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

TERRY F. SIMMONS

QWEST CORPORATION

JUNE 11, 2002

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1   **I.**   **IDENTIFICATION OF WITNESS**

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

4 A.   My name is Terry F. Simmons. I am employed by Qwest Corporation ("Qwest") as a

5   Senior Center Manager in the in the Wholesale Markets. My business address is 1005

6   17th St, Room 930, Denver, Colorado 80202.

7

8 **Q.**   **PLEASE STATE YOUR WORK EXPERIENCE AND PRESENT**
9   **RESPONSIBILITIES.**

10 A.   My 35 year telecommunications career began in 1967 with Northwestern Bell.

11   Northwestern Bell through subsequent mergers became Qwest. I held several positions

12   over my first 30 years, all of which were in Network Operations. The positions

13   included Plant Repair Service Clerk, Plant Records Clerk, District Reports Clerk, Plant

14   Line Assigner, Service Center Foreman, Customer Service Manager, Manager

15   Distribution Services, Manager Outside Plant Engineering, Network Transition

16   Manager Outside Plant Engineering, Manager Capacity Provisioning, Manager

17   Designed Services Capacity Provisioning, Director Designed Services Capacity

18   Provisioning and Director Capacity Provisioning.

19

20   From 1998 to present I have held the position of Senior Center Manager in the

21   Wholesale Markets organization. In this role, I manage the Denver Wholesale Service

22   Delivery Center, the Customer Service Inquiry and Education Team, oversee complex

1   resale order management and private line order management and manage the Aegis

2   (Sierra Vista) call center.

3

4 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

5 A.   I graduated from North Iowa Community College with an AD in Business

6   Administration and Sociology.

7

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE WASHINGTON**
9 **UTILITIES AND TRANSPORTATION COMMISION?**

10 A.   No.

11

12   II.   PURPOSE

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

14 A.   My testimony is in response to certain portions of the Direct Testimony of Jeff

15   Swickard and the Direct Testimony of Sheryl Hild on behalf of Tel West. Specifically,

16   I will discuss the Qwest Wholesale Service Delivery processes, the Qwest personnel

17   associated with processing CLEC Local Service Requests ("LSRs"), and the related

18   support provided to CLECs by Qwest.

19

20   II.   FLOW-THROUGH: PROCESSES

21 **Q. IN HIS TESTIMONY (PAGE 9, LINES 22-24), MR. SWICKARD STATED**
22 **THAT,** *"When a CR [customer representative] enters an order into either SONAR or*
23 *IMA-GUI, the interface must transmit the order to RSOLAR for processing. If the*

1   *interface transmits the order instantaneously, the order has flowed through."*
2   **PLEASE EXPLAIN HOW AN LSR BECOMES A SERVICE ORDER.**

3   A. To clarify, a Qwest CR enters a retail customer order into SONAR or (depending on the

4   type of service) another order entry application. However, a CLEC directly enters its

5   own LSR into IMA-GUI. When an LSR is submitted to the IMA-GUI by the CLEC, it

6   is processed through a series of edits that check the LSR for accuracy and for flow-

7   through eligibility. LSRs that pass the Business Process Layer ("BPL") and IMA edits

8   (both are discussed below) are sent to Flow Through Solutions ("FTS") along with the

9   associated Customer Service Record ("CSR") information. FTS edits the information

10   and translates the LSR/CSR information into a service order, which is then submitted to

11   RSOLAR, the Qwest Western Region Service Order Processor ("SOP"). RSOLAR

12   edits the service order and if there are no errors the service order is accepted by

13   RSOLAR. When the LSR passes through this process with no human intervention, the

14   LSR is considered to be a fully electronic flow-through LSR and has become a service

15   order. If any of the edits for IMA, FTS or RSOLAR fail the LSR will require manual

16   handling in order to be translated into a service order.

17

18 Q. **MR. SWICKARD CONTINUED (PAGE 11, LINES 23-26), STATING THAT,**
19   *"IMA-GUI orders sit in a queue until they are accepted by RSOLAR. The processing*
20   *time varies based on how Qwest classifies an order. If an order "flows through,"*
21   *Qwest processes the order within 20 minutes. The standard for non-flow through*
22   *orders is 24 hours."* **PLEASE RESPOND.**

23 A. Contrary to the understanding of Mr. Swickard, the only situation that would cause an

24   LSR to fall into a queue is when the LSR requires manual handling. The LSR may

25   require manual handling due to errors or because it is not eligible for flow-through.

1   Qwest clearly documents the types of orders that are eligible for electronic flow-

2   through and provides that documentation to CLECs via the Change Management

3   Process. The matrix of flow-through eligible order types is attached as Exhibit BJB-5

4   to the Response Testimony of Barbara Brohl.[1] If manual intervention is necessary on

5   an LSR submitted by a CLEC, it will be held in the IMA database with a status of

6   "submitted," "in review," "erred," or "partial" and must then be manually worked by an

7   Interconnect Service Center ("ISC") representative within 24 hours.

8

9   If an LSR submitted by a CLEC is eligible for electronic flow-through, and it passes the

10   edits required for conversion to a service order, the LSR will be processed within

11   seconds or minutes by IMA, FTS and RSOLAR. A Firm Order Confirmation ("FOC")

12   will then be automatically sent to the CLEC. The PO-5 PID[2] definition states that for a

13   fully electronic flow-through LSR an FOC should be sent to the CLEC within 20

14   minutes. See Exhibit WRE-6, at 7. For April 2002, Tel-West submitted

15   **[Confidential]** flow-through eligible LSRs for Washington; 100% of these LSRs

16   received an FOC within the 20 minute interval. See Exhibit WRE-C7, at 3. In fact,

17   Qwest's back up data shows that the average FOC response time for LSRs in April

18   2002 was only 20 seconds.

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[1]   As that matrix shows, residential POTS resale orders are capable of being eligible for electronic flow through.

[2]   Performance Indicator Definitions have been established as part of the overall ROC collaborative effort to establish measures for Qwest's Wholesale performance. The most current working version of PID definitions is 4.1. http://www.qwest.com/wholesale/results/roc.html. Excerpts from PID version 4.1 relating to pre-order PIDs PO-1, PO-2, PO-3, PO-5, PO-8, and PO-9 are attached as Exhibit WRE-6 to the Response Testimony of William Easton. Performance results for Washington under these PIDs are attached as Exhibits WRE-C7 (Tel West specific data) and WRE-8 (aggregate CLEC data) to Mr. Easton's testimony.

1

2   However, if an LSR submitted by a CLEC requires manual handling, the PO-5 PID

3   definition states that for a Resale POTS LSR, the FOC should be sent to the CLEC

4   within 24 hours. For April 2002, Tel-West submitted **[Confidential]** LSRs for

5   Washington that required manual intervention and received an FOC within 24 hours for

6   **[Confidential]** of these LSRs (99.57%). Further, Qwest's backup data shows that

7   the Qwest average FOC response time for these LSRs in April 2002 was only 2.13

8   hours.

9

10 **Q.** **FURTHER, MR. SWICKARD CONTENDS (PAGE 5, LINES 3-4) THAT, *"It is***
11   ***much more likely that an IMA-GUI ORDER will need manual processing compared***
12   ***with a SONAR order."* PLEASE COMMENT.**

13 A.   First, it is unclear to me that Mr. Swickard is correct in his rather broad assertion.

14   Assuming he is, however, there may be several reasons for which an LSR will require

15   manual handling. As previously discussed, edits for accuracy occur in the BPL, IMA,

16   FTS and the SOP. If the LSR fails any of the IMA, FTS or SOP edits, it will require

17   manual handling. The PO-2B PID measures the percentage of LSRs that are eligible for

18   flow-through that actually flow-through. In January 2002, the Steering Committee of

19   the Regional Oversight Committee ("ROC") Technical Advisory Group ("TAG")

20   established progressive benchmarks for this measure. Qwest's benchmark in January

21   2002 through June 2002 is 90% for Resale LSRs, and in July 2002, the standard will

22   increase to 95%. See Exhibit WRE-6, at 4. Qwest's actual commercial performance

23   for IMA-GUI Resale POTS transactions for Washington was 90.95% for all CLECs in

1   the aggregate and 92.71% for Tel West in April of 2002. See Exhibit WRE-8, at 9,

2   WRE-C7 at 1.

3

4   **Q.**   **MR. SWICKARD GOES ON TO SAY (PAGE 5, LINES 10-11) THAT,** *"Even if*
5   *our [Tel West's] order flows through automatically, it is still in the nature of a*
6   *service request, not a true order."* **PLEASE DESCRIBE THE DIFFERENCE**
7   **BETWEEN AN LSR AND A SERVICE ORDER.**

8   A.   Mr. Swickard's statement that the order is in the "nature of a service request, not a true

9   order," is absolutely false. The LSR is the trigger for the creation of a service order.

10   As stated above, when an order flows through automatically, it has become a service

11   order. Additionally, the design of the LSR itself has been and is managed by the

12   Ordering and Billing Forum ("OBF"). The OBF is an Alliance for

13   Telecommunications Industry Solutions (ATIS)-sponsored organization that "provides

14   a forum for customers and providers in the telecommunications industry to identify,

15   discuss and resolve national issues which affect ordering, billing, provisioning and

16   exchange of information about access services, other connectivity, and related

17   matters."[3] The fields and appropriate entries for the LSR are national standards that are

18   agreed to by participants of the OBF. The information populated in the LSR fields is

19   used by LECs to create internal service orders that are then used in provisioning the

20   orders and for triggering the billing of those orders.

21

22   **Q.**   **MR. SWICKARD FURTHER ASSERTS (PAGE 10, LINES 6-16) THAT,** *"Qwest*
23   *retail orders flow through from SONAR to RSOLAR at 7.8 times the rate that*
24   *Tel West's orders flow through from IMA-GUI to RSOLAR… According to Qwest's*

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[3]   This definition comes from the following website: http://www.atis.org/atis/clc/obf/obfhom.htm.

1   *own data, in February 2000 [sic],[4] there were 406,369 orders issued in SONAR for*

2   *the Western region, which includes Oregon, Washington and Northern Idaho…Of*

3   *these orders, 18,687 did not flow through during the conversion process to*

4   *RSOLAR… So, 4.59 percent of all orders did not flow through and required manual*

5   *processing. The manual processing rate was much higher for IMA-GUI orders.*

6   *Qwest received 135,159 local service requests in February for all 14 states through*

7   *IMA-GUI or IMA-EDI… Of this total, 49,039 did not flow through… This is*

8   *36.28 percent manual processing rate, which is approximately 7.8 times greater than*

9   *the rate for SOLAR [sic] orders."* **IS MR. SWICKARD'S COMPARISON OF**

10   **SONAR AND IMA-GUI FLOW THROUGH RATES ACCURATE?**

11 A.   Mr. Swickard's statement here is misleading. It is important to refer to Qwest's March

12   27, 2002 data request response, which was attached to Mr. Swickard's testimony at

13   Exhibit JS-4.[5] In that response, Qwest indicated, "…the comparison of retail errors and

14   wholesale errors/rejections is not an apples to apples comparison. The wholesale data

15   includes both errors and order entry rejections. The retail data only includes order

16   processing errors." Because Qwest does not have the backup calculations for how Tel

17   West derived its numbers, Qwest assumes the 49,039 orders that Tel West alleges

18   dropped to manual handling was calculated by adding the IMA-BPL reject total of

19   47,008 to the FTS reject total of 2,031. This calculation is incorrect because this

20   number includes 38,689 BPL rejects. As described in Ms. Brohl's testimony, a BPL

21   edit is a system edit which leads to the rejection of an LSR immediately after being

22   submitted by the CLEC. Thus, when a LSR is rejected during BPL edits, IMA does not

23   receive the order, and it is not manually handled. Orders that do pass through IMA may

24   flow through or drop out for manual handling later. Thus, flow-through percentages for

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[4]   Please note that the data provided by Qwest was for February 2002, not February 2000, as indicated in Mr. Swickard's testimony.

[5]   Please note that Qwest supplemented its response to that data request on May 14, 2002. A true and correct copy of that supplemental response is attached as Exhibit TFS-2. That response supersedes and replaces the wholesale section of the version attached to Mr. Swickard's testimony as Exhibit JS-4.

1   IMA are calculated using the established PIDs of PO-2 for flow-through and PO-4 for

2   LSR rejects.

3

4   In addition, given the complexity of the type of wholesale orders/products processed

5   via IMA GUI versus the retail POTS orders processed through SONAR, the

6   comparison Tel West attempts is not a valid one. Consequently, there are no

7   correlating measurements in SONAR with those that are in IMA.

8

9   III.   FIRM ORDER CONFIRMATIONS AND DUE DATES

10   **Q.   MR. SWICKARD STATED (PAGE 5, 12-13) THAT,** *"When we [Tel West]*
11   *complete an order in IMA-GUI, it is a request for service. Qwest only sends Tel West*
12   *notice that the order was accepted (called a firm order confirmation or "FOC")*
13   *between 20 minutes to 48 hours later."* **IS THE '20 MINUTE TO 48 HOUR'**
14   **TIMEFRAME MR. SWICKARD REFERS TO ACCURATE IN TERMS OF**
15   **EITHER THE PID STANDARD OR QWEST'S ACTUAL PERFORMANCE?**

16   A.   Mr. Swickard is inaccurate in categorically stating that FOCs are issued in a 20-minute

17   to 48-hour timeframe. In fact, the timeframes in which an FOC will be sent varies,

18   depending on whether the LSR is able to flow-through and the type of product being

19   requested. PID PO-5 monitors the timeliness with which Qwest returns an FOC to

20   CLECs in response to LSRs/ASRs[6] received from CLECs, focusing on the degree to

21   which FOCs are provided within specific intervals. See Exhibit WRE-6, at 6-8.

22

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[6]   ASRs are Access Service Requests and are used by CLECs to place service requests for access services
including, but not limited to: DS1, DS3, High Capacity Services, and LIS Trunks.

1   For FOCs provided for fully electronic LSRs (PO-5A), the formula can be paraphrased

2   as follows: the percentage of (fully electronic) LSRs for which the original FOCs are

3   issued within 20 minutes. *Id*. The benchmark agreed upon for PO-5A is 95% within

4   20 minutes. In the time period from November 2001 through April of 2002, for Tel

5   West specific orders in the state of Washington, Qwest met the benchmark in every

6   month with scores ranging from 99.92% to 100%. See Exhibit WRE-C7, at 3.

7   Commercial results across all CLECs in Washington show similar levels of success.

8   See Exhibit WRE-8, at 12.

9

10   With regard to FOCs provided for electronic LSRs that fall to manual handling (PO-

11   5B), the formula is: the percentage of (electronic/manual) LSRs for which the original

12   FOCs are issued within the intervals specified for the service category involved. See

13   Exhibit WRE-6, at 7-8. The standard FOC intervals specified for the service categories

14   involved range from 24 hours to 96 hours depending on the product being ordered. The

15   standard interval for residential POTS resale is 24 hours. *Id., at 7*. The benchmark

16   agreed upon for PO-5B is 90% within standard FOC intervals. *Id*. In the time period

17   from November 2001 through April of 2002, for Tel West specific orders in the state of

18   Washington, Qwest met the benchmark in every month with scores ranging from

19   98.04% to 99.57%. See Exhibit WRE-C7, at 4.

20

21 **Q.   MR. SWICKARD CONTENDS (PAGE 22, LINES 9-12) THAT,** *"Often, customers*
22 *will place an order with Tel West for service, call Qwest and receive the service the*
23 *same day, and then call Tel West back to cancel their service. Qwest retail CRs can*
24 *do this because SONAR permits them to."* **PLEASE DESCRIBE THE PROCESS A**

1 **CLEC WOULD EMPLOY TO OBTAIN EXPEDITED DUE DATES AND**
2 **WHERE A CLEC CAN OBTAIN INFORMATION ABOUT THIS PROCESS**

3 A. First of all, as discussed in the Response Testimony of Karen Taylor, SONAR has

4 implemented an edit and process that does not allow a Qwest retail CR to provide

5 shorter than standard interval due dates without management authorization.

6

7 Secondly, a CLEC can request the provisioning of its customer's orders in less than

8 three days under appropriate circumstances (depending on the products that have been

9 ordered) using the process described on the Qwest wholesale website at

10 http://www.uswest.com/wholesale/index.html. A request for an expedited due date is a

11 request to Qwest for an improved standard interval or a committed to ICB (individual

12 case basis) date. Qualifications for an expedited due date include, but are not limited

13 to, fire, flood, national emergency, disconnect in error by Qwest, medical emergency,

14 and conditions where the customer is completely out of service. Under this process,

15 CLECs will contact the ISC as their first point of contact. Expedites are processed

16 through the Customer Service Inquiry and Education Center ("CSIE"), a division

17 within the ISC.

18

19 The Service Delivery Coordinator ("SDC") at the CSIE will confirm if in fact the

20 earlier due date is available. The SDC may ask for documentation when an earlier due

21 date has been requested due to medical emergency. If an earlier due date is provided to

22 the CLEC, the SDC will ask that a supplemental LSR be sent for this due date change.

1   If an earlier due date is not available the CLEC will be advised. The CLEC has an

2   opportunity to escalate using the process available to the CLEC as described on the

3   Qwest web site at http://www.uswest.com/wholesale/index.html.[7]

4

5 **Q.** **MR. SWICKARD WENT ON TO SAY (PAGE 6, LINES 13-15) THAT,** *"There is*
6   *no proactive measurement that I am aware to make sure our orders connect properly*
7   *and the order was provisioned as ordered…"* **IS IT TRUE THAT CLECS CAN**
8   **TAKE NO PROACTIVE APPROACH TO VERIFY THAT THEIR ORDERS**
9   **CONNECT PROPERLY AND ARE PROVISIONED AS ORDERED?**

10 A. No. On the contrary, Tel West has the same or greater ability as Qwest retail

11   representatives to verify that its service has been provisioned as requested. Tel West

12   has the opportunity to proactively track the status of an order using the following

13   methods:[8]

14

15   1. IMA GUI provides a Status Update function that continuously displays status
16   messages for LSRs and related Service Orders. These status messages are
17   provided to CLECs in addition to the LSR Notice functionality. The Status
18   Update display represents a "snapshot" of statuses at a particular moment and
19   may change rapidly. These order status reports include, but are not limited to,
20   Jeopardy, Physical Work Completed, and Posted To Be Billed.

21

22   2. IMA GUI provides Jeopardy Notices. When Qwest is unable to meet the
23   commitment date of a particular LSR, Qwest generates and transmits a
24   Jeopardy Notice to the CLEC, indicating that the order is in jeopardy of not
25   being fulfilled by its prescribed due date. Jeopardy Notices tell CLECs when
26   a due date is at risk and enable them to inform their end-user customers
27   accordingly.

28

29   3. IMA GUI also provides an LSR Status Query function whereby a CLEC may
30   inquire on the status of a specific LSR. This tool indicates the progress of the
31   service request through the LSR life cycle.

---

[7]   The Response Testimony of Pamela Johnson, Tel West's service manager, indicates that she has assisted
Tel West in obtaining numerous expedites in 2002.

[8]   These methods are described in Chapter 3 of the IMA User Guide, which can be reviewed in its entirety at
http://www.qwest.com/wholesale/ima/gui.

1

2   4. Once service orders are provisioned, IMA will send a Completion notice to

3   the CLEC. Included in the Completion is the service and equipment ("S&E")

4   section. By line the S&E section provides the details as to what was actually

5   provisioned for the line.

6

7 **Q. MR. SWICKARD CONTINUED, STATING (PAGE 21, LINES 12-14) THAT,**

8 ***"The Qwest retail representative also receives confirmation that facilities exist at the***

9 ***address entered to indicate that the order can be completed in the standard due date***

10 ***interval or the customer requested due date if later… IMA-GUI does not do this."*** **IS**

11 **MR. SWICKARD'S STATEMENT CORRECT?**

12 A. No, Mr. Swickard is incorrect. In fact, IMA GUI includes a Facility Availability

13 function ("FAQ") that will identify by telephone number or address the facilities

14 currently available. IMA's FAQ is a stand-alone pre-order functionality that gives the

15 CLEC real time information about whether there is facility available that will allow the

16 order to be completed within the Service Interval. If the availability of a facility is in

17 jeopardy after the order has been placed, a jeopardy notice is sent to the CLEC via

18 email and/or fax.

19

20   **IV. ERROR AND REJECT NOTICES**

21 **Q. IN DESCRIBING ORDER ENTRY, MR. SWICKARD STATED (PAGE 6, LINE**

22 **26 AND PAGE 7, LINES 1-3) THAT, *"…if the Tel West CR has not filled in a field***

23 ***required by IMA-GUI, the CR will receive an error notice by email from IMA-GUI or***

24 ***a person typing the order. This error message is received anywhere from 20 minutes***

25 ***to 48 hours after the CR enters the order."*** **IS MR. SWICKARD'S STATEMENT**

26 **CORRECT?**

27 A. It is unclear to which errors Mr. Swickard is referring. If Mr. Swickard is referring to a

28 BPL error, the GUI will immediately, upon submission of the LSR, respond back with

29 a BPL reject message. This message will detail the error and the form on which it

1   occurred. If a Tel West LSR successfully passes the IMA/BPL edits but errs in the

2   back-end systems because Tel West has failed to correctly fill in a required field, Qwest

3   sends a reject notification. The timeframe for receipt of a Rejection Notice is

4   dependent upon the type of Rejection. According to PID PO-3A-1, for LSRs rejected

5   manually, the CLEC must be notified in 12 business hours or less, and for LSRs

6   rejected automatically, the CLEC must be notified in 18 seconds or less. See Exhibit

7   WRE-6, at 5. For Tel West, from November 2001 through April 2002, the average

8   reject notification for manual-rejects for Tel West was 2 hours and 6 minutes or less

9   each month. See Exhibit WRE-C7, at 2. On average over that period, Tel West

10   received reject notifications in just 1 hour, 45 minutes. *Id.* For the same timeframe, the

11   average reject notification timeframe for auto-rejects (measured by PO-3A-2) was 9

12   seconds or less each month. *Id.*

13

14   **Q.   IN HER TESTIMONY, MS. HILD STATES (PAGE 7, LINES 20-22) THAT**
15   **WHEN AN LSR IS REJECTED, THE CLEC MUST RETYPE THE ENTIRE**
16   **LSR. IS THIS TRUE? IF NOT, PLEASE DESCRIBE HOW A CLEC WOULD**
17   **CORRECT THE LSR.**

18   A.   No, this is incorrect. If an LSR is rejected, the CLEC does not have to re-type the

19   entire LSR unless it waits 90 days to respond. After receiving a rejection notice on an

20   LSR the CLEC has the option to resubmit the LSR as a supplement. On the IMA GUI

21   the end user can select "Open LSR" from the Order drop down menu. The CLEC can

22   then retrieve and select the correct LSR. On the LSR form, the CLEC can use the

23   "SUP" field to identify that it is submitting a supplemental request. The data can then

24   be corrected or changed on the LSR, the version on the LSR should be incremented,

1   and the supplemental version of the LSR can then be re-submitted. Directions for

2   submitting supplements can be found in the IMA User's Guide, which is available on

3   the Qwest Wholesale Market web site at

4   http://www.qwest.com/wholesale/ima/gui/imauser.html. After 90 days, the archives

5   process deletes the LSR and, at that point, a CLEC would be required to re-type the

6   LSR if it wishes to re-submit the LSR.

7

8   Q.   **MR. SWICKARD STATED (PAGE 10, LINES 23-25) THAT,** *"It is much easier*
9   *for a Qwest retail CR to resolve errors when they occur because they have real time*
10   *access to information. If there is an error in an order, for instance, the Qwest CR*
11   *receives an instant rejection from the SONAR system."* **PLEASE RESPOND.**

12   A.   As discussed above, CLECs also receive instant error messages in the form of BPL

13   rejects. I would assume Mr. Swickard is aware of this functionality since Tel West

14   received back 2,051 BPL reject messages between December 2001 and April 2002 (an

15   average of over 410 per month).

16

17   Q.   **MR. SWICKARD FURTHER STATED (PAGE 11, LINES 12-20) THAT** *"Most*
18   *orders, however, are much more difficult to resolve. For example, Tel West*
19   *sometimes seeks to reconnect a person who was disconnected for nonpayment. This*
20   *person may reside in a house with two different apartments on upper and lower*
21   *levels. Both levels will have the same or very similar addresses but different phone*
22   *numbers. When Tel West submits an order for new service for one of these levels,*
23   *the OSS will reject it because the system believes that there is already active*
24   *telephone service at the address. For some reason, Tel West sometimes learns about*
25   *this a week or more after it submitted the order. Often, Tel West only learns about a*
26   *problem when a customer calls to complain that their service was not turned on."*
27   **PLEASE RESPOND.**

28   A.   First, in response to Mr. Swickard's statements about apartments with similar

29   addresses, IMA GUI provides real-time address validation functionality. If Tel West

1   uses this function, and inputs the correct address on the LSR, the system will accept the

2   address for a new service request.

3

4   Secondly, in response to Mr. Swickard's statements about submitting a new order for a

5   customer who has been disconnected for nonpayment, Tel West must submit a

6   conversion request on this type of order rather than a new connect order. When a

7   customer is in a denied status for nonpayment, there is still a working line at that

8   location on which the dial tone has been suspended. Thus, if Tel West submits a

9   request for new service at that location, it will be rejected, advising that the order must

10   be submitted as a conversion.

11

12   **Q.   MR. SWICKARD STATED (PAGE 22, LINES 18-25 AND PAGE 23, LINES 1-2)**
13   **THAT,** *"Tel West only learns about problems long after it has submitted its order to*
14   *Qwest. It either finds out about them when it receives an email error message from*
15   *Qwest that may arrive two days after the order was entered, or when the angry*
16   *customer contacts Tel West and complains that their service is not functioning or*
17   *that there is something wrong with it. This is especially problematic where Tel West*
18   *has a new customer who does not have any service yet. Tel West has no way, in*
19   *many cases, to contact that customer to let them know about an error message or a*
20   *changed due date or some other problem with the account. This is why it is*
21   *extraordinarily important to have real time access, so that problems are resolved*
22   *while the customer is on the phone. These types of problems do not exist for Qwest*
23   *retail CRs."* **HOW DOES QWEST NOTIFY CLECS WHEN THEIR LSRS**
24   **REJECT?**

25   A.   Mr. Swickard is incorrect in his implication that Tel West waits days to receive reject

26   notices from Qwest. Again, please see my prior explanations of BPL rejects, IMA

27   rejects and jeoped orders.

28

1   V.   INTERCONNECT SERVICE CENTER AND OTHER TEL WEST SUPPORT

2   Q.   MR. SWICKARD STATED (PAGE 15, LINES 1-14) THAT, *"According to*
3   *Qwest's data, Qwest CRs Handle Retail Orders In The Following Time Frames:*
4
5   *New connection: 12.6 minutes*
6   *Change in existing service: 7 minutes*
7   *Disconnection: 4.3 minutes*
8   *Transfer of service (new address): 8.5 minutes*
9
10   *… these short processing times allow Qwest to process an order and give a retail*
11   *customer their new phone number and an expected date of service while that*
12   *customer is on the phone. Bear in mind that these times also include Qwest's retail*
13   *functions, like trying to retain customers, cross-selling additional services and*
14   *explaining services and procedures to customers. Qwest is able to combine the retail*
15   *order taking function with order entry because of its superior access to OSS. Tel*
16   *West has to split the two functions."* **CAN QWEST COMPARE THE NUMBERS**
17   **QUOTED ABOVE WITH THE CORRESPONDING WHOLESALE**
18   **NUMBERS?**

19   A.   Qwest can only track the processing time for a CLEC order once the CLEC LSR has

20   reached Qwest systems. PID PO-1 evaluates the timeliness of responses to specific pre-

21   order/order queries through the use of Qwest's OSS interface. It measures the time

22   interval between query and response according to established benchmarks. See Exhibit

23   WRE-6, at 1. Qwest refers the Commission to Qwest's performance results, which are

24   measured in seconds. See Exhibit WRE-8, at 1-8. Qwest has met every applicable PO-

25   1 benchmark for each month between November 2001 and April 2002. *Id*.

26

27   Q.   MR. SWICKARD CLAIMS (PAGE 28, LINES 21-25) THAT, *"…Qwest provides*
28   *significantly inferior quality service to Tel West, especially with regard to ordering*
29   *service and support. This is because the Aegis CRs that serve Tel West have far less*
30   *experience and fewer capabilities than CRs helping Qwest's retail customers. These*
31   *provide Qwest with a comparative advantage and decrease Tel West's ability to retain*
32   *customers."* **PLEASE RESPOND.**

1   A.   Aegis is a supplier under contract with Qwest to perform services on behalf of Qwest

2   for its wholesale customers.[9] Aegis employs call handlers in Sierra Vista, Arizona that

3   provide a tier 0 capability for the Interconnect Service Center ("ISC"), offering the

4   initial point of contact for all calls about LSRs submitted by CLECs. In addition,

5   Aegis-Dallas is a production-typing center that handles resale orders.

6

7   All call center representatives receive initial and ongoing training that allows them to

8   respond to CLEC inquiries. Each representative receives three weeks of system

9   training/product training, one week of shadowing another representative's calls, and

10   three days of "nesting" with an experienced representative (two days switching

11   responsibilities and one with the new representative performing and the experienced

12   representative observing). Training within the call handling center is continuous and

13   on-going due to new product deployment or changes in methods, procedures, or

14   systems.

15

16   In terms of the relative experience of Qwest's wholesale and retail personnel, the data

17   Tel West is relying upon – Qwest's response to data request Tel West 01-010 (see

18   Exhibit JS-20) – does not provide support for Tel West's assertions. The number of

19   years of experience described there is not an apples-to-apples comparison. The retail

20   data show all management and occupational personnel in the retail Care and Sales

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[9]   Incidentally, Aegis is also a supplier of service for various retail functions at Qwest. This is known to Tel West, as it is stated in Qwest's response to data request Tel West 01-010, a copy of which Mr. Swickard attached to his testimony at Exhibit JS-20. See page 3 of that exhibit.

1   organizations. The wholesale numbers are not aggregated (as are the retail numbers),

2   but instead are broken into Qwest personnel and Aegis personnel. The Aegis SDCs are,

3   in terms of job level, most closely comparable to the retail CRs. Given Ms. Taylor's

4   testimony about the high turnover rate on the retail side, especially in the retail call

5   centers, Mr. Swickard's allegations are not well supported.

6

7   *Q.*   **IN HIS CLAIM THAT AEGIS CRS ARE INFERIOR TO QWEST CRS MR.**
8   **SWICKARD INDICATED THAT,** *"Qwest CRs have 14.1 years of experience, and*
9   *AEGIS CRs have only 1.2 years of experience."* **WITH RESPECT TO TRAINING,**
10   **MR. SWICKARD ALSO STATED THAT,** *"Qwest gives its retail CRs [eleven*
11   *weeks] of training... Aegis CRs receive as little as two weeks of training… some CRs*
12   *receive up to eight weeks of training, although Qwest does not state which ones*
13   *do…presumably, these are supervisors who are not initially handling Tel West*
14   *inquiries. of course with and average of over 14 years of on-the-job experience, the*
15   *training time of Qwest's CRs is largely irrelevant."* **PLEASE RESPOND.**

16   A.   With regard to Mr. Swickard's assertion that Aegis CRs are inferior to Qwest CRs

17   because of their years of experience, it is important to note that the a CR's years of

18   experience are not necessarily indicative of his or her capability to handle CLEC calls

19   and/or process orders. In fact, Qwest employees, though they may have many years

20   with the company, migrate in and out of positions and may or may not have any

21   experience in call handling and or service order processing.   Mr. Swickard errs in his

22   comments that Aegis CRs receive as little as two weeks training. As described above,

23   Aegis CRs receive five weeks of initial training, as well as ongoing training.

24

25   Q.   **MR. SWICKARD CONTENDS (PAGE 31, LINES 3-5) THAT,** *"Qwest's CRs*
26   *process orders much faster than Aegis CRs. According to Qwest, its retail CRs*
27   *average 36.13 orders per day. Aegis CRs average 26.9 orders per day."* **PLEASE**
28   **RESPOND.**

1   A.   Any difference between Qwest and Aegis performance is irrelevant. The more

2   important question is whether the difference has an effect on the ultimate goal -

3   delivery of service to the customer. Absolutely not. See Qwest's PID measurements on

4   PO-5, which measures the timeliness of FOCs. As stated above, Qwest has surpassed

5   the benchmark for PO-5 for all CLECs aggregate as well as for Tel West specifically.

6   See Exhibit WRE-C7, at 3-4. Additionally, Qwest's performance on OP-3 and OP-4

7   for residential orders has been outstanding and at parity each month since the current

8   interconnection agreement went into effect. This was discussed in greater detail in the

9   Mr. Easton's testimony.

10

11   Also, once again, Tel West is trying to draw an apples-to-apples conclusions from data

12   which does not compare apples with apples. Aegis CRs processing orders on the

13   wholesale side do not perform the same function as retail CRs entering orders into

14   SONAR. On the retail side, the CR is asking for data from the source of that

15   information and is merely entering it into SONAR. Aegis CRs, especially those at

16   Aegis Dallas who handle resale POTS orders, only work with orders that have, due to

17   the existence of error or errors, dropped out of flow through for manual handling. The

18   Aegis CR has to do more than simple order entry; he or she has to troubleshoot the

19   LSR, the CSR and any other available information to determine the nature and remedy

20   for the problem. Thus, a simple quantitative comparisons of how many orders are

21   processed in a day by Aegis CRs versus how many are processed by retail CRs is

22   virtually meaningless.

1

2 **Q. FURTHER, MR. SWICKARD STATES (PAGE 6, LINES 22-23),** *"In our*
3 *experience Aegis is simply a screening mechanism that is only able to answer the*
4 *most basic questions, but cannot solve problems."* **PLEASE RESPOND.**

5 A. Mr. Swickard errs in his assertion that Aegis is simply a screening mechanism.

6 Between November 2001 and April 2002, Aegis Sierra Vista resolved 52.1% of Tel

7 West's **[Confidential]** inquiries without the need for further escalation;

8 only 45.7% required escalation. Mr. Swickard's statement that Aegis does not resolve

9 issues is obviously incorrect based on Tel West's own experience.

10

11 Aegis is the first point of contact for the CLEC that telephones the ISC. If a CLEC has

12 questions of a more technical nature, the CLEC has the option of either being warm

13 transferred to a Customer Service Inquiry and Education representative or it may

14 choose to have a ticket placed in a work queue and wait for Qwest to call it back. Ms.

15 Johnson's testimony also makes it clear that Tel West also makes frequent use of her

16 time to have its questions answered, expedites processed and issues resolved.

17

18 **Q. MR. SWICKARD ALSO CLAIMS (PAGE 28, LINES 12-17) THAT THE AEGIS**
19 **ISC REPRESENTATIVES HAVE ACCESS TO THE SAME RETAIL SYSTEMS**
20 **AS QWEST, WHICH PROVES THAT THERE IS NO NEED TO RESTRICT**
21 **ACCESS TO THESE SYSTEMS FOR QWEST EMPLOYEES ONLY. PLEASE**
22 **DESCRIBE AEGIS' RELATIONSHIP TO QWEST.**

23 A. Aegis is a supplier under contract with Qwest to perform services on behalf of Qwest

24 for its wholesale customers. Aegis is not a "customer" of Qwest. Thus, Aegis' access

1   to Qwest's internal systems is limited to its capacity as an agent "working for" Qwest.

2   Its relationship with Qwest is not comparable to Tel West's relationship with Qwest.

3

4   **VI.   CONCLUSION**

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

6 A.   Yes.