

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of Qwest
Corporation to Initiate a Mass-Market
Switching and Dedicated Transport Case
Pursuant to the Triennial Review Order**

Docket No. UT-033044

**DIRECT TESTIMONY OF
WILLIAM R. EASTON
ON BEHALF OF
QWEST CORPORATION**

DECEMBER 22, 2003

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1 **I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.**

3 A. My name is William R. Easton. My business address is 1600 7th Avenue, Seattle
4 Washington. I am employed as Director – Wholesale Advocacy. I am testifying on
5 behalf of Qwest Corporation (“Qwest”).

6 **Q. PLEASE GIVE A BRIEF BACKGROUND OF YOUR EDUCATIONAL**
7 **BACKGROUND AND TELEPHONE COMPANY EXPERIENCE.**

8 A. I graduated from Stanford University in 1975, earning a Bachelor of Arts degree. In
9 1980, I received a Masters of Business Administration from the University of
10 Washington. In addition, I am a Certified Management Accountant.

11 I began working for Pacific Northwest Bell in 1980, and have held a series of jobs in
12 financial management with U S WEST, and now with Qwest, including staff positions in
13 the Treasury and Network organizations. From 1996 through 1998, I was Director –
14 Capital Recovery. In this role I negotiated depreciation rates with state commission and
15 FCC staffs and testified in various regulatory proceedings. From 1998 until 2001 I was a
16 Director of Wholesale Finance, responsible for the management of Wholesale revenue
17 streams from a financial perspective. In this capacity I worked closely with the Product
18 Management organization on their product offerings and projections of revenue. In
19 October of 2001 I moved from Wholesale Finance to the Wholesale Advocacy group,
20 where I am currently responsible for advocacy related to Wholesale products and

1 services. In this role I work extensively with the Product Management, Network and
2 Costing organizations.

3 **Q. HAVE YOU TESTIFIED PREVIOUSLY IN WASHINGTON?**

4 A. Yes I have. I testified in docket numbers UT-940641, UT-950200, UT-951425, UT-
5 960347, UT-003013 (Part D) and UT-033035.

6 **II. PURPOSE OF TESTIMONY**

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

8 A. The purpose of my testimony is to provide an overview of several Qwest product
9 offerings available to CLECs. Specifically, I'll discuss Unbundled Switching,
10 Unbundled Network Element – Loop (UNE-L) and Resale product offerings. I will also
11 describe the transition process that Qwest and CLECs will use to transition away from
12 existing Unbundled Network Element – Platform (UNE-P) products should this
13 Commission find that there is no impairment related to mass market switching. I
14 recommend that the Commission make a finding of non-impairment with regard to mass
15 market switching in those geographic markets specified by Qwest witnesses Reynolds
16 and Shooshan.

17 **III. UNBUNDLED SWITCHING AND UNE-P PRODUCTS**

18 **Q. HOW DO CLECS GAIN ACCESS TO UNBUNDLED SWITCHING TODAY?**

19 A. Qwest's CLEC customers typically gain access to unbundled switching through the use
20 of UNE-P, a combination of UNEs that includes unbundled local circuit switching, an
21 unbundled loop, and shared transport. UNE-P allows the provisioning of services that are

1 functionally equivalent to Qwest's comparable retail service offerings. Qwest UNE-P
2 products currently offered for mass market customers include:

- 3 ▪ UNE-P Centrex – Centrex Plus, Centrex 21, and Centron®-
- 4 ▪ UNE-P Integrated Services Digital Network (ISDN) Basic Rate Interface
5 (BRI)
- 6 ▪ UNE-P Private Branch Exchange (PBX) Trunks
- 7 ▪ UNE-P Plain Old Telephone Service (POTS)
- 8 ▪ UNE-P Public Access Line (PAL)

9 **Q. HOW MANY DS0 UNE-P LINES DOES QWEST CURRENTLY HAVE IN**
10 **WASHINGTON?**

11 A. Attached as Confidential Exhibit WRE-2C is a listing of DS0 UNE-P line counts by wire
12 center as of July 2003. It should be noted that these counts include UNE-P lines serving
13 both mass market and enterprise customers.

14 **IV. UNBUNDLED NETWORK ELEMENT - LOOP**

15 **Q. PLEASE DESCRIBE UNE-L.**

16 A. UNE-L provides CLECs with access to the facility or transmission path between an end
17 user's premises and Qwest's distribution frame (or equivalent) in the Qwest Central
18 Office (CO). UNE-L includes all features, functions and capabilities of the transmission
19 facilities, including all attached electronics between the Qwest CO and the loop

1 demarcation point at an end user's premises (with the exception of Digital Subscriber
2 Line Access Multiplexer (DSLAM) owned by Qwest).

3 **Q. HOW IS UNE-L USED BY CLECS?**

4 A. CLECs can combine UNE-L with CLEC-provided circuit switching (or circuit switching
5 leased from a third party) and transport, and can provide the same (or comparably the
6 same) service to their end users as is currently being provided via UNE-P.

7 **Q. WHAT TYPES OF UNBUNDLED LOCAL LOOPS DOES QWEST PROVIDE
8 FOR USE SERVING MASS MARKET CUSTOMERS?**

9 A. The unbundled local loop family of products serving mass market customers includes:

- 10 • 2-wire or 4-wire Analog (Voice Grade) Loop
- 11 • 2-wire or 4-wire Non-Loaded Loop
- 12 • Asymmetric Digital Subscriber Line (ADSL) Compatible Loop
- 13 • Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) Capable
14 Loop
- 15 • xDigital Subscriber Line-Integrated Services Digital Network (xDSL-I) Capable
16 Loop

17 **Q. HOW MANY DS0 UNE-L LOOPS DOES QWEST CURRENTLY HAVE IN
18 WASHINGTON?**

1 A. Attached as Confidential Exhibit WRE-3C is a listing of DS0 UNE-L loop counts by wire
2 center as of July 2003. As was the case with the UNE-P numbers, these counts include
3 loops serving both mass market and enterprise customers.

4 **Q. IS COLLOCATION REQUIRED FOR CLECS TO ACCESS UNBUNDLED**
5 **LOOPS?**

6 A. Yes. Qwest offers a number of collocation options in order to meet the specific needs of
7 CLECs. These options are described in the testimony of Mr. Dennis Pappas.

8 **Q. DOES A CLEC HAVE TO HAVE COLLOCATION IN EVERY QWEST**
9 **CENTRAL OFFICE WHERE IT WISHES TO ACCESS UNBUNDLED LOOPS?**

10 A. No. A CLEC can utilize an Enhanced Extended Loop (EEL) to basically create a very
11 long loop from the end user's premises to the CLEC collocation in a distant Qwest
12 central office. An EEL is a combination of an unbundled loop and dedicated interoffice
13 transport between two Qwest central offices. When a CLEC has only a few end users
14 served from a central office, an EEL enables the CLEC to reach the loop serving the end
15 user without the additional cost of collocation in that office. Qwest witness Joseph
16 Weber describes EELs in greater detail in his direct testimony.

17 **Q. CLECS WOULD ALSO NEED TRANSPORT TO GO ALONG WITH THEIR**
18 **UNBUNDLED LOOPS. CAN CLECS PURCHASE THIS TRANSPORT FROM**
19 **QWEST?**

20 A. Yes. Qwest offers Unbundled Dedicated Interoffice Transport (UDIT), which provides
21 CLECs with a single transmission path between Qwest central offices and tandem

1 switches in the same LATA and state. Unbundled multiplexing is offered as an optional
2 feature associated with UDIT and unbundled loops. If a CLEC orders a UNE
3 combination that includes UDIT (such as a high capacity EEL), Qwest will perform all
4 the necessary cross connections between the UNEs in the same manner that it would
5 perform such cross connections for its own end users.

6 **V. RESALE**

7 **Q. ARE THERE OTHER WHOLESALE SERVICES BESIDES UNE-P WHICH**
8 **INCLUDE LOCAL SWITCHING CAPABILITIES?**

9 A. Yes. Resale services are, in most cases, functionally equivalent to UNE-P products, and
10 so would provide the same service to CLECs' end users as the equivalent UNE-P
11 product.¹

12 **Q. HOW MANY SWITCHED LOCAL RESALE LINES DOES QWEST CURRENTLY**
13 **HAVE IN WASHINGTON?**

14 A. Attached as Confidential Exhibit WRE-4C is a listing of resale line counts by wire center
15 as of July 2003. These counts include lines serving both mass market and enterprise
16 customers.

¹ There may be cases where a CLEC integrates its own enhanced features into UNE-P, something that is not possible with resale.

1 **VI. CONVERSION OF EXISTING UNE-P TO OTHER WHOLESALE SERVICES**

2 **Q. IF QWEST WERE NO LONGER REQUIRED TO PROVIDE UNBUNDLED**
3 **SWITCHING FOR MASS MARKET CUSTOMERS, HOW WOULD CLECS’**
4 **EXISTING UNE-P LINES BE TRANSITIONED TO OTHER WHOLESALE**
5 **SERVICES?**

6 A. If the Commission finds that CLECs are not impaired without unbundled switching for
7 mass market customers in a particular market, CLECs must commit to a transition plan
8 for existing UNE-P lines within two months from the “no impairment” finding. As
9 specified in the TRO, the Commission has nine months from the effective date of the
10 TRO (or July 2, 2004), to make a finding of impairment or no impairment, and CLECs
11 have two additional months (i.e., September 2004, at the latest, depending on the date of
12 the Commission’s order) to agree upon a transition plan for their existing UNE-P lines.
13 The TRO also provides that existing UNE-P lines will be transitioned under the following
14 schedule: 1) 13 months after a finding of no impairment, each CLEC must have
15 submitted orders for one-third of its unbundled switching [UNE-P] end users; 2) 20
16 months after a finding of no impairment, each CLEC must have submitted orders for half
17 of the remaining unbundled switching end users; and 3) 27 months after a finding of no
18 impairment, each CLEC must have submitted orders to transition all remaining
19 unbundled switching end users.² The FCC further specifies that five months after a

² *Id.* ¶ 532.

1 finding of no impairment, CLECs may no longer request mass market unbundled
2 switching.³

3 **Q. HOW WILL QWEST AND CLECS ARRIVE AT AN AGREED UPON**
4 **TRANSITION PLAN?**

5 A. Qwest and CLECs are currently engaged in discussions in the regional Batch Hot Cut
6 Forum concerning the development of a Batch Hot Cut Process. Qwest's proposed
7 process includes up-front coordination and negotiation between Qwest and the CLECs to
8 ensure an orderly transition of their embedded base of UNE-P to other wholesale
9 services. Qwest and the CLECs continue to discuss this issue in the Batch Hot Cut
10 Forums and more detailed information concerning the coordination of the transition plans
11 will be included in Qwest's Batch Hot Cut testimony due to be filed in January 2004.
12 Qwest will use the batch hot cut process to transition those lines that are eligible for batch
13 hot cut treatment. For those lines that are not eligible for processing through the batch
14 hot cut process, Qwest will use existing provisioning processes to make the desired
15 conversion.

16 **VII. CONCLUSION**

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

18 A. Yes. I recommend the Commission adopt Qwest's recommendation and make a finding
19 of non-impairment with regard to mass market switching in the markets specified in the
20 testimony Qwest witnesses Reynolds and Shooshan.

³ *Id.*