A. Yes. Washington Staff recommends that “Gateway Availability PIDs, GA-3 and GA-6 contained in the Qwest Performance Assurance Plan (QPAP), and any other PIDs that may apply, along with all required penalties, will continue to be required.”[[1]](#footnote-1) I would suggest the following approach to this issue to be clear that the PID measures will be returned to the QPAP and CLECs will be eligible to receive payments:

The Performance Indicator Definition (“PID”) Gateway Availability (measures GA-3 and GA-6) will immediately be returned to the Washington Qwest performance assurance plan (“QPAP”), with Tier 1 payment eligibility for CLECs, and will remain in the PAP until expiration of the minimum 30-month time period or retirement of MEDIACC, whichever is later.

VII. PROPOSED SOLUTIONS TO ADDRESS ASSERTED OSS RISK

A. UPDATE MEDIACC AND KEEP MEDIACC/CEMR OPERATIONAL

Q. ms. albersheim claims that the costs of developing a new b2b interface would be on par with the costs of updating mediacc.[[2]](#footnote-2) did qwest or centurylink consider the cost imposed upon clecs?

A. No, it does not appear that they did. Ms. Albersheim relies upon Confidential Exhibit RA-9 to support the decision to abandon MEDIACC, but the document barely mentions costs imposed upon CLECs.[[3]](#footnote-3)

1. Notarianni CO Staff Cross Answer Test., Docket No. 11F-436T (Oct. 31, 2011), p. 13, line 11 – p. 14, line 2.

   Williamson Test., WUTC Docket No. UT-111254, (Nov. 30, 2011), p. 24, lines 27-30. [↑](#footnote-ref-1)
2. Albersheim Direct Test., WUTC Docket UT-111254, (Oct. 14, 2011), p. 6, line 14 – p. 7, line 1; *see also,* Albersheim Answer Test., CO Docket No. 11F-436T (Sep. 15, 2011), p. 7, lines 4-8. [↑](#footnote-ref-2)
3. Albersheim Direct Test., WUTC Docket No. 111254 (Oct.. 14, 2011) Confidential Exhibit RA-9, p. 4. *See also*

   Albersheim Answer Test., CO Docket 11F-436T (Sep. 15, 2011), Confidential Exhibit RA-4b, p. 4. [↑](#footnote-ref-3)