

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE CONTINUED )  
COSTING AND PRICING OF UNBUNDLED ) Docket No. UT-003013  
ELEMENTS, TRANSPORT AND ) Part B  
TERMINATION, AND RESALE )**

**SUPPLEMENTAL DIRECT TESTIMONY**

**OF**

**RENÉE ALBERSHEIM**

**QWEST CORPORATION**

**January 8, 2001**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19

**I. IDENTIFICATION OF WITNESS**

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

A. My name is Renée Albersheim. My business address is 1999 Broadway, 10<sup>th</sup> Floor,  
Denver, Colorado 80202.

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

A. I am employed by Qwest Corporation (formerly U S WEST) as a Regulatory  
Manager in the Information Technologies Wholesale Systems organization.

**Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE AND EDUCATION.**

A. Currently, my responsibilities include identifying and managing regulatory issues  
involving Qwest's operational support systems (OSS) as a result of the  
Telecommunications Act of 1996, Federal Communications Commission (FCC)  
orders, state commission decisions, and other legal and regulatory matters. Since  
joining Qwest, I have worked in the Wholesale Systems organization in the  
Information Technologies Division.

Prior to becoming a Qwest employee, I was a consultant in application development  
projects for 15 years in a variety of roles: programming and systems development,  
systems architecture, project management, information center management, and  
software training. During my 15 years as a consultant, I worked on a number of  
Qwest's operational support systems.

1 I received a Bachelor of Arts Degree from the University of Colorado in 1983, and a  
2 Master of Business Administration in Information Systems from the University of  
3 Colorado Graduate School of Business in 1985. In addition to working full-time at  
4 Qwest, I am currently attending the University of Denver College of Law, and will  
5 receive my Juris Doctor in May 2001.

6 **Q. HAVE YOU TESTIFIED BEFORE OTHER STATE REGULATORY**  
7 **COMMISSIONS?**

8 A. I have submitted written testimony to the Arizona Corporation Commission and the  
9 Public Service Commission of Montana.

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

11 A. The purpose of my testimony is to discuss, at a very high level, the potential change  
12 to Qwest's OSS that are associated with line splitting. My purpose is also to respond  
13 to the Supplemental Direct Testimony of Joseph Gillan of AT&T and Roy Lathrop of  
14 Worldcom.<sup>1</sup> I do not provide OSS cost estimates here, as costs estimates are not  
15 available at this time.

16 **Q. HAS QWEST DETERMINED THE OSS CHANGES NECESSARY FOR LINE**  
17 **SPLITTING?**

18 A. No, not to the level sufficient to generate OSS cost estimates. The OSS requirements

---

<sup>1</sup> See In the Matter of Continued Costing and Pricing of Unbundled Network Elements, Transport, Termination, and Resale, WUTC Docket No. UT-003013, Part B – Supplemental Direct Testimony of Joseph Gillan, AT&T Communications of the Pacific Northwest, Inc., and Supplemental Direct Testimony of Roy Lathrop, Worldcom, filed October 19, 2000.

1 for line splitting have not been fully determined. Until line splitting as a product has  
2 been fully defined, and the methods and procedures for provisioning this product are  
3 fully defined, it will not be possible for Qwest to estimate the cost of making the OSS  
4 changes required by these definitions.

5 **Q. HAS QWEST STUDIED THE POTENTIAL IMPACTS OF LINE SPLITTING**  
6 **ON ITS OSS?**

7 A. Yes. Once discussions about line splitting began, the Qwest Wholesale Systems  
8 Development team began to assess the potential impacts of line splitting on Qwest's  
9 OSS, and the changes that might be required, depending on how line splitting is  
10 defined. However, the systems development team has not evaluated every impact for  
11 all variations since the various provider responsibilities are unclear.

12 **Q. MR. LATHROP CONTENDS THAT FROM A TECHNICAL AND**  
13 **OPERATIONAL PERSPECTIVE, LINE SPLITTING OVER UNE-P WOULD**  
14 **BE PROVISIONED IN EXACTLY THE SAME WAY AS LINE SHARING.<sup>2</sup>**  
15 **IS THIS ACCURATE FROM AN OSS PERSPECTIVE?**

16 A. No. At a minimum, methods and procedures will have to be established within Qwest  
17 systems that identify line splitting as a separate product. Mr. Lathrop and Mr. Gillan  
18 acknowledge the difference between line sharing and line splitting. With line sharing  
19 the Incumbent Local Exchange Carrier (ILEC), Qwest, is the underlying voice  
20 provider. With line splitting, another Competitive Local Exchange Carrier (CLEC) is

---

<sup>2</sup> Lathrop Direct Testimony.

1 the voice provider. By necessity, Qwest's OSS will have to account for this  
2 difference. Mr. Gillan identifies his criteria for line splitting,<sup>3</sup> but these criteria do  
3 not identify the processes necessary to implement line splitting. While Mr. Gillan's  
4 goals stress a desired end-result, they are not process oriented. For example, Mr.  
5 Gillan states that "line splitting should be implemented with a minimal of disruption  
6 to the customer."<sup>4</sup> The methods and procedures to accomplish that goal must be  
7 established. These will not be the same methods and procedures that have been  
8 established for line sharing. By definition, there are now three parties involved in the  
9 transaction: the voice CLEC, the data CLEC, and the ILEC. How these methods and  
10 procedures are defined will have a direct impact on the OSS changes necessary for  
11 their implementation.

12 **Q. IS QWEST WILLING TO WORK WITH CLECS TO ESTABLISH THE**  
13 **METHODS AND PROCEDURES NECESSARY TO IMPLEMENT OSS**  
14 **CHANGES NEEDED FOR LINE SPLITTING?**

15 A. Yes. As Qwest did with development of OSS requirements for line sharing, Qwest is  
16 willing to discuss requirements for line splitting with the CLECs. Qwest will seek  
17 CLEC input on a number of issues that will impact the ordering, provisioning,  
18 maintenance and repair, and billing of this new product. For example, who will  
19 control each process? Must the voice provider, the data provider, or either one submit  
20 orders or requests for repair? What sort of verification and process control

---

<sup>3</sup> Gillan Supplemental Direct p. 3.

<sup>4</sup> Id.

1 mechanisms will be required? What are the business relationships between the  
2 various parties? Answers to these and other questions will determine the OSS  
3 impacts of line splitting.

4 **Q. WHAT OSS CHANGES WILL BE REQUIRED AT A MINIMUM FOR THE**  
5 **LINE SPLITTING PRODUCT?**

6 A. At a very high level, Qwest's Wholesale Systems Development team has determined  
7 that the OSS work necessary to implement line splitting will probably require changes  
8 to the electronic interfaces, the flow-through system, and several downstream  
9 systems, including LFACS,<sup>5</sup> SWITCH,<sup>6</sup> and the CRIS Billing Systems.<sup>7</sup> Other  
10 downstream systems may also require changes, again depending upon how the  
11 product and its associated methods and procedures are ultimately defined.

12 **Q. WILL THERE BE INCREMENTAL OSS IMPACTS IF QWEST IS**  
13 **ORDERED TO PROVIDE THE SPLITTERS IN A LINE SPLITTING**

---

<sup>5</sup> LFACS is the Loop Facility Assignment and Control System, which maintains a mechanized inventory of outside plant facilities, (e.g., facility addresses, cables, cable pairs, serving terminals, cross connection devices, loops, etc.) and assigns the outside plant facilities to assignment requests received from SOAC as a result of customer service order activity.

<sup>6</sup> SWITCH is a central office inventory system. With cable pair data from LFACS and telephone number inventory information from CNUM, SWITCH completes the initial step in designing the circuit package. SWITCH supports line-side and trunk-side central office provisioning of digital, analog, and packet switching facilities by providing connection information for central office personnel.

<sup>7</sup> CRIS is the Customer Record Information System. CRIS is a billing system for the majority of residence and business account bills for exchange services. It calculates, prints, and mails bills to individual retail end-user customers for retail products, and CLECs for some interconnect (wholesale) products. After rating usage, CRIS posts service order processing updates, provisioning information, rating data, tolls, cash treatments, bills, payments, journal entries or adjustments, rate changes, message processing and other billing related information to the Customer Service Records (CSRs).

1       **ARRANGEMENT AS ADVOCATED BY MR. LATHROP<sup>8</sup> AND MR.**  
2       **GILLAN<sup>9</sup>?**

3       A. Yes. First, as detailed in the testimony of Barbara J. Brohl, Qwest opposes providing  
4       the splitters, and is not legally obligated to do so. Should Qwest be required to  
5       provide the splitters, Qwest systems would have to be changed to allow Qwest to  
6       keep an inventory of these splitters, and to track splitter port assignments. Changes  
7       would likely be required to allow for pre-ordering, ordering, provisioning,  
8       maintenance and billing of these splitters. At a high level, the Qwest Wholesale  
9       Systems Development team estimates that such a requirement could result in a very  
10      large systems development project due to the changes that would be required to  
11      Qwest's inventory systems.

12      **Q. ARE MORE PRECISE ESTIMATES OF LINE SPLITTING OSS WORK**  
13      **EFFORTS AVAILABLE AT THIS TIME?**

14      A. No. Before a more precise estimate can be provided, the systems development team  
15      must complete an idea assessment, followed by a business requirements document,  
16      based on input from the CLECs as discussed above. The discussion of system  
17      changes provided here is at a very high level and is based on experience with Qwest  
18      systems. A more precise discussion will not be possible until the line splitting  
19      product and its associated methods and procedures are fully defined. The idea  
20      assessment and business requirements documents will have to be completed before it  
21      is possible to prepare a budget for labor and other expenses as well as time required to

---

<sup>8</sup> Lathrop Direct Testimony p. 11.

1 implement the required system changes. These documents are standard steps in the  
2 systems development process. Again, Qwest will solicit input from the CLECs to  
3 insure that the ultimate line splitting OSS solution will serve CLEC ordering,  
4 provisioning, billing, maintenance and repair needs.

5 **Q. WILL QWEST SEEK TO RECOVER THE COSTS OF OSS CHANGES**  
6 **NECESSARY TO FACILITATE ORDERING, PROVISIONING, BILLING,**  
7 **MAINTENANCE AND REPAIR FOR LINE SPLITTING?**

8 A. Yes. The Telecommunications Act of 1996 allows Incumbent Local Exchange  
9 Carriers (ILECs) to recover the cost of UNEs.<sup>10</sup> The FCC<sup>11</sup> and this Commission<sup>12</sup>  
10 have recognized that ILECs have the right to recover reasonable costs for UNEs.  
11 OSS are defined as a UNE,<sup>13</sup> so ILECs such as Qwest have the right to recover the  
12 cost of making OSS available to CLECs. Therefore, Qwest has the right to recover  
13 the cost of making OSS changes necessary to provide CLECs with OSS access to line  
14 splitting.

---

<sup>9</sup> Gillan Supplemental Direct Testimony p. 4.

<sup>10</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. §§ 151 et seq., §252 (Telecom Act).

<sup>11</sup> The FCC most recently discussed the ILECs' authorization to recover costs in the Line Sharing order. See *In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98 and , ¶ 144 (rel. Dec. 9, 1999), (FCC Third Report and Order on Docket No. 98-147 and Fourth Report and Order on Docket No. 96-98).

<sup>12</sup> 17<sup>th</sup> Supplemental Order: Interim Order Determining Prices; Notice of Prehearing Conference, WUTC Docket Nos. UT-960369, UT-960370 and UT-960371 ¶ 100 (authorizing cost recovery for QWEST and setting interim rates).

<sup>13</sup> See *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, and *In the Matter of Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers*, CC Docket No. 95-185, ¶ 516 (rel. Aug. 8, 1996), (FCC First Report and Order).



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

2 A. Yes, it does.