

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into

U S WEST COMMUNICATIONS, INC.'s

Compliance with Section 271 of the
Telecommunications Act of 1996.

Docket No. UT-003022

**DIRECT TESTIMONY OF
ELIZABETH M. BALVIN**

**ON BEHALF OF
WORLDCOM, INC.**

**ADDRESSING
GENERAL TERMS AND CONDITIONS, SECTION 12**

June 7, 2001

1 **Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

2 **A.** Elizabeth M. Balvin, Project Manager for WorldCom's Carrier Management
3 Group at 6312 S. Fiddler's Green Circle, Suite 600 East, Englewood, CO 80111

4 **Q. PLEASE DESCRIBE YOUR RESPONSIBILITIES AT WORLDCOM.**

5 **A.** I am primarily responsible for overseeing the two Third Party Tests of Qwest
6 Operational Support Systems (“OSS”), one in the State of Arizona and the other for the
7 13-State Collaborative Regional Oversight Committee (“ROC”) on behalf of WorldCom.
8 I have been the Technical Advisory Group (TAG) core member for each test since
9 December of 1999 and speak on behalf of WorldCom regarding areas that relate to the
10 Third Party Tests and Qwest’s OSS. I am responsible for addressing WorldCom issues
11 surrounding systems, product and processes through the Qwest Co-Provider Industry
12 Change Management Process (“CICMP”). I have been attending Qwest’s monthly
13 CICMP meetings since its inception in the fourth quarter of 1999. I am also responsible
14 for the development and negotiation of Qwest Performance Indicator Definitions
15 (“PIDs”) on behalf of WorldCom, specifically as it relates to validating whether Qwest
16 provides non-discriminatory service. In support of these Third Party Tests, WorldCom
17 has volunteered its internal OSS (EB-TA) as well as commercial volume experiences,
18 which requires coordination on my part.

19 **Q. HAVE YOU PARTICIPATED IN THIS PROCEEDING PREVIOUSLY?**

20 **A.** Yes, as stated above, I have been the Technical Advisory Group (TAG) core
21 member on behalf of WorldCom since December of 1999. OSS workshops have been
22 hosted on a monthly basis to address issues surrounding language of the Master Test Plan

1 (AZ and the ROC), Test Standards Document (AZ only), test scenarios, capacity
2 volumes, performance measures, relationship management and retail parity objectives.

3 **Q. PLEASE DESCRIBE YOUR RELEVANT EXPERIENCE WITH**
4 **WORLDCOM AND EDUCATIONAL BACKGROUND.**

5 **A.** I began my career with WorldCom seven years ago as an Accountant in Bank
6 Card Operations and was responsible for settlement of credit card payment options,
7 monitored third party invoice transmissions and processed journal postings. I became a
8 Senior Unbillable Analyst in 1996 to identify and document required system
9 improvements to reduce long distance unbillable exposures. As well, determined billable
10 invoices and processed recoveries. In 1998 transferred to Supervisor of Billing Name and
11 Address (BNA) Group whereby I was responsible for implementing program
12 requirements for automated acquisition, installation, blocking and tracking of BNA
13 information. I was promoted to Carrier Management Group in 2000 and continue to be
14 responsible for the oversight of Qwest Operational Support System Third Party Tests. I
15 graduated from Rutgers University in 1998 with a Bachelors Degree in Child
16 Development and Family Studies.

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

18 **A.** The purpose of my testimony is to address WorldCom's concerns surrounding
19 Qwest proposed language in Section 12 - "Access to Operational Support Systems
20 (OSS)" of Qwest's Statement of Generally Accepted Terms ("SGAT").

21

1 **Q. DOES WORLDCOM HAVE ANY GENERAL CONCERNS ABOUT**
2 **SECTION 12 OF THE SGAT?**

3 **A.** Yes. Qwest asserts in section 12.2.1 “Local Service Request (“LSR”) Ordering
4 Process” that CLECs shall be provided electronic gateways for the submission of LSRs.
5 Qwest supports a manual interface called Interconnection Imaging System (“IIS”), which
6 provides for Qwest to electronically log and distribute to the appropriate Interconnect
7 Service Center (“ISC”) for input into the regional Service Order Processor (“SOP”)
8 system. As such, this interface needs to be included.

9 Qwest highlights what industry guidelines and/or standards have been employed
10 by Qwest to implement their OSS. What must be clearly stated in the SGAT is that
11 Qwest will document and make accessible to CLECs any deviations from these Industry
12 guidelines and/or standards.

13 Qwest needs to provide more details because as the document stands there is
14 much room for interpretation. No references should be made to documents whereby the
15 language is not explicit in the SGAT sections and/or appendices. Qwest references a web
16 site in section 12.2.5.2.7 that no longer exists for example. James Allan asserts that
17 detailed descriptions of Qwest interfaces have been removed from section 12 because
18 Qwest is constantly improving these interfaces and the interfaces are subject to change
19 requests in CICMP. In accordance with the ROC Third Party Test, Qwest implemented a
20 version control process for their state-filed but not yet approved SGATs. The version
21 control process was put in place because the language of these SGATs were ever-

1 changing and if any CLEC chose the SGAT as a means for Interconnection with Qwest, it
2 would be subject to the version they signed.

3 **Qwest Co-Provider Industry Change Management Process (“CICMP”).**

4 James Allan asserts that “CICMP has been working effectively since Qwest
5 implemented it”. WorldCom disagrees and will discuss the following reasons with
6 respect to what James Allan identified as the “four major objectives”:

7 **Provide a forum for CLECs and Qwest to discuss change request (“CRs”), Release**
8 **Notifications (“RNs”), Systems Release Life Cycles, and Communications.**

9 The CICMP forum allows for the discussion of CLEC change requests only.
10 Qwest determines software enhancements (“internal CRs”) that will be implemented and
11 CLECs have very little insight into that process. As well, the defined CICMP escalation
12 process only pertains to CLEC CRs formally submitted via CICMP. WorldCom believes
13 that any CR that will impact how CLECs support local orders via Qwest OSS must be
14 collaboratively determined as necessary to implement. Currently, CLECs are not
15 provided even enough information to determine how the internal CRs will impact their
16 business. It is not simply a matter of knowing what software changes will be
17 implemented, but how best to train employees to address these changes. Release
18 Notifications provide CLECs notice that Qwest will be implementing a system, product
19 and/or process change. CLECs are not provided a means to negotiate with Qwest what
20 will be made available via a Release Notification. As well, Qwest imposes the release life
21 cycles it will use.

22 **Provide a forum for CLECs as an industry to discuss and prioritize their CRs.**

1 CICMP allows for the discussion and prioritization of CLEC’s CRs only. The
2 CICMP forum requires CLEC CRs to be considered in addition to Qwest internal CRs.
3 CLECs have been provided input to the last two implemented releases, of which, CLEC
4 CRs only made up 24% of the total enhancements.

5 **Develop a mechanism to track and monitor CLEC CRs and Qwest RNs.**

6 The ability to track and monitor is critical but addressing CLEC concerns is
7 essential.

8 **Establish communication intervals where appropriate in the process.**

9 It is essential that CLECs are informed on a timely basis to address system and
10 training issues necessitated by Qwest implemented changes. Lack of timely notification
11 could result in delays and customer affecting issues.

12 As stated above, of Qwest total implemented enhancements, CLEC CRs made up
13 24%. The Qwest CICMP forum has been in place since fourth quarter of 1999 (1 ½
14 years). WorldCom has been engaged since its inception and believes that if Qwest were
15 to address CLEC CRs more aggressively, more CLECs would participate. Most CICMP
16 meetings only have CLEC representation from approximately 35 companies as opposed
17 to the 103 CLECs referenced by Mr. Allen.

18 Finally, Qwest policy states "Current Co-Provider Product, Process, or OSS
19 Interface users, or those who have an agreed upon project work plan for implementing a
20 Product, Process or OSS Interface, may submit change requests and participate in the Co-
21 Provider Industry Team." WorldCom currently has no agreed upon work plan for
22 implementing the Electronic Data Interchange (“EDI”) Interface. As such, WorldCom

1 cannot submit or prioritize any change requests related to EDI. WorldCom takes issue
2 with this policy for the following reasons; when it becomes economically feasible for
3 WorldCom to enter Qwest’s residential local market territory via UNE-P, WorldCom will
4 submit UNE-P Local Service Requests (“LSRs”) via EDI exclusively. To not be able to
5 identify and address issues ahead of implementation, WorldCom is at a distinct
6 disadvantage. Therefore, WorldCom requests that Qwest change this policy to ensure
7 that all CLECs interested in the outcome of Qwest CRs to OSS be provided the means to
8 have a say via CICMP.

9 **Qwest Stand Alone Test Environment**

10 Although Qwest has committed to provide a stand-alone test environment, it has
11 not yet been implemented and made available to CLECs. Qwest went “out of process”
12 for the sake of the Third Party Tests (both AZ and the ROC) during EDI implementation
13 which makes it imperative that Qwest implement this stand alone test environment in
14 time to be evaluated by the Third Party Testers. In doing so, CLECs could be assured
15 that the current process, which the Third Party Testers identified as costly and time-
16 consuming would be a thing of the past.

17 **Q. DOES WORLDCOM HAVE ANY SPECIFIC CONCERNS ABOUT**
18 **SECTION 12?**

19 **A.** Yes. Attached to my testimony as Exhibit EMB-1 is a redlined version of Section
20 12. I have made suggested changes to language contained in Section 12. I have also
21 included some editorial comments in that attachment in relevant areas of Section 12. In

1 addition, I have the following concerns with respect to Qwest’s proposals to assess
2 charges for the Daily Usage Feed and Category 11 records.

3 **Section 12.2.5.2.1 – 12.2.5.2.2**

4 WCOM objects to the inclusion of charges for the DUF for Resale and Unbundled
5 Switch Port. For resale: Qwest is required to provide its services at wholesale at its retail
6 rate minus avoided cost. There is absolutely no authority for charging any additional fees
7 to Qwest’s wholesale customers for the electronic data maintained routinely by Qwest to
8 bill its own customers and essential for a reseller to bill its customers. Qwest’s retail
9 service would include the daily usage information for its own customers, so that daily
10 usage information should be available also to CLECs as a routine part of the wholesale
11 service it purchases from Qwest. If Qwest’s position were adopted, it would be
12 improperly allowed to charge its wholesale customers more than its retail rate, less
13 avoided cost. For UNE-P, WCOM similarly believes that provision of the DUF is a cost
14 of doing business and should be provided to WCOM at no charge. Furthermore, from a
15 cost recovery perspective, the recording of the call is made by the local or tandem switch
16 and is already recovered in the unbundled switching rate. The cost to generate a bill
17 transmitted electronically, on an incremental (TELRIC) basis, is practically zero. Hence,
18 12.2.5.2.2 should read, “There is no charge for the Daily Usage Record File.”

19

20 **Section 12.2.5.2.6 – Category 11 Records**

21 As previously argued in this proceeding, WCOM continues to believe there
22 should be no charges for the exchange of Category 11 records. If Qwest’s prevails in

1 seeking a charge for Category 11 records, this would unfairly penalize CLECs. Category
2 11 records are used by the parties to jointly bill IXCs for jointly provided switched access
3 services. In practice, Qwest provides WCOM with all the records for each and every call
4 made by WCOM's customer. WCOM then aggregates these calls onto a summary bill
5 that is then sent back to Qwest to enable Qwest to bill the IXC. For the same amount of
6 call usage, Qwest generates say, hundreds of thousands records to WCOM but WCOM
7 only sends back a handful of records. Nevertheless, in aggregating the records that
8 WCOM receives from Qwest, it is handling and processing the same number of records
9 as Qwest does when making the initial transmission of records to WCOM. However,
10 under Qwest's proposed charging mechanism it would be permitted to bill WCOM for
11 each individual record while WCOM would only be allowed to bill for the single
12 aggregated record returned. Qwest would thus be unfairly billing WCOM high charges
13 and WCOM would only be able to bill back a fraction of those charges even though the
14 charges are reciprocal in nature. Hence, WCOM believes the fairest practice would be
15 for the parties to exchange records without seeking additional compensation for the
16 record transmission.

17 Alternatively, at a minimum, WCOM believes that carriers should be allowed to
18 negotiate whether to mutually exchange Category 11 records without charging each
19 other. In the existing interconnection agreements between MFS and Qwest (US West),
20 Sec V.K.3, the parties have agreed to exchange records "without additional
21 compensation." Hence, WCOM seeks to add the following clarification phrase to the end

1 of Sec 12.2.5.2.6, “Charges shall be listed in Exhibit A unless otherwise negotiated by the
2 Parties.”

3 **Q. DOES WORLDCOM HAVE ANY COMMENTS ABOUT MAINTENANCE
4 AND REPAIR?**

5 **A.** All maintenance and repair PIDs, except MR-10, use Parity standards which
6 means Qwest must address trouble related issues in substantially the same time and
7 manner for Wholesale as it does for Retail. Qwest acknowledged via the negotiated PIDs
8 that analogous processes exist between Wholesale and Retail trouble administration and
9 as such that Qwest would be able to support CLEC issues as it does it own end-user
10 customers. However, Qwest is in complete control of adhering to these standards and
11 providing service that is in parity. WorldCom’s reputation is affected if Qwest provides
12 bad service, even if that service is at parity, especially when CLECs are attempting to win
13 existing Qwest subscribers. This would also relate to services available to CLECs such
14 as status information of trouble tickets. CLECs could not provide quality customer
15 service if Qwest does not consistently and accurately provide status information.

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

17 **A.** Yes it does.