

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE INVESTIGATION)
INTO QWEST CORPORATION'S)
COMPLIANCE WITH §271(C) OF THE) DOCKET NO. UT-003022
TELECOMMUNICATIONS ACT OF 1996.)
_____)**

DIRECT TESTIMONY OF

JAMES H. ALLEN

ON BEHALF OF QWEST CORPORATION

REGARDING GENERAL TERMS AND CONDITIONS

May 16, 2001

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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, POSITION, EMPLOYER AND BUSINESS**
3 **ADDRESS.**

4 A. My name is James H. Allen. I am employed by Qwest Information
5 Technologies, Inc. ("Qwest") as a director in the Information Technologies (IT),
6 Wholesale Systems department. My business address is 1999 Broadway, 10th
7 Floor, Denver, Colorado, 80202.

8 **Q. WHAT POSITIONS HAVE YOU HELD AT QWEST?**

9 A. In 1995, I joined U S WEST Communications. I have held several assignments
10 within U S WEST, and later Qwest, primarily in the Law Department and
11 Information Technologies. My responsibilities have included contract
12 negotiations and development related to several products and services across
13 the company and, in the past two years, products and services specific to
14 Information Technologies. With the passage of the Telecommunications Act of
15 1996 ("the Act"), I was assigned to roles associated with Section 271 of the Act,
16 primarily involving Operational Support Systems ("OSS"). I am the single point
17 of contact for OSS language in Qwest's Statement of Generally Available
18 Terms and Conditions ("SGAT").

19 **Q. WHAT ARE YOUR CURRENT RESPONSIBILITIES?**

20 A. My current responsibilities in IT Wholesale Systems include coordinating the
21 implementation and deployment of all billing interfaces to Competitive Local

1 Exchange Carriers ("CLECs"). Additionally, I have Wholesale Systems
2 operational and service management responsibilities for addressing issues
3 related to systems availability and performance. In addition, IT Wholesale
4 Systems is responsible for all systems issues concerning Qwest's Co-Provider
5 Industry Change Management Process ("CICMP").

6 **Q. PLEASE STATE YOUR ACADEMIC BACKGROUND.**

7 A. I have three degrees: a Bachelor of Arts degree from the University of New
8 Hampshire in 1982, a Bachelor of Arts degree from Metropolitan State College
9 of Denver in 1990, and a Master of Arts from Colorado State University in 1993.

10 In addition to my employment with Qwest, since 1990 I have been an adjunct
11 faculty member of Spanish at Metropolitan State College of Denver.

12 **II. PURPOSE OF YOUR TESTIMONY**

13 **Q. PLEASE STATE THE PURPOSE OF YOUR TESTIMONY.**

14 A. My testimony covers the Qwest Co-Provider Industry Change Management
15 Process ("CICMP") and Section 12 of the SGAT.

16 Qwest has developed CICMP to provide a forum for CLECs and Qwest to
17 discuss Qwest's products, processes, technical publications and OSS interfaces.
18 The CICMP includes regularly scheduled, monthly change management
19 meetings. It also provides a process for Qwest to communicate to CLECs

1 changes to Qwest's products, processes, technical publications and OSS
2 interfaces.

3 Section 12 of the SGAT addresses access to Qwest's OSS. In Section 12,
4 Qwest commits to meet its legal obligations to provide access to OSS. Section
5 12 generally describes the interfaces that will be available for CLECs to access
6 Qwest's OSS. Qwest has removed detailed descriptions of its interfaces
7 because Qwest is constantly improving these interfaces and the interfaces are
8 subject to change requests in CICMP. Therefore, Qwest has changed Section
9 12 to contain a commitment by Qwest to meet its legal obligations to provide
10 access to OSS and to provide that changes to the interfaces will be handled
11 pursuant to the CICMP process.

12 III. TESTIMONY

13 A. Co-Provider Change Management Process

14 **Q. PLEASE EXPLAIN QWEST'S CO-PROVIDER CHANGE MANAGEMENT**
15 **PROCESS.**

16 A. In this first portion of my testimony, I will discuss Qwest's Co-Provider Change
17 Management Process ("CICMP"). I have attached as Exhibit JHA-2 the
18 governing document for the CICMP process, "Qwest Wholesale Program Co-
19 Provider Change Management Process." The CICMP escalation process is
20 detailed in Exhibit JHA-3, "Qwest Wholesale Program Co-Provider Industry
21 Change Management Process – Escalation Process." These documents are

1 also attached as Exhibits G and H, respectively, to the SGAT, referenced in
2 Section 12.2.6 of the SGAT, and publicly available at
3 <http://www.qwest.com/wholesale/cicmp/index.html> .

4 The participants in CICMP include CLECs, Interexchange Carriers, Payphone
5 Service Providers and Wireless Carriers (referred to collectively as CLECs in
6 this Testimony).

7 **Q. WHAT ARE CICMP'S MAIN OBJECTIVES?**

8 A. The CICMP has four major objectives: (i) provide a forum for CLECs and
9 Qwest to discuss change requests ("CRs"), release notifications ("RNs"),
10 systems release life cycles, and communications; (ii) provide a forum for
11 CLECs as an industry to discuss and prioritize their CRs; (iii) develop a
12 mechanism to track and monitor CLEC CRs and Qwest RNs; and (iv) establish
13 communication intervals where appropriate in the process.

14 **Q. WHAT INTERFACES ARE INCLUDED IN THE CICMP?**

15 A. The following OSS interfaces are included in the CICMP: Customer Terminal
16 Access System ("CTAS"),¹ Exchange Access, Control, and Tracking
17 ("EXACT"), Held, Escalated, and Expedited Tool ("HEET"), Interconnect
18 Mediated Access ("IMA") Electronic Data Interexchange ("EDI"), IMA Graphical
19 User Interface ("GUI"), Mediated Access System ("MEDIACC"), Product

20

¹ Qwest is in the process of replacing the CTAS interface with the Customer Electronic Maintenance and Repair ("CEMR") interface.

1 Database for CLECs, TELEcommunications Information System ("TELIS"), and
2 Wholesale Billing Interfaces. The following products and their associated
3 processes are included in the CICMP: local interconnection services ("LIS");
4 collocation, unbundled network elements ("UNE"); ancillary services such as
5 directory listings; and resale. The following process categories are included in
6 the CICMP: pre-ordering; ordering; provisioning; billing; and repair.

7 **Q. DOES THE CICMP INCLUDE AN ESCALATION PROCESS?**

8 A. The CICMP includes an escalation process for escalating items such as CRs to
9 Qwest. The CICMP escalation process, described in Exhibit JHA-2 to my
10 testimony and Exhibit H to the SGAT, defines items that can be escalated, such
11 as CRs to the CICMP. This process provides an opportunity for the CLEC and
12 Qwest to discuss and re-review the outcome of a previously-discussed CR at a
13 CICMP meeting.

14 **Q. IS THE CICMP EFFECTIVE?**

15 A. Yes. The CICMP has been working effectively since Qwest implemented it.
16 Currently, there are 283 participants in the CICMP, representing 103 CLECs.
17 The CICMP has received 124 CRs and has released 199 RNs since the fall of
18 1999. As a result of the accepted CRs, Qwest has either completed or is
19 working on 79 CRs, two have been placed on hold by the CLEC, 35 were
20 canceled by the CLEC, and eight were canceled by Qwest.

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B. Section 12

Q. PLEASE DESCRIBE SECTION 12 OF THE SGAT.

A. In this second portion of my testimony, I will discuss Section 12 of the SGAT, "Access to Operational Support Systems (OSS)." In these SGAT sections, Qwest addresses the various electronic interfaces available to CLECs for pre-ordering, ordering, maintenance and repair, and billing. Exhibit JHA-4 to my testimony contains the current SGAT language from Sections 12.0 through 12.3.23.

Sections 12.1.1 and 12.1.2 set forth Qwest's commitment to provide nondiscriminatory access to OSS using electronic gateways. In Section 12.1.2, Qwest commits to meet its legal obligations to provide nondiscriminatory access to OSS:

Through its electronic gateways, Qwest shall provide CLEC non-discriminatory access to Qwest's OSS for Pre-ordering, Ordering and Provisioning, Maintenance and Repair, and Billing for resale and unbundled network elements. For those functions with a retail analogue, such as pre-ordering and ordering and provisioning of resold services, Qwest shall provide CLEC access to its OSS in substantially the same time and manner as it provides to itself. For those functions with no retail analogue, such as pre-ordering and ordering and provisioning of unbundled elements, Qwest shall provide CLEC access to Qwest's OSS sufficient to allow an efficient competitor a meaningful opportunity to compete. Qwest shall deploy the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions. Qwest shall provide assistance for CLEC to understand how to implement and use all of the available OSS functions. Qwest shall provide CLEC sufficient electronic and manual interfaces to allow CLEC equivalent access to all of the necessary OSS functions. Qwest shall disclose to CLEC any internal business rules and other formatting information necessary to ensure that CLEC's requests and orders are processed

1 efficiently. Qwest shall provide OSS designed to accommodate both
2 current demand and reasonably foreseeable demand.

3 For functions with a retail analogue, such as pre-ordering and ordering and
4 provisioning of retail services, Qwest has agreed to provide access to its OSS
5 in substantially the same time and manner as it provides to itself. For functions
6 with no retail analogue, such as pre-ordering and ordering and provisioning of
7 unbundled network elements, Qwest provides CLECs with access to its OSS
8 sufficient to allow an efficient competitor a meaningful opportunity to compete.

9 Section 12.1.2 also provides for Qwest to deploy the necessary systems and
10 personnel to provide sufficient access to the necessary OSS functions and to
11 assist CLECs to understand how to implement and efficiently use these OSS
12 functions. Qwest has agreed to design its OSS to accommodate both current
13 and reasonably foreseeable demand.

14 Section 12.2.1, including Sections 12.2.1 through 12.2.7, describes OSS for
15 pre-ordering, ordering and provisioning. This section describes an Electronic
16 Data Interchange ("EDI") interface and a Graphical User Interface ("GUI"),
17 which enable CLECs to electronically transmit a Local Service Request ("LSR")
18 to Qwest.

19 As described in Section 12.2.1.2, Qwest developed the EDI interface standards
20 based upon the Order & Billing Forum ("OBF") Local Services Ordering
21 Guidelines ("LSOG"), the Telecommunications Industry Forum ("TCIF")
22 Customer Service Guidelines, and the American National Standards

1 Institute/Accredited Standards Committee ("ANSI ASC") X-12 protocols. The
2 EDI disclosure documents specify any exceptions to these guidelines and
3 standards.

4 As described in Section 12.2.1.3, GUI provides a single, browser-based
5 interface for pre-ordering and ordering functions. The GUI interface is based
6 on the LSOG and uses a web-standard technology, Hyper Text Markup
7 Language ("HTML"), JAVA and the Transmission Control Protocol/Internet
8 Protocol ("TCP/IP") to transmit messages.

9 Section 12.2.2 provides for Qwest to provide electronic interface gateways,
10 including an electronic bonding interface and a GUI interface, for exchanging
11 updated information and progress reports while Qwest is working on a trouble
12 report ("TR").

13 Section 12.2.3 discusses when the interfaces will be available and how Qwest
14 will notify CLECs regarding system downtime.

15 Section 12.2.4 describes billing information. This section identifies the two
16 primary sources for billing from Qwest: the Interexchange Access Billing
17 System ("IABS"), and the Customer Record Information System ("CRIS").

18 Section 12.2.5 discusses the different types of outputs that Qwest will provide
19 to CLECs, such as the usage record file, loss and completion reports, category

1 11 records, and street address/facility availability information ("SAG/FAM").

2 This section details the different type of outputs and the report media available.

3 Section 12.2.6 discusses modifications to OSS interfaces. This section
4 references Qwest's Co-Provider Industry Change Management Program
5 ("CICMP"), as set forth in Exhibit G, and the CICMP escalation process, as set
6 forth in Exhibit H. I discussed both exhibits in the first portion of this testimony.

7 Section 12.2.7 discusses the CLEC's responsibilities for implementation of OSS
8 interfaces. It identifies the CLEC questionnaire, which Qwest uses to establish
9 access to specific OSS, as requested by the CLEC.

10 Section 12.2.8 discusses Qwest's responsibilities for on-going support for OSS
11 interfaces. It details the length of time Qwest will support older versions of the
12 EDI releases and other issues related to EDI development.

13 Section 12.2.9 details the CLEC's responsibilities for on-going support of OSS
14 interfaces. This section describes the CLEC's responsibilities during the
15 planning, development and production phases of EDI.

16 Section 12.2.10 describes the support that Qwest provides to CLECs
17 concerning OSS. The section provides for Qwest to disclose to the CLEC any
18 internal business rules and other formatting information necessary to ensure
19 that the CLEC's requests and orders are processed efficiently. Qwest's
20 assistance includes training, documentation and the CLEC Help Desk.

1 Section 12.2.11 states that Qwest will bill on-going and one-time start-up
2 charges at rates set forth in Exhibit A of the SGAT, as specified by the
3 Commission.

4 Section 12.3 describes maintenance and repair functions and service levels.
5 This section states Qwest will provide non-discriminatory repair functions to
6 CLECs. It discusses the testing environment provided for EB-TA development
7 should a CLEC choose to use a computer-to-computer interface rather than
8 using a human-to-computer GUI interface. Barry Orrel of Qwest also will
9 address this subject in his testimony.

10 **IV. CONCLUSION**

11 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

12 **A.** Yes.

INDEX OF EXHIBITS

Qwest Wholesale Program Co-Provider Change Management Process	JHA-2
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