

**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  
PAMELA J. JOHNSON  
ON BEHALF OF  
QWEST CORPORATION**

**JUNE 11, 2002**

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**I. IDENTIFICATION OF WITNESS**

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

4 A. My name is Pamela J. Johnson. My business address is 6101 Yellowstone Road, 5<sup>th</sup>  
5 Floor, Cheyenne, WY 82009. I am a Service Manager in Qwest Corporation  
6 Wholesale Customer Service Operations.

7

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

10 A. I graduated from high school in Colorado Springs, Colorado in 1981. Before  
11 coming to Qwest in 1999, I worked as a legal assistant with a medical malpractice  
12 insurance defense law firm in Cheyenne, Wyoming. I was hired by US WEST in  
13 1999 as an order typist. Since November 2001, I have been a service manager. In  
14 this position, I provide customer service to 35 reseller CLECs, including Tel West.

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

18 A. No. I have never served as a witness in any administrative proceeding.

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**II. PURPOSE**

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

22 A. The purpose of my testimony is to respond to several of the points raised by Mr.  
23 Swickard in his Part B Direct Testimony and to provide the Commission with

1 information about my experiences with working with Tel West and that  
2 demonstrates that Tel West is receiving excellent customer service.

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4 **III. CUSTOMER SERVICE**

5 **Q. IN MR. SWICKARD'S TESTIMONY, HE ASSERTS THAT TEL WEST**  
6 **RECEIVES INFERIOR CUSTOMER SERVICE FROM QWEST. DO YOU**  
7 **AGREE?**

8 A. Not at all. Since I started handling Tel West as its service manager in February  
9 2002, I have done my best to make sure Tel West's concerns are addressed  
10 promptly and fully. Tel West is just one of 35 wholesale customers that I am  
11 assigned to as service manager. While Tel West is one of the larger of the CLECs I  
12 serve, its local service request ("LSR") volume is only about 13% of the total LSR  
13 volume of all 35 of my CLEC customers. Yet, I would estimate that I spend  
14 upwards of 70% of my time addressing Tel West's constant flow of inquiries and  
15 requests for expedited installation due dates. More than 65% of the telephone  
16 inquiries I handle in the course of my job are from Tel West and at least 95% of the  
17 requests for expedited due dates that I receive and handle are for Tel West. In  
18 addition, in February 2002 I traveled to Seattle, along with my Director, Sue Gwin,  
19 to meet with Tel West and address as many of their concerns as possible and to  
20 provide in-house training on Business Voice Messaging Services, per Tel West's  
21 request. I understand that Tel West was quite pleased with the results of that  
22 training session and meeting and has been pleased with my handling of its account.  
23 I do not say that to be boastful, but instead to explain my surprise that Tel West is

1 complaining to the Washington Commission about the quality of the customer  
2 service it receives from Qwest. I take my responsibilities quite seriously and I  
3 believe I have provided Tel West a superior level of customer service. I was under  
4 the impression that Tel West agreed.

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6 **Q. YOU MENTIONED ABOVE THAT YOU HAVE ASSISTED TEL WEST IN**  
7 **OBTAINING EXPEDITED PROVISIONING INSTALLATION**  
8 **INTERVALS. IN ITS FIRST AMENDED PETITION FOR**  
9 **ENFORCEMENT, TEL WEST ALLEGES AT PAGE 6 THAT IT, “cannot**  
10 **request nonstandard provisioning intervals” AND THAT “Qwest gives itself, but**  
11 **not Tel West, nonstandard provisioning intervals.” ARE THESE**  
12 **STATEMENTS ACCURATE?**

13 A. No, they are not. Between November 2001 and mid-April 2002, Tel West received  
14 expedites on at least 39 different occasions. Tel West has acknowledged this in  
15 response to data request Qwest-132, a copy of which is attached as Confidential  
16 Exhibit PJJ-C2. Between April 16, 2002 and May 29, 2002, Tel West received  
17 additional expedites on at least 4 occasions.

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19 **Q. IN MR. SWICKARD’S PART B DIRECT TESTIMONY, AT PAGE 24, HE**  
20 **STATES “Tel West must request a nonstandard [provisioning] interval through**  
21 **the Aegis ISC, which delays the request.” IS THIS ACCURATE?**

22 A. No, it is not true. Of the 43 expedites granted to Tel West since November 2001, I  
23 personally worked 39 of them. Tel West telephoned me directly for each of these  
24 39; it did not call the Interconnect Service Center (“ISC”). I then opened a ticket  
25 with the ISC and assisted Tel West in obtaining an expedited due date.

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**IV. WORKING OUT OF PROCESS**

**Q. AT PAGE 23 OF HIS PART B DIRECT TESTIMONY, MR. SWICKARD ALSO STATES “If a Tel West CR inputs a nonstandard interval into IMA -GUI, the system would simply reject it or provide the standard due date.” IS THIS STATEMENT ACCURATE?**

A. It is only half accurate. In Washington, the standard due date for non-dispatch residential POTS resale new connects is 3 days. I have attached as Exhibit PJJ-3 relevant excerpts from Qwest’s service interval guides. It is my understanding that if Tel West (when it wants an expedited due date) simply enters a same day or next day desired due date into IMA GUI, the due date on the order will be converted (automatically or manually) to the standard interval. I understand that if Tel West inputs a nonstandard interval into IMA-GUI, the system will not reject it for that reason. I have repeatedly told Tel West employees that the due date field should be populated with the standard interval due date. Nevertheless, I understand that Tel West persists on entering nonstandard desired due dates on its LSRs. Two Tel West employees have recently told me that it is Tel West’s policy to enter same or next day desired due dates on all LSRs. This is one example of how Tel West, in my experience, fails to follow clear Qwest processes and guidelines and how that may lead to it having difficulties. While I do not know this to be true for sure, if Tel West is informing its customers that they can expect service to be installed in one or two days, I am not surprised at all that these customers are frustrated when it takes three days. In my opinion, that frustration (if it exists) is being caused by Tel West, not by Qwest. Once again, I have explained to Tel West over and over that it

1 cannot obtain an expedited due date by simply entering a nonstandard desired due  
2 date in IMA GUI. I can not force Tel West to follow my guidance.

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4 **Q. ARE THERE OTHER EXAMPLES YOU CAN THINK OF THAT**  
5 **DEMONSTRATE TEL WEST NOT FOLLOWING QWEST GUIDELINES**  
6 **AND PROCESSES?**

7 A. There are. One example that comes to mind is how its employees handle repair  
8 requests. Backing up a second, Mr. Swickard states in his testimony at page 7, lines  
9 4-6, that “If Tel West has a problem with a repair issue, it contacts the repair  
10 personnel at Qwest directly, although it does not have access to the same repair  
11 databases as Qwest does.” His statement is incorrect and does not accurately  
12 describe Tel West’s practices. First, as Ms. Brohl’s testimony explains, I  
13 understand that any CLEC can directly access the same repair databases as Qwest  
14 does through Customer Electronic Maintenance & Repair (“CEMR”). If a repair  
15 ticket is submitted via CEMR, the CLEC can, among other things, access the  
16 history of that repair ticket and modify the ticket. However, the CLEC is not  
17 required to do so, and has the option of instead telephoning the Repair Call  
18 Handling Center (“repair center”). I have suggested to Tel West employees that  
19 they try using CEMR, but have been told that they believe it is too technical for  
20 them. Rather than using CEMR or calling the repair center, Tel West regularly  
21 telephones me with its repair issues. As an accommodation, I open the repair ticket  
22 on behalf of Tel West by calling the repair center myself.

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**V. CLEC TRAINING**

**Q. DOES QWEST OFFER CLECS SUCH AS TEL WEST TRAINING ON HOW TO USE IMA GUI?**

A. Yes, it does. Qwest provides frequent, free classroom training opportunities to CLECs on many subjects, including the use of IMA GUI. Qwest also offers web-based tutorials that CLECs can make use of on their own schedules. I have attached copies of the current course catalog and course schedule as Exhibit PJJ-4. Additional information about Qwest’s training opportunities can be found at <http://www.qwest.com/wholesale/trainingNotice.html>.

**Q. WOULD YOU SAY THAT TEL WEST HAS TAKEN ADVANTAGE OF THE TRAINING OPPORTUNITIES AND RESOURCES QWEST PROVIDES IT?**

A. I would not. When I took over as Tel West’s service manager in February 2002, I strongly emphasized that Tel West start sending its employees to Qwest training and to take advantage of the training available on-line. Prior to that, despite having processed orders over Qwest’s IMA GUI for years, Tel West employees had attended virtually no IMA training sessions. I have attached as Exhibit PJJ-5 and PJJ-C5 copies of Tel West’s responses to data requests Qwest-106 through -114. These responses indicate that Tel West sent no employees to Qwest training sessions on IMA versions 6.0, 6.1, 7.0, 7.1, 8.0, 8.1 or 9.0. The responses also indicate that, of the [CONFIDENTIAL] Tel West employees currently processing LSRs over Qwest’s IMA GUI, [CONFIDENTIAL] have never been sent by Tel



1 West to a formal Qwest IMA training session. Only 1 employee currently  
2 processing Qwest LSRs has attended Qwest training, and, prior to February 2002,  
3 that employee had attended only 1 IMA class since 1999 (that being in July 2001).  
4 There have been many IMA releases since 1999, but Tel West has not attended  
5 training on those new versions, with the exception of the single class in July 2001.  
6 And then, only 1 employee attended; 2 others were no shows.

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8 When I visited Seattle in February 2002, Tel West expressed an interest in Centrex  
9 training. At that time, Centrex training was not on the first quarter schedule to be  
10 held in Seattle. I advised Tel West that the training session was being offered in  
11 Minneapolis if it wanted to attend there, or we could make arrangements for a  
12 Qwest trainer to fly to Seattle at Tel West's expense to train Tel West employees  
13 in-house. This is offered to all CLECs. Tel West chose to go to Minneapolis for  
14 the training, since the trainer would not be available to fly to Seattle until late  
15 March or early April. In addition, from the questions Tel West employees  
16 frequently ask me, it is my impression that Tel West would prefer to telephone me  
17 as questions arise rather than review the many resources that I have provided to  
18 them and/or are available electronically to them. While I am more than happy to  
19 help Tel West resolve issues – and I do so numerous times each day – the questions  
20 Tel West employees often ask indicate to me that Tel West, as a company, may not  
21 be interested in training itself on Qwest's systems and products.

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**VI. PROBLEMS WITH TEL WEST ORDERS**

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**Q. MR. SWICKARD STATES AT PAGE 6 OF HIS TESTIMONY THAT TEL WEST IS USUALLY UNAWARE OF PROBLEMS WITH ITS QWEST ORDERS UNTIL “*After the order has been submitted and the customer notifies us of a problem. There is no proactive measurement that I am aware to make sure our orders connect properly and the order was provisioned as ordered, as seen from our billing disputes and the Brotherson Testimony.*” IS MR. SWICKARD CORRECT?**

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A. No, he is not. Please see the testimony of Terry Simmons and Barbara Brohl. Both discuss available tools on IMA GUI for tracking LSR status and BPL rejects, IMA rejects and jeopardy notices. I have discussed the reject and jeopardy parameters with various Tel West employees on a number of occasions.

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**Q. IN QWEST WITNESS JUDITH SCHULTZ’S RESPONSE TESTIMONY, SHE DISCUSSES THE CHANGE MANAGEMENT PROCESS (“CMP”) AND HOW CHANGE REQUESTS (“CR”) ARE USED. HAVE YOU EVER SUGGESTED TO TEL WEST THAT IT PARTICIPATE IN THE CMP AND SUBMIT CRS REGARDING ITS FRUSTRATIONS WITH IMA GUI?**

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A. Yes, I have repeatedly suggested that Tel West should take advantage of the CMP and should submit CRs so that its issues can be addressed. To my knowledge, Tel West has never done so. Tel West has explained to me that it believes the CMP is not for small resellers and is too complex. As Ms. Schultz explains, I believe (and that is why I have repeatedly made the suggestion to Tel West) that the CMP would be valuable and would not be as time consuming as Tel West believes. I hope that Mr. Swickard changes his mind and at least attempts to participate in the process, which I believe he could do by telephone.

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

2 A. Yes, it does.