

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for Arbitration of an  
Interconnection Agreement Between DIECA  
COMMUNICATIONS, INC., d/b/a COVAD  
COMMUNICATIONS COMPANY with QWEST  
CORPORATION Pursuant to 47 U.S.C. Section  
252(b), and the *Triennial Review Order*

**DOCKET NO. UT-043045**

**QWEST CORPORATION**

**RESPONSE TESTIMONY OF RENÉE ALBERSHEIM**

**DISPUTED ISSUE: 6 (Single LSR)**

**August 2, 2004**

**REDACTED VERSION**

Redacted  
Confidential per Protective Order in  
WUTC Docket No. Ut-043045

1 **I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH**  
3 **QWEST CORPORATION.**

4 A. My name is Renée Albersheim. I am employed by Qwest Corporation (“Qwest”), as a  
5 Staff Advocate. My business address is 1801 California Street, 24<sup>th</sup> floor, Denver, CO,  
6 80202.

7  
8 **Q. ARE YOU THE SAME RENÉE ALBERSHEIM WHO FILED DIRECT**  
9 **TESTIMONY IN THIS CASE?**

10 A. Yes, I am.  
11

12 **II. SINGLE-LSR PROCESSING IMPACTS ORDERING ONLY**

13 **Q. DO YOU HAVE ANY PRELIMINARY COMMENTS ON MR. ZULEVIC'S**  
14 **TESTIMONY?**

15 A. Yes. First, Mr. Zulevic broadly characterizes this dispute by stating on page 19 of his  
16 direct testimony that what Covad seeks is the ability to order both voice and data services  
17 using a single LSR. As I set forth in my direct testimony, for the most part, and for most  
18 data services, that ability already exists. The ability to order new connections and transfers  
19 for the product combinations at issue here on a single LSR has been available since April,  
20 ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~ The only voice and data combinations at  
21 issue are conversion orders for UNE-P combined with line splitting and unbundled loop  
22 combined with loop splitting, and single LSR ordering for these conversion orders is on  
23 track to be implemented in October 2004.

1 Second, the dispute here is over the timing of the systems changes that will enable Covad  
2 to submit conversion *orders* for line splitting with UNE-P and loop splitting with  
3 unbundled loops. Specifically, the dispute is about whether Covad must submit conversion  
4 *orders* on two LSRs until October, when single LSR ordering is implemented. Mr. Zulevic  
5 intermixes his comments about *ordering* these products with comments about *provisioning*  
6 these products. Ordering and provisioning are separate processes, and there is no dispute  
7 here about the *provisioning* processes for line splitting or loop splitting. It is important to  
8 understand the difference between the two processes and the fact that the single LSR  
9 *ordering* at issue here is an ordering systems change that does not affect the *provisioning* of  
10 the product. In other words, whether the line splitting/loop splitting order is submitted on  
11 two LSRs (the LSR for voice submitted first followed immediately by the LSR for the  
12 data) or on a single LSR, the *provisioning* of the products remains the same. To the extent  
13 Mr. Zulevic interchanges the terms "ordering" and "provisioning" his testimony is  
14 confusing and needs this correction. I explain Qwest's operational support systems  
15 ("OSS") below and demonstrate why Mr. Zulevic's assertions regarding the downstream  
16 processing and *provisioning* of line splitting and loop splitting *orders* are wrong and are  
17 unrelated to single LSR *ordering*.

18  
19 **Q. PLEASE BEGIN BY DESCRIBING WHAT PURPOSES OSS SERVE IN**  
20 **CONNECTION WITH COMPETITIVE LOCAL EXCHANGE CARRIER**  
21 **("CLEC") ORDERS?**

22 A. CLECs use OSS to obtain products and services from Qwest and other incumbent local  
23 exchange carriers ("ILECs"). OSS are used to process orders that CLECs submit for  
24 resold products and unbundled network elements. CLECs typically submit these orders  
25 in the form of local service requests (LSRs) and access service requests (ASRs) that enter

1 Qwest's OSS, are converted into service orders, and are processed through downstream  
2 systems. The downstream systems use the information on the service orders to perform  
3 the provisioning, billing and repair functions.  
4

5 **Q. WHAT IS MEANT BY OPERATIONAL SUPPORT SYSTEMS ELECTRONIC**  
6 **INTERFACES?**

7 A. Electronic interfaces facilitate the exchange of information between the OSS of a CLEC  
8 and those of Qwest. An interface allows a CLEC to submit pre-order and order  
9 transactions to Qwest electronically. The interface also permits the electronic exchange  
10 of other information between CLECs and Qwest, including information about products  
11 and services, installation timelines, the characteristics of facilities, and the completion of  
12 orders.  
13

14 **Q. WHAT IS IMA?**

15 A. "IMA" or "Interconnect Mediated Access" is a real-time electronic interface offered by  
16 Qwest for the exchange of information relating to pre-ordering, ordering and  
17 provisioning of resale service and unbundled network elements. Qwest built and offers a  
18 human-to-computer electronic interface, IMA-GUI (Interconnect Mediated Access –  
19 Graphical User Interface), and a computer-to-computer electronic interface, IMA-EDI  
20 (Electronic Data Interchange). Both interfaces are used for electronic pre-ordering,  
21 ordering, and provisioning of resale and line-side unbundled network elements  
22 ("UNEs"). These interfaces allow the CLEC to submit pre-order and order transactions  
23 electronically and allow Qwest to send confirming information back to the CLEC  
24 electronically.  
25

1 **Q. WHAT IS AN LSR?**

2 A. An LSR is the national standard form, modified as appropriate to meet a specific ILEC's  
3 system requirements, that CLECs use to order certain products and services from ILECs.

4

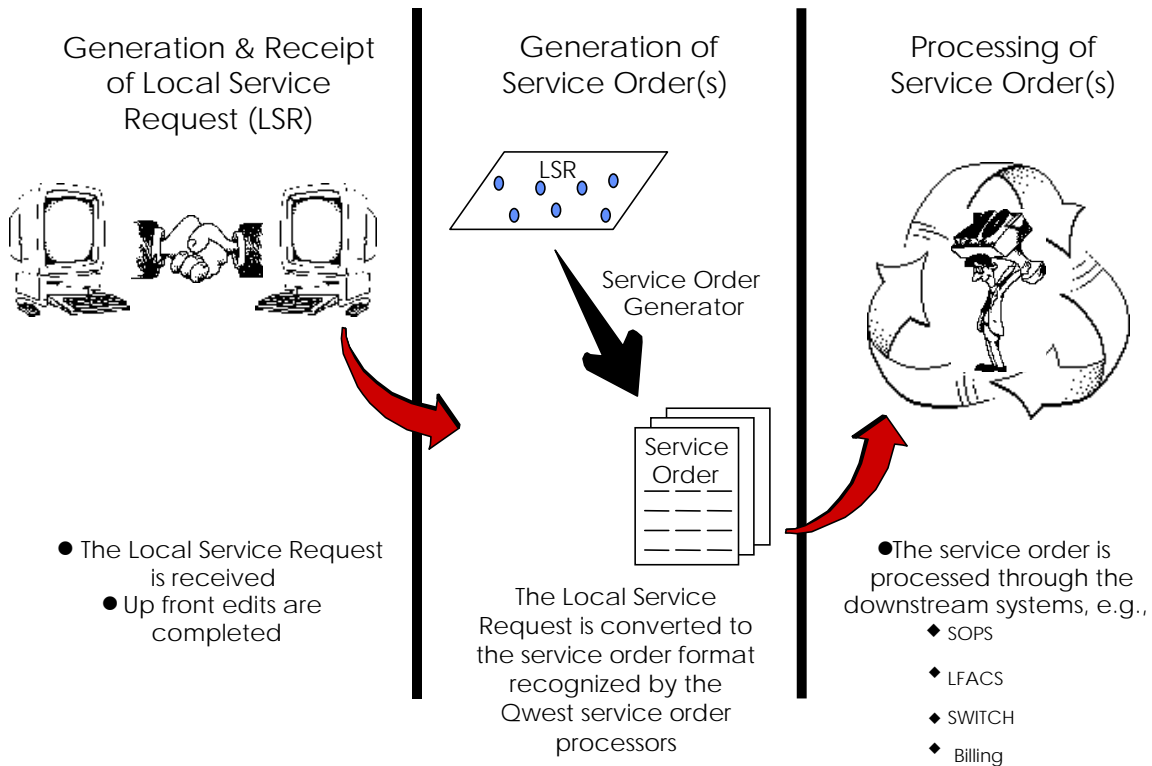
5 **Q. PLEASE DESCRIBE THE TYPES OF INFORMATION THAT QWEST AND**  
6 **CLECS ARE LIKELY TO EXCHANGE THROUGH ELECTRONIC INTERFACES**  
7 **USING AN LSR.**

8 A. In addition to the general information that CLECs must provide when they submit an  
9 LSR, CLECs must identify the element(s) ordered, provide information identifying the  
10 specific customer for whom the order is sought, and supply appropriate information, as  
11 necessary, about where the CLEC's equipment will connect with Qwest's equipment.

12

13 **Q. PLEASE DESCRIBE HOW AN LSR IS PROCESSED.**

14 A. When a CLEC submits an LSR, Qwest must process the LSR through all of the systems  
15 necessary to deliver a service to a customer. The service ordering process is the  
16 component that converts the CLEC's LSR into the service order format required to  
17 process the request through Qwest's service order systems. The ordering process is  
18 comprised of three major functions depicted in the following picture and explained  
19 below.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12

- 1) Local Service Request Generation and Receipt. A CLEC creates an LSR, in a format defined by the OBF (Ordering and Billing Forum), and transmits it to Qwest either via an electronic interface or facsimile.
- 2) Service Order Generation. Qwest’s OSS understand information contained on service orders. Therefore, Qwest must take the information from the LSR and create one or more service orders. A service order contains product codes (USOCs - Universal Service Order Codes) and Field Identifiers (“FIDs”). FIDs are the additional information required to provide a specific product.
- 3) Service Order Processing. Service orders are processed by many downstream systems resulting in the provisioning of service, with the equipment inventoried, and customer accounts updated.

1 **Q. WHAT HAPPENS AFTER A CLEC SUBMITS AN LSR?**

2 A. After an LSR is submitted to Qwest, it is processed through the IMA gateway. The  
3 service order processors (“SOPs”), and other downstream installation OSS, are critical  
4 components of the process that play a role after pre-ordering/ordering and provisioning  
5 functions, and before the later activities of maintenance and repair, and billing. All  
6 service orders, whether generated by CLECs or by Qwest retail operations are processed  
7 by the SOPs. The SOPs receive Qwest service orders from several sources and, in turn,  
8 communicate with the Service Order Activation and Control System (“SOAC”) that  
9 manages the service order process with respect to the specialized systems that design and  
10 activate network-based services, assign facilities, maintain central office inventory, and  
11 manage customer account information. In doing so, SOAC directs each service order  
12 through all steps necessary to complete the order and provision the service.

13

14 **Q. IS IT LOGICAL TO ASSUME THEN THAT IF A CLEC SUBMITS TWO LSRS,**  
15 **TWO SETS OF SERVICE ORDERS WILL BE CREATED IN QWEST’S**  
16 **DOWNSTREAMS SYSTEMS?**

17 A. It is a logical assumption, but it turns out that in the case of LSRS that have been linked  
18 using the RPON field as I described in my direct testimony, only one set of service orders  
19 may be generated in Qwest’s downstream systems. So, even though Covad must currently  
20 submit two LSRS for conversions to UNE-P combined with line splitting or unbundled loop  
21 combined with loop splitting, the act of linking those LSRS with the RPON field may result  
22 in one set of service orders for the combined products.

23

24 **Q. IS THERE AN IMPACT TO PROVISIONING IF THE TWO LSR PROCESS**  
25 **PRODUCES TWO SETS OF SERVICE ORDERS?**

1 A. No, there is not. The products are provisioned in parallel.

2

3 **Q. SO IS THERE AN ISSUE HERE ABOUT THE DOWNSTREAM PROCESSING OR**  
4 **PROVISIONING OF LINE SPLITTING OR LOOP SPLITTING?**

5 A. No. The downstream processing and provisioning of these products is not affected by the  
6 use of two LSRs back-to-back or the use of a single LSR. To the extent Mr. Zulevic  
7 suggests there are provisioning delays caused by the two LSR process, he is incorrect.

8

9 **Q. MR. ZULEVIC CLAIMS AT PAGES 19-20 THAT THE TWO-ORDER PROCESS**  
10 **FOR LINE SPLITTING PUTS COVAD AT A COMPETITIVE DISADVANTAGE.**  
11 **IS HIS CLAIM ACCURATE?**

12 A. No. As I set forth in my direct testimony, the practical effect of the requirement that  
13 conversion orders for the products at issue must be submitted on two LSRs until October  
14 is that Covad must spend a few more minutes at most in the typing of orders, because it  
15 must type two orders instead of one. There is no impact to the downstream processing or  
16 provisioning of the orders.

17

18 The differences created by the current two LSR process are *de minimis*. Further as I  
19 establish in my direct testimony, and Mr. Zulevic does not contest, the products at issue  
20 here very low volume products. ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX~~  
21 ~~XXXXXXXXXXXX~~

22

23 **Q. ON PAGE 20 OF HIS DIRECT TESTIMONY MR. ZULEVIC COMPARES**  
24 **QWEST'S WHOLESALE PROCESSES FOR LOOP SPLITTING TO UNSPECIFIED**  
25 **QWEST RETAIL PROCESSES. IS THIS AN APPROPRIATE COMPARISON?**



1 A. No. This is not a valid comparison because there is no retail analog for unbundled loops.  
2 Likewise there is no retail analog for unbundled loops combined with loop splitting. It is  
3 misleading to suggest a competitive advantage for Qwest when there is no comparable  
4 retail service, and therefore no comparable retail process. Further, Mr. Zulevic's argument  
5 is essentially moot given that 1) the two order process involves only the *de minimis*  
6 additional time of typing two orders instead of one; and 2) whether the order for an  
7 unbundled loop with loop splitting is submitted via one LSR or two, there is no impact to  
8 the *provisioning* of the service.

9  
10 **Q. ON PAGE 23 OF HIS DIRECT TESTIMONY, MR. ZULIVIC MAKES BROAD**  
11 **COMPARISONS BETWEEN LINE/LOOP SPLITTING AND CONVERSIONS**  
12 **INVOLVING LINE SHARING. ARE THESE COMPARISONS VALID?**

13 A. No. Again, it is not valid to make comparisons between loop splitting and retail products,  
14 but even if the comparison is limited to UNE-P with line splitting, a comparison to line  
15 sharing is also inappropriate. When a customer orders line sharing (Qwest voice and  
16 CLEC DSL), there are still two orders. But only one LSR is submitted. The Qwest retail  
17 customer submits an order to Qwest for voice service. The CLEC submits an LSR to  
18 Qwest for the shared loop. With line sharing there has always been a single LSR.

19

20 **III. QWEST IS ON SCHEDULE TO IMPLEMENT SINGLE-LSR**  
21 **ORDERING FOR CONVERSIONS**

22 **Q. ON PAGE 21 OF HIS DIRECT TESTIMONY, MR. ZULEVIC CHALLENGES**  
23 **QWEST'S COMMITMENT TO COMPLETING THE SECOND CR FOR**  
24 **CONVERSIONS. HOW DO YOU RESPOND?**

25 A. As I set forth in my direct testimony, Qwest initiated within the CMP the CRs necessary to

1 make the systems changes at issue. The first CR for new connections has since been  
2 implemented. The second CR for conversions is on track to be implemented in October.  
3 There is no basis to Mr. Zulevic's allegation that Qwest is not committed to completing the  
4 CRs that it initiated. Mr. Zulevic implies that Qwest purposely chose not to implement the  
5 single LSR process for those products as originally planned in IMA Release 13.0. That  
6 was not the case. Qwest underestimated the complexity of the system enhancements  
7 required to combine the products (UNE-P with line splitting and unbundled loop with loop  
8 splitting) and this underestimate affected the implementation schedule. During the testing  
9 of the IMA 13.0 Release, Qwest determined that it was necessary to create new codes and  
10 Product Identifications in IMA to make these product offerings. Because these changes  
11 required significant modifications to the Local Service Ordering Guide ("LSOG"), it was  
12 necessary to include them in a major IMA release. This work was projected to take over  
13 10,000 man hours of additional work at an additional cost to Qwest of over \$500,000.  
14 Once these complexities were recognized, Qwest determined that it was not possible to  
15 complete the changes in time for IMA Release 13.0.

16  
17 To put this issue in perspective, it is important to note that the vast majority of the system  
18 enhancements planned for IMA Release 13.0 were implemented on schedule in IMA  
19 Release 13.0.

20  
21 **Q. IS QWEST LIKELY TO ENCOUNTER THE SAME TECHNICAL DIFFICULTIES**  
22 **WITH THE CR FOR CONVERSION ORDERS THAT IT EXPERIENCED WITH**  
23 **THE CR FOR NEW CONNECTIONS?**

24 A. No. The CR for conversions (SCR030603-01EXSC) builds on the solution implemented  
25 with IMA Release 15.0 for new connections. As Qwest has resolved earlier technical

1 issues regarding the combination of the products, the second CR (SCR120303-02) adds to  
2 the activities that can be performed with these product combinations. Qwest will not  
3 experience the same technical difficulties with the second CR.  
4

5 **Q. ON PAGE 21 OF HIS DIRECT TESTIMONY MR. ZULEVIC ALLEGES THAT**  
6 **QWEST UNILATERALLY IMPLEMENTED ONLY THE PORTION OF THE CR**  
7 **THAT BENEFITED QWEST. IS HE CORRECT?**

8 A. No. Mr. Zulevic's claim does not make any sense. While Qwest was the sponsor of the  
9 CR, the purpose of the CR was to create enhancements to IMA. Qwest does not use IMA,  
10 and Qwest's retail operation does not submit LSRs to order its retail products. As  
11 documented in Exhibit RA-2 attached to my direct testimony, the entire CR was for the  
12 benefit of CLECs. The CR encompassed single LSR ordering for a set of wholesale  
13 products, all ordered by CLECs not by Qwest. The only portion of the CR that was not  
14 implemented was the single LSR process for line splitting and loop splitting for new  
15 connections and transfers.  
16

17 **Q. MR. ZULEVIC ALSO SUGGESTS ON PAGE 21 OF HIS DIRECT TESTIMONY**  
18 **THAT QWEST'S NOTIFICATION TO THE CLECS OF THE DELAY IN**  
19 **IMPLEMENTING THE SINGLE LSR PROCESS FOR LINE/LOOP SPLITTING**  
20 **WAS ARBITRARY. IS THAT AN ACCURATE CHARACTERIZATION?**

21 A. No. Qwest followed the notification procedures outlined in the Qwest Wholesale Change  
22 Management Process Document. Qwest notified the CLEC community as soon as it  
23 determined that the CR could not be implemented with IMA Release 13.0. As I set forth in  
24 my direct testimony, Qwest took steps to ensure that this CR was promptly rescheduled.  
25 Further, Qwest made certain that this CR would not take resources away from other CRs in

1 the next release. In other words, Qwest took on the cost of implementing this CR.

2

3 **Q. COVAD IMPLIES THAT QWEST HAS A PRACTICE OF ARBITRARILY**  
4 **DELAYING CMP CRS. IS THIS TRUE?**

5 A. No. Mr. Zulevic cites no support for the implication. The delay of CR SCR030603-  
6 01EXSC was an aberration.

7

8 **Q. ON PAGE 22 OF HIS DIRECT TESTIMONY, MR. ZULEVIC CLAIMS**  
9 **REDUCTIONS IN IMA DEVELOPMENT HOURS CREATED THE DELAY IN**  
10 **IMPLEMENTING SINGLE LSR ORDERING FOR NEW CONNECTIONS, AND**  
11 **MAY WELL DELAY SINGLE LSR ORDERING FOR CONVERSIONS. IS HE**  
12 **CORRECT?**

13 A. No. There was no relationship between the IMA development reductions and the  
14 implementation of the first CR. Development reductions will not have an impact on the  
15 implementation of the second CR. This CR has been ranked #2 by the CLECs. It is still  
16 included in IMA Release 16.0, which is still scheduled to be implemented in October 2004.

17

18 **Q. MR. ZULEVIC CLAIMS ON PAGE 23 OF HIS DIRECT TESTIMONY THAT**  
19 **QWEST SHOULD HAVE OFFERED AN INTERIM *MANUAL* SINGLE LSR**  
20 **ORDERING PROCESS TO CLECS WHILE SINGLE LSR ORDERING IS IN**  
21 **DEVELOPMENT. HOW DO YOU RESPOND?**

22 A. Again, Mr. Zulevic's claim makes no sense for a number of reasons. First, there is already  
23 an *electronic* process in place which is superior to a manual process. CLECs can currently  
24 place orders for conversions of the products in question using two electronic LSRs,  
25 submitted one right after the other. Putting a manual interim process in place, as suggested

1 by Covad, would not provide any advantage given that an electronic process is already  
2 available. Second, neither Covad nor any other CLEC has asked Qwest to consider an  
3 interim process through the CMP. As I set forth in my direct testimony, a manual process  
4 still requires process changes that must follow CMP guidelines. Third, given that the  
5 single LSR process is now partly deployed, with the remainder scheduled to be deployed in  
6 a few months, and given that the demand for line splitting and loop splitting is very low, it  
7 is not a good use of the CMP participants' time and resources to initiate now the steps  
8 necessary to deploy an interim, manual process.

9

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

11 A. Yes, it does.