EXHIBIT KLT-T1

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

KAREN L. TAYLOR

ON BEHALF OF

QWEST CORPORATION

JUNE 11, 2002

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I. IDENTIFICATION OF WITNESS

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

A. My name is Karen L. Taylor. My office is located at 1314 Douglas on the Mall, 16th Floor, Omaha, Nebraska. I am a Manager of IT Systems for Qwest Information Technologies.

Q. PLEASE DESCRIBE YOUR EDUCATION, WORK EXPERIENCE AND PRESENT RESPONSIBILITIES.

A. I have a high school diploma as well as over 2 years of college coursework in Special Education and Business. I have been employed by Qwest and its predecessor, U S WEST, for approximately 20 years. Prior to divestiture in 1984, I worked for Northwestern Bell. I have held a variety of positions during my tenure including order typist, order writer, order typist supervisor, manager working on SONAR system implementation and administration team, team lead for SONAR team, and project manager of SONAR system administration. I currently act as a staff analyst on the SONAR Application for SONAR SYAD (System Administration) and SONAR Development teams.

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

A. No.

II. PURPOSE

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to the various allegations made by Mr. Jeff Swickard and Ms. Sheryl Hild in their testimonies dated April 15, 2002 in this docket. Specifically, I will address the issues raised by Mr. Swickard and Ms. Hild regarding Qwest's SONAR system applications, functionality and capabilities.

III. SONAR FUNCTIONALITY

Q. IN HIS TESTIMONY (PAGE 4, LINES 20 TO 24), MR. SWICKARD INDICATES THAT SONAR IS SELF-NAVIGATIONAL. IS THIS TRUE?

A. It's hard to say what "self navigational" means. Assuming that "self-navigational" means that SONAR will guide the user, Mr. Swickard is partially correct in that SONAR does have predetermined screen flows depending upon the type of order or action selected by the user (the retail customer service representative or "retail CR") from the initial negotiation menu. However, those screen flows are not all-inclusive and retail CRs often have to navigate to other systems or other screens within SONAR depending on the needs and circumstances of the order. Also, it is important to understand that the preset screen flows were configured based on the norm at the time they were designed. What Mr. Swickard does not describe is that our business changes so rapidly that these situational flows have not necessarily been kept up to date or remain user friendly. What was once the norm may no longer be, which causes the retail CR to have to keep track of numerous exceptions

as he or she navigates through the flow. Two such exceptions are the Entity Billing (SEB01) and the FID Entry (SFE01) screens. Both are considered dumping spots for Field Identifiers ("FIDS")[1] for which SONAR has not been asked to provide a "self-navigational" entry location. Both screens have multiple pages for entry. Based on the need of the order, the retail CR is responsible for properly navigating to and through these screens vs. SONAR doing the navigating and forcing or generating the data necessary.

Q. IN MR. SWICKARD'S TESTIMONY AND MS. HILD'S TESTIMONY, THEY ALLEGE THAT RETAIL CRs GET A CONFIRMED ORDER IMMEDIATELY UPON ENTERING SONAR. IS THIS TRUE?

A. No, it is not. First of all, it should be understood that the Firm Order Confirmation ("FOC") does not exist on the retail side. What Mr. Swickard and Ms. Hild seem to believe is that a retail CR can provide the retail customer a guaranteed telephone number and installation date immediately after entering the order in SONAR. That is not correct. Qwest does not commit to a specific due date until the SONAR-issued order is accepted into the service order processor ("SOP") without a due date exception error. When the customer is on the telephone, the retail CR informs the customer of the expected due date. However, that due date will change under certain circumstances, and if so, Qwest contacts the customer to advise him or her of the new due date. Also, the telephone number ("TN") is not guaranteed until the

[1] FID - Field Identifier Code. An abbreviation or label used to describe the data necessary for provisioning and billing. FIDs serve as labels for information on customer service orders.

order has been completed. Nor is it true that SONAR or RSOLAR (the SOP for Qwest's western region) notifies the retail CR in real time if the order was successfully entered into RSOLAR. The SOP or SONAR's Exception Queues must be accessed manually to determine whether the order was successful.

It is also untrue that all errors are caught by SONAR prior to submission of the order and that there are never subsequent errors prior to or at the time the order is received by the SOP. There are many reasons why SONAR might not catch a situation that leads to an error while the retail CR is still in the order entry process. SONAR's editing functionality is not all inclusive of all potential edits for purposes of issuing a service order. Different types of orders error in different locations and different stages of the ordering or provisioning process. Some errors may actually lead to a total rejection and deletion of the SONAR order, which may require a CR to re-enter the order in SONAR or through ROMS. ROMS is a more manual process whereby a retail CR types a request that is transmitted to a order typist who enters the order directly into the SOP. Depending on the complexity of the error and the availability of resources, it could take anywhere from 5 minutes to days for the Regional Support Center to resolve an error in a particular SONAR order. Despite what Ms. Hild says (at page 12, lines 17-18), it is not true that, in all cases, a "CR can at least be sure that what they put into SONAR goes into RSOLAR properly or promptly." Like all situations involving a complex set of systems, there are many, many variables and circumstances that can lead to different levels of flow

through or success. It is difficult to boil them down into simple black-and-white statements that apply equally in all cases.

Q. IN HIS TESTIMONY (PAGE 8, LINES 4-10), MR. SWICKARD STATES THAT SONAR IS WRITTEN IN PLAIN ENGLISH. CAN YOU ADDRESS THIS STATEMENT?

A. Yes, I can. The example he gives is the list of Order Situations from which the CR selects the order type desired. Those Order Situations and some of SONAR's screen fields are formatted in the form of "plain English" questions. I think however that the implication that Mr. Swickard gives that SONAR is a simple system to use is incorrect. And, it is just one of many systems a retail CR must access. Retail CRs must have a great deal of background knowledge and training in order to effectively use SONAR. They need to know Screen names and mnemonics (five character code representing the screen used as a command), Commands such as \del and \cancel, USOCs or their very abbreviated description, the FIDs required for the order, the use of function keys,[2] the location of where data needs to be input, etc. Incorrect order entry leads to errors that delay the processing and completion of that order. Qwest retail experiences thousands of errors each month with retail orders. SONAR is not as simple and user-friendly as Tel West portrays. Also, SONAR is frequently modified, with new releases being issued several times

[2] Unlike IMA GUI, SONAR is not a point and click application. It is a much older keyboard entry and data field technology that does not offer drop down menus.

a year. Since 1997, there have been 38 SONAR releases incorporating approximately 310 changes to SONAR. Many releases required additional training, either in the form of face-to-face training or in the form of MCCs (Multi Channel Communicator) distributed to the users for self-training. In addition, the SONAR Tables[3] are updated once a week and, before 1998, were updated twice weekly. Each such change alters in some way the manner in which SONAR functions and how the retail CR interacts with it.

Q. IN HIS TESTIMONY (PAGE 9, LINES 8-14), MR. SWICKARD DISCUSSES THE NUMBER OF STEPS NECESSARY TO COMPLETE AN ORDER IN SONAR. ARE HIS NUMBERS CORRECT?

A. Not in my opinion. It depends on the definitions of "steps." I reviewed two documents in this regard – Qwest's response to data request Tel West 03-040 (attached as Exhibit JS-3 to Mr. Swickard's testimony) and Tel West's response to data request Qwest-088, a copy of which I have attached as Confidential Exhibit KLT-C2. Based on my review of these documents, the "17-35 steps" referred to in Mr. Swickard's testimony seem to use different definitions for the SONAR "steps," and neither definition is at the level Tel West used to define the IMA GUI "steps" in Confidential Exhibit KLT-C2. As previously stated, SONAR is not a GUI. There are no point and click or pull down list capabilities. If there is to be parity between the "steps" defined for IMA GUI and SONAR there would need to be

[3] A "table" is a collection of data in which each item is arranged in relation to the other items. It is a database.

many more "steps" defined for the SONAR flows in both documents. The IMA GUI "steps" are detailed to the point of each field filled, each "click on" and "selection", etc. The SONAR "steps" are at a high level such as "Select desired products" and "Enter the Customer's choice of InterLATA long distance carrier." "Selecting" the desired products includes multiple "steps" that include navigating to each of those products by paging, moving the cursor to each item, entering the quantity for each product desired, and entering the screen. That has to happen on multiple pages of multiple product screens. "Entering" the choice of InterLATA carrier includes paging through multiple pages of the Carrier list to determine if the Carrier desired is available, what the CIC (Carrier Identifier Code) is for the order, and entering that code in the CARRIER: field. In all situations, each screen visited has to be "entered" or "paged" to flow to the next screen or page of the screen. Some required screens were omitted by Tel West in the new connect example set out in Confidential Exhibit KLT-C2. Each SONAR screen visited typically has multiple fields that need data entered, changed, removed or verified but the "step" generically referred to "Enter Customer's Address" or "Enter Customer Name and Address." SONAR interfaces with PREMIS vs. Facility Check leaving the Facility Check system access and field input as more "steps."

Q. IN MR. SWICKARD'S TESTIMONY (PAGE 5, LINES 3-5 AND PAGE 10, LINES 7-20) AND MS. HILD'S TESTIMONY (PAGE 4, LINES 5-6), THEY ALLEGE THAT RETAIL ORDERS FLOW THROUGH AT 7.8 TIMES THE RATE AS IMA GUI ORDERS. IS THIS ACCURATE?

A. I do not believe SONAR orders and IMA GUI LSRs can be meaningfully compared

in the way that Mr. Swickard and Ms. Hild attempt to do. From reviewing the figures they rely upon, it appears that the retail data they are relying upon does not include orders that are "non-SONARable," i.e., those orders that SONAR cannot handle at all. Two examples of that might be if a USOC or FID is not recognized or the customer record is labeled a complex account. In the event an order is non-SONARable, it is manually input via ROMS. To my knowledge, no "flow through" data exists that includes these manually input orders. By definition, they do not "flow through" since they are manually entered directly into the SOP. Thus, the actual retail flow through rate is not as high as Mr. Swickard and Ms. Hild claim. The examples used from Qwest documentation are only the portion of flow through that Qwest can track. In addition, please remember that SONAR is only one retail order entry system and is used for the less complex (POTS – Plain Old Telephone Service) types of orders. Thus, you would expect the flow through of those orders to be somewhat higher than complex orders. More complex orders are manually entered into the SOPs, via other retail systems including Consulting Plus, or those used by other market units.

Q. IN HIS TESTIMONY (PAGE 10, LINE 23 - PAGE 11, LINE 2), MR. SWICKARD NOTES THAT RETAIL CRs RECEIVE REAL TIME REJECTIONS IN SONAR WHEN THERE IS AN ERROR. PLEASE DISCUSS THIS.

A. His statement is partially correct. SONAR does have edits that take place at the time a screen is entered (screen field and cross screen field edits). These edits could be defined as received in "real time." The balance of SONAR's edits take place at

the end of a SONAR screen flow, just prior to the appearance of the summary screen. The summary screen is used by the CR to recap the changes just made and is the screen from which the order must be issued. If the retail CR has made a cross-screen, server or compatibility error of the type for which SONAR has an edit, the summary screen will not immediately appear. Instead, an error screen will appear instructing the retail CR to fix a particular entry. The summary screen will then appear once the retail CR has fixed each of the errors identified by SONAR. Whether this is "real time" is unclear since the errors are not identified until the retail CR has reached the end of the order taking process instead of immediately upon being entered. Also, it is very important to note that not all errors will be caught before the order is submitted from SONAR. As discussed above, errors can occur in the SOP or in SONAR itself after the order is "issued." These include SOP 1 errors (which are orders totally rejected by the SOP forcing re-entry), SOP 2 errors (which the SOP accepts with errors, but kicks out for Back Office personnel to correct), and TRANGEN errors (internal SONAR rejects which do not get caught by SONAR prior to submission of the order). A common example of a SOP 1 error is a duplicate order number error. A common example of a SOP 2 error is that billing address 1 is missing, but billing address 2 is completed. A common example of a TRANGEN error is that the class of service is missing.

Q. IN HIS TESTIMONY (PAGE 12, LINES 7-20), MR. SWICKARD STATES THAT UP-FRONT EDITS ARE NOT REQUIRED FOR SONAR BUT ARE REQUIRED FOR IMA GUI. COULD YOU PLEASE ADDRESS THIS ISSUE?

A. I can address it from the SONAR perspective. Mr. Swickard is incorrect. There are many, many edits utilized in SONAR. An edit may refer to a particular format or pattern required for an order entry. By way of example, an edit in a social security number field may require that the number be entered NNN NN NNNN and may force the user to fix the entry if he or she enters it in any other format, for instance NAN NN NNNN or NNN NN NNN_. SONAR utilizes many types of edits, including screen field data entry edits, cross-field edits (involves editing linked fields on the same screen), cross-screen edits (involves editing linked fields on different screens or internal to SONAR), product compatibility edits and hard coded edits. (See the discussion in the previous question about where these edits take place.) The SSN edit above is an example of a Screen Field data entry edit. A typical cross-field edit is the requirement that a bill mailing address line 2 requires a bill mailing address line 1. The requirement for CBE[4] (which can be found at page 7 of Exhibit JS-1) is a hard coded edit. In addition, RSOLAR (the SOP for the Western region) utilizes many edits via RSOE (Regional Service Order Editor) to check any issued order. Edits are designed to minimize the number of external errors. In my opinion, both on the wholesale and retail side, they are very beneficial and improve flow through rates.

Q. IN HIS TESTIMONY (PAGE 12, LINE 23 AND PAGE 13, LINE 3), MR. SWICKARD STATES THAT VIRTUALLY ALL SCREENS IN SONAR AUTO-POPULATE. IS THIS TRUE?

[4] CBE refers to the Can Be Reached E-mail field.

A. No. While it is true that SONAR auto populates some data, it is not true that it does so in every possible location within SONAR. In fact, there is no cross-system auto population when the other system does not have a direct interface to SONAR. Only five of the approximately 18 retail service order systems that a retail CR may typically access for a new connect order directly interface with SONAR.

Not all information from the customer's customer service record ("CSR") will auto populate in each possible location in SONAR. SONAR's population functionality is table-driven. The decision to auto-populate a particular field or not is directed by SONAR's process and quality analysts and might be made for a number of reasons, for example the data may not be necessary in the separate field or the data requirements may be too variable.

Also, if a retail CR has to launch a separate retail system (other than SONAR) to retrieve information, nothing already typed in SONAR will be auto-populated into that other system and nothing retrieved from that other system will be auto-populated back into SONAR. For example, it is not uncommon for a retail CR (even on a simple order) to have to open up BOSS/CARS (which houses a retail customer's CSR, account history and bill) or Facility Check (to determine if a technician visit is needed). The Calling Party, TN, user initials and office code are needed by BOSS/CARS and the address is needed by Facility Check. All that information has been keyed into SONAR but cannot be cross populated when the

system used has no direct interface with SONAR, or when a system that has a direct interface has been accessed manually outside of the SONAR negotiation.

Q. IN HIS TESTIMONY (PAGE 13, LINE 23 - PAGE 14, LINE 7), MR. SWICKARD STATES THAT SONAR DOES NOT FORCE THE CR TO VALIDATE THE ADDRESS BEFORE PERFORMING A CHANGE ORDER AND THE ADDRESS VALIDATION IS ONLY REQUIRED FOR NEW CONNECTIONS. COULD YOU DISCUSS THIS ISSUE?

A. Yes, I can. Mr. Swickard is incorrect. Address validation is actually required by SONAR for all orders in which a new telephone number is needed. That includes many change (C) orders. The requirement for address validation include orders to add an additional line, to change the telephone number, address correction, for new connects, and for transfer from/to (Transfer Service) orders. For change order situations, the customer's account address as shown on his or her records is used to validate the address. If the data is incorrect, address validation will fail causing the order to take longer to complete on the telephone with the customer. Data may be incorrect for many reasons. One example is that the Address database, PREMIS, was changed but the CSR was not. Another example is that a previous order for the same customer posted incorrectly.

Going back to the previous question, SONAR also has edits that force the user to accept the street address, city, state and ZIP as it exists in PREMIS. If the address given by the customer is different than the address on which a "hit" is received, the retail CR must verify with the customer and possibly the PREMIS Maintenance

Center before the order can be issued. This adds time to the ordering process as well.

Also, SONAR has a process that forces the retail CR to go through extra steps when entering a location (e.g., an apartment, suite, building) that is not currently loaded in PREMIS. If the location requested is not available, the CR must validate the location in the same manner as he or she would validate the street address by getting a "hit" on a valid location at that address. The difference is that the CR may override the PREMIS "hit" and enter a location that is not available. The location will be loaded into PREMIS after the new order has been processed.

Q. IN HIS TESTIMONY (PAGE 14, LINE 26 - PAGE 15, LINE 14), MR. SWICKARD STATES THAT QWEST PROCESSING TIMES ARE QUICK (NEW CONNECTIONS 12.6 MINUTES, CHANGE ORDERS 7 MINUTES, DISCONNECTIONS 4.3 MINUTES, AND TRANSFERS 8.5 MINUTES). IS THIS TRUE?

A. It's difficult for me to say. I would note that every order is different and the length of time will vary depending on the complexity and the unique circumstances. I agree that the skill of the CR will also impact the length of the negotiation, but that is only one factor. As to the data Mr. Swickard relies upon, I would note that (as Qwest explained at the time it provided the data to Tel West) the average times were derived from a fairly small set of orders.

Q. IN HER TESTIMONY (PAGE 5, LINES 20-21), MS. HILD STATES THAT A DISCONNECTION ORDER TAKES 15 SECONDS ON SONAR AND THAT

IT TAKES TWO TO FOUR MINUTES IN IMA GUI. IS THIS ACCURATE?

A. I have no idea how long it takes Tel West to enter an average disconnect order, although again it's my opinion that every order is different due to the unique circumstances of each customer interaction. If two to four minutes is accurate for Tel West, I would note that it is the same or better than the time Mr. Swickard relies upon in his testimony (see page 15, line 5) for the average time it takes Qwest retail to process such an order (4.3 minutes).

As to Ms. Hild's statement that it does or should take 15 seconds to process a disconnect ("D") order, that is very unrealistic. Again, as I keep saying, the time will vary with each D order, like all other orders. But 15 seconds is far too short. For a D order, the retail CR must pull up the customer's CSR. The CSR is retrieved from CARS. The interface (to CARS) response time can be anywhere from three seconds to a minute, or can time out altogether when there are system problems. The balance of the time necessary to enter a D order depends on user knowledge and the complexity of the order entries necessary. For example, the final bill may be different from the current billing address, or the customer may need a special transfer of calls. If the customer requests a transfer of calls, the retail CR must go to another screen to enter additional data. This is merely a summary of some of the steps necessary. A more complete and detailed list of the steps necessary to enter and process a D order was appended to Mr. Swickard's testimony as exhibit JS-3, beginning at page 14.

Q. IN HIS TESTIMONY (PAGE 16, LINES 6-13), MR. SWICKARD STATES THAT SONAR SHOWS THE STATUS OF SERVICE AFTER ADDRESS VALIDATION. PLEASE DISCUSS THIS ISSUE.

A. That would be true if he is referring to the STAT (status) display in the PREMIS response. The PREMIS "hit" has a STAT field where the status of the current service for the address is displayed. SONAR displays this data on the bottom of the second of two address validation screens. The status of service is typically displayed under one of the following categories: Non-Work; Pend-Out;[5] Suspend; or Working. This is not "real time" data and thus may be incorrect when new service for the address is provided by the customer. Data in that field is not updated in PREMIS during a working day, but at night during a batch file run from the SOPs.

Q. IN HIS TESTIMONY (PAGE 16, LINES 15-20), MR. SWICKARD STATES THAT SONAR PERMITS A CR TO REQUEST AN EASY NUMBER. IS THIS TRUE?

A. No. SONAR does not have Easy Number functionality as defined for CNUM, the telephone number data base. An Easy Number is one that meets a defined set of customer requirements for which the customer is willing to pay. Examples would be a line number that equals 1234 (366-1234), or a TN that spells part of a name. If the retail CR needs an Easy Number, he or she must access TAG, which is a different user GUI (graphical user interface) for telephone number assignment. The

[5] A Pend-Out status means that there is a disconnect order pending that has not been completed.

user must then return to SONAR to overtype any telephone number previously assigned to SONAR by CNUM with the Easy Number.

If the customer wants to select a number "easier" to remember than the one returned to SONAR is perceived to be (but not defined as an Easy Number), the CR must use TAG to initiate a TN request. For a single line account TN request, TAG will return three TNs from which the customer and CR may select.

Q. IN HIS TESTIMONY (PAGE 16, LINE 22 - PAGE 17, LINE 6), MR. SWICKARD STATES THAT SONAR HAS A SOFT DIAL TONE OPTION. IS THIS TRUE?

A. No. As of September 2001, soft dial tone was deleted in all states. At page 6, line 17, Ms. Hild even notes that soft dial tone may not be an option.

Q. IN HIS TESTIMONY (PAGE 17, LINES 9-16), MR. SWICKARD STATES THAT SONAR SHOWS AIR QUARTER MILES. IS THIS TRUE?

A. No. Mr. Swickard is again apparently forgetting that there are many retail systems to aid with manual entry or issue orders into the SOP. SONAR is one of several systems that issue the order directly to the SOP and it does not handle every product. It is my understanding that air quarter miles are used for products (such as Centrex) SONAR does not handle. Centrex orders are issued with the aid of a separate system called Centrex Assist.

Q. IN MR. SWICKARD'S TESTIMONY (PAGE 17, LINES 17-26) AND MS. HILD'S TESTIMONY (PAGE 3, LINES 12-14 AND PAGE 5, LINES 3-4), THEY ALLEGE THAT SONAR ALLOWS CRs TO CHANGE CUSTOMER ACCOUNT INFORMATION BY CHECKING BOXES. IS THIS TRUE?

A. No. While SONAR does allow retail CRs to "check" or "X" boxes to bring up particular screens, checks or Xs are not used to select particular features. Instead, the CR must enter a desired quantity next to the appropriate Universal Service Order Code ("USOC"). While it is the case that many USOCs are provided on the screen, the CR needs to recognize the USOCs, which appear in code form (e.g., the product CustomNet appears only as SEA, its associated USOC). There are many USOCs and only a brief (17 character) description is provided. Given the number of USOCs shown, significant knowledge and recognition is needed. Many USOCs also require appropriate FIDs to be manually entered in conjunction with the selection of the USOC. The FIDs are not pre-populated and the retail CR must know and enter the FID independently on a separate FID screen.

Q. IN HIS TESTIMONY (PAGE 18, LINES 3-6), MR. SWICKARD STATES THAT SONAR DOES NOT REQUIRE RETAIL CRs TO CYCLE THROUGH MANY DIFFERENT FIELDS OR FORMS TO COMPLETE ORDERS. DO YOU AGREE WITH HIS CHARACTERIZATION?

A. Not at all. SONAR has at least 80 service order processing screens and many fields on each screen. And remember that it is not at all uncommon for a retail CR to need to employ additional systems in addition to SONAR to process a single retail order. The precise number of screens and fields needed to process a retail order will vary with the type of order (e.g., C, N, T, D) and, within each type, the

complexity and unique circumstances of the order itself. I would note that the screen prints for the change order appended to Mr. Swickard's testimony at Exhibit JS-1 represent a very simple change order. There are many common circumstances which could complicate the change order and require entry on additional screens. Examples would include FID changes needed on the FID Entry (SFE01) screen, changes needed on multiple lines of an account would require the screens for all the lines being changed, and customer also wants to change the bill mailing and / or listed name (SBM01 & SPL01). Other types of orders will invariably require more screens. For example, a simple new connect order will involve at least 20 screens. The flow is defined as containing up to 45 screens with more possible when all defined screens are needed for the order and the order has more than one line so more than one set of Service Offering (product selection) screens are needed. I have attached as Confidential Exhibit KLT-C3 a copy of Qwest's fifth supplemental response to data request Tel West 01-006, which includes screen prints for simple N (new connect), D (disconnect) and T (transfer of service) orders in SONAR.

Q. IN HIS TESTIMONY (PAGE 18, LINES 14-15), MR. SWICKARD STATES THAT SONAR PERMITS QWEST TO DISCONNECT AN EXISTING, WORKING LINE AND TO INITIATE NEW SERVICE. IS THIS ACCURATE?

A. Retail CRs are not supposed to issue a new connect or transfer service order for an address that has working service. Such orders, if entered, should result in an error from a downstream system. The center handling those errors will then attempt to

clear the error by contacting the customer(s) and issuing a revised or new order.

Q. IN HIS TESTIMONY (PAGE 19, LINES 1-6), MR. SWICKARD STATES THAT SONAR PERMITS SPLIT NUMBER REFERRALS. IS THIS TRUE?

A. He is correct that split number referrals are permitted, but I am unsure if he is properly defining what a split number referral is. The Qwest materials he references (Exhibit JS-3 at page 19) do not define a split number referral as "allowing a customer to direct incoming calls to different numbers throughout the month according to a predetermined schedule." That is Mr. Swickard's definition (at page 19, lines 2-3 of his testimony). Qwest defines a split number referral as "the ability to allow the calls for a disconnected or changed TN to be referred to different customers and numbers for the time period specified. The time period specified must be the same for both customers and may not exceed three months for Consumer and 12 months for NBA [National Business Accounts]."

Q. IN HIS TESTIMONY (PAGE 20, LINES 9-12), MR. SWICKARD STATES THAT SONAR PROVIDES CRs ESSENTIALLY EVERYTHING IN REAL TIME. IS THIS TRUE?

A. What Mr. Swickard means by "real time" is unclear to me and so I can't say it is a true statement. If he were to provide a more precise definition and specific examples of what he believes SONAR provides in real time, I could better respond. His focus seems to be that SONAR provides due date and TN confirmation immediately upon submitting the SONAR order. As I discussed earlier, that is not true.

Q. IN HIS TESTIMONY (PAGE 21, LINES 11-14), MR. SWICKARD STATES THAT SONAR PROVIDES REAL TIME CONFIRMATION THAT FACILITIES EXIST AT AN ADDRESS ENTERED WHICH INDICATES IF AN ORDER CAN BE COMPLETED IN THE STANDARD INTERVAL. IS THIS TRUE?

A. No, SONAR does not have this functionality. A retail CR has to go to another system, Facility Check, to determine if facilities exist at the specified addressed. As I discussed above, neither SONAR nor Facility Check can guarantee that an order will be completed in the standard interval.

Q. IN MR. SWICKARD'S TESTIMONY (PAGE 23, LINES 10-20) AND MS. HILD'S TESTIMONY (PAGE 6, LINES 3-10 AND LINES 14-21), THEY ALLEGE THAT QWEST'S CRs DON'T FOLLOW THE POLICY OF ADHERING TO THE STANDARD INTERVALS AND THAT QWEST CRs CAN EASILY OBTAIN NONSTANDARD INTERVALS FOR DISPATCHED AND NON-DISPATCHED ORDERS WHILE THE CUSTOMER IS ORDERING SERVICE. IS THIS TRUE?

A. No, it is not true. As described in Qwest's data request response to Tel West which was attached as to Mr. Swickard's testimony as Exhibit JS-15, SONAR has recently been modified to increase safeguards against a retail CR providing a nonstandard interval except in appropriate circumstances. That edit went into effect in mid-April 2002 and has already decreased the number of nonstandard intervals provided to retail customers. All Due Date Expedites are to be released only by a Coach after the CR has explained the reason for the expedite and the Coach approves. As an additional safeguard, each approving Coach will receive a report of the orders with exceptions with his/her initials. That data should be reviewed to ensure he or

she authorized each exception. Any order on the list that was not legitimately authorized will be reviewed with the responsible CR and the instance used as a coaching tool.

Q. IN HIS TESTIMONY (PAGE 24, LINES 4-5) MR. SWICKARD INDICATES THAT QWEST DOES NOT REQUIRE DOCUMENTATION FROM A RETAIL CUSTOMER TO SUPPORT A REQUEST FOR A NONSTANDARD INTERVAL. IS THIS TRUE?

A. No, it is not. Documentation is required for medical emergencies. Mr. Swickard's exhibit JS-13 (at page 2) indicates that "[i]n order for the customer to obtain a medical emergency expedite they have to have supporting documentation. The documentation has to be on legal letterhead and signed be [sic] a practicing physician. The documentation has to be faxed or mailed to the Sales Consultant for verification prior to the release of the order. The documentation should be filed according to the local office procedure."

Q. IN HER TESTIMONY (PAGE 2, LINES 21-26), MS. HILD STATES THAT A RETAIL CR CAN ACCESS A CSR IN SONAR BY SIMPLY INPUTING THE CUSTOMER'S TELEPHONE NUMBER. IS THIS TRUE?

A. Not quite. The retail CR is required to enter the TN, a calling party name, and order situation number in order to access the CSR in SONAR. If the account is a DUPL within CARS (more than one account for the TN), they will also need to know the name on the account or CUS (three digit customer) code. These are needed to determine which of the accounts for the TN is the correct account.

Q. IN HIS TESTIMONY (PAGE 30, LINES 3-26), MR. SWICKARD STATES THAT QWEST CRs ARE BETTER COMPENSATED, BETTER TRAINED AND MORE EXPERIENCED THAN AEGIS CRs. IS THIS TRUE?

A. No. In terms of compensation, the average salaries on the wholesale and retail side are fairly comparable. Attached as Highly Confidential Exhibit KLT-HC4 is Qwest's fourth supplemental response to data request number Tel West 01-010.

In terms of experience and training, as discussed in the testimony of Terry Simmons, the wholesale and retail "experience" data relied upon by Mr. Swickard does not provide a meaningful comparison since it is comparing the average tenure of all retail Sales and Care employees (at all levels of responsibility) on the retail side with the average tenure of just the Aegis SDCs on the wholesale side. Ms. Simmons' testimony indicates that Aegis SDCs are similar in function to the retail call center employees. In addition, the Commission should understand that the retail customer service organization faces incredible levels of turnover, especially in the ranks of retail CRs. I have attached as Confidential Exhibit KLT-C5 Qwest's fifth supplemental response to data request Tel West 01-010. That exhibit includes a spreadsheet showing the tenure of Qwest sales retail call center employees as of the end of January 2002. That document shows that over 66% of Qwest's retail CRs have less than or equal to 2 years in their current jobs and nearly 50% have 1 year or less.

Q. IN HIS TESTIMONY (PAGE 30, LINES 3-26), MR. SWICKARD STATES THAT QWEST CRs PROCESS MORE ORDERS THAN AEGIS CRs. IS

THIS TRUE?

A. I do not believe so, although again Mr. Swickard is comparing apples and oranges. My understanding of what Aegis does on the wholesale side – and this understanding is merely from reading the testimony of Qwest witness Terry Simmons – is that Aegis is not interfacing with the end user and generally deals with orders that have dropped out of flow through because of some problem with the order. Given that retail CRs generally perform simpler order entry and Aegis CRs have to troubleshoot the problem orders they receive and do order entry, the comparison Mr. Swickard is trying to make seems strained.

IV. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes it does.