

1

I.INTRODUCTION

2

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 My name is Linda Casey. My business address is 600 Hidden Ridge, Irving, Texas 75038.

5 :

6

7

8 **ARE YOU THE SAME LINDA CASEY WHO FILED PHASE A DIRECT AND**
9 **RESPONSIVE DIRECT TESTIMONY IN THIS MATTER?**

10 Yes, I am.

11

12 **ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS PROCEEDING?**

13 I am presenting testimony on behalf of Verizon Northwest Inc., which was formerly known as GTE Northwest
14 Incorporated. The company recently changed its name after the closure of the merger between its
15 parent company, GTE Corporation, and Bell Atlantic Corporation. The merged company name is
16 Verizon Communications.

17

18 **IN YOUR TESTIMONY HOW DO YOU USE THE TERMS "VERIZON NW" AND "GTE"?**

19 My fellow witnesses and I use "Verizon NW" to refer to Verizon Northwest Inc., the company that is a party
20 to this proceeding and on whose behalf we are testifying. I use "GTE" to refer to the former GTE
21 companies, which are now part of the Verizon Communications companies along with the former Bell
22 Atlantic companies. This will make clear that we are talking about cost studies and inputs that have
23 been developed by and for the GTE telephone operating companies and about those companies'

1 operations, practices and procedures.

2

3 **WHAT IS THE PURPOSE OF YOUR PHASE A REBUTTAL TESTIMONY?**

4 The purpose of my phase A rebuttal testimony is to respond to comments made by Msrs.

5 Klick, Zulevic and Lathrop in relation to costs for operations support systems

6 (“OSS”) transition, line sharing, installation and disconnection.

7

8 **II.OSS TRANSITION COSTS**

9

10 Q. MR. LATHROP ASSERTS THAT IT IS POSSIBLE THAT VERIZON NW DID NOT HAVE
11 FORWARD-LOOKING, EFFICIENT OSS SYSTEMS TO BEGIN WITH. IS THIS ASSERTION
12 TRUE?

13 A. No. The facts regarding Verizon NW's OSS prior to, and after, the implementation
14 of the Telecommunications Act of 1996 (“the Act”) are:

15

16 1) Verizon NW fulfilled its retail end-user customer requirements with systems and
17 processes that met their needs in the most cost-effective and efficient manner
18 available prior to the Act.

19

20 The Act mandated that Verizon NW make these same functionalities available to
21 CLECs.

22

1 CLECs have enjoyed access to the same functionalities at the same level of service to serve their
2 customers.

3
4 Verizon NW has incurred costs that would not otherwise be incurred but to make
5 these processes and systems available to CLECs.

6
7 Verizon NW has developed interfaces that are solely utilized by CLECs and would
8 not otherwise have been developed.

9
10 Any application of overheads and cost factors applied for recovery of Verizon NW's
11 OSS costs do not impact the incremental additional costs Verizon NW has
12 incurred to make these functionalities available to CLECs.

13

14 **III.LINE SHARING COSTS**

15

16 **Q. BOTH MSSRS. KCLICK AND ZULEVIC PROPOSE TIME ESTIMATES FOR**
17 **THREE SPLITTER COLLOCATION DESIGNS FOR LINE**

1 SHARING. HOW DO THESE WORK TIMES COMPARE TO VERIZON
2 NW'S WORK TIMES?

3 A. Verizon NW's witness Mr. Behrle discusses how the work times for functions other
4 than "ILEC Contact Groups" and "Other ILEC Groups" compare to Verizon NW's
5 projected costs. I discuss these last two categories, assuming them to be associated
6 with the activities performed by Verizon NW personnel to receive and provision a
7 line sharing request, including the completion of central office jumper work.

8

9 It appears that the work time estimates proposed by Mssrs. Klick and Zulevic are for
10 the initial ordering of the line sharing service, and that disconnect costs, which would
11 apply at the time of disconnection, are ignored.

12

13 The work times presented by Mssrs. Klick and Zulevic, which total 2.0 hours for
14 these two functions, are very close to the work times Verizon NW has projected for
15 work groups involved in initiating and provisioning a line sharing request, without
16 accounting for the eventual disconnect:

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Verizon NW Work Time Estimates In Hours

		CONNECT	DISCONNECT
CLEC OWNED SPLITTER			
	Ordering (NOMC)	.64	.32
	Provisioning (FAC)	.60	.60
	Field Work (CO Jumper)	.45	.36
	TOTAL	1.69	1.28
GTE OWNED SPLITTER			
	Ordering (NOMC)	.64	.32
	Provisioning (FAC)	.90	.60
	Field Work (CO Jumper)	.62	.45
	TOTAL	2.16	1.37

As addressed by Mr. Tanimura in his phase A revised direct testimony, Verizon NW is proposing separate disconnection rates to recover these costs.

IV. INSTALLATION AND DISCONNECTION COSTS

Q. MR. KLICK STATES THAT VERIZON NW HAS BEEN ORDERED BY PARAGRAPH 482 OF THE COMMISSION'S EIGHTH SUPPLEMENTAL ORDER TO UPDATE THE INSTALLATION AND DISCONNECTION CHARGES TO REFLECT 100% FULL-ELECTRONIC, FLOW THROUGH PROCESSES. DOES MR. KLICK ACCURATELY INTERPRET THE REFERENCED PARAGRAPH?

A. No. The paragraph states that cost studies should be revised to reflect the associated cost savings that may be achieved through computer links between the ILECs and CLECs' operational support systems when these systems are in place. Nowhere does this statement indicate that this will result in 100% electronic flow-through.

1 **Q. HAS VERIZON NW INCLUDED THE EFFICIENCIES GAINED BY IMPROVING**
2 **ELECTRONIC INTERFACES BETWEEN THE CLECS' SYSTEMS AND VERIZON**
3 **NW'S SYSTEMS?**

4 A. Yes. Verizon NW updated work times associated with order processing in
5 the National Open Market Centers (“NOMC”) in August of 1999. The
6 efficiencies gained from all OSS development and enhancements to date are
7 reflected in the updated work times. CLECs have the option to enter local
8 service requests (“LSRs”) into the Secure Integrated Gateway System
9 (“SIGS”) utilizing various electronic options. Today, approximately 27% of
10 basic LSR requests flow through these systems into the National Order
11 Collection Vehicle (“NOCV”) without human intervention. These
12 efficiencies are reflected in the updated cost studies submitted in this
13 proceeding.

14
15 **Q. DOES THIS CONCLUDE YOUR PHASE A REBUTTAL TESTIMONY?**

16 Yes.

17

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Continued Costing)
And Pricing for Interconnection,) DOCKET NO. UT-003013
Unbundled Elements, Transport and) PHASE A
Termination and Resale)

PHASE A REBUTTAL TESTIMONY OF

LINDA CASEY

MANAGER - COSTING

ON BEHALF OF

VERIZON NORTHWEST INC.

Formerly Known as GTE Northwest Incorporated

SUBJECT: COSTS SUPPORTING NON-RECURRING CHARGES

AUGUST 4, 2000

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