

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

IN THE MATTER OF THE INVESTIGATION )  
INTO U S WEST COMMUNICATIONS, INC.'S )  
COMPLIANCE WITH §271(C) OF THE ) DOCKET NO. UT-  
003022 )  
TELECOMMUNICATIONS ACT OF 1996. )

**REBUTTAL TESTIMONY OF**  
MARGARET S. BUMGARNER  
ON BEHALF OF  
U S WEST COMMUNICATIONS, INC.

**JUNE 5, 2000**

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BEEN FILED UNDER SEAL.**

**Exhibit MSB-10 U S WEST Regional Practice**  
**Exhibit MSB-14 Performance Results**

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1

**I. INTRODUCTION AND PURPOSE OF TESTIMONY**

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

4 A. My name is Margaret S. Bumgarner. I am employed by U S WEST Communications  
5 (U S WEST) as Director – Regulatory Strategy. My business address is Room 2803,  
6 1600 7<sup>th</sup> Avenue, Seattle, Washington, 98191.

7 **Q. DID YOU FILE DIRECT TESTIMONY IN THIS MATTER?**

8 A. Yes, I did. I filed direct testimony regarding access to Basic 911 (“911”) and  
9 Enhanced 911 (“E911”) emergency services, numbering administration, access to  
10 call-related databases and associated signaling, and local dialing parity.

11 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

12 A. The purpose of my rebuttal testimony is to reply to the testimony of the only two  
13 parties commenting on checklist items 7(l), 9, 10, and 12: the testimony of Michael  
14 A. Beach of Worldcom Inc. (“WCom”) and the testimony of Kenneth Wilson of AT&T  
15 Communications of the Pacific Northwest, Inc. and AT&T Local Services (“AT&T”).  
16 As described in my direct testimony and in this rebuttal testimony, U S WEST  
17 satisfies the requirements of Section 271 of the Act and the FCC’s rules for checklist  
18 item 7 (access to 911/E911 emergency services), checklist item 9 (numbering  
19 administration), checklist item 10 (access to call-related databases and associated  
20 signaling), and checklist item 12 (local dialing parity).

1

## II. EXECUTIVE SUMMARY

### 2 Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.

3 A. U S WEST satisfies the requirements in Section 271 of the Telecommunications Act  
4 of 1996 ("Act") for access to 911/E911 services, numbering administration, access to  
5 call-related databases and associated signaling, and local dialing parity requirements  
6 that are prerequisites for U S WEST's entry into the interLATA long distance market  
7 in Washington. U S WEST has legally binding commitments to provide these  
8 checklist items to competitive local exchange carriers ("CLECs"), in accordance with  
9 the Act and FCC rules, in its various Commission-approved interconnection  
10 agreements and the Statement of Generally Available Terms and Conditions  
11 ("SGAT") in Washington. The Regional Oversight Committee ("ROC") has developed  
12 extensive performance measures for the checklist items and a comprehensive third  
13 party test of the access to U S WEST's operational support systems, including  
14 auditing of the performance measures. The ROC performance measures and third  
15 party test will provide further evidence of U S WEST's compliance with these checklist  
16 items.

17

### Access to 911 and E911 Services

18 U S WEST provides CLECs with nondiscriminatory access to 911 and E911 services,  
19 in accordance with the requirements of the Act and FCC rules. There were three  
20 issues raised by WCom and AT&T regarding this checklist item: 1) WCom and AT&T  
21 raise a concern regarding the adequacy of documentation for provision of direct  
22 connections from a collocated CLEC's space to U S WEST's network without the use  
23 of an intermediate frame. U S WEST expects this issue to be resolved shortly  
24 through collaborative work with AT&T and WCom for the Arizona workshop on this  
25 checklist item and checklist item 10 (access to signaling); 2) WCom requests an  
26 SGAT revision to require a minimum of two dedicated trunks to protect 911/E911  
27 service. U S WEST is willing to make WCom's suggested SGAT revision; and, 3)  
28 AT&T's concern about protection of circuits is unfounded because U S WEST  
29 provides the same protection to CLEC circuits as it does its own 911/E911 circuits.  
30 U S WEST identifies and protects all 911/E911 circuits in accordance with  
31 Washington law.

32 In addition to these three issues, WCom articulates several 911/E911 service  
33 requirements. However, WCom does not identify any specific issue regarding  
34 U S WEST's provision of 911/E911 access or any rationale for these requirements.  
35 In any event, U S WEST already satisfies all but one of the requirements WCom  
36 recommends. U S WEST disagrees with WCom's suggested requirement to overflow  
37 911/E911 calls to the U S WEST or CLEC operator services platform. Decisions  
38 about trunk requirements between the 911 selective router and the PSAPs and  
39 alternate routing are made by the appropriate Washington 911 authorities, not

1 U S WEST or CLECs. U S WEST provides nondiscriminatory access to its 911/E911  
2 services. In fact, the Nebraska Commission found that U S WEST satisfies this  
3 checklist item.

#### 4 **Numbering Administration**

5 U S WEST is no longer the numbering administrator in its region having transferred  
6 those functions to the new North American Numbering Plan Administrator (NANPA),  
7 NeuStar on September 1, 1998. After the transfer of the number administration  
8 functions, the FCC requires continued compliance with its guidelines, plans, or rules.  
9 WCom and AT&T do not raise any new issues regarding this checklist item. Both  
10 WCom and AT&T note that the issues, if any remain, regarding Location Routing  
11 Number ("LRN") and number reassignment were deferred in the Arizona workshop  
12 to the checklist item Nos. 1 and 11 workshops, respectively. U S WEST agrees that  
13 these issues should be deferred to those workshops as well. U S WEST has put  
14 processes in place to activate NXX codes in a nondiscriminatory and timely manner  
15 which will be verified by the new ROC performance measure. The Nebraska  
16 Commission and Arizona Commission have found that U S WEST meets the  
17 requirements of this checklist item.

#### 18 **Access to Call-Related Databases and Associated Signaling**

19 U S WEST provides CLECs with nondiscriminatory access to call-related databases  
20 and associated signaling, in accordance with the requirements of the Act and FCC  
21 rules. In Mr. Beach's testimony, WCom recommended revisions to three SGAT  
22 sections: 1) U S WEST is willing to change the SGAT language for Calling Party  
23 Number (CPN) to recognize that there are technical restrictions, allowed by the FCC,  
24 such that the CLEC may not have the CPN information to forward in its signaling  
25 message; 2) U S WEST does not agree to make the suggested InterNetwork Calling  
26 Name ("ICNAM") SGAT revisions. U S WEST provides unbundled access to the call-  
27 related databases for switch query and database response through SS7 signaling to  
28 allow a CLEC to provide any call-related database-supported services to customers  
29 served by the CLEC's switch, in accordance with the FCC's rules; and, 3) U S WEST  
30 is willing to change the Line Information Database ("LIDB") SGAT section to include  
31 language about making reasonable efforts to provide accurate and complete  
32 information in the LIDB database.

33 Regarding AT&T's two issues: 1) U S WEST agrees to add clarifying language to the  
34 SGAT section regarding unbundled signaling, including a reference to the  
35 Interconnection section for signaling interconnection options; and, 2) AT&T's second  
36 issue is the same open issue from the Arizona workshop on checklist item 7 (access  
37 to 911/E911 services), i.e., the adequacy of CLEC documentation and internal  
38 U S WEST operations documentation for provision of direct connections from a  
39 collocated CLEC's space to U S WEST's network without the use of an intermediate  
40 frame. As discussed above, U S WEST expects this issue will be resolved shortly for

1 the Arizona workshop. Finally, the Nebraska Commission has found that U S WEST  
2 meets this checklist item.

3 **Local Dialing Parity**

4 The Act, and the resulting FCC rules, require that customers be able to dial the same  
5 number of digits to make any given local call without regard to the local service  
6 provider of the calling or called party. All customers – regardless of whether local  
7 service is provided by a CLEC or U S WEST – are able to dial the same number of  
8 digits to originate local calls. There were no comments disputing U S WEST's  
9 compliance with this checklist item. In addition, the Arizona and Nebraska  
10 Commissions have approved this checklist item.

11 **Summary**

12 This rebuttal testimony demonstrates that U S WEST has satisfied the requirements  
13 for access to 911/E911 services (checklist item 7(i), numbering administration  
14 (checklist item 9), access to call-related databases and associated signaling (checklist  
15 item 10), and local dialing parity (checklist item 12). U S WEST provides access to  
16 these services and capabilities in accordance with the requirements of the Act and  
17 the FCC's rules. The minor open issues the commentors raise, such as reaching  
18 concurrence on revisions to documentation for direct connection interconnection  
19 arrangements of 911/E911 trunks and signaling links, are nearly resolved as part of  
20 the Arizona workshops on these checklist items. With regard to any disputed issues,  
21 U S WEST is providing the checklist item in accordance with the FCC or Commission  
22 rules. In addition, the ROC has developed performance metrics and a third party test  
23 plan that will provide additional evidence that U S WEST satisfies these checklist  
24 items. The Washington Commission should therefore find that U S WEST satisfies  
25 these checklist requirements.

1 **III.CHECKLIST ITEM NO. 7(I) - 911 AND E911 SERVICES**

2 **Q. WHICH PARTIES FILED COMMENTS OR TESTIMONY REGARDING THIS**  
3 **CHECKLIST ITEM?**

4 A. Mr. Beach on behalf of WCom and Mr. Wilson on behalf of AT&T filed testimony on  
5 this checklist item. I will first address Mr. Beach's testimony.

6 First, Mr. Beach lists several requirements for provisioning or repair of 911/E911  
7 service, but does not identify any specific issue related to U S WEST's provision of  
8 access to 911/E911 service. Nevertheless, all of these suggested requirements,  
9 except one, are already provided by U S WEST and are industry standard 911/E911  
10 serving arrangements. The 911 interconnection trunking arrangements and 911  
11 network capabilities are provided according to the Washington State Code,  
12 Commission rules, and the U S WEST tariff which was filed in accordance with the  
13 Commission's rules.<sup>1</sup> Decisions about 911/E911 serving arrangements are made by  
14 the Washington State E911 Coordination Office and E911 Advisory Committee. In  
15 addition, 911/E911 serving arrangements are described in the National Emergency  
16 Number Association ("NENA") standards, and in the 911/E911 documentation for  
17 CLECs in U S WEST's Interconnect and Resale Resource Guide ("IRRG").<sup>2</sup>  
18 U S WEST is legally obligated to satisfy these requirements as to CLECs under the  
19 911 nondiscrimination provisions in the SGAT (sections 10.3.7.4 and 10.3.7.5).

20 **Q. WHAT IS THE WCOM RECOMMENDATION WITH WHICH U S WEST DISAGREES**  
21 **AND WHY DOES U S WEST DISAGREE WITH IT?**

22 A. U S WEST disagrees with WCom's suggested requirement that U S WEST provide  
23 for overflow of 911/E911 calls to U S WEST's Operator Services platform or, at the  
24 CLEC's discretion, directly to the CLEC's Operator Services platform. Alternate  
25 routing is a decision for the Washington 911 Authorities, not U S WEST or CLECs.  
26 Furthermore, U S WEST does not overflow its own customers' 911/E911 calls to its  
27 operators. The PSAP operators are trained to handle emergencies and are the  
28 appropriate people to do so. U S WEST operators are, of course, trained to take  
29 immediate action on emergency calls they might receive, but that action is to direct  
30 the call to the appropriate PSAP based on the same list of emergency telephone  
31 numbers provided to CLECs. U S WEST's SGAT Section 10.3.2.7 commits that the  
32 emergency telephone numbers necessary for the CLEC's operators to handle  
33 emergency calls, in those instances where the CLEC's end user dials "0" instead of

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<sup>1</sup> Revised Code of Washington (RCW) 38.52.010 – 560; 40.14.010 – 43.43.934(5); 80.04.010 – 82.14B.100; Washington Administrative Code (WAC) 118-65-010 – 480-120-530; U S WEST tariff WN U-31 "Exchange and Network Services."  
<sup>1</sup> <sup>2</sup> National Emergency Number Association (NENA) Standards, NENA-03-001; and U S WEST's  
<sup>2</sup> Interconnect and Resale Resource Guide, website: <http://www.uswest.com/carrier>.

1 "911", will be provided to the CLEC. These are the same emergency telephone  
2 numbers used by U S WEST's operators in the event customers, including customers  
3 of CLECs using U S WEST's operator service, call "0" instead of "911." At any rate,  
4 emergency call handling and alternate routing is a decision for the appropriate  
5 Washington 911 authorities. For these reasons, U S WEST will not agree to this  
6 recommended requirement.

7 **Q. DID MR. BEACH OF WCOM IDENTIFY ANY OTHER ISSUES REGARDING**  
8 **U S WEST'S PROVISION OF 911/E911 SERVICE?**

9 A. Yes. Mr. Beach identified two additional issues: 1) WCom has some general  
10 concerns regarding U S WEST's documentation for direct connection interconnection  
11 arrangements; and, 2) WCom suggests a revision to the SGAT language regarding  
12 dedicated trunk provisions. I will address each of these issues in turn.

13 First, WCom has some general concerns regarding underlying documentation that  
14 is available to CLECs and internally to U S WEST personnel regarding provision of  
15 direct connection interconnection arrangements to U S WEST's network without the  
16 use of an intermediate frame. This is an open issue from the Section 271 Arizona  
17 workshop on this checklist item, as well as checklist item 10 (access to signaling). Mr.  
18 Beach correctly notes that WCom, AT&T, and U S WEST have been meeting to  
19 discuss the documentation U S WEST provides to CLECs and U S WEST personnel  
20 for interconnection to U S WEST's network as part of the Section 271 workshop  
21 process for Arizona. U S WEST has been revising its documentation for CLECs and  
22 its internal operations manuals to satisfy the concerns expressed by AT&T and  
23 WCom in these meetings. As a result of a recent meeting, U S WEST developed an  
24 additional document in its IRRG for CLECs which provides a step-by-step reference  
25 guide for ordering and provisioning of direct connections, and provides diagrams of  
26 direct connection interconnection options available to CLECs. In addition to the new  
27 reference document specifically for direct connections, U S WEST provided additional  
28 CLEC documentation and internal U S WEST operations manuals revised to clarify  
29 interconnection arrangements for direct connections to WCom and AT&T for their  
30 review and concurrence. At a recent meeting, both U S WEST and AT&T took away  
31 action items. U S WEST was to make some further revisions to its documentation  
32 and has completed most of the revisions, but needed AT&T's responses to finalize  
33 the documentation. AT&T has now provided its responses regarding the direct  
34 connection interconnection options, and the parties have agreed in concept. Based  
35 on these agreements, U S WEST is completing the revisions to its documentation.  
36 U S WEST expects that the issues involving the documentation of interconnection  
37 arrangements for direct connections will be resolved shortly for the Arizona workshop.

38 Second, WCom suggests a revision to the SGAT language regarding dedicated  
39 trunks to protect 911 service. WCom suggests that the following language be  
40 incorporated into the SGAT Section 10.3.7:



1           “The Parties shall establish a minimum of two dedicated trunks from  
2           CLEC’s Central Office to each U S WEST 911/E911 selective router (i.e.,  
3           911 Tandem Office) that serves the areas in which CLEC provides  
4           Exchange Service, for the provision of 911/E911 services and for access to  
5           all subtending PSAPs (“911 Interconnection Trunk Groups”).”

6           U S WEST is willing to add this language in the SGAT. The requirement for a  
7           minimum of two dedicated circuits for 911 and a grade of service that has one percent  
8           (P.01) or less blocking is part of the above referenced Washington 911 authorities’  
9           requirements, industry standards, and IRRG documentation. The CLEC is  
10          responsible for engineering the trunks from their end office(s) to the E911 selective  
11          router and, if there are separate trunk facilities available, it is certainly a good idea to  
12          provide for diversity in the trunking used to provide E911 service.

13 **Q. WHAT ISSUES DID MR. WILSON OF AT&T IDENTIFY REGARDING U S WEST’S**  
14 **PROVISION OF 911/E911 SERVICE?**

15 A. Mr. Wilson identified two issues. First, AT&T has concerns regarding U S WEST’s  
16          documentation for direct connection interconnection arrangements. Second, AT&T  
17          comments that U S WEST provides additional security for 911 circuits in its own  
18          network than for CLEC 911 circuits. I will address each of these issues in turn.

19          Mr. Wilson’s first concern regarding U S WEST’s documentation for direct connection  
20          interconnection arrangements is the same issue addressed above in my reply to Mr.  
21          Beach’s testimony and is the same issue nearing resolution in Arizona.

22          Mr. Wilson’s second concern is that U S WEST provides additional security for 911  
23          circuits in its own network than for CLEC 911 circuits which is simply incorrect. As I  
24          stated in my direct testimony, U S WEST provides special protection for **all** 911/E911  
25          circuits – whether the circuits are for U S WEST, CLEC, or other incumbent LECs.  
26          U S WEST’s protection of 911/E911 circuits is in accordance with the Washington  
27          Administrative Code that requires the 911/E911 circuits be identified and protected,  
28          as follows:

29                 Each local exchange company shall develop and institute by April 1, 1993,  
30                 a circuit identification and protection program for dedicated 911 circuits.  
31                 The program shall be fully implemented by July 1994. This program shall  
32                 ensure that all dedicated 911 circuits and associated electronic equipment  
33                 serving governmental emergency response agencies are clearly identified  
34                 as such in every central office and remote switch.<sup>3</sup>

35          Indeed, U S WEST has protected 911/E911 circuits for other incumbent LECs for

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1           <sup>3</sup> See WAC 480-120-530(2) Emergency Services.

1 many years and has processes in place and documented to ensure the integrity and  
2 protection of 911 circuits used by CLECs. Proprietary Exhibit MSB-10 is a copy of  
3 U S WEST's regional practice for protecting special service circuits, which include  
4 911/E911 services. U S WEST provides the same protection for CLECs' 911/E911  
5 circuits as it does for U S WEST's 911/E911 circuits. Moreover, U S WEST is legally  
6 obligated to satisfy these requirements as to CLECs under its 911 nondiscrimination  
7 provisions in the SGAT, which are Sections 10.3.7.4 and 10.3.7.5. Thus,  
8 U S WEST's protection of 911 circuits is nondiscriminatory.

9 **Q. DOES U S WEST HAVE PERFORMANCE MEASURES AND RESULTS FOR**  
10 **CHECKLIST ITEM 7(I) – ACCESS TO 911/E911 EMERGENCY SERVICE?**

11 A. Yes. The Regional Oversight Committee ("ROC") has developed performance  
12 measures and third party OSS testing. The ROC developed a comprehensive Test  
13 Requirements Document ("TRD") that tests both transaction driven systems analysis  
14 and an operational analysis. Section 11.6 of the TRD describes the replicate  
15 transaction mix that will include the 911/E911 service. The ROC also developed 15  
16 performance measures for access to 911/E911 services. The Ordering and  
17 Installation performance measures are in Exhibit MSB-11. The Repair performance  
18 measures are in Exhibit MSB-12. The Database Updates performance measures are  
19 in Exhibit MSB-13. The ROC performance measures and third party OSS testing will  
20 provide further evidence of U S WEST's compliance with this checklist item. The  
21 following is a list of the performance metrics:

22 Ordering and Installation Performance Measures:

- 23 OP-3 - Installation Commitments Met
- 24 OP-4 - Installation Interval
- 25 OP-5 - New Service Installations Quality
- 26 OP-6 - Delayed Days
- 27 OP-15 - Interval for Pending Orders Delayed Past Due Date

28 Repair Performance Measures:

- 29 MR-3 - Out of Service Cleared within 24 Hours
- 30 MR-4 - All Troubles Cleared within 48 Hours
- 31 MR-5 - All Troubles Cleared within 4 Hours
- 32 MR-6 - Mean Time to Restore
- 33 MR-7 - Repair Repeat Report Rate
- 34 MR-8 - Trouble Rate
- 35 MR-9 - Repair Appointments Met
- 36 MR-10 - Customer-Related Trouble Reports
- 37

1           Database Updates Performance Measures:

2           DB-1 - Time to Update Databases

3           DB-2 - Accurate Database Updates

4           The performance results for January through March 2000 are shown in Proprietary  
5           Exhibit MSB-14.

6 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY FOR CHECKLIST ITEM NO.**  
7 **7(I) - ACCESS TO 911 AND E911 SERVICES.**

8 A. U S WEST provides CLECs with nondiscriminatory access to Basic and Enhanced  
9 911 services in accordance with the requirements of the Act and FCC rules.  
10 U S WEST has legally binding commitments to make nondiscriminatory access  
11 available to CLECs for 911 and E911 services through its Commission-approved  
12 interconnection agreements in Washington and the SGAT.

13 Regarding the four issues raised by WCom and AT&T about this checklist item: 1)  
14 The issue involving the adequacy of documentation for provision of direct connections  
15 from a collocated CLEC's space to U S WEST's network without the use of an  
16 intermediate frame is close to being resolved through collaborative work with AT&T  
17 and WCom for the Arizona workshop on this checklist item and checklist item 10  
18 (access to signaling); 2) U S WEST is willing to make WCom's suggested SGAT  
19 revision to include the requirement for multiple trunks to protect 911 service; 3)  
20 AT&T's concern about protection of circuits has no foundation. U S WEST provides  
21 the same protection to CLEC circuits as it does its own 911/E911 circuits. U S WEST  
22 protects all 911/E911 circuits in accordance with Washington law; and, 4) U S WEST  
23 disagrees with WCom's proposed 911/E911 service requirement to overflow 911 calls  
24 to the U S WEST or CLEC Operator Services platform. Decisions about trunk  
25 requirements between the 911 selective router and the PSAPs and alternate routing  
26 are made by the appropriate Washington 911 authorities. Accordingly, U S WEST  
27 does not overflow calls to its Operator Services platform and provides the same  
28 access for CLEC customers as it does for its own customers to 911/E911 emergency  
29 services.

30 The ROC has developed several performance measures for access to 911/E911  
31 services and its testing will verify that U S WEST is providing parity of access to  
32 CLECs compared to the access U S WEST provides itself. The Nebraska  
33 Commission found that U S WEST satisfies this checklist item. The Commission  
34 should recommend that U S WEST meets the requirements of checklist item 7(I).

1 **IV.CHECKLIST ITEM NO. 9 - NUMBERING ADMINISTRATION**

2 **Q. DID ANY PARTIES SUBMIT COMMENTS OR TESTIMONY REGARDING**  
3 **U S WEST'S NUMBERING ADMINISTRATION?**

4 A. Not really. Mr. Beach and Mr. Wilson commented only that two issues raised in the  
5 Arizona workshop for this checklist item involving the Location Routing Number  
6 ("LRN") and number reassignment were deferred to the workshops for checklist items  
7 Nos. 1 and 11, respectively. U S WEST agrees that these issues, if any concerns  
8 remain, are more appropriately addressed as part of those checklist items. In  
9 addition, Mr. Wilson commented that the new performance metric NP-1 will determine  
10 whether U S WEST is providing parity in the provisioning of CLEC NXX codes.

11 **Q. DOES U S WEST HAVE PERFORMANCE MEASURES AND RESULTS FOR**  
12 **CHECKLIST ITEM 9 – NUMBERING ADMINISTRATION?**

13 A. Yes. A new performance measure has been developed through the ROC's  
14 collaborative workshops, NP-1, which measures the activation of NXX codes prior to  
15 the effective date. U S WEST has implemented the new performance measure. The  
16 NP-1 performance indicator description ("PID") is in Exhibit MSB-15. The  
17 performance results for March 2000 are shown in Proprietary Exhibit MSB-14. The  
18 ROC performance measures and third party OSS testing will provide further evidence  
19 of U S WEST's compliance with this checklist item.

20 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY FOR CHECKLIST ITEM NO.**  
21 **9 - NUMBERING ADMINISTRATION.**

22 A. WCom and AT&T did not raise any new issues regarding this checklist item. Both  
23 WCom and AT&T commented that two issues, LRN and number reassignment, raised  
24 in the Arizona workshop had been deferred to checklist item Nos. 1 and 11  
25 workshops, respectively, and U S WEST agrees.

26 U S WEST has put processes in place to activate NXX codes in a nondiscriminatory  
27 and timely manner which will be verified by the new performance measure, NP-1.  
28 The ROC-developed performance measures and testing will verify that U S WEST  
29 has satisfied the requirements for this checklist item for numbering administration.  
30 The Nebraska Commission and Arizona Commission have found that U S WEST  
31 meets the requirements of this checklist item. The Commission should recommend  
32 that U S WEST satisfies the requirements of checklist item 9.

**V.CHECKLIST ITEM NO. 10 – CALL-RELATED DATABASES AND  
ASSOCIATED SIGNALING**

1  
2

3 **Q. WHICH PARTIES FILED COMMENTS OR TESTIMONY REGARDING U S WEST'S**  
4 **PROVISION OF ACCESS TO CALL-RELATED DATABASES AND ASSOCIATED**  
5 **SIGNALING?**

6 A. Both Mr. Beach of WCom and Mr. Wilson of AT&T testified regarding this checklist  
7 item. I will first address the three issues Mr. Beach raised: 1) WCom recommends  
8 a change to SGAT Section 9.13.2.4.4 regarding delivery of Calling Party Number  
9 ("CPN"); 2) WCom recommends changes to SGAT Section 9.17.2 for InterNetwork  
10 Calling Name ("ICNAM"); and, 3) WCom recommends a change to SGAT Section  
11 9.15.3.2.4 for LIDB Query Service. I will address each of these issues in turn.

12 First, WCom recommends a change to SGAT Section 9.13.2.4.4 regarding delivery  
13 of Calling Party Number ("CPN"). The recommended language is as follows:

14 "Calling Party Number (CPN), or a reasonable alternative, will be delivered  
15 by each party to the other, in accordance with FCC requirements, when  
16 received from another carrier or from the telephone equipment of the end  
17 user."

18 U S WEST is willing to add WCom's recommended language to Section 9.13.2.4.4.  
19 U S WEST has already agreed to modify language in SGAT Section 7.3.8 to  
20 recognize that there may be technical restrictions preventing the delivery of CPN.  
21 These technical restrictions are included as exceptions in the FCC's rules.

22 Second, WCom recommends several changes to SGAT Section 9.17.2. for  
23 InterNetwork Calling Name ("ICNAM"). WCom states that CLECs must be able to  
24 obtain the full contents of the database, not just have access to it and recommends  
25 several SGAT revisions designed to give CLECs the entire ICNAM database.  
26 U S WEST disagrees with WCom's position and proposed changes.

27 The FCC's Third Interconnection Order<sup>4</sup> is clear that incumbent LECs are not required  
28 to give their entire database to CLECs. Rather, incumbent LECs must only provide  
29 access:

30 For purposes of switch query and database response through a signaling  
31 network, an incumbent LEC shall provide access to its call-related  
32 databases, including but not limited to, the Calling Name Database, ...by  
33 means of physical access at the signaling transfer point linked to the  
34 unbundled databases.

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<sup>4</sup> Id., ¶402. See 47 C.F.R. §51.319(e)(2)(A).

1 This language demonstrates that CLECs must access incumbent LEC databases on  
2 a "per-query" basis.

3 In addition, WCom states that U S WEST should revise Section 9.17.2 to remove  
4 restrictions regarding a CLEC's right to access and use the information contained in  
5 the database, except those imposed by law or regulatory rule. U S WEST provides  
6 access to ICNAM, in accordance with the FCC's rules,<sup>5</sup> by means of physical access  
7 at the signaling transfer point linked to the unbundled database for the purpose of  
8 switch query and database response through a signaling network. Further, the FCC  
9 rules<sup>6</sup> state that incumbent LECs must "allow a requesting carrier to provide any call-  
10 related database-supported services to customers served by the requesting  
11 telecommunications carrier's switch." U S WEST's SGAT Section 9.17.2.11 restricts  
12 CLECs from copying, storing, maintaining or creating any table or database of any  
13 kind from any response received after initiating an ICNAM query to U S WEST's  
14 database. U S WEST asserts that it retains ownership and control of the ICNAM  
15 database and all of the information in its database. U S WEST allows access by the  
16 CLEC for use on a query basis in the CLEC's signaling network to provide a  
17 telecommunications service to its end users, in accordance with the FCC's rules.

18 Finally, WCom recommends including the following language in SGAT Section  
19 9.15.3.2.4 for LIDB Query Service:

20 U S WEST shall exercise reasonable efforts to provide accurate and  
21 complete [LIDB] information in U S WEST's [LIDB].

22 U S WEST agrees with WCom's suggested revision to include the same provision in  
23 the LIDB section as is included in the ICNAM Section 9.17.2.9.

24 **Q. WHAT ISSUES DID MR. WILSON IDENTIFY REGARDING U S WEST'S PROVISION**  
25 **OF ACCESS TO CALL-RELATED DATABASES AND ASSOCIATED SIGNALING?**

26 A. Mr. Wilson identified two issues: 1) AT&T recommends adding language to SGAT  
27 Section 9.13.1.1 regarding unbundled signaling; and, 2) AT&T has the same  
28 concerns with regard to U S WEST's documentation for direct connection  
29 interconnection arrangements for signaling access discussed above in connection  
30 with checklist item 7(l).

31 First, Mr. Wilson recommends adding clarifying language to SGAT Section 9.13.1.1,  
32 as follows:

33 U S WEST will offer unbundled access to its signaling network to CLECs

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1 5 See 47 C.F.R. §51.319(e)(2)(A).  
1 6 See 47 C.F.R. §51.319(e)(2)(C).

1 that request signaling as an unbundled network element or as part of a  
2 UNE combination. Access to U S WEST's signaling network for purposes  
3 of interconnection and the exchange of traffic is addressed in Section 7 of  
4 this Agreement.

5 U S WEST agrees to adding clarifying language to the SGAT Section 9.13.1.1, as  
6 follows, with U S WEST's additions underlined:

7 U S WEST will provide CLEC with non-discriminatory access to signaling  
8 networks, including signaling links and Signaling Transfer Points (STP).  
9 Access to U S WEST's signaling network provides for the exchange of  
10 signaling information between U S WEST and CLEC necessary to  
11 exchange traffic and access call-related databases. Signaling networks  
12 enable CLEC the ability to send SS7 messages between its switches and  
13 U S WEST's switches, and between CLEC's switches and those third party  
14 networks with which U S WEST's signaling network is connected. CLEC  
15 may access U S WEST's signaling network from a CLEC switch via  
16 unbundled signaling and unbundled transport elements between CLEC's  
17 switch and U S WEST STPs. CLEC may access U S WEST's signaling  
18 network from each of its switches via a signaling link pair between its switch  
19 and the U S WEST STPs. CLEC may make such connection in the same  
20 manner as U S WEST connects one of its own switches to STPs. Access  
21 to U S WEST's signaling network for purposes of interconnection and the  
22 exchange of traffic is addressed in Section 7. The Common Channel  
23 Signaling used by the parties shall be Signaling System 7.

24 However, U S WEST does not agree that it is appropriate to include the language "or  
25 as part of a UNE combination" in this section of the SGAT. This section of the SGAT  
26 addresses signaling as an unbundled network element. Unbundled Network Element  
27 Combinations ("UNE Combinations") are addressed in Section 9.23 of the SGAT,  
28 including any limitations on particular combinations or specific UNEs. Furthermore,  
29 UNE Combinations are the subject of a future workshop.

30 Second, Mr. Wilson has the same concerns with regard to U S WEST's  
31 documentation for direct connection interconnection arrangements for signaling  
32 access as described above for checklist item 7(l). As I stated above, U S WEST  
33 expects that the issues involving the documentation of interconnection arrangements  
34 for direct connections for signaling links will be resolved shortly.

35 **Q. DOES U S WEST HAVE PERFORMANCE MEASURES FOR CHECKLIST ITEM 10**  
36 **– ACCESS TO CALL-RELATED DATABASES AND ASSOCIATED SIGNALING?**

37 A. Yes. The ROC's TRD Section 11.6 describes the replicate transaction mix that will  
38 include LIDB orders. The ROC developed two performance measures for LIDB. The

1 performance measures, DB-1 – Time to Update Databases and DB-2 – Accurate  
2 Database Updates, are designed to measure the time required to update the  
3 database and the accuracy of the updates. The descriptions of the performance  
4 measures for the LIDB database are in Exhibit MSB-13. U S WEST is currently  
5 developing the capability to provide the performance measures for LIDB. The ROC  
6 performance measures and third party OSS testing will provide further evidence of  
7 U S WEST’s compliance with this checklist item.

8 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY FOR CHECKLIST ITEM NO.**  
9 **10 - ACCESS TO CALL-RELATED DATABASES AND ASSOCIATED SIGNALING.**

10 A. U S WEST satisfies all of the conditions for checklist item 10 relative to  
11 nondiscriminatory access to call-related databases and associated signaling.  
12 U S WEST has Commission-approved interconnection agreements in place in  
13 Washington as well as the SGAT, which require U S WEST to make access to its  
14 signaling network and call-related databases available to CLECs in a  
15 nondiscriminatory manner.

16 With regard to WCom’s recommended revisions to the SGAT sections: 1) U S WEST  
17 is willing to change the SGAT language that requires conformance with the FCC rules  
18 for Calling Party Number (CPN) to recognize that there are technical restrictions,  
19 allowed by the FCC, such that the CLEC may not have the CPN information to  
20 forward in its signaling message; 2) U S WEST does not agree to make the  
21 suggested ICNAM SGAT revisions. U S WEST provides unbundled access to the  
22 call-related databases, in accordance with the FCC rules; and, 3) U S WEST is  
23 willing to change the LIDB SGAT section to include the same language found in the  
24 ICNAM SGAT section about making reasonable efforts to provide accurate and  
25 complete information in the LIDB database.

26 Regarding AT&T’s two issues: 1) U S WEST agrees to add clarifying language to the  
27 SGAT section on unbundled signaling, including a reference to the Interconnection  
28 section of the SGAT for signaling interconnection options. However, U S WEST does  
29 not agree that it is appropriate to add language regarding UNE combinations in this  
30 specific section of the SGAT; and, 2) The adequacy of CLEC documentation and  
31 internal U S WEST operations documentation for provision of direct connections from  
32 a collocated CLEC’s space to U S WEST’s network without the use of an intermediate  
33 frame will be resolved shortly for the Arizona workshop.

34 Finally, the ROC performance measures and testing will provide further evidence that  
35 U S WEST satisfies this checklist item. The Nebraska Commission has found that  
36 U S WEST satisfies this checklist item. Based on this evidence, the Commission  
37 should find that U S WEST satisfies checklist item 10.



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**VI.CHECKLIST ITEM NO. 12 - LOCAL DIALING PARITY**

2 **Q. WERE THERE ANY COMMENTS FILED CONCERNING U S WEST'S PROVISION**  
3 **OF LOCAL DIALING PARITY?**

4 **A.** No. No party filed comments identifying any issues concerning U S WEST's provision  
5 of local dialing parity. In fact, AT&T expressly states that it does not have any issues  
6 with U S WEST's compliance with this checklist item. Therefore, the Commission  
7 should find that U S WEST satisfies checklist item No. 12.

8

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## VII.CONCLUSION

2 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.**

3 A. My rebuttal testimony responded to comments by WCom and AT&T regarding  
4 U S WEST's provision of four of the checklist items: access to 911/E911 emergency  
5 services, numbering administration, access to signaling and call-related databases,  
6 and local dialing parity. U S WEST meets the requirements in the Act and the related  
7 FCC regulations in its various Commission-approved interconnection agreements and  
8 the SGAT in Washington. Therefore, I recommend that the Commission find that  
9 U S WEST has satisfied the requirements of Section 271(c)(2)(B)(vii) 911 and E911  
10 Services, Section 271(c)(2)(B)(ix) Numbering Administration, Section 271(c)(2)(B)(x)  
11 Databases and Associated Signaling, and Section 271(c)(2)(b)(xii) Local Dialing  
12 Parity checklist items.

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

14 A. Yes it does.

15

16

BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

IN THE MATTER OF THE INVESTIGATION )  
INTO U S WEST COMMUNICATIONS, INC.'S )  
COMPLIANCE WITH §271(C) OF THE ) DOCKET NO. UT-  
003022  
TELECOMMUNICATIONS ACT OF 1996. )

EXHIBITS OF  
MARGARET S. BUMGARNER  
ON BEHALF OF  
U S WEST COMMUNICATIONS, INC.

JUNE 5, 2000

**NOTICE OF CONFIDENTIALITY: THE PORTIONS OF THIS DOCUMENT  
IDENTIFIED BELOW, HAVE BEEN FILED UNDER SEAL.**

Exhibit MSB-10 U S WEST Regional Practice

Exhibit MSB-14 Performance Results

INDEX OF EXHIBITS

<u>DESCRIPTION</u>	<u>EXHIBIT</u>
Regional Practice - Special Service Circuit Protection [Proprietary]	MSB-10
911/E911 PIDs for Ordering and Installation	MSB-11
911/E911 PIDs for Repair	MSB-12
911/E911 and LIDB Database PIDs for Database Updates	MSB-13
Performance Results Summary – 7(l), [Proprietary]	MSB-14
Numbering Administration PID	MSB-15