**Exhibit No. \_\_\_ T (RTW-1T)**

**Docket UT-111254**

**Witness: Robert T. Williamson**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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| **In the Matter of a Complaint by the Joint CLECs against the Joint Applicants Regarding OSS for Maintenance and Repair** | **DOCKET UT-111254** |

**CORRECTED TESTIMONY**

**OF**

**ROBERT T. WILLIAMSON**

**STAFF OF**

**WASHINGTON UTILITIES AND**

**TRANSPORTATION COMMISSION**

**February 1, 2012**

 Commission, never envisioned that the OSS Settlement Conditions would require 39 months, instead of 30, to bring a new OSS online.

**Q. Are there any other protections for CLECs and penalties for Qwest/CenturyLink if there is a failure of MEDIACC before it can be retired?**

A. Yes, there are. The Qwest Performance Assurance Program (QPAP) was created to protect the CLECs from poor wholesale service quality including OSS performance issues[[1]](#footnote-1) and will remain in effect through the term of the Qwest Alternative Form of Regulation (AFOR).[[2]](#footnote-2) QPAP provides a rubric whereby quality performance can be gauged by monitoring Performance InDicators (PIDs). QPAP results are reported in Docket UT-030388. A failure to meet a PID requires Qwest/CenturyLink to make payments as set forth in the QPAP. In particular, two Gateway Availability (GA) PIDs, GA-3 and GA-6, measure access to MEDIACC and CEMR.[[3]](#footnote-3) GA-3 measures access to Electronic Bonding (EB-TA), or MEDIACC, and GA-6 monitors access to GUI-Repair or CEMR. QPAP is a region-wide, 14-state self-executing remedy plan designed to verify that Qwest provides parity between the wholesale service it provides to CLECs and the service it provides to its own retail customers. Of the 14 regional states, two have removed PIDs GA-3 and GA-6 from their performance assurance plans. Failure to meet parity for PIDs GA-3 and GA-6 in the remaining 12 states would require Qwest/CenturyLink to payup to $360,000

 region-wide (up to $30,000 per state). PIDs GA-3 and GA-6 are Tier 2 performance measures that require payments to each state. There are also many Tier 1 measurements that

1. *See* Exhibit K, Performance Assurance Plan, Qwest Washington SGAT Eighth Revision, Twelfth Amended Exhibit K, January 5, 2009, on file with the Commission and available in Docket UT-073034 (filed February 6, 2009). [↑](#footnote-ref-1)
2. Condition 3 of the Staff/PC Agreement contemplates extension of the Qwest AFOR term until at least April 2014. [↑](#footnote-ref-2)
3. Albersheim, Exh. No. \_\_\_ (RA-9C) at p. 3. [↑](#footnote-ref-3)