

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

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

**RESPONSE TESTIMONY OF
WILLIAM R. EASTON**

QWEST CORPORATION

June 11, 2002

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1

I IDENTIFICATION OF WITNESS

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION**
3 **WITH QWEST CORPORATION.**

4 A. My name is William R. Easton. My business address is 1600 7th Avenue, Seattle
5 Washington. I am employed as Director – Wholesale Marketing. I am testifying on
6 behalf of Qwest Corporation (“Qwest”).

7

8 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
9 **EMPLOYMENT EXPERIENCE.**

10 A. I graduated from Stanford University in 1975, earning a Bachelor of Arts degree. In
11 1980 I received a Masters of Business Administration from the University of
12 Washington. In addition, I am a Certified Management Accountant and member of
13 the Institute of Management Accountants.

14

15 I began working for Pacific Northwest Bell in 1980, and have held a series of jobs in
16 financial management with U S WEST, and now with Qwest, including staff
17 positions in the Treasury and Network organizations. From 1996 through 1998, I was
18 Director – Capital Recovery. In this role I negotiated depreciation rates with state
19 commission and FCC staffs and testified in various regulatory proceedings. From
20 1998 until 2001 I was a Director of Wholesale Finance, responsible for the
21 management of wholesale revenue streams from a financial perspective. In this
22 capacity I worked closely with the Product Management organization on its product
23 offerings and projections of revenue. In October of 2001 I moved from Wholesale

1 Finance to the Wholesale Advocacy group, where I am currently responsible for
2 advocacy related to Wholesale products and services. In this role I work extensively
3 with the Product Management, Network and Costing organizations.
4

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

7 A. Yes. I testified in Docket Numbers UT-940641, UT-950200, UT-951425 and UT-
8 960347. Most recently, I testified in Part D of the Washington cost docket, Docket
9 No. UT-003013.
10

11 **II. PURPOSE**

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

13 A. My testimony is a response to the Direct Testimony of Jeff Swickard for Tel West
14 Communications, LLC Regarding Part Two Issues (“Swickard Part B Direct
15 Testimony”) filed April 15, 2002. Specifically, I will address Mr. Swickard’s claim
16 that there is a lack of parity between Qwest’s wholesale and retail order provisioning
17 performance. I will discuss the statistical measurements that Qwest and the CLECs
18 have jointly developed and implemented to measure the degree to which there is
19 parity between Qwest’s wholesale and retail order provisioning. I will then examine
20 Qwest’s performance with respect to these measures. Finally, I will introduce
21 additional statistical measurements being tracked by Qwest that shed light on other
22 issues in this proceeding.
23

1

III. WHOLESALE/RETAIL PARITY MEASURES

2 **Q. MR. SWICKARD CHARGES THAT QWEST PROVIDES SERVICES TO**
3 **TEL WEST “In an inferior manner, a lower quality and a longer time than it**
4 **provides services to itself.”¹ ARE THERE WAYS TO QUANTITATIVELY**
5 **DETERMINE WHETHER QWEST’S WHOLESALE ORDER**
6 **PROVISIONING IS AT PARITY WITH ITS RETAIL ORDER**
7 **PROVISIONING?**

8 A. Yes. Qwest’s systems contain order provisioning information for both wholesale and
9 retail orders. Thus, a statistical comparison of this information can be performed to
10 determine the degree to which there is parity between wholesale and retail from a
11 quantitative perspective based on the available data.

12

13 **Q. HAS QWEST DEVELOPED ANY SPECIFIC INDICES WHICH MEASURE**
14 **THE PARITY BETWEEN QWEST’S WHOLESALE AND RETAIL ORDER**
15 **PROVISIONING?**

16 A. Yes. As a part of its process to receive Section 271 approval, Qwest has developed,
17 and is tracking, numerous service performance indicators designed to address service
18 quality associated with specified Section 271 Checklist items. These Performance
19 Indicator Definitions (“PIDs”) address key dimensions of service, primarily involving
20 installation and repair, with a focus on timeliness and accuracy. A number of the
21 PIDs focus specifically on a comparison of Retail and Wholesale order provisioning.

22

23 The PIDs have been compiled into a comprehensive Performance Indicator
24 Definitions document that explains each of the PIDs, providing detailed descriptions,

¹ Swickard Part B Direct Testimony, page 2, lines 10-12.

1 formulas and standards. Attached as Exhibit WRE-2 are excerpts from Performance
2 Indicator Definitions version 4.1 detailing the PIDs related to order provisioning
3 discussed below. A copy of the complete PID document can be found at
4 www.qwest.com/wholesale/results/roc.html.

5

6 **Q. HOW WERE THE PIDS DEVELOPED?**

7 A. The PIDs were developed under the guidance of the Regional Oversight Committee
8 (ROC), through a two year collaborative process involving Qwest, CLECs and the
9 state commissions. This process was summarized concisely by the Liberty
10 Consulting Group, an outside consultant engaged by the ROC, on page 1 of its Final
11 Report on the Audit of Qwest's Performance Measures dated September 25, 2001.²

12 Prior to the start of the PMA [the Performance Measures Audit
13 conducted by Liberty at the request of the ROC], the
14 stakeholders in the Qwest region generally reached a consensus
15 about how to measure the adequacy of Qwest's service to
16 CLECs, what role comparative and absolute measures should
17 play in those measurements, and what detailed measures would
18 be used to evaluate Qwest's fulfillment of its obligations to
19 make the network available to CLECs. This consensus was
20 documented in the Performance Indicator Definitions, or PID
21 report. The PMA did not include an examination of the
22 propriety of the measurements required by the PID. It took
23 them as a given, recognizing that any process for changing
24 them was a matter for the larger group that worked to develop
25 them. However, the audit work did include an assessment of
26 whether all requirements of the PID were objectively stated
27 and not subjected to multiple interpretations.
28

² A complete copy of Liberty's 156 page Final Audit Report was appended to Qwest's performance filing in the 271 docket (Nos. UT-003022/UT-003040) for August 2000 to July 2001 data. If requested, Qwest will provide another copy to the Commission.

1 Based on the measurements ultimately agreed to by consensus, Qwest has tracked its
2 commercial data on a regional and a state-by-state basis, both on a CLEC-specific
3 level (which is held confidential) and an aggregate (all CLECs) level. Each month,
4 two versions of each aggregate state and the regional report (one version organized by
5 PID categories and one version organized by checklist item) are posted for public
6 inspection on Qwest's external website at
7 <http://www.qwest.com/wholesale/results/index.html>.

8
9 During the performance measurement audits and the 271 OSS transactional testing,
10 after the data was posted each month, an extensive and open process for addressing
11 and resolving test issues was employed by the test administrator and participating
12 Commission staffs. This included re-tests and a repeat of the process to ensure that
13 critical issues were resolved. The results are reported in the KPMG final test report, a
14 copy of which is attached to the Response Testimony of Barbara Brohl, and in the
15 Liberty final audit report.

16

17 **Q. WHAT CONCLUSION DID THE LIBERTY AUDIT REACH ABOUT THE**
18 **ACCURACY OF THE PIDS?**

19 A. Liberty found (at pages 2 and 3 of its Final Audit Report) the following: "Liberty has
20 now concluded that the audited performance measures accurately and reliably report

1 actual Qwest performance.” Liberty’s full audit findings were summarized in its 156
2 page Final Audit Report.³

3

4 **Q. HOW ARE THESE PIDS BEING USED IN THE 271 PROCESS?**

5 A. The PIDs and Qwest’s performance for each of the measures have been reviewed
6 extensively by state utilities Commissions, including the Washington Utilities and
7 Transportation Commission, as part of the 271 process. The performance measures
8 are used by the Commissions to determine if Qwest is serving CLECs in substantially
9 the same time and manner as Qwest provides the analogous services to its retail
10 customers. These PIDs also form the basis for the Qwest Performance Assurance
11 Plan (“QPAP”) that will be used to help assure that performance standards continue
12 to be maintained following the approval for Qwest to offer long distance services.
13 Attached, as WRE-3, is a copy of Qwest’s most recently proposed QPAP.

14

15 **Q. DO THESE PERFORMANCE INDICATOR DEFINITIONS EVER CHANGE?**

16 A. Yes they do. The Technical Advisory Group (TAG) of the ROC reviewed PID issues
17 up to the completion of the test and, where the parties agreed that modification would
18 lead to a more meaningful measurement, the PID was modified. When changes to the
19 PIDs were adopted by the Technical Advisory Group, Qwest formally memorialized
20 the changes in subsequent versions of the PID. Also, soon after publishing its
21 performance results on the website each month, Qwest also publishes a Summary of

³ See footnote 2.

1 Notes document which summarizes any changes which have been made that affect
2 results, including both PID changes and other changes which are PID compliant.

3 This document is available at Qwest's public website at
4 www.qwest.com/wholesale/results/roc.html. Together, the PID document and the
5 Summary of Notes provide the most current description and definition of the PIDs.
6 When a PID changes, the corresponding results on that PID have been re-cast, as
7 appropriate.

8

9 **Q. WHAT IS THE "SUCCESSOR FORUM" TO THE TECHNICAL ADVISORY**
10 **GROUP, NOW THAT THE ROC 271 OSS TEST HAS BEEN COMPLETED?**

11 A. As one of its closing activities, the ROC Technical Advisory Group discussed
12 recommendations for what the parties called, "Long Term PID Administration."
13 Ideas and proposals were discussed and Qwest submitted its proposal for going
14 forward. The Steering Committee (comprised of commission staff members from
15 participating states) is in the process of developing a recommendation and discussing
16 it with the ROC commissioners who were designated to oversee the ROC 271 OSS
17 test. These commissioners are expected to recommend to the ROC, as a whole, an
18 approach for Long Term PID Administration that it supports. Qwest anticipates that,
19 at some point in the near future, the ROC commissioners will make known their plans
20 and invite the participation of state Commissions, CLECs, and Qwest.

21

22 Based on the dimensions that appeared to have common agreement among the parties
23 before the matter went to the ROC commissioners for consideration, Qwest

1 anticipates that the Long Term PID Administration will include a forum much like
2 the Technical Advisory Group of the ROC 271 OSS test. This forum will hold
3 regular meetings, possibly bi-monthly, will discuss PID issues, and will endeavor to
4 reach agreement on appropriate changes. When such agreements are reached, Qwest
5 will update its PIDs, as appropriate. Where agreements are not reached, Qwest
6 expects that there will be some process for the moving party to pursue the matter
7 further, in escalation, to reach resolution. As a minimum, since performance
8 assurance plans will be administered with the involvement of individual state
9 Commissions, Qwest expects that contested matters could be brought to individual
10 state Commissions, where needed, for resolution. Thus, going forward, the PID
11 measurements will continue to be reported in accordance with definitions that have
12 been adopted by the appropriate forum, such as was done through the Technical
13 Advisory Group during the ROC 271 OSS test.

14

15 **Q. ARE THERE DIFFERENT TYPES OF PERFORMANCE MEASURES?**

16 A. Yes. There are two primary types of measures, based on the type of standard applied:
17 parity and benchmark.⁴ Parity measures compare CLEC performance to Qwest retail
18 performance where a retail analogue is available. Where no retail analogue is

19

⁴ In addition to parity and benchmark standards, Qwest also utilizes diagnostic measures and measures which are deemed to be parity by design.

1 available, or where the parties otherwise agreed, a benchmark standard (i.e., a hard
2 and fast performance level such as 90% or 24 hours) is specified.

3

4 **Q. HOW IS PARITY MEASURED BETWEEN QWEST'S WHOLESALE AND**
5 **RETAIL PERFORMANCE?**

6 A. The degree of parity between wholesale and retail performance is determined through
7 a statistical comparison of the wholesale and retail performance data. Basically this
8 analysis determines whether differences in performance are statistically significant or
9 are the result of random variations. The detailed calculations have been discussed
10 and documented in the 271 workshops. Attached as Exhibit WRE-4 is a guide titled
11 "Understanding Qwest's 271 Statistical Reports" which explains the statistical
12 methodology employed in the reports and the development of parity scores.

13

14 **Q. HAS THE FCC USED SIMILAR MEASURES FOR EVALUATING**
15 **PERFORMANCE PARITY?**

16 A. Yes. In its decision approving Verizon's application to provide interLATA services
17 in the state of Pennsylvania, the FCC set forth a legal standard for the use of
18 performance measures in determining parity. Specifically:

19 8. The Commission has explained in prior orders that parity and
20 benchmark standards established by state commissions do not represent
21 absolute maximum or minimum levels of performance necessary to satisfy the
22 competitive checklist. *Rather, where these standards are developed through*
23 *open proceedings with input from both the incumbent and competing carriers,*
24 *these standards can represent informed and reliable attempts to objectively*
25 *approximate whether competing carriers are being served by the incumbent in*
26 *substantially the same time and manner, or in a way that provides them a*
27 *meaningful opportunity to compete. Thus, to the extent there is no statistically*
28 *significant difference between a BOC's provision of service to competing*
29 *carriers and its own retail customers, the Commission generally need not look*
30 *any further. Likewise, if a BOC's provision of service to competing carriers*

1 satisfies the performance benchmark, the analysis is usually done. Otherwise,
2 the Commission will examine the evidence further to make a determination
3 whether the statutory nondiscrimination requirements are met. Thus, the
4 Commission will examine the explanations that a BOC and others provide
5 about whether these data accurately depict the quality of the BOC's
6 performance. The Commission also may examine how many months a
7 variation in performance has existed and what the recent trend has been. The
8 Commission may find that statistically significant differences exist, but
9 conclude that such differences have little or no competitive significance in the
10 marketplace. In such cases, the Commission may conclude that the
11 differences are not meaningful in terms of statutory compliance. Ultimately,
12 the determination of whether a BOC's performance meets the statutory
13 requirements necessarily is a contextual decision based on the totality of the
14 circumstances and information before the Commission.

15 9. Where there are multiple performance measures associated with a
16 particular checklist item, the Commission would consider the performance
17 demonstrated by all the measurements as a whole. Accordingly, a disparity in
18 performance for one measure, by itself, may not provide a basis for finding
19 noncompliance with the checklist. The Commission may also find that the
20 reported performance data is affected by factors beyond a BOC's control, a
21 finding that would make it less likely to hold the BOC wholly accountable for
22 the disparity. This is not to say, however, that performance discrepancies on a
23 single performance metric are unimportant. Indeed, under certain
24 circumstances, disparity with respect to one performance measurement may
25 support a finding of statutory noncompliance, particularly if the disparity is
26 substantial or has endured for a long time, or if it is accompanied by other
27 evidence of discriminatory conduct or evidence that competing carriers have
28 been denied a meaningful opportunity to compete.⁵
29

30 **Q. COULD YOU PLEASE BRIEFLY DESCRIBE THE KEY ORDERING AND**
31 **PROVISIONING PIDS THAT ARE DETAILED IN WRE-2?**

32 A. Qwest has developed several performance indicators that are designed to determine if
33 ordering and provisioning for CLECs is performed in a non-discriminatory manner.
34 These measures include, most importantly, installation commitments met (measure
35 OP-3) and average installation intervals (measure OP-4). The specific measures are
36 listed and summarized below:

⁵ *In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania*, CC Docket No. 01-138 App. C, ¶¶ 8-9 (Sept. 19, 2001) (footnotes omitted; italics added).

1

2 **Installation Commitments Met (OP-3):** Measures the extent to which Qwest
3 installs services for Customers by the scheduled due date.

4

5 **Installation Interval (OP-4):** Measures the timeliness of Qwest's installation of
6 services for customers, focusing on the average time to install service.

7

8 It should be noted that, in addition to reporting results for each of the more than two
9 dozen products, each of these measures has several sub-elements:

- 10 - Dispatches within MSA;
- 11 - Dispatches outside MSA;
- 12 - No dispatches;
- 13 - In interval zone 1;
- 14 - In interval zone 2 .

15

16 **A. DOES QWEST TRACK PERFORMANCE ON THESE MEASURES FOR**
17 **INDIVIDUAL CLECS SUCH AS TEL WEST?**

18 A. Yes. As I noted above, Qwest tracks these measures for all CLECs in the aggregate
19 (on a state-by-state and a regional level) and also for each individual CLEC for each
20 state in which the CLEC does business in Qwest's region. These reports track data on
21 a rolling 12-month basis. Monthly reports with CLEC specific information are
22 produced and provided to each of the CLECs. The following section of my testimony

1 will analyze Tel West specific information related to Qwest's performance on the
2 order provisioning measures I have identified above.

3

4

IV. QWEST ORDER PROVISIONING PERFORMANCE

5 **Q. DO YOU HAVE A REPORT WHICH TRACKS QWEST ORDER**
6 **PROVISIONING PERFORMANCE FOR TEL WEST ORDERS?**

7 A. Yes. Attached as confidential exhibit WRE-C5 are the pages from Tel West's May
8 2001 through April 2002 report containing OP-3 and OP-4 performance information.
9 This report was issued on May 18, 2002.

10

11 **Q. COULD YOU PLEASE EXPLAIN HOW THESE REPORTS SHOULD BE**
12 **READ?**

13 A. Yes. The following is a description of each of the fields on the report.

14

15 • **Column headings for data tables and accompanying graphs:**

16 **Date:** Reporting month of data

17 **CLEC Num.:** The quantity meeting the criteria described in the
18 performance indicator definition for the numerator of the formula for the
19 measurement, dealing with services Qwest provides to the CLEC. The
20 formula for a particular PID is set out in PID 4.1, excerpts of which are
21 attached at WRE-2.

1 **CLEC Denom.:** The sample size or number of events contributing to the
2 measurement, as defined in the PID to represent the specific dimension of
3 service performance provided to the CLEC(s).

4 **CLEC Result or Result:** The outcome of executing the formula
5 calculation defined in the PID to represent the specified dimension of service
6 performance provided to CLEC(s).

7 **Std. Dev.:** The standard statistical parameter representing the degree of
8 variability of performance in the PID-specified dimension of the service (e.g.,
9 installation or repair) for the events measured in accordance with the PID.
10 Standard deviations are generally reported where statistical methods will be
11 used to evaluate the comparisons between performance for CLECs and for
12 retail.

13 **Qwest Num.:** The quantity meeting the criteria described in the PID for the
14 numerator of the formula for the measurement, dealing with services Qwest
15 provides to retail customers or, as specified, to “itself” (e.g., for network
16 components used in providing retail service, as stated in the PID).

17 **Qwest Denom.:** The sample size or number of events contributing to the
18 measurement, as defined in the formula, dealing with services Qwest provides
19 to retail customers or, as specified, (e.g., for network components used in
20 providing retail service, as stated in the PID).

1 **Qwest Result:** The outcome of executing the formula calculation defined
2 in the PID to represent the specified dimension of service performance
3 provided to the retail customers.

4 **Mod Z-Score:** The statistical Z-score, based on the ILEC variance, for the
5 difference between CLEC and retail results reported in the table, calculated
6 using standard statistical methods. A Mod Z-score of less than +1.645 means
7 there is no statistically significant evidence of a lack of parity at the 95 percent
8 confidence level to the disadvantage of CLECs. A Mod Z-score of greater
9 than or equal to +1.645 means the result shows a statistically significant
10 disparity in favor of Qwest retail for a given month at the 95 percent
11 confidence level.

12 **Parity Score:** A numeric indication of whether the reported difference in
13 results is statistically significant, based on a standard Z-test or, where volumes
14 are less than 100, based on a permutation or proportion test. A negative Parity
15 Score means the result is not statistically significant at the 95 percent
16 confidence level to the disadvantage of CLECs. A positive Parity Score
17 means the result shows a statistically significant disparity in favor of Qwest
18 retail for the given month at the 95 percent confidence level.

19 • **Response Time:** In the PO-1 measurement, where pre-order query/response
20 transaction time intervals are measured, the response time column reports the time
21 interval associated with the transaction specified in the heading of the table.

- 1 • Each **graph** depicts values from the “result” columns in the table at its left, with the
2 reporting months shown along the bottom of the or “x” axis and the value scale along
3 the left edge or “y” axis.
- 4 • Where there is **no retail comparison reported**, the graph only reports the result
5 representing the service performance as provided to the CLEC(s).
- 6 • Where a **benchmark** applies, the graph shows a dashed line representing the
7 benchmark that applies.
- 8 • **Blank spaces** in the table mean that there is no activity to be reported under the
9 specified measurement in the reporting month.
- 10 • “NA” or “not applicable,” indicates that the statistical parameter is not defined,
11 usually due to a divide-by-zero situation.
- 12 • Where **no table or graph** is provided for a measurement defined in the PID, there
13 was either (1) no activity in any of the reporting months shown in the report for that
14 measurement or (2) the measurements under development, as of the date of the report.
15 Presently, none of the ordering and provisioning measurements are under
16 development.

17

18 **Q. COULD YOU PLEASE DISCUSS THE TEL WEST RESULTS FOR EACH**
19 **PROVISIONING MEASURE IN YOUR EXHIBIT?**

20 A. Yes. Throughout my analysis I will be focusing on the parity scores, the last column
21 of data in each table. As noted above and detailed in WRE-4, parity scores indicate
22 whether there is parity between a wholesale measurement and its retail comparative.
23 A score of greater than zero indicates that retail performance is better than wholesale

1 performance and that, with 95 percent confidence, the difference is statistically
2 significant. Any negative score indicates that, according to the available data, there
3 is no statistically significant disparity in favor of Qwest retail.

4
5 **OP-3 – Installation Commitments Met** Looking at the data starting in November
6 2001, when the Tel West interconnection agreement became effective, through April
7 2002, there are a total of 40 separate monthly data points comprising
8 **[CONFIDENTIAL]** Tel West orders. When I use the phrase “data point,” I am
9 referring to the fact that there is a result under a particular PID or PID subcategory for
10 a particular month. For example, I am counting Qwest’s performance results under
11 OP-3A for residential POTS resale orders for April 2002 as one data point. For
12 residential POTS resale orders, which comprise **[CONFIDENTIAL]** % of Tel
13 West’s orders to Qwest during this six month time period, Qwest’s performance for
14 Tel West’s orders was at parity with Qwest’s own retail performance each month in
15 each subcategory. Only 4 of the 40 monthly data points had a positive parity score
16 and these positive scores related to just **[CONFIDENTIAL]** orders (or
17 **[CONFIDENTIAL]** % of Tel West’s reported orders). Those few misses, which
18 related to business POTS resale, PBX and DS0, are even less relevant to this
19 proceeding given Mr. Swickard’s testimony in Part A that this case has nothing to do
20 with business services.⁶

21

⁶ Part A Exhibit 1, page 3, lines 11-13.

1 **OP-4 – Installation Interval** For OP-4 there were 40 data points during the relevant
2 time period comprising [CONFIDENTIAL] orders. Qwest provided parity
3 performance under OP-4 for residential POTS resale service in each month between
4 November 2001 and April 2002 in each subcategory. Again, the data shows that
5 these orders constituted [CONFIDENTIAL] % of Tel West’s reported orders
6 during this period. Only 3 of the 40 data points had a positive parity score and these
7 related to just [CONFIDENTIAL] of the orders (or [CONFIDENTIAL] %
8 of Tel West’s reported orders).

9
10 **Q. HAVING REVIEWED THESE PERFORMANCE RESULTS, WHAT**
11 **CONCLUSIONS CAN YOU DRAW ABOUT QWEST’S PROVISIONING OF**
12 **TEL WEST ORDERS VERSUS ITS PROVISIONING OF SERVICE TO ITS**
13 **OWN RETAIL CUSTOMERS?**

14 A. Contrary to Mr. Swickard’s assertions, the data clearly indicates that Qwest’s
15 provisioning performance related to Tel West orders is at parity with its own retail
16 performance.

17
18 **V. ADDITIONAL PERFORMANCE INDICATORS**

19 **Q. ARE THERE ADDITIONAL PERFORMANCE MEASURES WHICH HAVE A**
20 **BEARING ON ISSUES RAISED IN THIS PHASE OF THE PROCEEDING?**

21 A. Yes. There are a number of other performance measures that provide useful
22 information related to issues that TelWest has raised in its testimony. Attached as
23 WRE-6 are pages from PID 4.1 relating to these additional measures. These
24 measures include:

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Pre-Order/Order Response Times (PO-1A): Measures the time interval between query and response for specified pre-order/order transactions through the IMA electronic interface.

Electronic Flow-Through (PO-2B-1): Measures the percentage of all flow-through-eligible LSRs that flow from the specified electronic gateway interface to the Service Order Processor (SOP) without any human intervention.

Local Service Request (LSR) Rejection Notice Interval (PO-3): Monitors the timeliness with which Qwest notifies CLECs that electronic and manual LSRs were rejected.

Firm Order Confirmations On Time (PO-5): Measures the percentage of Firm Order Confirmations (FOCs) that are provided to CLECs within the intervals specified under “Standards” below for FOC notifications.

Jeopardy Notice Interval (PO-8A): Measures the average time elapsed between the date the customer is first notified of an order jeopardy event and the original due date of the order.

1 indicates that Qwest's provisioning performance related to Tel West orders is at
2 parity with its own retail performance.

3

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

5 A. Yes it does.