EXHIBIT ECM-1T

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE REVIEW OF UNBUNDLED LOOP AND SWITCHING RATES; THE DEAVERAGED ZONE STRUCTURE; AND UNBUNDLED NETWORK ELEMENTS, TRANSPORT, AND TERMINATION	))))))	**DOCKET NO. UT-023003**

DIRECT TESTIMONY

OF

ELMER CRAIG MORRIS

ON BEHALF OF

QWEST CORPORATION

JUNE 26, 2003

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I. IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT POSITION.

A. My name is Elmer Craig Morris. I am employed by Qwest as a Senior Staff Advocate. My business address is 301 West 65th Street, Richfield, Minnesota, 55423.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS.

A. I have been employed by Qwest Corporation ("Qwest"), formerly Northwestern Bell Telephone Company and U S WEST Communications, for 29 years. During this time, I have worked in the Network, Carrier, Finance and IT organizations, as well as the Qwest Retail and Wholesale product and marketing organizations. Most recently I was responsible for Qwest OSS testing for our 271 application and development of CLEC methods, procedures or system enhancements to ensure 271 compliance.

My current work assignment is to provide testimony and information concerning Qwest products in these and similar proceedings. I have a Bachelor of Arts degree in Economics and Public Administration from the University of St. Thomas in Minneapolis, Minnesota, and a Master of Science degree in Management from Stritch University, Milwaukee, Wisconsin.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION?

A. No. However, I have testified before the State Commissions in Arizona, Colorado, Iowa, Idaho, and Minnesota on matters concerning pricing, product performance and complaint litigation.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to describe certain products and services that Qwest makes available to Competitive Local Exchange Carriers (CLECs). I will describe the following products and services, along with their associated recurring rates and charges: Unbundled Local Tandem Switching; Unbundled Local Switching; Shared Transport; Unbundled Network Element ("UNE") Combinations, including UNE-P. Mr. William Easton addresses the EEL product in his testimony. Finally, I provide information about the concept of Deaveraged Switching. Prices associated with each product and service element addressed in my testimony are included in Exhibit TKM-2 that is attached to the testimony of Ms. Teresa K. Million. The price that Qwest is proposing is the TELRIC cost for each of the elements.

III. UNBUNDLED NETWORK ELEMENTS

Q. WHAT TYPES OF UNBUNDLED LOCAL SWITCHING ARE AVAILABLE?

A. Qwest provides unbundled local tandem switching and unbundled local switching to CLECs. Qwest provides these services to CLECs using the same elements and facilities it uses to provide service to Qwest's own end users.

1) Unbundled Local Tandem Switching

Q. PLEASE DESCRIBE UNBUNDLED LOCAL TANDEM SWITCHING.

A. The unbundled local tandem switching network element includes the facilities connecting the trunk distribution frames to the tandem switch, including those facilities that establish a temporary transmission path between two other local network switches, and all functions of the local tandem switch itself. The unbundled local tandem switching element also includes the functions that are centralized in local tandem switches rather than end office switches, such as call recording and signaling conversion features.

Q. WHAT RATE ELEMENTS AND CHARGES APPLY FOR UNBUNDLED LOCAL TANDEM SWITCHING?

A. Exhibit TKM-2 to Ms. Teresa K. Million's testimony at Section 9.10.4 identifies the Per Minute of Use (MOU) charge applied to originating minutes to recover the traffic sensitive costs associated with the local tandem switch.

2) Unbundled Local Switching

Q. PLEASE DESCRIBE UNBUNDLED LOCAL SWITCHING.

A. Unbundled local switching includes access to line-side and trunk-side switch facilities, plus access to the features, functions and capabilities of the switch. The features, functions, and capabilities of the switch include the basic switching function, including the same basic capabilities that are available to Qwest's end-user customers.

Q. PLEASE DESCRIBE THE UNBUNDLED ANALOG LINE-SIDE LOCAL SWITCH PORT.

A. An Analog Line-Side Port is an interface on the line-side of the end office switch that provides access to the basic functionality of an end office switch. This service is a 2-wire Plain Old Telephone Service (POTS) line side switch connection, the same kind of connection that supports line side analog PBX trunks. A separate Interconnection Tie Pair (ITP) must be ordered for each Analog Line-Side Port to provide connection from the Main Distribution Frame (MDF) to the Interconnection Distribution Frame (ICDF) demarcation point on the collocation frame. The Analog Line-Side Port also includes most of the vertical features provided by the switch (e.g., OS/DA, Call Blocking, etc.). Qwest also offers a Premium Analog Line-Side Port. It includes all of the switch features that are provided with the Analog Line-Side Port, plus additional Call Management System (CMS) and conference calling features.

Q. WHAT ARE THE RATE ELEMENTS AND CHARGES FOR THE UNBUNDLED ANALOG LINE -SIDE LOCAL SWITCH PORT AND PREMIUM PORT-ADDITIONAL CHARGE?

A. Section 9.11.1 of Exhibit TKM-2, attached to Ms. Teresa K. Million's testimony, identifies the recurring charge for the unbundled Analog Line-Side Local Switch Port. The Premium Port-Additional Charge and its elements is included at Section 9.11.6.2.

Q. PLEASE DESCRIBE UNBUNDLED DIGITAL LINE-SIDE LOCAL SWITCH PORTS (SUPPORTING ISDN BRI).

A. The unbundled Digital Line-Side Local Switch Port, used for Integrated Services Digital Network - Basic Rate Interface (ISDN BRI), is provided via digital architecture that provides integrated voice and data capability. Similar to the Analog Line-Side Switch Port, the Digital Line-Side Switch Port includes access to basic vertical switch features.

Q. WHAT ARE THE RATE ELEMENTS AND CHARGES FOR UNBUNDLED DIGITAL LINE-SIDE SWITCH PORTS?

A. Section 9.11.2 of Exhibit TKM-2 attached to Ms. Teresa K. Million's testimony identifies the recurring charges for the unbundled Digital Line-Side Switch Port. The same Premium Port-Additional Charge would apply if the CLEC wants CMS/conference calling features along with a Digital Line-Side Port.

Q. WHAT TYPES OF UNBUNDLED TRUNK-SIDE LOCAL SWITCH PORTS DOES QWEST PROVIDE?

A. Qwest provides the following types of unbundled trunk-side local switch ports:

Unbundled Digital DS1 Local Message: Trunk-Side Local Switch Port is a trunk-side switch port that is extended to the trunk main distributing frame and is connected to the demarcation point through an ITP. Each DS1 trunk port includes a subset of 24 DS0 channels capable of supporting local message type traffic.

Unbundled Digital DS1 PRI ISDN: The Unbundled Digital DS1 PRI ISDN Trunk-Side Local Switch Port (supporting DID/DOD/PBX) is a digital DS1 trunk-side switch

port terminated at a DS1 or equivalent. Each DS1 trunk port includes a subset of 24 DS0 channels capable of supporting DID/DOD/PBX type traffic.

DID / PBX Trunk Port, per DS0: DID/PBX Trunk Port is a DS1/Digital trunk- side end-office switch port termination that provides the ability to connect a digital PBX user with the trunk side of the Qwest CO and permits incoming calls from the exchange network to reach a specific PBX station directly without attendant assistance. All trunks are designed as 4-wire facilities.

Unbundled Analog DS0: The Unbundled Analog DSO Trunk-Side Local Switch Port can be configured as Direct Inward Dial (DID), Direct Outward Dial (DOD), and two-way and is available on an individual case basis (ICB).

Q. WHAT ARE THE RATE ELEMENTS AND CHARGES FOR UNBUNDLED TRUNK-SIDE LOCAL SWITCH PORTS?

A. Sections 9.11.3 and 9.11.4 of Exhibit TKM-2 specify monthly recurring charges that apply for trunk-side switch ports.

Q. PLEASE DESCRIBE THE USAGE CHARGE FOR UNBUNDLED LOCAL SWITCHING.

A. Section 9.11.5 of Ms. Teresa K. Millions's Exhibit TKM-2 specifies the MOU charge for originating calls on unbundled local switch ports. The usage-based MOU charge and the flat-rated port charge are the primary means by which the costs of local switching investment are recovered in UNE prices.

3) Shared Transport

Q. PLEASE DESCRIBE SHARED TRANSPORT SERVICE.

A. Shared transport service is a UNE provided to CLECs that allows them to use Qwest's interoffice transmission facilities that are shared by more than one carrier, including Qwest, between Qwest end offices and tandem switches within a local calling area. Shared transport can be between Qwest end office switches, between Qwest end office switches and Qwest tandem switches, and between Qwest tandem switches. Shared transport service is currently provided in two situations: (1) when a CLEC purchases unbundled local switching; or (2) when a CLEC purchases a combination of UNEs that includes Qwest unbundled local switching, such as a UNE-P combination service. Shared transport is automatically provided when a CLEC orders unbundled switching or UNE-P, unless the CLEC requests a different arrangement (i.e., customized routing to another transport service). Shared transport used by CLECs accesses and utilizes Qwest's routing tables that reside in Qwest's switches in the same manner that the routing tables are employed for Qwest retail services. The routing tables direct both Qwest and CLEC traffic over Qwest's shared transport service.

Q. WHY IS SHARED INTEROFFICE TRANSPORT ONLY AVAILABLE TO CLECS THAT PURCHASE UNBUNDLED LOCAL SWITCHING?

A. Qwest provides shared interoffice transport service in conjunction with services provided to CLECs that use Qwest's switches; unbundled local switching and UNE-P combination services are UNEs for which Qwest provides the switching for CLECs. It

is not technically feasible for Qwest to provide its shared interoffice transport service, which, by definition, is transport that carries traffic between Qwest switches, to a CLEC that does not use Qwest's switches.

4) Unbundled Network Element (UNE) Combinations

Q. PLEASE DEFINE THE UNE COMBINATIONS YOU ARE DISCUSSING IN THIS SECTION OF YOUR TESTIMONY.

A. "UNE combinations" are UNEs provided to a CLEC in a combined, or bundled state, as requested by the CLEC. The two general types of UNE combinations provided by Qwest are UNE-Platform (UNE-P) and Enhanced Extended Loops (EEL). I discuss UNE-P combinations and Mr. William Easton discusses EEL in his testimony. If a CLEC desires UNE combinations beyond those defined below, the CLEC may request such combinations through the Special Request Process (SRP).

Q. PLEASE DESCRIBE UNE-P COMBINATION SERVICE, AND IDENTIFY THE UNE-P COMBINATIONS THAT ARE AVAILABLE FROM QWEST.

A. UNE-P combination service is a combination of UNEs that includes, at minimun, an unbundled loop, an unbundled switch port, unbundled switching, and shared transport. Qwest provides UNE-P combinations as finished services, as ordered by a CLEC, to allow the CLEC to serve its end user customer. Even though the basic network facilities to provide local service are provided by Qwest in this situation, the CLEC is the "owner" of the UNE-P service and is the end users' local service provider. The CLEC and not Qwest has the right to bill interexchange carriers for switched access

associated with its UNE-P combinations. Each UNE-P combination identified below works like the comparable Qwest retail service. The following descriptions identify the UNE-P combinations and their sub-elements that Qwest provides to CLECs.

UNE-P POTS: Qwest provides UNE-P POTS combinations to residents and businesses as a finished service to end-users on behalf of CLECS. UNE-P POTS provides service similar in functionality as Qwest's retail residential and business services, such as Flat Rate Residential/Flat Rate Business (1FR/1FB) services and Measured Rate Residential/One Measured Rate Business (1MR/1MB) services. UNE-P POTS is the combination of the following UNEs:

2-Wire Analog (Voice Grade) Loop
Analog Line Side Port (including Vertical Switch Features)
Local Switch Usage (MOU)
Shared Transport Originating (MOU)

UNE-P ISDN BASIC: UNE-P ISDN BRI is an all-digital communications technology that provides services and capabilities not available through standard analog technology. The ISDN digital architecture provides a high-speed, integrated transfer of voice, data and video over the same line, using the Public Switched Network (PSN). UNE – P BRI with Premium features is only available when ordered in conjunction with Centrex and is SRP. UNE-P ISDN BRI is comprised of the combination of the following UNEs:

ISDN BRI Capable Loop

Local Switch Usage (MOU)
Digital Line Side Port (Supporting ISDN BRI)
Shared Transport Originating (MOU)

UNE-P ISDN PRIMARY RATE: Qwest provides the UNE-P ISDN PRI combination as a finished service to ISDN compatible Private Branch Exchange (PBX) end-users on behalf CLECs, providing similar finished service functionality as is provided with Qwest's retail service offering. UNE-P ISDN PRI is a 4-wire full duplex transmission path between ISDN-capable Customer Provided Equipment (CPE) and an ISDN-equipped central office (CO). The basic service consists of 23 B Channels and a D Channel with a transmission rate of 1.544 Megabits per second (Mbps). Each B Channel carries user information and the D Channel is used for signaling. The channel configuration is commonly referred to as 23B+D. UNE-P ISDN PRI is comprised of the combination of the following UNEs:

Facility
DS1 or DS3 Capable Loop
ISDN PRI Trunk Port

Trunks
("Trunk connections")
One DS1 Local Message Trunk Port
Shared Transport Originating (MOU)
Local Switch Usage (MOU)

UNE-P DSS: UNE P DSS is a digital exchange service between an end-user's Customer Provided Equipment (CPE) and the Qwest Central Office (CO). Multiplexing of the digital transmission facility Digital Service, Level 1/Digital Service Level 3 (DS1/DS3), at the speed of 1.544 Mbps, (or fiber optic upon request) in Qwest's CO will accommodate up to 24 voice grade channels (trunks) into the switch. Basic and advanced trunks are available with UNE-PDSS. Basic Trunks (line side termination) are available as: In-only; Out-only; and/or 2-way. Advanced Trunks (trunk side termination) are available as: In-only with Direct Inward Dialing (DID®) and Hunting; Out-only with Answer Supervision; and/or 2-way with DID, Hunting and Answer Supervision. UNE-P DSS is the finished service combination of the following UNEs:

Basic Trunks
DS1 or DS3 Capable Loop
Multiplexing (Necessary with basic trunks only)
Up to 24 Analog Line Side Ports
Shared Transport Originating (MOU)
Local Switch Usage (MOU)

Advanced Trunks
DS1 or DS3 Capable Loop
DS1 Local Message Trunk Port
Shared Transport Originating (MOU)
Local Switch Usage (MOU)

UNE-P PBX: Qwest provides UNE-P PBX with analog trunks (analog Direct Inward Dialing (DID®) and non-DID trunks) as a finished service to end-users on behalf of UNE-P CLECs. UNE-P PBX provides analog trunks to connect your end-user's Customer Provided Equipment (CPE) PBX telecommunication system equipment from your end-user's premises to the Qwest Central Office (CO). DID special trunk arrangements permit incoming calls from the exchange network to reach a specific PBX station directly, bypassing the attendant for assistance. UNE-P PBX analog trunks are combinations of the following UNEs:

Analog non-DID Trunks:
2 Wire Analog (Voice Grade) Loop
Analog Line Side Port
Shared Transport Originating (MOU)
Local Switch Usage (MOU)

Analog 1-way DID Trunks:
2-Wire Analog (Voice Grade) Loop
DID Trunk Port
Shared Transport Originating (MOU)
Local Switch Usage (MOU)
Optional Features

Analog 2-way DID Trunks:
4 Wire Analog (Voice Grade) Loop
DID Trunk Port
Shared Transport Originating (MOU)
Local Switch Usage (MOU)

UNE-P PAL: UNE-P Public Access Lines (PAL) service is a combination of UNEs that provides finished service to CLECs that furnish service to Payphone Service Providers (PSPs). PSPs in turn establish connections of intelligent instrument-controlled hardware to the UNE-P PAL service for public use. UNE-P PAL offers the equivalent functionality of Qwest's retail service offering of two-way, incoming and outgoing, Basic PAL. Basic PAL includes all functions associated with the Qwest network such as access to operator, sent paid (1+) service, N11 and 800/888 services. Coin collection and/or return of coins are controlled by the PSPs pay telephones. UNE-P PAL is the finished service combination of the following UNEs:

2-Wire Analog (Voice Grade) Loop
Analog Line Side Port
Shared Transport Originating (MOU)
Local Switch Usage (MOU)

UNE-P Centrex: UNE-P Centrex provides exchange service between an end-user's premises and the Qwest CO. UNE-P Centrex products available are UNE-P Centrex 21, UNE-P Centrex Plus, and UNE-P Centron® which may be ordered as a new combination or converted from existing Qwest resale or retail services. UNE-P Centrex is comprised of the combination of the following UNEs:

UNE-P Centrex 21:[1]

2-Wire Analog (Voice Grade) Loop

Analog Line Side Port

Shared Transport Originating (MOU)

Local Switch Usage (MOU)

Common Block

UNE-P Centrex Plus and UNE-P Centron:

2-Wire Analog (Voice Grade) Loop

Analog Line Side Port

Shared Transport Originating (MOU)

Local Switch Usage (MOU)

Common Block

Q. WHAT ARE THE RATE ELEMENTS AND RECURRING CHARGES FOR UNE-P COMBINATIONS?

A. Monthly recurring charges for the various UNE-P combinations are the sum of the UNEs that make up the particular UNE-P combination requested. All UNE-P combinations include, at a minimum, an unbundled loop monthly recurring charge from Section 9.2, an unbundled switch port monthly recurring charge and usage charges from Section 9.11, unbundled shared transport usage charges from Section 9.8, and unbundled local switching usage charges from Section 9.11.5 of Exhibit

[1] UNE-P Centrex 21 is a business service intended for end-users with 2 to 50 station lines per location. It consists of standard features that are available to all station lines in the shared customer group. UNE-P Centrex 21 can be integrated into current lines, utilizing 21 different standard and optional features, maximizing productivity.

TKM-2. Section 9.23.7 of TKM-2 includes additional recurring charges that may apply (e.g., for multiplexing).

IV. DEAVERAGED SWITCHING

Q. WHAT IS GEOGRAPHIC DEAVERAGING?

A. Geographic Deaveraging determines costs for network elements based on geographic-specific cost characteristics. Geographic deaveraging of loop costs has been in place in Washington since December 2000, in accordance with the Commission's orders in Docket No. UT-960369, et al. Costs may be deaveraged at the wire center level, based on differences in costs associated with a particular UNE in that wire center versus in another wire center. These differences in costs are typically associated with customer density in a particular wire center. Geographic deaveraging is the methodology that this Commission has endorsed for pricing of unbundled loops costs. In the past, other parties have proposed that deaveraged loop costs, within a wire center, be determined by the using distances from the central office to the end-user's locations. However, that methodology has not been adopted to date.

Q. DOES QWEST GEOGRAPHICALLY DEAVERAGE ITS SWITCH PRICING?

A. No. In contrast to loop costs, Qwest has generally determined that switching costs do not exhibit different cost characteristics based on geographic area. Unlike loop facilities, determinations about where switches are placed, the type of equipment deployed, and the distance between a switching equipment location and an end user's location do not create cost differences. A particular type of equipment will cost Qwest

the same no matter which geographic area the switch is located in. Qwest opposes the geographic deaveraging of unbundled switching prices because there is no correlation between costs and the geographic location of the switch.

Q. WHAT THEN DETERMINES THE PORT CHARGE AND MINUTES OF USE PRICING CHARGED BY QWEST FOR SWITCHING?

A. Qwest proposed switching rates are based on the number of lines and features associated within a particular port. Charges are not based on, nor should they be based on, the geographic location or the distance between an end user's address and the Qwest switching equipment location. Nor is there a basis to deaverage switching prices based on customer density within a particular wire center. The testimony of Ms. Theresa K. Million and Exhibit TKM-2, more fully explains the proposed pricing, methodology and elements used to establish the proposed switching rates in Washington.

V. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.