

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of A Complaint By The
Joint CLECs Against the Joint Applicants
Regarding OSS For Maintenance And
Repair

Docket No. UT-111254

**DIRECT TESTIMONY OF
CHRISTOPHER HANSEN
ON BEHALF OF
MCLEODUSA TELECOMMUNICATIONS SERVICES L.L.C.
D/B/A PAETEC BUSINESS SERVICES**

October 14, 2011

1 **I. INTRODUCTION**

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

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

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

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

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

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

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

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

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

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

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

15 A: Yes, but not without substantial effort on PAETEC’s part. As we told
16 CenturyLink/Qwest, we estimate that it would take six -months to switch over to
17 the MTG system provided that PAETEC stopped other IT projects and focused on
18 this new project. However, dedicating resources to do that conversion now is not
19 in PAETEC’s IT plan, and therefore, not a viable option. One of the expected
20 benefits of the settlement we signed with the merging companies was that we
21 believed that we could not be forced into quickly making unscheduled changes in
22 our OSS. Because PAETEC’s automated systems are directly connected with
23 MEDIACC, in order to utilize MTG to perform the same functions that

1 MEDIACC performs today, PAETEC would have to develop its own systems to
2 be able to “talk” to MTG in the same way that our systems do with MEDIACC.
3 While we ultimately would be able to do so, we had expected that such
4 development would occur in future years such that we could incorporate that work
5 flow into our IT planning schedule.

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

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

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

17 **A:** Yes. If CenturyLink/Qwest moves forward with development of MTG even if
18 they continue to have MEDIACC available for our use, their moving forward with
19 the development and implementation of MTG could still force us to expend IT
20 resources to protect our interests that MTG will support our internal OSS
21 automation. Once the MTG system is developed, we fear it would be harder to
22 undo something that is already developed. Thus, we expect that we will be forced
23 to monitor the development of MTG to make sure our interests are protected.

1 Essentially, we would run the risk that CenturyLink/Qwest could later claim that
2 it would be too costly to make subsequent changes to MTG once it becomes
3 operational. That puts PAETEC in the position of having to weigh the risk of
4 protecting our interests versus delaying or short circuiting other IT projects.
5 Given the settlement agreement, PAETEC does not believe that is a risk that we
6 should forced to take.

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

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

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

18 A: Although, as I've explained, PAETEC has not experienced problems with
19 stability of MEDIACC, now that the Merged Company has raised this issue,
20 PAETEC cannot simply ignore the Merged Company's claims about the potential
21 risks of system failure. In an attempt to resolve the dilemma that the Merged
22 Company's conduct has created, PAETEC has proposed a true backup plan that,
23 although requiring some modification of the merger conditions, would minimize

1 both the risk and disruption to CLECs. A copy of PAETEC's proposal to the
2 Merged Company is being provided as **Exhibit CH-1** these responses. Under that
3 plan, the Merged Company would proceed now to develop MTG as a backup so
4 that it is able to communicate with both CMIP – the language currently used by
5 MEDIACC – and XML, but not implement MTG unless and until an
6 unrecoverable failure of MEDIACC. Because the system would interface using
7 CMIP, this would assure that MEDIACC users continue to receive the same
8 functionality as they do now. Additionally, for MTG to be a true backup system,
9 the Merged Company would also need to commit the necessary resources to
10 maintain the existing system – MEDIACC – in working order.

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

20 **Q: HAS THE MERGED COMPANY RESPONDED TO PAETEC'S**
21 **PROPOSAL?**

22 **A:** PAETEC initially made its proposal on August 9, 2011. Since then, although the
23 Merged Company has indicated that it is considering the proposal, it has made no

1 commitment to pursue any alternatives to its current plan to implement a MTG
2 that is based solely on XML.

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

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

10
11 **Q: THE MERGED COMPANY HAS ASSERTED THAT MEDIACC NEEDS**
12 **TO BE REPLACED BECAUSE IT USES A PROTOCOL, CMIP, THAT IS**
13 **"OUTDATED."¹ PLEASE COMMENT ON WHETHER MEDIACC USES**
14 **AN OUTDATED PROTOCOL.**

15 A: The CMIP protocol used by MEDIACC remains an industry standard protocol.²
16 In addition to exchanging repair information with Qwest via CMIP, PAETEC
17 exchanges repair information with Verizon Business using CMIP protocol. From
18 a functional perspective, MEDIACC allows PAETEC's back office OSS to
19 perform as many automated functions as does the XML protocol based B2B
20 interface that it has in place with AT&T. But for Qwest/CenturyLink's actions in
21 CMP and allegations of potential repair OSS failure, PAETEC would not be

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.

² See, e.g., <http://www.atis.org/docstore/product.aspx?id=21171>.

1 looking at a move to XML for repair OSS in legacy Qwest territory at this time
2 and instead would be relying upon the 30-month time period in the merger
3 settlement agreement.

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

6 A: Yes, PAETEC has an XML interface with AT&T. The conversion from CMIP to
7 XML protocol in the AT&T territory took approximately 18 months to complete
8 the coding changes, train, test and transition. The amount of time necessary to
9 perform a conversion from CMIP to XML depends on many variable factors,
10 including any differences in how Qwest proceeds as compared to AT&T. Other
11 factors affecting the time needed are planning and budgeting. Based on the
12 knowledge gathered from the previous conversion, PAETEC believes that another
13 conversion would take a minimum of six months and could be much longer,
14 depending on whether the conversion to MTG and its XML protocol also impacts
15 the functionality of how PAETEC's systems are able to interact with MTG
16 beyond the conversion to XML protocol. Although the fact that PAETEC has
17 converted from CMIP to XML for its interface with one carrier does not mean
18 that it will be cheaper, easier or take less time to perform such a conversion with
19 another carrier, PAETEC has nonetheless attempted to account for any applicable
20 learning gained by the conversion from CMIP to XML protocol in the AT&T
21 territory by estimating a six-month time period for legacy Qwest territory, while
22 at the same time recognizing that violation of the 30-month term of the settlement

1 agreements means that this would require PAETEC to redirect resources to do so
2 at a time when per the merger agreement it should not have to do so.

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

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

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

12 A. Yes, it does.

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