

**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
JUSTINA BLANCHARD
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 Justina (Tina) Blanchard. 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., as a Project Manager II. My
7 job duties include planning, managing, and executing IT strategic projects.
8 PAETEC Communications, Inc. is the direct parent company of McLeodUSA
9 Telecommunications Services, L.L.C. d/b/a PAETEC Business Services
10 ("PAETEC Business Services" or "PAETEC").

11 **Q. HOW LONG HAVE YOU BEEN INVOLVED IN**
12 **TELECOMMUNICATIONS AND IN WHAT CAPACITIES?**

13 A. I began my career in the telecommunications industry in March 1990 and have
14 held a variety of positions related to IT and Network Repair operations. Before
15 starting at PAETEC/McLeodUSA in 1997, I worked for MCI as a Senior LAN
16 Specialist and a Lead Customer Service Professional. I began my career with
17 PAETEC/McLeodUSA in November 1997 as a Technical Support Scheduler. I
18 transitioned to Lead Dispatcher in May 1998 and moved into the role of Dispatch
19 Manager in August 1999. I transitioned to a Network Operations Center Manager
20 in October 2006 and later became a Senior Manager in May 2010. In July 2011 I
21 transitioned to a Project Manager II role due to responsibilities of the Network
22 Operations Center being moved to Rochester, New York.

23 **Q. PLEASE DESCRIBE PAETEC BUSINESS SERVICES.**

1 A. PAETEC provides a wide range of competitive broadband and broadband-related
2 services primarily to business customers, and in some states such as Colorado,
3 residential customers. PAETEC operates in 86 of the top 100 MSAs, but in many
4 states, such as Colorado, PAETEC operates in many exchanges in addition to the
5 top 100 MSAs. Thus, in addition, to competing in the Denver MSA, PAETEC
6 offers services in Boulder, Colorado Springs, Fort Collins, Pueblo, Greeley,
7 Longmont, Loveland, and a number of other exchanges.

8 **Q. HAVE YOU EVER TESTIFIED PREVIOUSLY BEFORE THE**
9 **WASHINGTON PUBLIC UTILITIES COMMISSION?**

10 A. No.

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

12 A. My testimony will discuss PAETEC's internal automation that would be at risk if
13 CenturyLink/Qwest makes changes to its CEMR/MEDIACC system that do not
14 support the current functionalities that our system has in place with
15 CenturyLink/Qwest by virtue of the e-bonding that exists today.

16 **II. DISCUSSION**

17 **Q. WHY IS PAETEC PARTICIPATING IN THIS PROCEEDING?**

18 A. PAETEC is participating in this proceeding because it is concerned that
19 CenturyLink/Qwest has announced plans to replace a legacy Qwest OSS that
20 PAETEC relies on to provide repair services to its customers, in a time frame that
21 would be well before when PAETEC had understood that it would have to be
22 prepared to migrate from a Qwest system. The change to a new system to support
23 trouble tickets could have significant impacts on our operations if the new system

1 does not allow PAETEC to retain its existing level of internal automation that we
2 have achieved with the CEMR/MEDIACC system.

3 **Q. HOW DOES PAETEC INTERACT WITH THE QWEST OSS?**

4
5 **A.** PAETEC uses an Electronic Data Interchange (“EDI”) interface to electronically-
6 bond with various Qwest OSS, including Interconnected Media Access (“IMA-
7 XML”), Directory Inquiry Listing System (“DLIS”), Electronic Bonded Trouble
8 Administration (“EBTA”) as distinguished from the MEDIACC-EBTA GUI,
9 Centrex Management System (CMS), and E-Bonded ASRs. Also, PAETEC has
10 established direct interfaces that are web-based application to application for
11 Customer Electronic Maintenance and Repair (“CEMR”), Q-Pricer, Qwest
12 Control (“Q-Control”), Online Dispute Management (“ODM”). As back-up,
13 PAETEC uses web-based GUIs including, but not limited to Qwest Online
14 Request Application (QORA) Access Service Requests (ASRs).

15 **Q. DOES PAETEC USE QWEST MEDIACC AND CEMR SYSTEMS?**

16 **A.** Yes, as noted, PAETEC uses both MEDIACC and CEMR. Specifically with
17 respect to MEDIACC, PAETEC uses (“EBTA”) Electronic Bonded Trouble
18 Administration to directly connect into Qwest’s MEDIACC OSS for auto ticket
19 generation and real time communications throughout the life-cycle of the ticket,
20 that trigger next step processes within PAETEC internal systems. I would note
21 that CEMR is accessed by different groups within PAETEC for different
22 purposes. However, my testimony today focuses on the EBTA to connect to
23 MEDIACC. For trouble tickets, CEMR is a manual back-up for EBTA.

1 **Q. CAN YOU PLEASE BRIEFLY EXPLAIN WHAT BEING “E-BONDED”**
2 **WITH QWEST MEANS?**

3 A. Being “e-bonded” with the CenturyLink/Qwest OSS means that our back office
4 systems are electronically connected in such a way as to allow our systems to
5 “talk” with Qwest’s systems (and related databases) with little, if any, human
6 intervention. The ability of systems to “talk” to each other significantly reduces
7 the number of times that an employee of PAETEC, Qwest, or both, must be
8 involved in processing trouble tickets to resolution. Thus, e-bonding reduces
9 errors and costs and makes both companies much more efficient.

10 **Q: PLEASE PROVIDE SOME EXAMPLES OF VARIOUS TROUBLE**
11 **TICKET RELATED PROCESS FLOWS THAT HAVE BEEN**
12 **AUTOMATED BY PAETEC.**

13 A: Attached as **Exhibit JB-1** and **Exhibit JB-2** are examples of trouble ticket flows
14 for POTS (*i.e.*, basic telephone service) and T1 and above circuit based services
15 (*i.e.*, voice and data services integrated on a high capacity channelized T1 or
16 above access loop facility). The automation that PAETEC has developed allows
17 12% of all POTs trouble tickets to get resolved without any manual intervention
18 once the original trouble ticket is created in the PAETEC system. PAETEC
19 averages around 155 POTs trouble tickets a month, with an average of 8
20 transactions per trouble ticket. In this context, a “transaction” is a
21 communication between Qwest and PAETEC, in this case, regarding trouble
22 tickets. PAETEC’s experience is that manual intervention for each transaction
23 averages between 10-15 minutes per phone call not including the hold times in

1 cue. I would note that hold times can be significant for PAETEC personnel since
2 it may take up to 30 minutes before someone from CenturyLink/Qwest answers a
3 call. Thus, we believe our automation conservatively saves PAETEC more than
4 200 people hours each month, based on the average number of transactions
5 (excluding hold time), and likely saves CenturyLink/Qwest a significant amount
6 of people hours as well since the loss of automation means that PAETEC
7 personnel would be calling CenturyLink/Qwest personnel about the trouble
8 tickets. Obviously, if PAETEC is forced to making phone calls and Qwest does
9 not augment staffing levels, the loss of automation will be even more problematic
10 for competitors.

11 Cost efficiencies gained on the circuit side are even more significant
12 because the trouble ticket volume is significantly higher (average of 1,173/month)
13 and the average transactions per trouble ticket (11) are greater. Thus, we estimate
14 that our automation saves PAETEC more than 2,100 people hours each month.
15 Again, PAETEC's automation likely saves CenturyLink/Qwest a significant
16 amount of people hours for the same reason – significantly less human
17 intervention is required by CenturyLink/Qwest to process PAETEC's trouble
18 tickets.

19 PAETEC's automated trouble repair processes depend on the information
20 that PAETEC's systems receive from Qwest's MEDIACC system. Qwest's
21 MEDIACC system responses trigger specific automated functionalities that would
22 be affected by replacement of MEDIACC, which include: status changes within

1 PAETEC's OSS, additional referrals to internal resources in an effort to resolve
2 trouble, confirmation of restoral to the customer, and the like.

3 **Q. DESCRIBE PAETEC'S PARTICIPATION IN THE MERGER**
4 **PROCEEDINGS?**

5 A. PAETEC was an active participant in proceedings before the Washington
6 Commission as well as before a number of other state commissions and the
7 Federal Communications Commission. PAETEC's primary goals in those
8 proceedings was (a) to explain the negative impacts that PAETEC would
9 experience should the merged company modify or replace a Qwest OSS in any
10 way that would negatively impact the automation that PAETEC has achieved in
11 its own back office systems through the e-bonding with the current Qwest OSS
12 and related databases, and (b) to urge regulators to prevent the merged company
13 from doing so unless modifications or replacements to the Qwest OSS would
14 continue to accommodate PAETEC's internal back office automations.

15 PAETEC's involvement in the merger proceedings culminated in a
16 settlement agreement dated March 3, 2011, between Qwest, CenturyLink,
17 PAETEC and a number of other CLECs. A copy of the settlement agreement is
18 attached to the Direct Testimony of Bonnie Johnson, who is submitting testimony
19 on behalf of Integra. The terms of that settlement relating to OSS apply
20 throughout Qwest's 14 state territory.

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

22 A. Yes, it does.

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