

1 **I. INTRODUCTION**

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

3 A. My name is Justina (Tina) Blanchard. My business address is 1 Martha's Way,
4 Hiawatha, Iowa 52233.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by PAETEC Communications, Inc., as a Project Manager II. My job
7 duties include planning, managing, and executing IT strategic projects. PAETEC
8 Communications, Inc. is the direct parent company of McLeodUSA Telecommunications
9 Services, L.L.C. d/b/a PAETEC Business Services ("PAETEC Business Services" or
10 "PAETEC"). PAETEC is now part of Windstream.

11 **Q. HOW LONG HAVE YOU BEEN INVOLVED IN TELECOMMUNICATIONS
12 AND IN WHAT CAPACITIES?**

13 A. I began my career in the telecommunications industry in March 1990 and have held a
14 variety of positions related to IT and Network Repair operations. Before starting at
15 PAETEC/McLeodUSA in 1997, I worked for MCI as a Senior LAN Specialist and a
16 Lead Customer Service Professional. I began my career with PAETEC/McLeodUSA in
17 November 1997 as a Technical Support Scheduler. I transitioned to Lead Dispatcher in
18 May 1998 and moved into the role of Dispatch Manager in August 1999. I transitioned
19 to a Network Operations Center Manager in October 2006 and later became a Senior
20 Manager in May 2010. In July 2011 I transitioned to a Project Manager II role due to
21 responsibilities of the Network Operations Center being moved to Rochester, New York.

22 **Q. PLEASE DESCRIBE PAETEC BUSINESS SERVICES.**

1 A. PAETEC provides a wide range of competitive broadband and broadband-related
2 services primarily to business customers, and in some states such as Washington,
3 residential customers. PAETEC operates in 86 of the top 100 MSAs, but in many states,
4 such as Washington, PAETEC operates in many exchanges in addition to the top 100
5 MSAs. Thus, in addition, to competing in the Seattle MSA, PAETEC offers services in
6 the Battleground, Longview, and Vancouver ate centers.

7 **Q. HAVE YOU EVER TESTIFIED PREVIOUSLY BEFORE THE WASHINGTON**
8 **PUBLIC UTILITIES COMMISSION?**

9 A. No.

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

11 A. My testimony will discuss PAETEC's internal automation that would be at risk if
12 CenturyLink/Qwest makes changes to its CEMR/MEDIACC system that do not support
13 the current functionalities that our system has in place with CenturyLink/Qwest by virtue
14 of the e-bonding that exists today.

15 **II. DISCUSSION**

16 **Q. WHY IS PAETEC PARTICIPATING IN THIS PROCEEDING?**

17 A. PAETEC is participating in this proceeding because it is concerned that
18 CenturyLink/Qwest has announced plans to replace a legacy Qwest OSS that PAETEC
19 relies on to provide repair services to its customers, in a time frame that would be well
20 before when PAETEC had understood that it would have to be prepared to migrate from
21 a Qwest system. The change to a new system to support trouble tickets could have
22 significant impacts on our operations if the new system