIACC instability or failure.

**Q: PLEASE DESCRIBE PAETEC’S PROPOSAL TO THE MERGED COMPANY TO ADDRESS CONCERNS THAT THE MERGED COMPANY HAS RAISED ABOUT A POTENTIAL FAILURE OF MEDIACC.**

A: Although, as I’ve explained, PAETEC has not experienced problems with stability of MEDIACC, now that the Merged Company has raised this issue, PAETEC cannot simply ignore the Merged Company’s claims about the potential risks of system failure. In an attempt to resolve the dilemma that the Merged Company’s conduct has created, PAETEC has proposed a true backup plan that, although requiring some modification of the merger conditions, would minimize both the risk and disruption to CLECs. A copy of PAETEC’s proposal to the Merged Company is being provided as **Exhibit CH-1** these responses. Under that plan, the Merged Company would proceed now to develop MTG as a backup so that it is able to communicate with both CMIP – the language currently used by MEDIACC – and XML, but not implement MTG unless and until an unrecoverable failure of MEDIACC. Because the system would interface using CMIP, this would assure that MEDIACC users continue to receive the same functionality as they do now. Additionally, for MTG to be a true backup system, the Merged Company would also need to commit the necessary resources to maintain the existing system – MEDIACC – in working order.

 If, however, the Merged Company seeks to implement MTG as a system to replace MEDIACC and/or CEMR (i.e., implement MTG for use by the Merged Company or by any retail or wholesale customer), then the merger conditions must be complied with. If the Merged Company wishes to proceed with the development of MTG before the expiration of 30 months after the merger, it will need to obtain a modification of the 30 months moratorium requirement and it is reasonable, as a condition of being given such a modification of the merger conditions, that the Merged Company should bear any costs associated with earlier replacement of a Qwest legacy system.

**Q: HAS THE MERGED COMPANY RESPONDED TO PAETEC’S PROPOSAL?**

A: PAETEC initially made its proposal on August 9, 2011. Since then, although the Merged Company has indicated that it is considering the proposal, it has made no commitment to pursue any alternatives to its current plan to implement a MTG that is based solely on XML.

**Q: IS THERE AN EXAMPLE OF THE DEVELOPMENT OF MTG THAT COULD NEGATIVELY IMPACT PAETEC’S EXISTING OSS AUTOMATION?**

A:Yes. If CenturyLink refuses to provide both CMIP and XML into MTG, the functionality of our OSS will be impacted. Today, our systems use CMIP to “talk” with MEDIACC and EBTA. If CMIP is eliminated in MTG, that would stop the interfacing of our automated trouble ticket processing.

**Q: THE MERGED COMPANY HAS ASSERTED THAT MEDIACC NEEDS TO BE REPLACED BECAUSE IT USES A PROTOCOL, CMIP, THAT IS “OUTDATED.”[[1]](#footnote-1) PLEASE COMMENT ON WHETHER MEDIACC USES AN OUTDATED PROTOCOL.**

A: The CMIP protocol used by MEDIACC remains an industry standard protocol.[[2]](#footnote-2) In addition to exchanging repair information with Qwest via CMIP, PAETEC exchanges repair information with Verizon Business using CMIP protocol.  From a functional perspective, MEDIACC allows PAETEC’s back office OSS to perform as many automated functions as does the XML protocol based B2B interface that it has in place with AT&T.  But for Qwest/CenturyLink’s actions in CMP and allegations of potential repair OSS failure, PAETEC would not be looking at a move to XML for repair OSS in legacy Qwest territory at this time and instead would be relying upon the 30-month time period in the merger settlement agreement.

**Q: HAS PAETEC CONVERTED TO AN XML PROTOCOL FOR ITS INTERACE WITH ANY OTHER CARRIERS?**

A: Yes, PAETEC has an XML interface with AT&T. The conversion from CMIP to XML protocol in the AT&T territory took approximately 18 months to complete the coding changes, train, test and transition. The amount of time necessary to perform a conversion from CMIP to XML depends on many variable factors, including any differences in how Qwest proceeds as compared to AT&T. Other factors affecting the time needed are planning and budgeting. Based on the knowledge gathered from the previous conversion, PAETEC believes that another conversion would take a minimum of six months and could be much longer, depending on whether the conversion to MTG and its XML protocol also impacts the functionality of how PAETEC’s systems are able to interact with MTG beyond the conversion to XML protocol. Although the fact that PAETEC has converted from CMIP to XML for its interface with one carrier does not mean that it will be cheaper, easier or take less time to perform such a conversion with another carrier, PAETEC has nonetheless attempted to account for any applicable learning gained by the conversion from CMIP to XML protocol in the AT&T territory by estimating a six-month time period for legacy Qwest territory, while at the same time recognizing that violation of the 30-month term of the settlement agreements means that this would require PAETEC to redirect resources to do so at a time when per the merger agreement it should not have to do so.

**Q. IS PAETEC A PARTY TO ANY OTHER AGREEMENTS CONCERNING QWEST’S OSS?**

A. Yes, OSS is addressed in PAETEC’s interconnection agreements with Qwest. In Washington, PAETEC operates under an interconnection agreement between U S WEST (the predecessor of Qwest) and McLeod USA (a predecessor of PAETEC). A copy of relevant excerpts from PAETEC’s Washington interconnection agreement is attached as an exhibit to the Amended Complaint in this matter and is also attached as **Exhibit CH-2** to my Direct Testimony.

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

A. Yes, it does.

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1. See Integra Telecom, PAETEC Business Services and tw telecom of Colorado v. Qwest Corporation and CenturyLink, Colorado P.U.C. Docket No. 11F-436T, Answer Testimony of Renee Albersheim, p. 7, lines 10-11. [↑](#footnote-ref-1)
2. See, e.g., <http://www.atis.org/docstore/product.aspx?id=21171>. [↑](#footnote-ref-2)