

**Exhibit No. ___ T (RTW-1T)
Docket UT-111254
Witness: Robert T. Williamson**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**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

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

3
4 **Q. Are there any other protections for CLECs and penalties for**
5 **Qwest/CenturyLink if there is a failure of MEDIACC before it can be retired?**

6 A. Yes, there are. The Qwest Performance Assurance Program (QPAP) was created to
7 protect the CLECs from poor wholesale service quality including OSS performance
8 issues¹ and will remain in effect through the term of the Qwest Alternative Form of
9 Regulation (AFOR).² QPAP provides a rubric whereby quality performance can be
10 gauged by monitoring Performance InDicators (PIDs). QPAP results are reported in
11 Docket UT-030388. A failure to meet a PID requires Qwest/CenturyLink to make
12 payments as set forth in the QPAP. In particular, two Gateway Availability (GA)
13 PIDs, GA-3 and GA-6, measure access to MEDIACC and CEMR.³ GA-3 measures
14 access to Electronic Bonding (EB-TA), or MEDIACC, and GA-6 monitors access to
15 GUI-Repair or CEMR. QPAP is a region-wide, 14-state self-executing remedy plan
16 designed to verify that Qwest provides parity between the wholesale service it
17 provides to CLECs and the service it provides to its own retail customers. Of the 14
18 regional states, two have removed PIDs GA-3 and GA-6 from their performance
19 assurance plans. Failure to meet parity for PIDs GA-3 and GA-6 in the remaining 12
20 states can would require Qwest/CenturyLink to payments of up to \$420360,000

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).

² Condition 3 of the Staff/PC Agreement contemplates extension of the Qwest AFOR term until at least April 2014.

³ Albersheim, Exh. No. ____ (RA-9C) at p. 3.

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