

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

TEL WEST COMMUNICATIONS, LLC)	
)	
Petitioner,)	DOCKET NO. UT-013097
)	
v.)	
)	PART B
QWEST CORPORATION, INC.)	
)	
Respondent.)	
)	

**RESPONSE TESTIMONY OF
BARBARA J. BROHL**

QWEST CORPORATION

June 11, 2002

TABLE OF CONTENTS

I	IDENTIFICATION OF WITNESS	1
II	PURPOSE	1
III	THE ROC THIRD PARTY TEST	2
IV	QWEST PROVIDED OSS INTERFACES	14
V	FLOW-THROUGH: SYSTEMS	22
VI	CAPABILITIES OF IMA-GUI	27
VII	CONCLUSION	47

1

I. IDENTIFICATION OF WITNESS

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT**
3 **POSITION.**

4 A. My name is Barbara J. Brohl. I am a Director of Legal Issues in the IT Systems
5 Wholesale organization at Qwest Information Technologies, Inc. (“Qwest IT”), a unit
6 of Qwest Corporation (“Qwest”). My business address is 930 15th, 10th Floor, Denver,
7 Colorado.

8

9 **Q. PLEASE STATE YOUR WORK EXPERIENCE, PRESENT**
10 **RESPONSIBILITIES, AND EDUCATIONAL BACKGROUND.**

11 A. My work experience, present responsibilities and educational background are contained
12 in Exhibit BJB-2, Professional Experience and Education.

13

14 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE WASHINGTON**
15 **UTILITIES AND TRANSPORTATION COMMISION?**

16 A. Yes. I have testified in a number of proceedings, including Docket Nos. UT-960369, et
17 al. and Docket No. UT-003013.

18

19

II. PURPOSE

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

21 A. My testimony is in response to certain portions of the Direct Testimony of Jeff
22 Swickard and the Direct Testimony of Sheryl Hild on behalf of Tel West. Specifically,
23 I will clarify certain Operations Support System (“OSS”) topics, and I will introduce
24 the Regional Oversight Committee’s (“ROC”) evaluation of Qwest’s OSS and explain

1 why it is relevant to the Tel West complaint. Also, I will discuss the Interconnect
2 Mediated Access Graphical User Interface and Electronic Data Interchange (“IMA-
3 GUI” & “IMA-EDI”) and other Qwest provided electronic interfaces.
4

5 **III. THE ROC THIRD PARTY TEST**

6 **Q. PLEASE PROVIDE AN OVERVIEW OF THE ROC’S EVALUATION OF**
7 **QWEST’S OSS, ALSO KNOWN AS THE ROC THIRD PARTY TEST.**

8 A. The OSS test process, which was initiated approximately three years ago, has been the
9 subject of extensive and exhaustive collaboration between the ROC, state agencies,
10 CLECs, Qwest and numerous other parties.

11
12 Thirteen participating ROC states initiated a collaborative process to design an overall
13 plan for ensuring that Qwest's OSS and related databases and personnel are available to
14 CLECs in an open and non-discriminatory manner.¹ The rationale for subjecting
15 Qwest's OSS to the ROC process (as opposed to evaluating Qwest's OSS on a state-by-
16 state basis) was to encourage collaboration among the states, the CLECs, Qwest and
17 other industry participants. The intent was to ensure that all CLECs – whether they
18 serve a small area or cover Qwest's entire region – are provided with non-
19 discriminatory access to Qwest's OSS.

¹ Extensive information about the ROC and the testing process is available on the ROC's OSS Information Repository at <http://www.nrri.ohio-state.edu/oss/oss.htm>. The Arizona Corporation Commission was the only state in Qwest's local service region to not participate in the ROC. Arizona did not participate largely because its own OSS testing process was already underway when the ROC OSS test process convened.

1 **Q. YOU MENTIONED THAT THE INTENT OF THE TEST WAS TO ENSURE**
2 **THAT ALL CLECS ARE PROVIDED WITH NON-DISCRIMINATORY**
3 **ACCESS TO QWEST’S OSS. PLEASE EXPLAIN.**

4 A. The intent of the test was precisely that. In the language of FCC orders related to 271,²
5 the test evaluated non-discriminatory access to Qwest’s OSS based on, among other
6 things, whether access was provided in “substantially the same time and manner” as
7 Qwest provides to itself and when no retail equivalent exists, whether CLECs are
8 provided a “meaningful opportunity to compete.”³

9
10 Tel West refers to the same language in the present complaint by discussing whether
11 Qwest provides access to its OSS in “substantially the same time and manner” as
12 provided to its own retail operations.⁴ Further, many of the claims raised by Tel West
13 in its testimony are thoroughly covered by the ROC Third Party Test. Specifically, a
14 portion of the test included an evaluation of the pre-ordering, ordering, and
15 provisioning functions of IMA-GUI and IMA-EDI. Other relevant parts of the test
16 included a review of the assistance and support provided to CLECs and an assessment
17 of the maintenance and repair capabilities provided by Qwest. The collaborative nature
18 and scope of the test, combined with the use of independent testers ensures that the test

² See *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc for Provision of In-Region, InterLATA Services In Georgia and Louisiana*, CC Docket No. 02-35, Memorandum Opinion And Order, FCC 02-147 (Adopted May 15, 2002) at App. D, ¶¶ 27,28

³ KPMG Final Report, Section II-3.0 (p. 5). A true and correct copy of the Final Report is attached as Exhibit BJB-7. Please note that pagination of the KPMG Final Report may vary when printed due to the software and printer used when printing. The KPMG Final Report page numbers referenced in this testimony are based on the hard copy of the KPMG Final Report provided as Exhibit BJB-7.

⁴ See First Amended Petition, ¶¶18–21.

1 results are relevant and meaningful in addressing OSS questions in the current Tel West
2 complaint.

3

4 **Q. PLEASE EXPLAIN HOW THE ROC TEST WAS DEVELOPED.**

5 A. The test was developed as a collaborative process among CLECs, Qwest, any other
6 interested parties, and the State Public Utilities Commissions of the ROC States,
7 including the State of Washington. All parties, CLECs in particular, were allowed to
8 participate in the test as much or as little as they chose. CLECs could choose to
9 actively participate in all meetings and proceedings, and some did. Or, CLECs could
10 choose to simply be added to the document distribution lists.

11

12 As part of the test process, the ROC retained a number of professional consultants –
13 who brought significant experience to the ROC because they had been involved in the
14 testing of other RBOC OSS – to assist in the development and execution of Qwest's
15 OSS test. A complete chronology of the test development and execution process used
16 by the ROC is described more fully in Exhibit BJB-3.

17

18 **Q. WERE ALL INTERESTED ORGANIZATIONS ALLOWED TO PARTICIPATE**
19 **IN THE TEST?**

20 A. Absolutely. As stated above, any CLEC or other organization that wanted to had the
21 opportunity to participate. The ROC TAG was – and still is – a collaborative forum
22 comprised of – and open to – representatives of the ROC, Commission staff, test
23 vendors, CLECs, industry associations, consumer groups, and Qwest. Therefore, as an

1 interested competitive local exchange carrier authorized to provide service in
2 Washington, Tel West had the opportunity to participate in this process.

3
4 **Q. WHAT ORGANIZATIONS ACTUALLY PARTICIPATED IN THE TEST?**

5 A. The primary participants were the 3rd party test vendors (described in Exhibit BJB-3),
6 state staff members, the ROC Executive Committee, the ROC Steering Committee, the
7 Department of Justice (“DOJ”), the Federal Communications Commission (“FCC”),
8 Qwest, and numerous CLECs. The CLECs with the highest visibility were AT&T,
9 Covad, and WorldCom, but other participants included Allegiance, Black Hills
10 FiberCom, Cox, Eschelon, McLeodUSA, Midcontinent Communications, New Edge
11 Networks, Nextlink, Northstar, Onepoint Communications, Onvoy, Rhythms, Skyland
12 Technologies, Sprint, Tel West, Time Warner, and United Comm. Tel West
13 participated as acknowledged in its response to data requests Qwest-145 and -146 by
14 interviewing with test vendor KPMG. True and correct copies of those data requests
15 have been included in Exhibit BJB-4.

16
17 **Q. PLEASE EXPLAIN WHAT WAS ACTUALLY TESTED AS PART OF THE**
18 **ROC OSS EVALUATION.**

19 A. The ROC test included the following evaluations: (1) Pre-ordering, Ordering, and
20 Provisioning Functional Evaluation; (2) Order Flow-Through Evaluation; (3) Pre-
21 ordering, Ordering, and Provisioning Volume Performance Test; (4) M&R
22 Functionality and End-to-End Trouble Report Processing Tests; (5) Billing Usage and
23 Carrier Bill Functionality Test; (6) CLEC Support Processes and Procedures Review;

1 (7) Change Management Test; and (8) Performance Measure Audit. Each of these
2 evaluations is described more fully in Exhibit BJB-3.

3
4 **Q. DID THE TEST TAKE INTO ACCOUNT ANY QWEST REGIONAL**
5 **DIFFERENCES? IF SO, PLEASE EXPLAIN.**

6 A. Yes, the test did take into account the differences in Qwest's region. Qwest's current
7 operating territory, and therefore much of its OSS legacy architecture, is the product of
8 the merger of three predecessor Bell Operating Companies: Pacific Northwest Bell
9 (covering Washington and Oregon); Mountain Bell (covering Arizona, Colorado,
10 Idaho, Montana, New Mexico, Utah, and Wyoming); and Northwestern Bell (covering
11 Iowa, Minnesota, Nebraska, North Dakota, and South Dakota). Pacific Northwest
12 Bell's operating area is now referred to as Qwest's Western Region; Mountain Bell's
13 operating area is now referred to as Qwest's Central Region; and Northwestern Bell's
14 operating area is now referred to as Qwest's Eastern Region.

15
16 To ensure that the ROC third party test would provide a valid basis upon which each of
17 the 13 participating ROC states could base their respective recommendations to the
18 FCC regarding Qwest's section 271 applications, KPMG, in addition to administering
19 the overall test, performed a Regional Differences Assessment ("RDA"). In doing so,
20 KPMG interviewed a number of Qwest personnel and reviewed Qwest documentation
21 to illuminate any differences in systems and processes throughout the Qwest territory.

1 KPMG's RDA, released on October 5, 2000, found that Qwest's order management,
2 provisioning, maintenance and repair, and CLEC relationship management and
3 infrastructure are materially consistent across the three regions. Although KPMG
4 found that Qwest's CRIS billing and service order processors differ by region, it noted
5 that Qwest has standardized most of its processes across these regions. KPMG also
6 noted that, although Qwest's performance in certain respects was not consistent across
7 the three regions, a region-wide test presented an appropriate way to measure the
8 company's OSS because the MTP could be designed to accommodate these differences.
9 Test transaction volumes therefore were set at levels and distributed in such a way as to
10 produce statistically valid results given the identified differences.

11
12 **Q. WHAT IS THE CURRENT STATUS OF THE TEST?**

13 A. The test has been completed. On April 19, 2002 KPMG generated and delivered a
14 *Draft Final Report* to the ROC that was similar to the Final Reports it prepared in the
15 context of other RBOC OSS tests. The *Draft Final Report* integrated previously
16 delivered Discrete Test Reports ("DTRs") and additional test results that were not
17 previously reported. The Draft Final Report also included sections for test result
18 summaries, overall evaluation, overall material and distribution and document control
19 information.

20
21 Like all reports issued as part of the OSS test process, the Draft Final Report was
22 subject to significant review by the ROC and the TAG, as well as comment and

1 deliberation at the Vendor Technical Conferences (“VTCs”). Following this review
2 process, KPMG issued its Final Report on May 28, 2002 (see Exhibit BJB-7).

3

4 **Q. PLEASE PROVIDE A SUMMARY OF QWEST’S PERFORMANCE UNDER**
5 **THE TEST.**

6 A. Qwest performed excellently under the ROC Test. It satisfied the vast majority of the
7 criteria set out in the MTP. I will discuss below the subcomponents (tests) of the Test
8 that are relevant to this proceeding and provide the Commission references in the Final
9 Report where it can view the summary of results and a more detailed discussion of each
10 test.

11

12 **Q. PLEASE PROVIDE A REFERENCE TO THE APPLICABLE TEST RESULTS**
13 **FROM THE KPMG FINAL REPORT FOR THE FOLLOWING AREAS: PRE-**
14 **ORDERING, ORDERING, PROVISIONING, MAINTENANCE AND**
15 **REPAIR, CLEC SUPPORT, AND BILLING.**

16 A. The specific tests referenced within each section below apply specifically to issues
17 raised by Tel West in this complaint.

18

19 **PRE-ORDERING, ORDERING, AND PROVISIONING FUNCTIONAL EVALUATION**
20 **(TESTS 12, 12.7, 12.8, 14, 14.7 AND 14.8)**

21 There were multiple tests that collectively validated the existence, functionality, and
22 behavior of the Qwest interfaces (including IMA-GUI) and processes for pre-ordering,
23 ordering, and provisioning. Additionally, these tests evaluated generally Qwest’s
24 Wholesale performance in these areas in comparison to its Retail systems. The tests
25 consisted of live transactions submitted through the IMA-GUI, IMA-EDI, and EXACT

1 electronic interfaces. This evaluation was intended to examine an end-to-end view of
2 the pre-ordering through provisioning processes, and included a mix of stand-alone pre-
3 ordering transactions, along with pre-order transactions followed by LSRs, supplements
4 and cancels. In addition, this test intended to compare actual functionality to Qwest's
5 OSS documentation.

6
7 Another component of this evaluation was a comprehensive review of the methods and
8 procedures used to handle orders that have been manually submitted or require manual
9 intervention during order processing. This evaluation also included a comprehensive
10 review of Qwest's provisioning processes. Specifically, KPMG evaluated Qwest's
11 ability to properly provision orders and timely complete them; whether Qwest's
12 Wholesale provisioning processes are in parity with those used by Qwest's Retail
13 operations; and Qwest's processes used to support coordinated provisioning with
14 CLECs.

15
16 Test 12 – Evaluation of POP Functionality and Performance Versus Parity Standards
17 and Benchmarks

18 A summary of the test results can be found in the KPMG Final Report, Section
19 III-1.4 (pp. 21-24). A more detailed description of the test results can be found in
20 the KPMG Final Report, Section IV-12-3.0 (pp. 72-119).

21
22 The pseudo-CLEC, HPC, performed tests 12A, 12B and 12C as part of Test 12.

23 Test 12A results can be found in the KPMG Final Report, Section IV-12A-3.0

1 (pp. 12-A-14 – 12-A-21). Test 12B results can be found in the KPMG Final
2 Report, Section IV-12B-3.0 (pp. 12-B-10 – 12-B-17). Test 12C results can be
3 found in the KPMG Final Report, Section IV-12C-3.0 (pp. 12-C-4 – 12-C-7).
4

5 Test 12.8 – POP Manual Order Processing Evaluation

6 A summary of the test results can be found in the KPMG Final Report, Section
7 III-3.4 (pp. 26). A more detailed description of the test results can be found in the
8 KPMG Final Report, Section IV-12.8-3.0 (pp. 144-151).
9

10 Test 14 – Provisioning Evaluation

11 A summary of the test results can be found in the KPMG Final Report, Section
12 III-5.4 (pp. 28-30). A more detailed description of the test results can be found in
13 the KPMG Final Report, Section IV-14-3.0 (pp. 181-202).
14

15 Test 14.7 – Provisioning Process Parity Evaluation

16 A summary of the test results can be found in the KPMG Final Report, Section
17 III-6.4 (pp. 30-33). A more detailed description of the test results can be found in
18 the KPMG Final Report, Section IV-14.7-3.0 (pp. 215-232).
19

19 **ORDER FLOW-THROUGH EVALUATION (TEST 13)**

20 This evaluation verified Qwest's ability to mechanically convert LSRs into service
21 orders without manual intervention for all order types that are designated as flow-

1 through by Qwest. It also validated that the flow-through capabilities of Qwest's
2 systems are consistent across the three regions.

3
4 Test 13 – Order Flow Through Evaluation

5 A summary of the test results can be found in the KPMG Final Report, Section
6 III-4.4 (p. 27). A more detailed description of the test results can be found in the
7 KPMG Final Report, Section IV-13-3.0 (pp. 157-168).

8
9 **M&R FUNCTIONALITY AND END-TO-END TROUBLE REPORT PROCESSING**
10 **EVALUATIONS (TESTS 16, 18, AND 18.7)**

11 The tests that comprised the evaluation of maintenance and repair (“M&R”)
12 functionality collectively validated the performance of Qwest's M&R functionality as
13 documented. These tests included an evaluation of the functional equivalence of
14 Qwest’s M&R processing for wholesale and retail trouble reports. Additionally, these
15 tests evaluated Qwest's performance in making repairs under various wholesale
16 maintenance test scenarios. Finally, these tests included an evaluation of the end-to-
17 end repair processes in Qwest’s M&R work centers to ensure that they were effective
18 and adhered to common support/help desk procedures.

19
20 Test 16 – CEMR Functional and Performance Evaluation

21 A summary of the test results can be found in the KPMG Final Report, Section
22 III-9.4 (pp. 36-38). A more detailed description of the test results can be found in
23 the KPMG Final Report, Section IV-16-3.0 (pp. 319-337).

1

2 Test 18 – M&R End to End Trouble Report Processing

3 A summary of the test results can be found in the KPMG Final Report, Section
4 III-11.4 (p. 40). A more detailed description of the test results can be found in the
5 KPMG Final Report, Section IV-18-3.0 (pp. 351-355).

6

7 Test 18.7 – M&R Work Center Support Process Evaluation

8 A summary of the test results can be found in the KPMG Final Report, Section
9 III-12.4 (pp. 41-42). A more detailed description of the test results can be found
10 in the KPMG Final Report, Section IV-18.7-3.0 (pp. 363-385).

11

12 Test 18.8 – End-to-End M&R Process Evaluation

13 A summary of the test results can be found in the KPMG Final Report, Section
14 III-13.4 (pp. 42-43). A more detailed description of the test results can be found
15 in the KPMG Final Report, Section IV-18.8-3.0 (pp. 390-406).

16

17 **CLEC SUPPORT PROCESSES AND PROCEDURES REVIEW**

18 **(TESTS 24.3, 24.5, 24.7, AND 24.8)**

19 These tests evaluated the systems, processes, and documentation provided by Qwest for
20 establishing and maintaining CLEC business relationships. The test included a
21 determination of whether Qwest is adequately assisting CLECs to understand how to
22 implement and use all of the OSS functions available to them. The areas included in

1 the evaluation that are relevant to this proceeding were: (1) Account Establishment and
2 Management; (2) CLEC Training; (3) OSS Interface (IMA) Help Desk Support; and (4)
3 Interconnect Service Center Support.

4
5 Test 24.3 – Account Establishment and Management Review

6 A summary of the test results can be found in the KPMG Final Report, Section
7 III-20.4 (pp. 52-53). A more detailed description of the test results can be found
8 in the KPMG Final Report, Section IV-24.3-3.0 (pp. 536-545).

9
10 Test 24.5 – CLEC Training Review

11 A summary of the test results can be found in the KPMG Final Report, Section
12 III-22.4 (pp. 54-55). A more detailed description of the test results can be found
13 in the KPMG Final Report, Section IV-24.5-3.0 (pp. 557-562).

14
15 Test 24.7 – Wholesale Systems Help Desk Review

16 A summary of the test results can be found in the KPMG Final Report, Section
17 III-24.4 (p. 58). A more detailed description of the test results can be found in the
18 KPMG Final Report, Section IV-24.7-3.0 (pp. 613-623).

19
20 Test 24.8 – Interconnect Service Center (ISC) Support Review

21 A summary of the test results can be found in the KPMG Final Report, Section
22 III-25.4 (pp. 58-59). A more detailed description of the test results can be found
23 in the KPMG Final Report, Section IV-24.8-3.0 (pp. 631-642).

1

2

BILLING

3

Tel West did not raise any issues specific to billing in this complaint. Billing related

4

test information can be found in the KPMG Final Report under Tests 19 and 20.

5

6

IV. QWEST PROVIDED OSS INTERFACES

7

Q. SEVERAL OF QWEST'S OSS INTERFACES HAVE BEEN REFERENCED IN THE CURRENT PROCEEDING. WHAT SPECIFIC INTERFACES WILL YOU DESCRIBE IN THIS TESTIMONY?

8

9

10

A. I will describe the following interfaces: Interconnect Mediated Access Electronic Data

11

Interchange ("IMA-EDI") and IMA-GUI. I will also briefly mention Electronic

12

Bonding Trouble Administration ("EB-TA") and Customer Electronic Maintenance and

13

Repair/Repair Call Expert ("CEMR/RCE"). Although Tel West has not specifically

14

addressed IMA-EDI and EB-TA in its complaint,⁵ I am including a discussion of these

15

interfaces as they represent a significant piece of the access to OSS provided by Qwest.

16

For IMA-GUI and for CEMR/RCE, I will describe the interfaces and respond to all of

17

the complaints raised by Tel West.

18

19

Q. PLEASE BRIEFLY DESCRIBE IMA-EDI.

20

A. Qwest's IMA-EDI is a real-time, computer-to-computer, electronic interface that allows

21

CLECs access to pre-ordering, ordering, and provisioning OSS functions. It enables

⁵ In fact, Tel West stated in response to data request Qwest-097 that it does not use IMA-EDI and makes no contentions regarding it in this litigation. A true and correct copy of Tel West's response to that data request is included in Exhibit BJB-4.

1 the electronic submission and processing of Local Service Requests (“LSRs”) through
2 the pre-ordering inquiries, ordering transactions, and order status requests.

3
4 IMA-EDI enables a CLEC to develop an interface directly between its own systems and
5 Qwest systems. Essentially, IMA-EDI consists of an interface that facilitates computer
6 transactions between both CLEC and Qwest systems. This enables a CLEC Customer
7 Representative to interact with CLEC developed screens and functions.

8
9 **Q. WHAT ARE THE PRIMARY BENEFITS OF USING THE IMA-EDI**
10 **INTERFACE?**

11 A. As mentioned above, IMA-EDI provides CLECs electronic access directly from CLEC
12 systems to Qwest's interfaces. Further, IMA-EDI provides CLECs with uniform access
13 to the same Qwest OSS across Qwest's 14-state region. As mentioned above in the
14 description of the Third Party Test, Qwest internal systems vary by region and state.
15 IMA-EDI integrates these varying systems and interfaces into a single interface,
16 simplifying CLEC access.

17
18 IMA-EDI also enables CLECs to integrate the IMA-EDI's pre-ordering and ordering
19 functions by providing pre-ordering information in a fielded manner that matches the
20 information requirements on the LSR forms. This gives CLECs significant control
21 over the design and use of their ordering systems. CLECs can design their system
22 screens to use their own terminology, their own drop down menus for their products,
23 features, and product descriptions. CLECs can also program their system screen to

1 auto-populate information such as customer and address information along with
2 product and feature information on their ordering forms. Also, IMA-EDI enables
3 CLECs to obtain order status at any time, giving the CLECs further control in
4 establishing internal procedures for providing order status to their customers.

5

6 **Q. DOES QWEST OFFER IMA-EDI TO ALL CLECS?**

7 A. Yes. As a matter of fact, over 20 CLECs have implemented a connection to IMA-EDI
8 and are using it regularly to submit LSRs to Qwest.

9

10 **Q. PLEASE BRIEFLY DESCRIBE THE IMA-GUI INTERFACE.**

11 A. Qwest's IMA-GUI is a real-time, human-to-computer, electronic interface that allows
12 CLECs to access Qwest's OSS to perform a variety of pre-ordering, ordering and
13 provisioning functions. Just like IMA-EDI, the IMA-GUI facilitates electronic
14 submission and processing of LSRs through the pre-ordering inquiries, ordering
15 transactions and order status requests. A CLEC can connect to Qwest's OSS using the
16 IMA-GUI in three ways, through:

- 17 • A dial-up modem
- 18 • A dedicated connection such as a T-1 line
- 19 • The Internet with digital certificate access

20

21 Essentially, IMA-GUI is a fully functional interface with Qwest provided screens and
22 functions, allowing CLECs a quick and lower cost option for electronically submitting

1 LSRs and pre-ordering queries to Qwest. It uses point and click capabilities and relies
2 on the same business process rules as IMA-EDI.

3

4 **Q. YOU MENTION THAT IMA-GUI USES THE SAME BUSINESS RULES AS**
5 **IMA-EDI. DOES IMA-GUI PROVIDE DIFFERENT CAPABILITIES THAN**
6 **IMA-EDI?**

7 A. Absolutely not. IMA-GUI and IMA-EDI provide the same pre-ordering, ordering and
8 provisioning features and functions. As mentioned above, they both use the same
9 business rules software that is also known as the Business Process Layer (“BPL”).

10

11 The BPL greatly simplifies CLEC access to Qwest’s OSS by managing CLEC system
12 requests, automatically routing these requests to the appropriate and various Qwest
13 internal systems, and sending appropriate responses to the CLEC. Because of the BPL,
14 CLECs can access a single interface instead of having to manage the complex and
15 varying systems across the Qwest region. By using either IMA-EDI or IMA-GUI, a
16 CLEC can obtain the same information in substantially the same time and manner as
17 obtained by Qwest representatives without the need to log on to numerous systems and
18 interfaces as must retail CRs.

19

20 **Q. SO WHAT IS DIFFERENT BETWEEN IMA-EDI AND IMA-GUI?**

21 A. The primary difference is simply the method of accessing the BPL, and therefore the
22 OSS functions. As mentioned above, IMA-EDI provides “system to system” access
23 while IMA-GUI provides “human to system” access. Essentially, a CLEC can access

1 the IMA-GUI with a personal computer, browser software, and an Internet connection
2 to Qwest.

3
4 IMA-GUI provides the same integration capabilities for pre-ordering and ordering that
5 IMA-EDI does. Qwest used the same fielding of pre-ordering information available
6 through IMA-EDI to develop the IMA-GUI. As discussed more fully below, this
7 translates into a significant amount of “auto-population” of information in IMA-GUI.
8 More significantly, IMA-GUI provides this same access to Qwest’s OSS without
9 requiring CLECs to develop their own software or systems.

10
11 **Q. TO WHAT EXTENT DID THE ROC THIRD PARTY TEST EVALUATE IMA-**
12 **GUI?**

13 A. The test vendors in the ROC test extensively evaluated the IMA-GUI by submitting
14 thousands of pre-order and order transactions across product types and activity
15 scenarios. Evaluation criteria included:

- 16 • clarity, accuracy and completeness of GUI documentation,
- 17 • accessibility of the GUI interface,
- 18 • timeliness and completeness of GUI responses,
- 19 • clarity and accuracy of error messages,
- 20 • accuracy, responsiveness and completeness of Help Desk support,
- 21 • usability of information,
- 22 • consistency with retail capability, and
- 23 • flow through performance.

1

2 Fourteen different pre-order functions were tested, including address validation,
3 telephone number availability and selection, customer service record availability,
4 appointment availability and selection, cancel appointment or reserved telephone
5 number, facility availability, service availability, connecting facility assignment, loop
6 qualification, design layout record availability, and directory listing availability. For
7 the ordering tests, the vendors evaluated IMA-GUI order accuracy and completeness in
8 the following categories: timely provisioning of FOCs for flow through and non-flow
9 through orders, timely rejection responses for manual and automated LSRs, timely
10 jeopardy notifications, timely work completion notifications or SOCs, and timely
11 billing completion notifications. In addition, a comparison of Qwest's pre-order and
12 order capabilities for retail and wholesale systems and processes was conducted to
13 determine if parity existed.

14 **Q. WHAT DID THE TEST VENDORS CONCLUDE ABOUT THE IMA-GUI?**

15 A. After thoroughly testing IMA-GUI capabilities the test vendors determined that all
16 evaluation criteria subject to a pass/fail criteria (i.e., those that were not diagnostic) did
17 result in a satisfied determination for all pre-ordering, ordering and flow through
18 scenarios.⁶ Parity of Qwest's comparable retail and wholesale systems and processes
19 for Qwest's pre-order loop qualification tools was evaluated using Qwest and

⁶ There are 33 non-diagnostic evaluation criteria in the KPMG Final Report that specifically reference IMA-GUI. All 33 were satisfied. They are (in KPMG's section of the report) 12-2-1, 12-2-2, 12-3-1 to 12-3-10, 12-5-3, 12-5-5, 12-6-1 to 12-6-6, 12-10-2, 12-10-4 and (in HPC section of the report) 12-1-2, 12-2-1, 12-2-2, 12-3-1, 12-3-2, 12-4-1, 12-4-2, 12-5-1, 12-5-2, 12-6-1, 12-6-2. A detailed description of the evaluation criteria is included in the KPMG Final Report, Section IV-12-3.0, pages 72-99. See Exhibit BJB-7.

1 commercial CLEC on-site interviews and observations and was determined to be
2 functionally equivalent.⁷

3

4 **Q. DO IMA-EDI AND IMA-GUI FOLLOW ANY NATIONAL STANDARDS OR**
5 **GUIDELINES? PLEASE EXPLAIN.**

6 A. Both IMA-EDI and IMA-GUI follow the national guidelines set by participating
7 companies' Ordering and Billing Forum ("OBF"). OBF develops Local Service
8 Ordering Guidelines ("LSOG") that outline fields, forms, and rules for ordering local
9 service products.⁸ Qwest also publishes Qwest Local Service Ordering Guide
10 ("QLSOG") documentation, which identifies OBF industry guidelines, Qwest specific
11 requirements, and fields not currently utilized by Qwest.⁹

12

13 IMA-EDI also follows other national standards specific to EDI and transactional
14 processing. Specifically, IMA-EDI follows the EDI Service Order Committee
15 ("ESOC"), formerly known as the Service Order Subcommittee ("SOSC"), standards.
16 The ESOC is dedicated to the interpretation of established and future American
17 National Standards Institute ("ANSI") Accredited Standards Committee ("ASC") X.12
18 standards and United Nations/Electronic Data Interchange for Administration

⁷ Test 12.7 assessed the parity between retail and wholesale in the design, implementation and use of Qwest's loop qualification process. All 11 criteria were satisfied. A detailed description of Test 12.7 and its evaluation criteria are included in the KPMG Final Report, Section IV-12.7, pages 120-132. See Exhibit BJB-7.

⁸ OBF and LSOG are more fully outlined on the Alliance for Telecommunications Industry Solutions ("ATIS") web site at <http://www.atis.org/atis/clc/obf/obfinfo.htm>

⁹ QLSOG can be accessed at the following website address: <http://www.qwest.com/wholesale/clecs/lsog.html>.

1 Commerce and Transport (“UN/EDIFACT”) messages for pre-ordering, ordering,
2 provisioning and maintenance of telecommunications services in an EDI environment.

3
4 **Q. AS A RELATED QUESTION, IN HIS TESTIMONY (PAGE 8, LINES 11-12)**
5 **MR. SWICKARD STATED THAT, “IMA-GUI uses numerous acronyms that**
6 **provide no clue as to their meaning.” PLEASE RESPOND.**

7 A. Mr. Swickard implies that these are Qwest acronyms. On the contrary, most of these
8 are industry standard acronyms and data fields related directly to the LSOG. Qwest has
9 simply implemented the national guidelines for Local Service Ordering. Both IMA-
10 EDI and IMA-GUI are designed to facilitate navigation and compliance with the LSOG
11 forms and fields. An understanding of the industry LSOG guidelines will greatly
12 enhance a user’s ability to navigate these interfaces. To help CLECs better understand
13 and use the acronyms and field names in IMA-EDI and IMA-GUI, Qwest publishes the
14 QLSOG.¹⁰ Also, CLECs can access information directly from OBF / ATIS.¹¹

15
16 **Q. PLEASE BRIEFLY DESCRIBE EB-TA AND CEMR/RCE.**

17 A. EB-TA is Qwest’s computer-to-computer interface that offers CLECs a real-time
18 interface with Qwest’s Maintenance and Repair functions. It can be used for both non-
19 design and design repairs. EB-TA functionality includes, among other items, the
20 ability to create Trouble Reports and to obtain Trouble History.

21

¹⁰ See fn. 9, supra.

¹¹ See fn. 8, supra.

1 CEMR/RCE is a real time, human-to-computer interface that allows access to Qwest's
2 Maintenance and Repair functions through the Internet. CLECs access CEMR directly
3 through a web site using a digital certificate. Using CEMR, CLECs can access the
4 same functions as available through EB-TA. Through CEMR, CLECs can also access
5 the diagnostic capabilities provided by Repair Call Expert ("RCE").
6

7 **Q. DOES QWEST OFFER BOTH EB-TA AND CEMR/RCE TO ALL CLECS?**

8 A. Absolutely. Qwest offers both EB-TA and CEMR/RCE to any interested CLEC.

9 Qwest also publishes information about these interfaces on its web site.¹²

10 **V. FLOW-THROUGH: SYSTEMS**

11 **Q. WHAT IS ELECTRONIC FLOW THROUGH AND HOW DOES IT RELATE**
12 **TO IMA-EDI AND IMA-GUI?**

13 A. In order for an LSR to be successfully processed by Qwest, it must be converted into
14 one or more service orders. Electronic flow through refers to the automatic conversion
15 of an LSR into related internal Qwest service orders without human intervention. IMA-
16 EDI and IMA-GUI are the Qwest electronic interfaces that facilitate electronic flow
17 through.

18

19 When processing an LSR, IMA-EDI and IMA-GUI determine in the BPL whether the
20 LSR meets the necessary criteria for flow through, and send the LSR to Flow Through
21 Solutions ("FTS"). FTS then creates the appropriate service orders, and submits them

1 to the appropriate Qwest Service Order Processor (“SOP”), which is RSOLAR in
2 Washington. After the service orders successfully pass the SOP edits (just as retail
3 orders do), the service orders are issued in the SOP, and a Firm Order Confirmation
4 (“FOC”) is automatically and immediately returned to the CLEC.

5
6 Because of the complex nature of the data, the various scenarios, and the differing
7 products that can be requested on an LSR through IMA-EDI and IMA-GUI, successful
8 electronic flow through is dependent on many factors. Most significantly, flow through
9 depends on the software capabilities developed by Qwest, and on the accuracy of LSRs
10 that are submitted by CLECs.

11 The Qwest flow through software, a combination of the BPL and FTS working
12 together, is continually being enhanced. Qwest publishes the current product list and
13 LSR types that are eligible for flow through and updates it with each new IMA-EDI
14 and IMA-GUI release.¹³ An LSR is eligible for flow through if it fits into a category
15 that is supported by the Qwest flow through software. A copy of the LSRs Eligible for
16 Flow Through matrix is attached as Exhibit BJB-5. Notably, the product referenced by
17 Tel West in this complaint, Resale POTS, is fully eligible for flow through.

18

¹² EB-TA and CEMR information can be found at the following website addresses:
<http://www.qwest.com/wholesale/systems/mediacc-ebta.html>, and
<http://www.qwest.com/wholesale/systems/cemrandrce.html>

¹³ To date, this matrix has been published through the Change Management Process. However, as of
June 17, 2002, Qwest will be posting the matrix on its public website at: [www.qwest.com/wholesale/clecs/
ordering.html](http://www.qwest.com/wholesale/clecs/ordering.html).

1 The second major factor in successful flow through is the accuracy of CLEC submitted
2 LSRs. This places primary responsibility for flow through with the CLEC for
3 submitting correct and valid LSRs. When a CLEC submits an invalid LSR or an LSR
4 with invalid data, even though the LSR is otherwise eligible for flow through, the LSR
5 will be dropped for manual handling so a Qwest service center representative can
6 trouble shoot and correct the CLEC order.

7

8 **Q. IN HIS TESTIMONY (PAGE 12, LINES 7-10) MR. SWICKARD DESCRIBED**
9 **UPFRONT EDITS AS FOLLOWS: “Upfront edits are changes that are necessary**
10 **to convert an order from the IMA -GUI interface into the RSOLAR system. There are**
11 **three types of edits that are executed in IMA -GUI before the LSR is sent to Flow**
12 **Through Solutions (FTS) for further processing.” IS THIS DESCRIPTION OF**
13 **UPFRONT EDITS ACCURATE?**

14 A. Again, not necessarily. Upfront edits in IMA-EDI and in IMA-GUI are not changes
15 required, but are instead business rules that are necessary to assure the accuracy and
16 validity of a submitted LSR. The edits are also used to determine whether an LSR is
17 eligible for flow through. Instead of acting as an obstacle to LSR submission, upfront
18 edits actually facilitate efficient LSR processing.

19

20 Mr. Swickard was correct in stating that there are three types of edits that are executed
21 in IMA-EDI and in IMA-GUI before an LSR is sent to FTS for further processing:
22 Request Integrity edits; Request Acceptance edits; and Flow-through Disposition edits.
23 The request integrity and acceptance edits work to ensure that LSRs are accurate. The
24 flow through disposition edits on the other hand determine whether an LSR is valid to

1 send to flow through or whether the LSR must be manually processed due to the type of
2 product or activity being requested.

3
4 **Q. MR. SWICKARD FURTHER STATED IN HIS TESTIMONY (PAGE 12, LINES**
5 **18-20) THAT, “Upfront edits slow the processing of an order and sometimes lead to**
6 **erroneous order rejections. In addition, upfront edits impose restrictions on Tel**
7 **West’s (but not on Qwest’s) due dates and USOC availability.” PLEASE**
8 **RESPOND.**

9 A. As previously stated, upfront edits are necessary to ensure that the LSR is accurate. In
10 so doing, the edits actually increase the efficiency of LSR processing by increasing the
11 likelihood of full electronic flow through. Further, the IMA BPL runs the edits in a
12 parallel process in order to ensure the quickest response time.

13
14 Qwest’s upfront edits of due dates do not allow the CLEC to enter a Desired Due Date
15 for the LSR that is before the request submittal date of the LSR. The FTS system also
16 checks the requested due date against the standard intervals for that particular product
17 and if the desired due date is less than the standard interval the due date is changed and
18 the new date is provided to the CLEC on the FOC. This editing ensures that Qwest will
19 be making a reasonable commitment to the CLEC, and also allows the CLEC to make a
20 reasonable commitment to its end user customer. Enhancements to SONAR made in
21 April 2002 provide the same Due Date functionality to Retail as is found in IMA/FTS,
22 which ensures that the due date is not less than the standard interval. See the Response
23 Testimony of Karen L. Taylor for a more in-depth discussion of the SONAR edit. Ms.
24 Taylor also testifies regarding the existence and benefit of up-front edits in SONAR.

1

2 The primary upfront edit for USOC availability is a check against the Co-Provider
3 Services (“CPS”) database to determine if the USOC is valid for the CLEC based on
4 that particular CLEC’s Interconnection Agreement. Some consistency edits are also
5 performed so as to ensure the correct combination of USOCs are included on the LSR.

6 The USOC edits are necessary to ensure that the correct USOCs are included on the
7 LSR to provide successful processing, provisioning and billing of the service.

8

9 **Q. ELSEWHERE IN HIS TESTIMONY (PAGE 33, LINE 5), MR. SWICKARD**
10 **ALSO DISCUSSES THE QWEST WHOLESALE AND RETAIL**
11 **PROVISIONING PROCESSES. HE CLAIMS THAT “[Qwest] has clearly**
12 ***designed the provisioning process to be substantially different.*” IS THIS TRUE?**

13 A. Absolutely not. Qwest has instead done the opposite, and created a provisioning
14 process that provides “parity by design.” As discussed above, the flow through process
15 takes an LSR and converts it to appropriate service orders. Once service orders are
16 created, Qwest’s provisioning process is virtually identical for Wholesale and Retail.
17 Each order is identified as either Non-Design (POTS) or Design Services (Complex)
18 and the appropriate work flow process is followed. What this means is that service
19 orders follow a provisioning flow through Qwest systems based on product category,
20 and not based on a Wholesale or Retail designation.

21

1

VI. CAPABILITIES OF IMA-GUI

2 **Q. IN THEIR TESTIMONY, MR. SWICKARD AND MS. HILD MAKE SEVERAL**
3 **ALLEGATIONS ABOUT THE CAPABILITIES OF IMA-GUI. PLEASE**
4 **RESPOND TO EACH OF THEIR CLAIMS BELOW.**

5 **MR. SWICKARD STATES THE FOLLOWING (PAGE 7, LINES 23-25 AND**
6 **PAGE 8, LINES 1-2): “SONAR is more informative, faster, and easier to use than**
7 **IMA-GUI. SONAR allows direct access to databases that enable Qwest’s retail CRs**
8 **to give customers quick and accurate information. IMA -GUI does not provide this**
9 **information to Tel West, which can obtain information only through interface**
10 **systems that are hard to use, time consuming, expensive, and often lacking the**
11 **desired information.” DO YOU AGREE WITH MR. SWICKARD’S**
12 **ASSESSMENT?**

13 A. No, I do not agree. Mr. Swickard’s assessment is incorrect. IMA-GUI provides access
14 to the same source data and downstream systems that are available to Qwest retail
15 representatives for order processing. Further, IMA-GUI simplifies access to these pre-
16 ordering systems by integrating them into a single interface for all systems across the
17 Qwest regions.

18
19 The IMA-GUI utilizes a BPL that, as described above, invokes responses from
20 downstream system interfaces. Depending upon the transaction initiated by the CLEC,
21 the BPL will interface with the appropriate internal systems. For example, instead of
22 being forced to know which systems and which regions need to be accessed in order to
23 perform a CSR Retrieval, a CLEC can simply log onto IMA-GUI and initiate a pre-
24 ordering query. The request will cause the IMA-GUI BPL to connect to the appropriate
25 Customer Record database (CARS, for requests made in Washington) and to provide
26 the appropriate CSR response.

27

1 Specifically, IMA-GUI provides access to the following Qwest internal systems, among
2 others:

- 3 • PREMIS, for address validation
- 4 • CARS, for customer record information
- 5 • CNUM / CTAG, for telephone number assignment
- 6 • Appointment Scheduler, for scheduling dispatched technicians
- 7 • LQDB, for Loop Qualification information
- 8 • Facility Check, for determining availability of current facilities

9
10 IMA-GUI response time for pre-order transactions is measured by PO-1A. See the
11 Response Testimony of William R. Easton, Exhibit WRE-6, at 1. As the data attached
12 to Mr. Easton's testimony shows, Qwest has continually met the performance measure
13 benchmarks. See Exhibit WRE-8, at 1-6. Also, content and timeliness of pre-ordering
14 information provided by IMA-GUI as it relates to Qwest retail operations was validated
15 as part of the ROC third party test.¹⁴

16
17 **Q. MS. HILD STATED IN HER TESTIMONY (PAGE 7, LINES 18-23) THAT**
18 **WHEN TEL WEST ISSUES AN LSR THAT HAS AN ERROR, THE IMA-GUI**
19 **DOES NOT INDICATE THAT THERE IS ANYTHING WRONG WITH THE**
20 **LSR. PLEASE RESPOND.**

21 **A.** Ms. Hild is incorrect. IMA-GUI does provide notice of LSR errors to CLECs. ..The
22 IMA-GUI response to an LSR error is dependent upon when the error is discovered and

¹⁴ See Exhibit BJB-7, Table III-1, Test 12 Evaluation Criteria (pp. 21-24).

1 the severity of the error. When Tel West issues an LSR with an error, they will receive
2 a BPL Error Message, an Error Notice, a Reject Notice or a Jeopardy Notice.

3
4 A BPL Error Message is sent in real-time back to the CLEC for errors detected during
5 data entry to the IMA-GUI. The message describes the errors that are contained on the
6 LSR that prevent it from being submitted to Qwest. The CLEC will be unable to
7 submit the LSR unless this error is corrected.

8
9 If an LSR passes the IMA-GUI BPL edits, but experiences an error in the downstream
10 systems before an FOC is issued an Error Notice (for non-fatal errors) or Reject Notice
11 (for fatal errors) is sent to the CLEC via email or fax. Non-fatal and fatal errors are
12 explained in detail on Qwest's Wholesale web site.¹⁵ Both Error Notices and Reject
13 Notices describe the LSR fields that must be corrected in order for Qwest systems to
14 process the LSR.

15
16 If an LSR error is identified after an FOC is issued, Qwest will transmit a Jeopardy
17 Notice to the CLEC. This Jeopardy Notice identifies the problem and advises the
18 CLEC that it must supplement the LSR within 4 hours.

19

¹⁵ A description of non-fatal and fatal errors can be found on Qwest's Wholesale web site at:
<http://www.qwest.com/wholesale/clecs/ordering.html>.

1 IMA-GUI Post Order functions offers alternate access to Error, Reject and Jeopardy
2 Notices, as well as access to LSR status information. The “LSR Notice Inquiry”
3 function allows CLECs to view any notices associated to an LSR (e.g. the Notices
4 mentioned above). The “LSR Status Inquiry” function allows CLECs to view the status
5 of an LSR and/or the associated service orders (e.g. “Rejected,” “Canceled,” “Error”).
6 Also, CLECs can subscribe to “Status Updates” which will, in real-time, display the
7 current status of a CLECs LSRs. The IMA-GUI Post Order functions are explained in
8 detail in the IMA User’s Guide.¹⁶

9
10 **Q. MR. SWICKARD STATED (PAGE 26, LINES 18-22 AND PAGE 27, LINES 1-3)**
11 **THAT, “Tel West CRs cannot access CARS. Instead, they must obtain a customer**
12 **service record, or CSR, through IMA-GUI. To do so, Tel West CRs must provide a**
13 **name and phone number of the customer and state that there is a letter of**
14 **authorization on file. Although the Tel West CR receives the CSR in 30 seconds, the**
15 **information contained in the CSR is two weeks old...so, for all new connections,**
16 **Tel West must wait approximately two weeks to make any changes to the customer’s**
17 **account.” PLEASE COMMENT.**

18 A. There is no discrepancy in the ability for a Qwest retail CR to view a CSR as compared
19 to a CLEC CR. CARS is the source of record for CSRs in the Western region, and is
20 utilized by both Wholesale and Retail. Therefore, whether the CSR is retrieved by a
21 Retail representative or by the CLEC through the IMA-GUI Pre-Order ‘Retrieve CSR’
22 query, they will both access the same system (CARS) and retrieve the same CSR
23 information.

24

¹⁶ The IMA User’s Guide can be found on Qwest’s Wholesale web site at:
<http://www.qwest.com/wholesale/ima/gui/document.html>.

1 The average time that it takes for a CSR to be updated following order submission is 3-
2 5 days. Retail and Wholesale processes for updating service order information into the
3 CSR are comparable and rely on the same systems to process orders. Service Order
4 information is viewable in the CSR only after all orders have cleared and posted to
5 Qwest systems, whether accessed by Retail or Wholesale requests.

6
7 Subsequent LSRs may be issued on an account that has current order activity. IMA
8 will detect the pending service order, pass that information downstream to FTS, and
9 FTS will then create a service order that will be manually handled.

10 Details of this process are outlined on the Qwest Wholesale web site.¹⁷

11

12 **Q. IN HER TESTIMONY (PAGE 4, LINES 22-24) MS. HILD STATES THAT TEL**
13 **WEST CANNOT GIVE ITS CUSTOMERS THEIR DUE DATE BECAUSE IT IS**
14 **DEPENDENT UPON HOW QUICKLY THE ORDER IS HANDLED BY**
15 **QWEST. DO YOU AGREE WITH HER ASSESSMENT?**

16 A. No. Tel West has access to the Standard Intervals Guide (“SIG”)¹⁸ and should be able
17 to provide reliable due dates to its customers based on the guide.

18

¹⁷ Process details can be found on Qwest’s Wholesale web site at:
http://www.qwest.com/wholesale/downloads/2001/010917/8_0_Frequently_Asked_Questions.doc
<http://www.qwest.com/wholesale/ima/gui/faq.html>.

¹⁸ Excerpts from the SIG are attached as Exhibit PJJ-3 to the Response Testimony of Pamela J. Johnson. The SIG can be found in its entirety on Qwest’s Wholesale web site at:
<http://www.qwest.com/wholesale/guides/sig/index.html>.

1 **Q. IN HER TESTIMONY (PAGE 9, LINES 4-5) MS. HILD ALSO STATES**
2 **SERVICES ARE ONLY SHOWN IN USOC FORMAT THROUGH IMA-GUI.**
3 **HOW CAN A CLEC OBTAIN THE ENGLISH DESCRIPTION OF THE**
4 **USOCS?**

5 A. USOCs are an industry standard used by all telecommunications companies,
6 administered by Telcordia, and available on Telcordia's web site.¹⁹ In addition, IMA-
7 GUI provides two methods of accessing English USOC descriptions. The first method
8 can be accessed via the CSR Query tool found in the Pre-Order menu on the IMA-GUI.
9 A Tel West CR has the ability to select <Request USOC Descriptions>. The response
10 will include, in the Service & Equipment section, the English USOC descriptions
11 associated on the CSR retrieved.

12
13 The second method can be found by accessing the 'USOC/FID Finder' on Qwest's
14 Wholesale web site.²⁰

15

16 **Q. IN HIS TESTIMONY (PAGE 20, LINES 15-22) MR. SWICKARD CONTENTS**
17 **THAT, "Qwest's retail CRs receive order information in real time, as components of**
18 **the electronic service order. This information includes the due date of the requested**
19 **order, the billing name, address, product codes, the Qwest CRs identity, and the**
20 **assigned telephone number. In addition, the order number is automatically**
21 **populated during the negotiation process with the customer. The Qwest retail CR**
22 **negotiates the due date of the order and provides this information to the customer**
23 **verbally, in real time. SONAR also informs the CR if a feature is available on a line,**
24 **in real time."** **HOW DOES IMA-GUI PROVIDE COMPARABLE**
25 **FUNCTIONALITY?**

26 A. First of all, please see Ms. Taylor's Response Testimony, where she explains that Mr.
27 Swickard and Ms. Hild are incorrect in their understanding of the real time capabilities

¹⁹ Telcordia's web site is located at: <http://www.telcordia.com>

1 of SONAR, especially concerning their allegations that retail CRs immediately receive
2 the equivalent of an FOC. Furthermore, IMA-GUI does provide many real time
3 capabilities. For instance, CLECs have the ability to see if a feature is available on a
4 line, in real time with the following functions:

- 5 • CLECs have available to them the Pre-Order function Service Availability. This
6 function allows the CLEC to determine what products and features are available
7 to be ordered.
- 8 • Features that already exist on a line, can be viewed by selecting the CSR query
9 function.

10

11 Also, as mentioned above, CLECs have access to due date information in real time in

12

²⁰ The second method of accessing English USOC descriptions is described on Qwest's Wholesale web site at: <http://usocfind.qwest.com/>

1 the SIG²¹ located on the Wholesale web site.

2

3 **Q. IN HIS TESTIMONY (PAGE 21, LINES 12-15) MR. SWICKARD STATED**
4 **THAT, “*The Qwest retail representative also receives confirmation that facilities***
5 ***exist at the address entered to indicate that the order can be completed in the***
6 ***standard due date interval or the customer requested due date if later. . . . IMA -GUI***
7 ***does not do this.” HOW DO CLECS OBTAIN INFORMATION REGARDING***
8 **FACILITY AVAILABILITY AND APPLICABLE DUE DATES FOR THE**
9 **FACILITY?**

10 A. The IMA-GUI includes a Facility Availability function (“FAQ”) that will identify by
11 telephone number or address the facilities currently available. IMA's FAQ is a stand-
12 alone pre-order functionality that gives the CLEC real time information about whether
13 there are facilities available that will allow the order to be completed within the Service
14 Interval. If the facilities are not in place, then the CLEC would schedule an
15 appointment via the Appointment Scheduler function while considering the standard
16 due date interval and the availability of the customer to be on premises in order set the
17 due date for the service request.

18

19 **Q. IN HIS TESTIMONY (PAGE 14, LINES 14-16) MR. SWICKARD CLAIMS**
20 **THAT, “*...the IMA -GUI process is so slow and cumbersome that Tel West is not***
21 ***able to have a single person enter the order at the same time they take the order from***
22 ***the customer.” PLEASE RESPOND.***

23 A. The test vendors extensively evaluated the IMA-GUI by submitting thousands of pre-
24 order and order transactions across product types and activity scenarios. Their
25 Evaluation criteria included (but not restricted to):

26 • accessibility of the GUI interface

²¹ See fn. 18, supra.

- 1 • timeliness of GUI responses
- 2 • accuracy and completeness of GUI responses

3
4 As mentioned above, after testing the IMA-GUI capabilities the test vendors
5 determined that all evaluation criteria subject to a pass/fail criteria (i.e., those that were
6 not diagnostic) did result in a satisfied determination for all pre-ordering, ordering and
7 flow through scenarios.²² In addition, parity of Qwest's comparable retail and
8 wholesale systems and processes for Qwest's loop qualification tools was evaluated
9 using Qwest and commercial CLEC on-site interviews and observations and was
10 determined to be functionally equivalent.²³ Also, the speed of an individual CLEC's
11 access over IMA-GUI will depend to some degree on whether it uses a dial up
12 connection, a dedicated connection or the internet via digital certificate access.

13

14 **Q. IN HIS TESTIMONY (PAGE 8, LINES 17-20) MR. SWICKARD CONTENDS**
15 **THAT, “SONAR’s ordering process flows logically from one step to the next and**
16 **permits the CR to type in data and follow system prompts for information. IMA -GUI**
17 **has no logical flow and requires CRs to flip back and forth between various tabs and**
18 **opening and closing screens.” DO YOU AGREE WITH HIS CONTENTION?**

19 A. No, I do not agree. The IMA-GUI order process does flow logically if the CLEC
20 follows the steps established in the IMA User Guide.²⁴ The User Guide details the Pre-
21 Order process, the Order process and the Post Order process. As with any other
22 system, including SONAR, the screens will (or should) become more familiar to the
23 user with repeated use. The IMA-GUI screen prints, attached as Exhibit BJB-6 for the

²² See fn. 6, supra.

²³ See fn. 7, supra.

²⁴ See fn. 16, supra.

1 Commission's review, provide a visual indication of IMA-GUI's logical flow. Qwest
2 originally provided these screen prints in response to Data Request Tel West-006, as
3 Attachment Z.
4

5 **Q. IN HER TESTIMONY (PAGE 4) MS. HILD STATES THAT IMA-GUI IS NOT**
6 **AS AUTOMATED AS SONAR AND USES AS HER EXAMPLE THE FACT**
7 **THAT CLECS CANNOT JUST PUT AN "X" NEXT TO THE EQUIPMENT OR**
8 **SERVICE THE CUSTOMER WANTS. CAN YOU EXPLAIN HOW A CLEC**
9 **WOULD SELECT THE PRODUCTS OR SERVICES DESIRED BY ITS**
10 **CUSTOMERS?**

11 A. First, a CLEC must select the product and service it wishes to offer. The IMA-GUI
12 Resale form makes available a drop down list box of the most commonly ordered
13 features for a product. The CLEC has the option of merely selecting from the most
14 commonly order features the desired feature with the click of a mouse. If the CLEC is
15 selecting a product or service that is not commonly ordered, the CLEC can manually
16 key in the desired feature. Therefore, for the products and services that Tel West would
17 likely order – POTS resale – it would merely point and click with a mouse to make its
18 selection.
19

20 Second, Qwest makes available to both IMA-GUI and IMA-EDI CLECs the Qwest
21 LSOG (QLSOG)²⁵ on the Qwest Wholesale Markets web site. The QLSOG is
22 organized by product. In addition, the Feature Availability Matrix,²⁶ available on the
23

²⁵ See fn. 9, supra.

²⁶ The Feature Availability Matrix can be found on Qwest's Wholesale web site at:
<http://www.qwest.com/wholesale/systems/street.html>.

1 web site, identifies the features that are available per product by NPA/NXX. Qwest
2 also provides on its web site a Product Catalog²⁷ that provides details on the features
3 available for a product. A listing of the specific optional features available with each
4 product is found in the specific document for each product. Service Availability is also
5 available through the IMA-GUI interface Pre-Order menu. Using these tools, a CLEC
6 can determine which products and services it wishes to offer.

7
8 **Q. IN HIS TESTIMONY (PAGE 12, LINES 23-24) MR. SWICKARD CONTENDS**
9 **THAT, “*Virtually all the screens in SONAR auto-populate and few of the screens in***
10 ***IMA-GUI do.*” PLEASE DESCRIBE THE AUTO-POPULATION**
11 **FUNCTIONALITY IN THE IMA-GUI.**

12 A. The IMA-GUI screen prints, attached as Exhibit BJB-6, should assist the Commission’s
13 review of this response.

14
15 A CLEC’s performance of proper pre-order queries, as described in the IMA User
16 Guide,²⁸ allows for auto population. IMA provides auto population functionality as
17 outlined below.

18
19 The IMA-GUI auto-populates the following screens in the Pre-Order menu:

- 20 • Address Validation auto-populates the address in the CSR query
21
22

²⁷ The Product Catalog (PCAT) can be found on Qwest’s Wholesale web site at:
<http://www.qwest.com/wholesale/pcat>.

²⁸ See fn. 16, supra.

1 The IMA-GUI auto-populates the following screens in the Order menu:

- 2 • Schedule Appointment auto-populates the PON in the 'New LSR' screen
- 3 • Pre-Order Schedule Appointment auto-populates the Appointment
- 4 information in the LSR form
- 5 • Reserve TN auto-populates the TN List in the Resale form
- 6 • Pre-Order Review CSR auto-populates the Account Number (AN) on all
- 7 applicable order forms, including the LSR. Also, Pre-Order Review CSR
- 8 auto-populates Authorization Approval (AGAUTH), Authorization Date
- 9 (Dated), and Authorization Name (Authnm) on the LSR, and Customer Name
- 10 on the End User form.
- 11 • Initiator contact information is auto-populated from CLEC profile information
- 12 on the LSR form
- 13 • Contact information is auto-populated from CLEC profile information on the
- 14 Directory Listing Request form
- 15 • The user can create a new LSR from an LSR in pending status by using the
- 16 <SAVE AS TEMPLATE> function
- 17 • The user can use the pre-validated address in the pull down menu to auto
- 18 populate other fields in the End User form

19
20 **Q. IN HIS TESTIMONY (PAGE 13, LINES 23-24) MR. SWICKARD STATED**
21 **THAT, “Only IMA -GUI forces Tel West to validate an address before performing a**
22 **change order, not SONAR.” DOES IMA-GUI FORCE CLECS TO VALIDATE**
23 **ADDRESSES BEFORE ISSUING LSRS? DESCRIBE THE BENEFITS OF**
24 **PERFORMING AN ADDRESS VALIDATION.**

25 A. CLECs are not required to complete a pre-order address validation (AVQ) before
26 submitting a Change Order;²⁹ however, IMA-GUI recommends that CLECs complete

27

²⁹ This misunderstanding on the part of Tel West is also clear from reviewing its data request responses. Included within Exhibit BJB-4 is a true and correct copy of Tel West's response to data request Qwest-116. In that response, Tel West states incorrectly that “IMA-GUI requires preorder validation for new connects, disconnects, address changes, and feature changes.”

1 an AVQ because it increases the likelihood of a successful, error-free order. IMA-GUI
2 performs a “background” address validation for Change Orders. If the CLEC has not
3 completed an AVQ, the address information completed by the CLEC may not match
4 what the Change Order transaction requires and the IMA-GUI will return a BPL error
5 message recommending that the CLEC complete an AVQ. Valid addresses are
6 required for all activity types except Disconnects.

7
8 The benefits for executing an Address Validation Query include that if a user submits a
9 request and IMA is unable to match the customer address to a single address in
10 PREMIS, IMA will reject the request. To minimize rejections and the delays inherent
11 with rejections, a user should validate customer addresses before submitting requests to
12 IMA.

13
14 The IMA User Guide,³⁰ Chapter 1 provides an overview and directions on how to
15 execute an Address Validation.

16
17 **Q. IN HER TESTIMONY (PAGE 4) MS. HILD CLAIMS THAT THE BIGGEST**
18 **DIFFERENCE BETWEEN THE IMA-GUI AND SONAR IS THAT IN IMA-**
19 **GUI, A CLEC CANNOT SIMPLY PUT IN A PHONE NUMBER AND GET THE**
20 **CUSTOMER’S RECORDS. IS THAT TRUE?**

21 A. First, it is important to note that the Qwest retail CR must access many systems that
22 may reside in many locations. For example, when a Qwest CR needs a CSR, he or she

³⁰ See fn. 16, supra.

1 must know the system and location in that system (e.g., CARS in Washington or BOSS
2 in Colorado) where the information resides before the query to the appropriate system
3 is made. The IMA-GUI does not require the CLEC to have that same knowledge – in
4 fact, the interface has within it a piece of software that directs the CLEC’s query to the
5 proper system and location. For the IMA-GUI to make that determination, a minimal
6 amount of information is needed. The CLEC must enter the Working Telephone
7 Number, the customer name, street name, city and state. This additional information
8 will ensure that IMA-GUI will point to the correct internal Qwest systems. As can be
9 seen, this decreases the responsibility of CLECs; it does not increase it.

10
11 **Q. IN HIS TESTIMONY (PAGE 25, LINES 23-25 AND PAGE 26, LINES 1-2) MR.**
12 **SWICKARD STATED THAT, “Qwest requires Tel West to obtain an LOA from all**
13 **potential customers prior to passing an order for service to Qwest. To prove that**
14 **Tel West has obtained the required LOA, Qwest also requires entry of the date of**
15 **authorization on all forms and orders on IMA-GUI. No such requirement exists for**
16 **Qwest retail, giving it a processing advantage.” PLEASE RESPOND.**

17 **A.** First, it is important to note that an indication that the CLEC has received a Letter of
18 Authorization (LOA) and population of the AGAUTH field is only required if the
19 CLEC attempts to retrieve a CSR for a customer account owned by Qwest or another
20 CLEC. Indication of LOA receipt is not required if the CLEC already owns the
21 customer account. The AGAUTH field indicates that the customer is acting as an end
22 user’s agent and has authorization on file.

23

1 Qwest's use of the AGAUTH field to indicate that a CLEC has received an LOA from
2 its end-user customer comports with anti-slamming state³¹ and FCC regulations and
3 other laws. The FCC defines "slamming" as, "the term used to describe the changing
4 of [a consumer's] local or long distance carrier to another company without [a
5 consumer's] knowledge or permission."³² When a CLEC is using IMA to convert a
6 Qwest (or another CLEC's) customer, it must do so with the end-user customer's
7 knowledge and permission. When using IMA, the CLEC must take affirmative steps to
8 indicate that such knowledge exists and such permission was obtained. Therefore, the
9 AGAUTH field serves as a necessary consumer protection device; in fact, IMA will not
10 accept orders in which the AGAUTH field does not indicate that an LOA was indeed
11 obtained. This also protects the CLEC from submitting orders without end-user
12 customer authorization, and protects Qwest from having its Wholesale systems used to
13 promote slamming.

14
15 **Q. AND FINALLY, MR. SWICKARD MADE THE FOLLOWING CLAIMS**
16 **CONCERNING SONAR VS. IMA-GUI:**

17
18 **A. (PAGE 16, LINE 3) "SONAR has more and better features than IMA-GUI."**

19
20 **B. (PAGE 16, LINES 6-7) "SONAR shows the status of service after address**
21 **validation, and IMA -GUI does not. Ex. JS-9 at 2."**

22
23 **C. (PAGE 16, LINES 19-20) "Only SONAR permits the Qwest retail CR to request an**
24 **easy number. In contrast, IMA -GUI does not. Ex. JS-10 at 2."**

25
26 **D. (PAGE 17, LINE 6) "SONAR has a soft dial tone option, and IMA -GUI does not."**
27

³¹ See WAC 480-120-139(1).

³² The FCC definition can be found at: <http://www.fcc.gov/cgb/telephone.html>.

1 E. (PAGE 17, LINES 14-16) *“SONAR shows the air quarter miles, but IMA -GUI*
2 *does not.] Ex. JS-12 at 2.”*

3
4 F. (PAGE 18, LINES 3-6) *“IMA –GUI has many different forms the CR must*
5 *complete to execute a simple change order. SONAR does not. Ex. JS-13 at 3.*
6 *Additionally, IMA -GUI has multiple tabs which require the CR to cycle through*
7 *many different fields to complete orders. SONAR does not.”*

8
9 G. (PAGE 18, LINES 14-15) *“SONAR permits Qwest to disconnect an existing,*
10 *working line to initiate new service. IMA -GUI prohibits this.”*

11
12 H. (PAGE 18, LINES 23-26) *“SONAR permits Qwest to give a number referral to a*
13 *customer for disconnected lines as well as with changed numbers. IMA -GUI only*
14 *permits Tel West to provide a number referral for disconnected lines, but not for*
15 *changes in telephone numbers.”*

16
17 I. (PAGE 19, LINES 5-6) *“Only SONAR permits Qwest to provide a split number*
18 *referral. Ex. JS-3 at 19. IMA -GUI prohibits this.”*

19
20 J. (PAGE 20, LINES 11-12) *“Essentially, SONAR provides everything to Qwest retail*
21 *CRs in real time, and IMA -GUI provides little or nothing in real time.”*

22
23 **ARE THESE STATEMENTS CORRECT? PLEASE EXPLAIN.**

24 A. No. None of Mr. Swickard’s statements are correct except one. Further explanations
25 are provided below.

26 A. **FALSE** - The IMA-GUI allows a CLEC User to access one interface to
27 perform many different queries to external system interfaces (PREMIS,
28 BOSS/CARS, LQDB/QSERV, DLIS, CPSTIRKS,CMD, APRIL, SWITCH,
29 FACILITY CHECK, SOPS, APPT. SCHEDULER, LFACS, DSOI and SOSE).

30
31 B. **FALSE** - IMA-GUI address validation determines if a customer address
32 provided by a CLEC matches an address in Qwest’s Operations Support
33 Systems (OSS). The Address Validation response includes PNA remarks

1 (Primary Number Address remarks contains remarks regarding the account), SL
2 remarks (to view any remarks regarding the status of the line) and Switch
3 Information (LSR, Rate Zone, Site ID, TTA and Switch Type). All of these are
4 comparable with SONAR.

5
6 C. **FALSE** - Custom/Vanity telephone numbers can be reserved through the IMA
7 system. Easy numbers have 10 categories that offer a variety of telephone
8 numbers that a user may select.

9
10 D. **FALSE** - As Ms. Taylor explains in her Response Testimony, as of September
11 2001, Soft Dial Tone was deleted in all states. In fact, Ms. Hild acknowledges
12 this in her testimony at page 6, line 17.

13
14 E. **FALSE** – As Ms. Taylor explains, SONAR does not handle ordering for
15 complex services, such as Centrex. Conversely, IMA does handle ordering for
16 complex services (i.e. Centrex, Centrex Plus, UNE Centrex, and Centron).
17 When a CLEC uses IMA to order Centrex service, there are several pre-order
18 queries that the CLEC should perform, including but not limited to checking
19 facility availability. In response to a Facility Availability Query (FAQ), IMA
20 returns one of two responses: A positive response would indicate that facilities
21 exist that are close enough in distance to the end-user for the CLEC to order the

1 service. A negative response would indicate that facilities do not exist that are
2 close enough in distance to the end-user for the CLEC to order the service.
3 In the case of a positive response, the CLEC could continue using IMA to order
4 Centrex for its end-user customer, reserving available facilities. In the case of a
5 negative response, the response would indicate that an appointment was
6 necessary for scheduling the dispatch of a technician, and the CLEC could
7 continue using IMA to schedule this appointment.

8
9 This system of responses eliminates the need for the CLEC to perform
10 additional steps with an AQM tool, which would merely calculate the mileage
11 from a Wire Center to a Customer Premise in order to determine a Qwest Retail
12 customer's line rate. A CLEC would calculate line rate charges according to its
13 own formula, contacting its Qwest Wholesale Account Manager for specific rate
14 information. Qwest's Retail representatives and Wholesale customers receive
15 the same real-time information from the same databases about available
16 facilities.

17
18 F. **FALSE** - (1) The IMA-GUI does support multiple tabs for certain types of
19 transactions. However, the accusation that this necessitates cycling through
20 many different fields is exaggerated. The amount of information found on one
21 IMA-GUI form would generally take several SONAR screens to navigate

1 through. By utilizing the LSOG information³³ and the IMA User Guide,³⁴
2 CLECs have the information they need to navigate smoothly through the
3 form(s) as well as the appropriate tabs found on the form(s). (2) The IMA-GUI
4 provides connectivity to all the back end systems that Retail utilizes.

5
6 G. **FALSE** - Only the LEC that is providing local service to the end user can
7 disconnect the account. The IMA-GUI, at this time, will prohibit one CLEC
8 from disconnecting a line owned by another CLEC. To take over ownership of
9 this line the CLEC would submit either a “Conversion As Is,” “Conversion As
10 Specified,” or a “Conversion As Specified/No Directory Listing Changes” LSR.
11 If the same CLEC wishes to add or remove features or other attributes of the
12 line then the “Conversion As Specified” or the “Conversion As Specified/No
13 Directory Listing Change” is the best course of action.

14
15 For the case where the CLEC owns the line that is being disconnected and the
16 same CLEC wishes to initiate new service, the CLEC can use the IMA-GUI to
17 submit two LSRs. The first service request would be a disconnection request.
18 The second service request would be a new install service request. The CLEC
19 would link these two service requests together using the Related PON field to
20 minimize the interruption of service. It should be noted that this course of

³³ See fn. 9, supra.

³⁴ See fn. 16, supra.

1 action is not readily recommended, however it is available to the CLEC. For an
2 existing line to receive "new service" the CLEC has the option of submitting the
3 Conversion As Is, Conversion As Specified or Conversion As Specified/No
4 Directory Listing Change service request. This is the more logical option made
5 available to the CLECs and it will ensure that there is no interruption of service.

6
7 H. **FALSE** - Qwest does provide number referral for telephone numbers changes
8 for CLECs.

9
10In the case where a CLEC is disconnecting at the account level and wishes to
11 utilize the Transfer of Calls Referral, the CLEC would enter the
12 disconnect/transfer information on the End User (EU) form. The appropriate
13 fields are found on the 'Disconnect' tab on the EU form. Detailed instructions
14 may be found in the QLSOG³⁵ and by referring to the appropriate PCAT³⁶ as
15 well as the IMA User's Guide.³⁷

16
17 In the case where a CLEC is disconnecting at a line level, they are to utilize the
18 RESALE form and enter the appropriate disconnect/transfer information per the
19 QLSOG, PCAT and the IMA User's Guide.

³⁵ See fn. 9, supra.

³⁶ See fn. 27, supra.

³⁷ See fn. 16, supra.

1

2

I. **FALSE** - Qwest supports the following types of call referrals:

3

N = None – (basic intercept message - no new number referral)

4

S = Standard – (forwarded to the new number)

5

T = Split Transfer of Calls – (forwarded to multiple new numbers)

6

Field not populated (basic intercept message – no new number referral)

7

8

Additional information on Transfer of Calls options can be found in the Qwest

9

LSOG documentation available on the Qwest Wholesale Market web site.

10

11

J. **FALSE** - The IMA application has access to the same data and back end

12

legacy systems that are used by Retail. All IMA Pre-Order transactions provide

13

real time responses.

14

15

VII. CONCLUSION

16

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17

A. Yes it does.