

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
JUDITH M. SCHULTZ
ON BEHALF OF
QWEST CORPORATION

JUNE 11, 2002

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I. IDENTIFICATION OF WITNESS

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

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A. My name is Judith M. Schultz. I am a Director in the Qwest Corporation wholesale service delivery organization. My office is located at 1005 17th Street, Denver, Colorado. I have been employed by Qwest for approximately 20 years (previously known as Mountain Bell and U S WEST). I have held a variety of positions at Qwest, including sales, senior quality management, program management, product management, product development, and wholesale systems planning. I am currently Director -- Change Management and am responsible for directing the change management process redesign effort and managing the implementation of Qwest's change management process.

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Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION?

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A. Yes. I have testified in Qwest's Section 271 proceedings in Washington (Docket Nos. UT-003022, UT-003040).

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II. PURPOSE

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Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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A. The purpose of my testimony is to briefly describe Qwest's Change Management Process ("CMP") and how the CMP could be a valuable forum for Tel West to address its concerns with IMA-GUI without having to initiate litigation.

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III. CMP

2 **Q. WHAT IS THE CHANGE MANAGEMENT PROCESS?**

3 A. The Change Management Process (CMP) contains the procedures that the CLECs
4 and Qwest follow to manage and communicate changes to the products the CLECs
5 order from Qwest and to the processes and systems that support pre-ordering,
6 ordering, provisioning, maintenance and repair, and billing. The CLECs and Qwest
7 meet two days per month to discuss these changes. One day is dedicated to product
8 and process changes and one day is dedicated to systems changes. All CLECs are
9 welcome to attend the monthly meetings either in person by calling a toll free
10 conference line. CLECs do not have to attend the monthly meetings to participate
11 in the CMP. Qwest posts all meeting materials, including minutes from the
12 previous meeting, on the CMP web site three days before the meeting.

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14 **Q. IS THE CMP CUMBERSOME TO LEARN ABOUT AND KEEP UPDATED**
15 **ON?**

16 A. No, not at all. Qwest's CMP is easy to access on the World Wide Web by
17 navigating to the Qwest Communications web site, www.qwest.com. From this site,
18 CLECs unfamiliar with CMP may select the Wholesale link on the left side of the
19 screen. This link takes users to the Qwest Wholesale web site,
20 www.qwest.com/wholesale, where they are invited to participate in CLEC Industry
21 Team meetings by selecting the link to the CMP web site. On the CMP web site,
22 www.qwest.com/wholesale/cmp, CLECs can learn about the history and purpose of
23 CMP, review the *Qwest Wholesale Change Management Process Document*, learn
24 how to submit a CR, or understand how to participate in the CMP monthly

1 meetings. On this page, CLECs may also view a current interactive report of Qwest
2 and CLEC initiated Change Requests and a rolling 12-month calendar describing
3 the dates, times, meeting locations, and conference call numbers for all Qwest CMP
4 meetings. Also available through the Qwest Wholesale web site are the OSS
5 Release Calendar to plan for upcoming GUI or Application-to-Application
6 changes/enhancements, in addition to information on training for products and OSS
7 GUI functionality. Furthermore, Qwest's Wholesale Service Managers have
8 received extensive CMP familiarization training and are ready to assist any CLEC
9 having difficulty understanding or participating in the CMP.

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11 **Q. DOES THE CMP FOCUS ON ISSUES SURROUNDING THE IMA-GUI**
12 **USED BY TEL WEST TO ACCESS QWEST'S OSS?**

13 A. Absolutely. OSS Interface changes constitute a significant percentage of the issues
14 raised by the CLECs. Specifically, in the past eight months, Qwest has processed
15 nearly 200 systems change requests in accordance with the CMP. In comparison,
16 Qwest has processed 50 product or process change requests.

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18 **Q. HOW DOES THE CMP WORK?**

19 A. The central instrument of the CMP is the Change Request ("CR"). The Change
20 Request is the means CLECs and Qwest use to initiate a change to an existing OSS
21 Interface, to establish a new OSS Interface, or to retire an existing OSS Interface.
22 To submit a CR the requestor may download the *CLEC Change Request Form with*
23 *Instructions*, located on the CMP CR web site,
24 <http://www.qwest.com/wholesale/cmp/changerequest.html>, and follow those

1 instructions to complete the form. Once completed, the requestor may email the
2 completed change request to the CMP Systems Manager, cmpcr@qwest.com.

3
4 When the CMP Systems Manager receives the submitted CR he/she sends the CR
5 initiator an acknowledgement email and enters the CR into the CMP database.

6 Qwest posts an interactive report generated from the CMP database to the CMP
7 web site every Monday, Wednesday, and Friday. This interactive report contains
8 the entire history of each CR including minutes from clarification calls and all
9 Qwest responses.

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11 No more than eight business days following the submission of a CR a Qwest
12 Change Management Project Manager (CRPM) schedules a clarification meeting
13 with the initiating CLEC and the appropriate Qwest subject matter experts. The
14 purpose of the clarification meeting is to ensure that Qwest fully understands the
15 nature of the request and the deliverables required to fulfill the request. If the CR is
16 submitted at least three weeks before the next CMP Systems monthly meeting, the
17 CR initiator may present the CR at the meeting, and Qwest presents its response.
18 Qwest's response includes acceptance or denial of the CR and an estimate of the
19 hours required to complete the work.

20
21 If Qwest denies the CR, the CLEC may escalate the CR via the CMP Escalation
22 Process or invoke the CMP Dispute Resolution Process. The former provides for a

1 higher level management review of the denied request. The latter provides for
2 consideration of the issue by a third party or the appropriate regulatory agency.

3 Qwest may only deny a CR for one or more of the following reasons:

- 4 • Technologically not feasible – a technical solution is not available.
- 5 • Regulatory ruling/Legal implications –regulatory or legal reason prohibit the
6 change as requested, or if the request benefits some CLECs and negatively
7 impact others (parity among CLECs) (Contrary to ICA provisions).
- 8 • Outside the Scope of the Change Management Process – the request is not
9 within the scope of the Change Management Process (as defined in this CMP),
10 seeks adherence to existing procedures, or requests for information.
- 11 • Economically not feasible – low demand, cost prohibitive to implement the
12 request, or both.
- 13 • The requested change does not result in a reasonably demonstrable business
14 benefit (to Qwest or the requesting CLEC) or customer service improvement.

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16 If the CR is accepted, it generally progresses to the development stage of the CR
17 lifecycle. However, if system capacity constraints are such that not all CRs may be
18 included in the next major systems release, the CR is subject to the agreed upon
19 prioritization process contained in the CMP. Such is the case for IMA GUI and
20 IMA application-to-application changes.

21
22 At the last CMP Systems monthly meeting before prioritization occurs, Qwest
23 facilitates a Prioritization Review, which includes a discussion of all CRs eligible
24 for prioritization. Following the meeting that includes the Prioritization Review,
25 Qwest distributes the Prioritization Form for ranking. Each CLEC and Qwest may
26 submit one numbered ranking of the CRs to the Qwest CMP Systems Manager

1 within three business days following Qwest's distribution of the Prioritization
2 Form. Qwest tabulates the results and distributes them to the CLECs in the form of
3 an Initial Prioritization List. There are currently seven open IMA GUI change
4 requests. One is scheduled for inclusion in the IMA 10.0 Release, which will be
5 deployed on June 16, 2002. The remainders were ranked in the IMA 11.0 Release
6 prioritization. The IMA 11.0 Release is scheduled to be released on or about
7 November 18, 2002. Thus, the modifications to IMA that are made a part of
8 Qwest's regular releases are suggested by CLECs and Qwest and primarily
9 prioritized by the CLECs.

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11 **Q. HAS TEL WEST PARTICIPATED IN THE CMP?**

12 A. To my knowledge, Tel West is currently not an active participant in the Qwest
13 Wholesale CMP, although all CMP notifications are sent by e-mail to Tel West
14 employee [CONFIDENTIAL].

15 To my knowledge, Tel West has not attended any CMP meetings and has not
16 submitted any CMP CRs.

17
18 **IV. CONCLUSION**

19 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes it does.