

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the matter of,

Joint Application of Qwest Communications
International Inc. and CenturyTel, Inc. for
Approval of Indirect Transfer of Control of
Qwest Corporation, Qwest Communications
Company LLC, and Qwest LD Corp.

Docket No. UT-100820

EXHIBIT__TJG-4

ASSURANCES NOT MET

USWC/Qwest 1999/2000 Assurances:

“In summary, US West has deployed the necessary system and personnel to provide sufficient access to its OSS, adequately assists CLECS to use all of the OSS functions available to them, and demonstrates that its OSS functions are operational ready, as a practical matter.” *USWC, CO 271 97I-198T, 11/30/99, Notarianni Affidavit, p. 4.*

- Type of interfaces: “US WEST meets [the FCC’s OSS] standards. US WEST will submit the testimony . . . which will demonstrate that, to provide CLECs nondiscriminatory access to OSS, US WEST has built a computer-to-computer EDI [Electronic Data Interchange] interface and a GUI [Graphical User Interface] interface called IMA.” *USWC Prelim. Statement, WUTC UT-970300, 3/22/00, p. 30.*

CenturyLink/Qwest 2010 Assurances:

“The purpose of my direct testimony is to: 1) provide an overview of the CTL Wholesale Operations organization, 2) provide a high level overview of CTL’s ability to service our wholesale customers via our Operations Support System (OSS), and 3) **provide assurances** relative to the current obligations of Qwest relative to the CLEC market. . . . In addition, the combined company will continue to employ highly skilled and experienced personnel in its wholesale operations group.” *CL OR Supp. Direct (Hunsucker), pp. 2-3.*

- Types of Interfaces: “EASE provides Wholesale customers with both a web-based GUI (graphical user interface) as well as electronic data interface options to allow flexibility to our customers in placing orders with CTL.” *Id. p. 7.*

After USWC/Qwest made similar assurances in 1999 and 2000, what happened?

NUMEROUS FAILINGS OF QWEST’S OSS SYSTEMS AND PROCESSES WERE IDENTIFIED AND RESOLVED THROUGH OSS IMPROVEMENTS OVER A 3-YEAR PERIOD

- KPMG performed third party testing of OSS, revealing hundreds of issues of concern (known as exceptions and observations). 256 Exceptions and 242 Observations identified during third-party testing, reduced to 14 Exceptions and 1 Observation through OSS improvements and re-testing.
- Hewlett Packard, acting as a pseudo CLEC, identified problems, such as the one described by the Idaho Public Utilities Commission as “an unacceptably high level of human errors in the manual processing of orders” that resulted in 75 Observations and Exceptions.
- Liberty Consulting, which audited both PIDs and data reconciliation (Qwest versus CLEC reporting), discovered a number of deficiencies in Qwest’s measurement and reporting processes and PIDs that, when addressed, resulted in what Liberty referred to as “significant improvements to both the processes used by Qwest and the specificity and clarity of the PID.” Liberty also identified problems during the data reconciliation audit, such as the need for additional user documentation and training, revised data collection efforts and computer programming fixes.

What did the third-party testing of Qwest's OSS indicate?

CLECs would have been “severely disadvantaged, if not precluded altogether, from fairly competing” absent the third-party testing of Qwest’s OSS. *See, Local Competition Order, ¶ 518.* In other words, there would have been no meaningful opportunity to compete.

Did USWC/Qwest systems eventually pass OSS testing for 271 purposes?

Yes, after addressing the numerous problems identified during third-party OSS testing

“This *Final Report* marked the culmination of more than three years of exhaustive and comprehensive effort, ***unlike any seen before***, to determine whether Qwest’s OSS meet the standards set forth under Section 271 of the Telecommunications Act of 1996, as those standards have been amplified and applied by the FCC.” *Qwest Verified Comments, WUTC UT-003022, pp. 1-2* (emphasis added).

Have CenturyLink's systems passed similar testing?

No.