## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

QWEST CORPORATION,

Complainant,

v.

MCLEODUSA TELECOMMUNICATIONS SERVICES, INC., d/b/a PAETEC BUSINESS SERVICES.

Respondents.

Docket No. UT-090892

DECLARATION OF CHRISTOPHER VIVEROS IN SUPPORT OF QWEST CORPORATION'S ANSWER TO MCLEOD'S MOTION FOR SUMMARY DETERMINATION

- I, Christopher (Chris) Viveros declare as follows:
- My name is Christopher (Chris) Viveros. My business address is 1350 Treat
  Boulevard, Suite 200, Walnut Creek, CA 94597. I am employed by Qwest
  Corporation as a Staff Director in the Law Department. In this position, I am
  responsible for preparing testimony and testifying about Qwest's cost studies in a
  variety of regulatory proceedings.
- 2. I have 30 years experience in the telecommunications industry with an emphasis in regulatory and wholesale services. I began my career with AT&T Inc., (formerly Pacific Telephone, Pacific Bell and SBC) in 1979. Between 1979 and 1996 I held a variety of positions, primarily in the wholesale department, including assignments on the methods and procedures staff, systems support, industry guideline development and product management. In April 1996, I moved to a newly created organization responsible for implementation and oversight of compliance with the requirements of the Telecommunications Act of 1996 (the "Act"). In January 2000, I accepted a

position with US WEST in the Policy and Law organization focused on compliance

with the Act and the various state and federal proceedings on the company's Section

271 application. In November 2008, I began my current assignment as a cost witness.

In this position, I am responsible for managing cost issues and representing Qwest in

proceedings before regulatory commissions.

3. In my capacity as a witness for Qwest, I have reviewed McLeod's Motion for

Summary Determination and the attached Declarations. I am familiar with the non-

recurring cost studies cited by Dr. Ankum. I have also reviewed Qwest Corporation's

Answer to McLeod's Motion for Summary Determination and I attest that the facts

stated within paragraphs 53-56 of that answer are true and accurate to the best of my

knowledge.

I declare under penalty of perjury under the laws of the state of Washington that the

foregoing is true and correct.

Signed at Denver, Colorado on November 18, 2009.

Christopher Viveros

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