

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

**In the Matter of the Complaint and Request)
for Expedited Treatment of AT&T)
Communications of the Pacific Northwest,) DOCKET NO. UT-991292
Inc. Against U S WEST Communications,)
Inc. Regarding Provisioning of Access)
Services.)**

DIRECT TESTIMONY OF MARY M. RETKA

U S WEST COMMUNICATIONS, INC.

November 17, 1999

1 **Q. PLEASE STATE YOUR NAME, PRESENT POSITION AND PLACE OF**
2 **EMPLOYMENT.**

3 A. My name is Mary Retka. I hold the position of Director, Network Interconnection
4 Planning for U S WEST Communications (U S WEST). My business address is 700 W.
5 Mineral, Littleton, CO, 80120.
6

7 **Q. PLEASE DESCRIBE YOUR QUALIFICATIONS AND EXPERIENCE.**

8 A. See Exhibit MMR-1.

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

10 A. The purpose of my testimony is to address AT&T's discrimination allegations contained
11 on pages 68-78 of Charlotte Field's Direct Testimony regarding U S WEST's network
12 provisioning, network funding process and dissemination of network information.
13

14 **Q. WHAT IS THE SINGLE MOST IMPORTANT FACTOR THAT DRIVES HOW**
15 **U S WEST PROVISIONS ITS NETWORK?**

16 A. The single most important factor that drives network provisioning is the growth in
17 demand for network services. Accordingly, U S WEST develops its network
18 provisioning plans based on product forecasts.
19

20 **Q. PLEASE EXPLAIN U S WEST'S FORECASTING PROCESS.**

21 A. Forecasts are initially developed by U S WEST's wholesale and retail market units based
22 on sales projections for each entity's respective products. The completed forecasts are
23 then submitted to tactical planning engineers in the network organization. The tactical
24 planning engineers convert the product forecasts into switch and interoffice (IOF) facility
25 forecasts that are used to determine actual network provisioning. The tactical planning
26 engineers, in turn, submit their facility forecasts to both switch and interoffice facility
27 (IOF) planning engineers to determine if there are adequate switch and IOF facilities to
28 meet the projected demand. If not, then growth jobs are developed and facility orders are
29 issued to equipment vendors to obtain the necessary equipment to augment the network.
30 Ultimately, forecasts are the basis for determining how much network provisioning will
31 be required for a particular planning period.
32

33 **Q. HOW DO FORECASTS AFFECT U S WEST'S BUDGET PROCESS ?**

34 A. The process of determining funding to construct facilities is based on forecasted growth
35 for both lines, e.g. 1FR, 1FB, coin service, basic and primary rate ISDN, message DS1s
36 and trunks, e.g. PBX, CLEC and IXC facilities, U S WEST interoffice message trunking
37 and umbilicals between host offices and remote switches. The aforementioned line and
38 trunk forecasts are provided to Network Resource Allocation from the forecasting group.
39 Network Resource Allocation determines funding requirements by facility type, i.e.,

1 switch, interoffice facility, and outside plant, based on the current distribution area and
2 wire center forecasts. Network solutions suited to accommodate a given forecast
3 requirement are modeled, configured and budgeted based on vendor specific pricing
4 derived from competitive vendor agreements assuming particular equipment
5 architectures, models and configurations.
6

7 Construction budgets are snapshots in time and infrastructure requirements may change
8 depending on variations in growth trends, related forecast adjustments, competitive
9 considerations, internet traffic impacts, weather, disasters, regulatory requirements, and
10 variations or updates to equipment vendor agreements. Therefore, during any given year
11 projects may be added to, or eliminated from, the construction budget based on
12 determinations related to these variables.

13 **Q. IS THE ULTIMATE DECISION TO FUND GROWTH JOBS BASED ON
14 WHETHER THE UNDERLYING FORECASTED FACILITIES BENEFITS
15 RETAIL OR WHOLESALE CUSTOMERS ?**

16 A. No. Growth jobs are funded based on the need for facilities independent of the type of
17 customer that initially generated the need.
18

19 **Q. HOW DOES U S WEST PROVISION THE NETWORK?**

20 A. The provisioning process is initiated by a request for service in the form of an order. For
21 access services this order is called an Access Service Request (ASR). Either a wholesale
22 or retail customer can issue an ASR through their respective sales/service account
23 representatives. To process an order, an account representative sends an ASR to the
24 network design organization, where circuits are designed and equipment and facility
25 assignments are made. The equipment and facility assignments are then sent to the
26 switch, central office and field technicians to install the service, resulting in a completed
27 order. Orders are provisioned on a first come, first served basis, in the order received,
28 based on due date.
29

30 **Q. ON PAGE 68 OF HER TESTIMONY, MS. FIELD CONTENDS THAT U S WEST
31 DISCRIMINATES AGAINST AT&T BY NOT PROVIDING IT WITH
32 INFORMATION ABOUT WHERE FACILITY PROVISIONING DIFFICULTIES
33 MAY EXIST IN U S WEST'S NETWORK. WOULD YOU RESPOND TO THIS
34 ALLEGATION?**

35 A. U S WEST has wire centers in its network where the demand for facilities is high and the
36 available capacity is at a premium. These wire centers are typically high usage offices in
37 locations that serve large amounts of customers, usually in metropolitan areas.
38 U S WEST closely monitors these areas in an effort to ensure there is adequate network
39 capacity to serve customer needs.
40

1 **Q. DOES U S WEST USE THE SAME PROVISIONING PROCESS IN THESE SO-**
2 **CALLED “HOT SPOTS”?**

3 A. Yes. The forecasting, provisioning and ordering process is the same as in any other area
4 of the U S WEST network.

5

6 **Q. DOES U S WEST PUBLISH INFORMATION INTERNALLY ABOUT THESE**
7 **HOT SPOTS?**

8 A. No, but these areas are generally known to both U S WEST and its customers (including
9 interexchange carriers), as they are typically the larger wire centers in major metropolitan
10 areas. Furthermore, s described in Ms. Halvorson’s testimony, U S WEST is very
11 willing to check facilities on a case-by-case basis for wire centers where orders are
12 pending.

13

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

15 A. Yes, it does.