

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE CONTINUED)
COSTING AND PRICING OF UNBUNDLED) Docket No. UT-003013
ELEMENTS, TRANSPORT AND) Part B
TERMINATION, AND RESALE)**

REBUTTAL TESTIMONY

OF

RENÉE ALBERSHEIM

QWEST CORPORATION

February 28, 2001

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I. IDENTIFICATION OF WITNESS

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

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A. My name is Renée Albersheim. My business address is 1999 Broadway, 10th Floor,
4 Denver, Colorado 80202.

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**Q. ARE YOU THE SAME MS. ALBERSHEIM THAT PRESENTED DIRECT
6 TESTIMONY IN THIS DOCKET?**

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A. Yes.

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Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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A. The purpose of my testimony is to rebut positions taken by Roy Lathrop of

10

WorldCom.¹ Specifically, I will describe why Mr. Lathrop's position that the

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Commission should require Qwest to implement a line splitting OSS reflecting

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WorldCom's "principles for line splitting OSS" is pre-mature. I will demonstrate

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why Mr. Lathrop's assertion that Qwest's OSS require little modification for line

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splitting is in error. Finally, I will explain why Mr. Lathrop's proposal to require

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measures for line splitting OSS is inappropriate in this docket.

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Q. ARE MR. LATHROP'S PRINCIPLES FOR LINE SPLITTING OSS

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SUFFICIENT TO ESTABLISH REQUIREMENTS FOR OSS?

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A. No. It would not be prudent for Qwest to modify its OSS based on the principles of a

¹ See *In the Matter of Continued Costing and Pricing of Unbundled Network Elements, Transport, Termination, and Resale*, WUTC Docket No. UT-003013, Part B – Response Testimony of Roy Lathrop, WorldCom, dated February 7, 2001 (Lathrop Response).

1 single competitive local exchange carrier (CLEC). Qwest has no evidence that all
2 CLECs interested in line splitting agree with Mr. Lathrop's principles for line
3 splitting. As discussed further in the Rebuttal Testimony of Qwest witness Barbara J.
4 Brohl, Qwest agrees with staff witness Jing Roth that line splitting OSS requirements
5 should be developed by a collaborative group of interested CLECs and Qwest. From
6 business requirements that accurately capture CLECs' collective line splitting needs,
7 system impacts can be accurately determined. With the combination of business
8 requirements and system impacts developed through the collaborative process, Qwest
9 can effectively and successfully modify its OSS to support line splitting. Qwest
10 encourages WorldCom to participate in a collaborative process to develop the
11 business requirements for line splitting.

12 **Q. DO YOU AGREE WITH MR. LATHROP'S ASSERTION THAT LINE**
13 **SPLITTING SHOULD REQUIRE LITTLE OSS DEVELOPMENT EFFORT**
14 **BECAUSE "THERE SHOULD BE NO SIGNIFICANT CHANGES TO THE**
15 **LINE SHARING ORDERING PROCESS?"²**

16 A. No. There are a number of reasons why the line splitting order process will not be the
17 same as the line sharing order process. For example, in line sharing it is clear which
18 CLEC will be submitting the LSR and how the provisioning work will be divided
19 between Qwest and the CLEC. With line splitting, it is still unclear which CLEC
20 (voice or data) will be submitting the LSR and how the CLECs intend to divide up the

² See *In the Matter of Continued Costing and Pricing of Unbundled Network Elements, Transport, Termination, and Resale, WUTC Docket No. UT-003013, Part B – Principles of Line Sharing OSS, WorldCom – Exhibit RL4, filed February 7, 2000, at page 2 (Lathrop Response Exhibit).*

1 provisioning work, as well as specifically how Qwest will be involved in that
2 provisioning work. Even Mr. Lathrop's principles for line splitting require a process
3 that does not exist as part of the line sharing order process. Part of Mr. Lathrop's
4 proposed plan would require Qwest to "track authorized Advanced Services Suppliers
5 of UNE-P CLECs on a statewide basis."³ Mr. Lathrop's proposed plan also requires
6 Qwest to refuse orders from unauthorized suppliers. Maintaining such a list
7 necessitates the creation of a database that must be linked to the ordering process. It
8 also requires establishing maintenance procedures that will ensure that changes to the
9 list of suppliers are made only with CLEC authorization. These functions are not
10 present in the line sharing ordering process. Developing the database and associated
11 processes as well as linking the database to the line splitting order process could
12 result in the need for significant business process changes and OSS modifications.
13 This is another reason why ordering procedures and systems changes should be
14 established in a collaborative process involving all interested parties.

15 **Q. MR. LATHROP REQUESTS THAT THE COMMISSION ORDER QWEST**
16 **TO IMPLEMENT OSS MODIFICATIONS IN TIME TO BE INCLUDED IN**
17 **THE REGIONAL OVERSIGHT COMMITTEE'S TEST OF QWEST'S OSS.⁴**
18 **IS THIS SUGGESTION APPROPRIATE?**

19 A. No. This is a cost docket in which the Commission is engaged in establishing prices
20 for unbundled network elements. It is not appropriate to consider measures and

³ *Id* at page 1.

⁴ *Lathrop Response* at page 2.

1 testing here. WorldCom has been an active participant in Regional Oversight
2 Committee (ROC) functions. WorldCom is well aware that the ROC has a process
3 for adding and removing elements for performance measurements. This cost docket
4 is not the appropriate forum for consideration of system performance issues.

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

6 A. Yes, it does.