

1 proposed that Qwest put together some sort of process
2 for single LSR.

3 A I don't recall one like that, no.

4 Q You also testify in your direct that
5 the demands made for single LSR that are made outside
6 of the CMP will undermine the CMP. Could you please
7 explain for the record why the demand for a single
8 LSR will undermine the CMP.

9 A If you're speaking of Covad's proposed
10 language with regard to single LSR -- is that what
11 you're asking me about?

12 Q No. I'm just asking about the
13 statement that you make in your direct where you say
14 specifically the demands made for single LSR would
15 undermine the CMP.

16 A Our point is that Covad is asking for
17 specific language that goes to a process being handled
18 through the CMP. As you know, the CMP document
19 requires us to follow our interconnection agreements
20 for the CMP. This is asking that we have a single LSR
21 process in place once the agreement would be signed.
22 We won't have that for conversion orders until
23 October.

24 Q Directing your attention to your
25 Direct Testimony on page 7, lines 21 through 22,

1 you state that Qwest has committed to implementing
2 a single LSR ordering capability in an IMA ordering
3 system. What does the word "committed" mean to you?

4 A We proposed a change request through
5 the CMP process. It was voted on by the CLECs and
6 ranked -- actually we proposed two CRs, two change
7 requests. One we proposed for IMA release 13; it was
8 delayed and implemented in IMA 15. That one is no
9 longer an issue. It has been implemented. The
10 remaining CR we proposed in December, voted on by the
11 CLEC, it was ranked number two and it is scheduled
12 with IMA release 16 which is to be installed in
13 October. That's what we mean by "committed."
14 We're doing the work to implement that CR.

15 Q When was your IMA 13.0 implemented?

16 A August of 2003.

17 Q When was your IMA 15.0 implemented?

18 A April 2004.

19 Q Do you know when Covad proposed that
20 Qwest include the single LSR in the CMP?

21 A No, I do not. I did not find a change
22 request to that effect. I was looking for one.
23 I didn't find a record of one.

24 Q So you were not present when that
25 request was denied, correct?

1 A No.

2 MS. WAXTER: Objection; assumes a
3 fact.

4 A.L.J. JENNINGS-FADER: Restate or
5 move on.

6 BY MS. FRAME:

7 Q Ms. Albersheim, you just testified you
8 were not present during any CMP meeting where Covad
9 made a request for a single LSR, correct?

10 A Correct.

11 Q Therefore you were not present when
12 any sort of request may have been denied, correct?

13 MS. WAXTER: Objection.

14 A.L.J. JENNINGS-FADER: She may
15 answer.

16 A If I wasn't at the meeting I could
17 still find a record of such a request through the CMP
18 documents on line. I looked for a change request from
19 Covad that would have requested a single LSR and did
20 not find one. So when you ask if I was present at a
21 meeting where it was denied, I can't say that one was
22 denied because I couldn't find one that was submitted.
23 I wasn't present at a meeting in that case.

24 BY MS. FRAME:

25 Q Ms. Albersheim, are you familiar with

1 the minutes -- are you involved with the taking of
2 minutes at CMP meetings?

3 A No.

4 Q Do you frequently refer to these
5 minutes that you just stated that you looked for on
6 the Web site?

7 A What I stated was, I was looking for
8 records of change requests. Change requests are kept
9 records separately from the meeting minutes. I do
10 peruse the meeting minutes.

11 Q Are those meeting minutes typically
12 complete?

13 A I would imagine they are, as the CLECs
14 are allowed to review them for completeness and make
15 corrections.

16 Q Calling your attention to your Direct
17 Testimony on page 8, line 23, and on page 9, line 2.
18 Are you there?

19 A Yes.

20 Q Where does the obligation to upgrade
21 come from?

22 A Which part of my testimony are you
23 referring to?

24 Q Page 8 in your direct, line 23, and
25 page 9, line 2, which I believe is Exhibit 1.

1 A That doesn't speak of a requirement to
2 upgrade.

3 Q Can you answer that question
4 generally: Where does the obligation to upgrade
5 come from?

6 A I don't know that there is an
7 obligation to upgrade. What we're obligated to
8 do is provide access to our OSS for CLECs as a UNE.
9 I'm not aware of an obligation to upgrade.

10 Q Is Qwest obligated to a parity
11 standard?

12 A For some things.

13 Q Is it up to Qwest to determine how it
14 meets parity standards?

15 MS. WAXTER: Objection; outside the
16 scope of the direct.

17 A.L.J. JENNINGS-FADER: I'll allow it.

18 A What was the --

19 BY MS. FRAME:

20 Q Is it up to Qwest to determine how it
21 will meet parity standards?

22 A I don't think that's Qwest alone.
23 I believe that's done through the negotiation for the
24 performance indicator definitions which are entered
25 into between Qwest, the CLECs, and the commissions.

1 Q Let's explore change requests a little
2 bit. Can you guide us through the process of a change
3 request.

4 A If a party would like an enhancement
5 or change to Qwest's systems, that includes Qwest or a
6 CLEC. They may submit a change request using change
7 request form that's available on the CMP section of
8 the Qwest wholesale Web site, and then that change
9 request is submitted to the CMP forum itself.

10 A.L.J. JENNINGS-FADER: May I
11 interject here. I want to be sure that we're all
12 understanding this correctly. CMP is the Change
13 Management Process?

14 THE WITNESS: Yes.

15 A.L.J. JENNINGS-FADER: Which is the
16 shorthand way of referring to CMP?

17 THE WITNESS: Yes.

18 A.L.J. JENNINGS-FADER: Okay. Thank
19 you.

20 BY MS. FRAME:

21 Q Can Qwest deny change requests?

22 A Yes. Qwest must provide reasons for
23 the denial but, yes, Qwest can deny change requests.

24 Q What might some of those reasons be?

25 A There are a number of them. I believe

1 they're laid out in the Change Management Process
2 documents itself. Off the top of my head, I believe
3 they include if they are financially infeasible or
4 technically infeasible.

5 Q Are you familiar with Qwest denying a
6 change request regarding DS-1 provisioning issues?

7 MS. WAXTER: Objection.

8 MS. FRAME: Goes to demonstrate the
9 ability of Qwest in denying change requests, which
10 goes to the issue at hand which may be that Qwest
11 could deny the change request with respect to the
12 single LSR issue unilaterally.

13 MS. WAXTER: If I might. Nowhere in
14 either Ms. Albersheim's or Mr. Zulevic's testimony is
15 there a discussion about a change request or a denial
16 of a change request, so this is just way outside the
17 scope of the testimony.

18 MS. FRAME: In Mr. Zulevic's testimony
19 -- in his direct testimony he discusses delaying the
20 implementation of the change conditions and the fact
21 that his request for a single LSR was actually not
22 officially taken up by Qwest and Qwest instead,
23 according to Ms. Albersheim in her direct testimony,
24 implemented the Change Management Process issue for
25 this single LSR.

1 A.L.J. JENNINGS-FADER: I'm going to
2 allow this for the following reason. There's some
3 discussion in both Qwest's testimony and Covad's
4 testimony about Change Management Process. Qwest,
5 as I read the testimony, relies substantially on the
6 point that allowing an arbitration to dictate Change
7 Management would undermine or undercut the Change
8 Management Process, and this seems to be reasonably
9 related to an inquiry explaining that.

10 So, you may continue.

11 MS. FRAME: Thank you, Your Honor.

12 BY MS. FRAME:

13 Q Let's talk a little bit about the
14 delay of an implementation of a particular change
15 request in the CMP. Is it possible based upon what
16 you testified earlier to with respect to the change
17 request that Qwest implemented in IMA 15.0 that should
18 have been implemented in 13.0 and the single LSR issue
19 may not be implemented until 2005 or beyond?

20 A No. I don't see how --

21 Q Can you please explain that.

22 A I don't understand how that could
23 not be, as we have already implemented the single LSR
24 process for new connections and transfers. The only
25 piece missing -- actually I should correct a fact

1 here. The original change request, which was supposed
2 to go into 13.0, for the most part did. Just the two
3 products that we have at issue here did not go in in
4 August of 2003. The line splitting and loop splitting
5 single LSR, those were implemented for new connections
6 and transfers in April.

7 Now, I don't believe that the CR
8 scheduled for IMA 16.0 will be delayed.

9 Q So you just testified --
10 (Discussion off the record.)

11 BY MS. FRAME:

12 Q Are you familiar -- you've been
13 testifying about the CMP. Are you familiar with the
14 CMP document itself?

15 A I've read it. Yes.

16 Q Do you have a copy of that document?

17 A I was handed a copy of what was the
18 Exhibit G.

19 Q Yes. I believe it's premarked Exhibit
20 16.

21 A Okay. I don't have it in that form.
22 I have a copy of the document.

23 Q We have "Exhibit G - Change Management
24 Process for Local Service" in front of you dated
25 January 6, 2003?

1 A Yes. As I understand, this is part of
2 the proposed interconnection agreement. I should
3 point out that this --

4 A.L.J. JENNINGS-FADER: Before we get
5 too far off track. Ms. Albersheim, in the stack of
6 documents to your testimony is what's been marked for
7 identification as Exhibit No. 16.

8 THE WITNESS: Yes.

9 A.L.J. JENNINGS-FADER: Let's all
10 refer to the exhibit that will be in evidence.

11 Next, do you want to go ahead and put
12 that in now? Do you want to wait? How do you want to
13 deal with this?

14 MS. FRAME: I'm sorry, Your Honor.
15 Could you repeat that.

16 A.L.J. JENNINGS-FADER: Are you now
17 going to be asking questions with respect to this
18 document?

19 MS. FRAME: Correct.

20 A.L.J. JENNINGS-FADER: Would you like
21 now to put Exhibit No. 16 in evidence or wait for some
22 future time?

23 MS. FRAME: We will move for
24 administrative notice of Exhibit No. 16.

25 A.L.J. JENNINGS-FADER: I need to

1 ask a question and ask if anybody has any objection.
2 Is what's been marked for identification as Exhibit
3 No. 16 the same document as is Exhibit G to the
4 agreement being negotiated?

5 MS. FRAME: Yes, Your Honor, it is.

6 A.L.J. JENNINGS-FADER: Does Qwest
7 have an objection?

8 MS. WAXTER: I have no objection at
9 this time, Your Honor. If I might, Ms. Albersheim has
10 my copy of the document. May I ask that be returned?

11 A.L.J. JENNINGS-FADER: Let's get rid
12 of some procedural things here. Exhibit No. 16 -- I'm
13 sorry. Staff objection?

14 MR. NOCERA: No objection.

15 A.L.J. JENNINGS-FADER: Exhibit No. 16
16 is admitted.

17 (Exhibit No. 16 was admitted.)

18 MS. FRAME: Thank you, Your Honor.

19 BY MS. FRAME:

20 Q Ms. Albersheim, you're familiar with
21 this particular document?

22 A Yes. I should point out that this
23 copy of the Change Management document dated
24 January 6, '03, is not the most current. I'm most
25 familiar with the most current version which is dated

1 in April of 2004. Just so you understand this is an
2 older version.

3 Q Do you know what the changes are
4 between --

5 A There's a change history log at the
6 front of that document which explains what they are.
7 I don't know the specifics.

8 (Discussion off the record.)

9 BY MS. FRAME:

10 Q Ms. Albersheim, are you familiar --
11 are you aware of the fact that the copy of Exhibit G
12 that you just referred to is not the copy that's
13 available to competitors or readily available to
14 competitors on the Web site, the copy that you just
15 referred to dated April 2004?

16 A Actually I think it may be in an
17 archive. I'm not certain. But I understand that this
18 is the copy that was started with the negotiations and
19 attached is Exhibit G.

20 I also understand that there's
21 language -- I don't know if it's in this particular
22 version of the interconnection agreement, but
23 generally there's language that indicates that as
24 this document is updated it is accepted as Exhibit G.

25 Q Okay. Thank you. Do you know if

1 there's any way to appeal a CMP decision?

2 A There is a dispute resolution process
3 in the CMP, yes.

4 Q Do you know how that works?

5 A I don't know all the particulars.
6 It is laid out in the Change Management document.

7 Q Could you please turn to page --
8 Exhibit 16, Section 14.0 and I believe it is on
9 page 88. Could you please briefly refresh your
10 recollection regarding the process that you referred
11 to.

12 A This is the escalation process.
13 Did you mean for me to look at this or the dispute
14 resolution process?

15 Q I'll get to that in a minute as well.

16 A All right.

17 Q What happens if Qwest denies or --
18 could you please explain to us how the escalation
19 process works in the CMP.

20 A A CLEC is allowed to submit an
21 escalation for a change request that has been denied.
22 That's laid out here in this Section 14.

23 Q Do you know how long that takes -- how
24 long the process in Section 14.0 would take?

25 A There are several time frames involved

1 in here.

2 Q A matter of months? Years?

3 A Looks like it's days.

4 Q Please turn to page 90 which is
5 Section 15.0.

6 A.L.J. JENNINGS-FADER: Excuse me.
7 Just so I understand the applicability of the
8 escalation process. Is the escalation process used
9 in situations in which Qwest denies a change request,
10 Ms. Albersheim?

11 THE WITNESS: Let me look back here
12 because there may be other circumstances. That would
13 be the primary reason that CRs are escalated but there
14 are other reasons to use the escalation process.

15 A.L.J. JENNINGS-FADER: Thank you.

16 THE WITNESS: Sure.

17 BY MS. FRAME:

18 Q So if Qwest denies a change request
19 and one goes through the escalation process in 14.0,
20 what happens next?

21 A After they've escalated?

22 Q Correct.

23 A Qwest has the obligation to respond
24 with a binding position to the escalation which is
25 written and shipped to the CMP.

1 Q A binding --

2 A A binding position e-mail including
3 supports and rationale as soon as practicable but no
4 later than for escalated CRs seven calendar days after
5 sending an acknowledgement of receipt of the
6 escalation.

7 Q That's in 14.0?

8 A Yes. That's on page 89.

9 Q If a competitive carrier wants to
10 object to that particular denial, what happens next?
11 Is there any dispute resolution process?

12 A Yes. That was what I had mentioned in
13 the first place. That's the Section 15.0.

14 Q May Qwest or a competitive carrier
15 actually go through, if it's agreed upon, an
16 alternative dispute resolution process?

17 A Yes. That's laid out by the dispute
18 resolution provisions here.

19 Q Or arbitration, correct?

20 A Yes.

21 Q But only if it's agreed upon, correct,
22 by the parties?

23 A If they agree to an alternative
24 dispute resolution process, yes.

25 Q Do you know how long this particular

1 process may take?

2 A No, I don't.

3 Q Could it take months? Years?

4 A I don't believe anyone has engaged in
5 this process so I don't really know how long it would
6 take.

7 Q Just because maybe the parties
8 don't agree upon going to ADR, alternative dispute
9 resolution, or arbitration, they may seek alternative
10 channels, namely going through the regulatory process
11 or the legal process, correct?

12 A Yes.

13 Q Turning your attention to Section 1
14 of Exhibit 16. I think you stated earlier in your
15 cross-examination that the interconnection agreement
16 controls, is that correct, as opposed to the CMP?

17 A It's stated in the CMP document the
18 provisions in an interconnection agreement will
19 supersede CMP, yes.

20 Q Thank you.

21 Q Let's explore a little bit about what
22 you state in your Direct Testimony on page 10, line 21
23 and on page 11, line 3. It appears that you testified
24 that the single LSR was delayed to release 14.0
25 because Qwest discovered that it was too complicated

1 to finish it in 13.0, and 14.0 was closed to new
2 changes.

3 A Yes.

4 Q What makes the completion of the LSR
5 related to migrations and conversions any different?

6 A The complexities discovered with the
7 CR that we did the new connections and transfers
8 handled the complexities. They were dealt with by
9 designing in the final resolution which in 15.0.
10 We don't expect the same kind of difficulty with
11 the second CR as we have resolved those issues.

12 Q So why wasn't this handled, the
13 conversions and the migrations for a single LSR,
14 handled in 15.0?

15 A They were not part of the scope of the
16 first CR. The CR was always scoped on new connections
17 and transfers.

18 Q Please turn your attention now to
19 Direct Testimony on page 11, line 7 through 9.

20 A Yes.

21 Q What does it mean that Qwest used
22 internal resources to complete the change with Qwest?

23 A The CMP has a budget allocation for
24 each release, dollars associated with each development
25 for each release. When the portion of the CR that did

1 not get installed in Release 13 was delayed to 15,
2 Qwest took upon itself the cost for the additional
3 work to finish the line splitting and loop splitting
4 for new connections and migrations without taking any
5 of the budget allocation for IMA release 15.

6 (Discussion off the record.)

7 MS. FRAME: That's all I have for you.
8 Thank you. Appreciate it.

9 THE WITNESS: Thank you.

10 A.L.J. JENNINGS-FADER: Staff?

11 MR. NOCERA: No questions from staff.

12 EXAMINATION

13 BY A.L.J. JENNINGS-FADER:

14 Q Ms. Albersheim, would you please turn
15 to page 4 of your Direct Testimony, Exhibit 1.

16 A I'm there.

17 Q Thank you. I was comparing the Qwest
18 proposed language for Section 9.21.1 with the Covad
19 proposed language for the same section which appears
20 on page 5 of your Direct Testimony. It appeared to
21 me that a substantial part of the Qwest proposal has
22 been removed from the Covad proposal. Is my reading
23 correct? I call your attention specifically -- if
24 you'll turn to the Qwest language beginning on line 24
25 of page 4 through line 29 of page 4. I couldn't find

1 okay with Qwest if that language is not contained in
2 the final provisions.

3 MR. NEWELL: Okay. I understand.
4 I think.

5 A.L.J. JENNINGS-FADER: At least I
6 hope that's what she told me.

7 THE WITNESS: I did.

8 A.L.J. JENNINGS-FADER: Thank you.
9 That helps me to understand why the language didn't
10 quite track for me.

11 I would say, Mr. Newell, that that
12 language, as far as I can tell, has nothing to do
13 with the issue in dispute. I was simply trying to
14 understand why the language was different between the
15 sections.

16 MR. NEWELL: Thank you, Your Honor.

17 BY A.L.J. JENNINGS-FADER:

18 Q Ms. Albersheim, I need to clarify
19 one -- probably one more than one but this additional
20 point with respect to your testimony.

21 On page 13 of your Direct Testimony,
22 Exhibit 1, lines 5 to 15, you discuss there your -- it
23 contains a discussion that in your opinion it doesn't
24 make sense to institute a Change Management for manual
25 processing of these CRs between the end of this

1 arbitration and the issuance of IMA release 16.0.
2 Can you explain to the Commission what the process
3 is -- either is or will be for handling those requests
4 before 16.0 was released.

5 A Yes. The process that was in place
6 originally was a two LSR process -- two electronic
7 LSRs, and that is still in place.

8 I didn't mention this in my testimony,
9 but given that we already have an electronic process
10 it's somewhat illogical to go back to a manual one
11 for single LSR. At any rate, given that a CR hasn't
12 been submitted yet for a manual process, it probably
13 wouldn't exist very long if a manual process were
14 instituted before IMA Release 16.0 were implemented.

15 Q Pending release of IMA Release 16.0,
16 the current process, one LSR followed immediately by
17 a second one is the standard operating procedure and
18 would be through October?

19 A That's correct.

20 Q I'd like to ask a couple questions
21 about the release in October. Are you familiar at all
22 with where the release is in terms of the stage of
23 development in which it is?

24 A I would have to compare development
25 calendar to the current schedule to figure out where

1 exactly we are. I have frequently asked the people
2 involved how that CR is doing. Obviously I'm
3 concerned that it proceed okay. Everyone has told me
4 that it is proceeding according to schedule and should
5 be implemented in IMA Release 16.0.

6 Q But you have no firsthand knowledge;
7 that's just what folks you've discussed this with have
8 told you, development people?

9 A Right. And I've also asked if it's at
10 all possible we would run into any of the same kind of
11 technical delays that occurred with the first CR and
12 they assured me it will not because they've figured
13 out processes for new connections and transfers and
14 it will be the same for migrations and conversions.

15 Q With respect to your Rebuttal
16 Testimony Exhibit 2 at page 4, lines 19 to 23,
17 you're discussing there the question of submission
18 and whether there needs to be a delay between the
19 two submissions of the severed LSRs -- electronic
20 submissions. With respect to the immediate submission
21 of the data LSR following submission of the voice LSR,
22 were the CLECs made aware of this and if so by what
23 process. That is to say, that they could follow on
24 immediately.

25 A That's a good question. I would

1 imagine they would have been, but I didn't look into
2 when they would have been told that. It was probably
3 through a notification.

4 Q I don't want probably. To your
5 knowledge in your search did you come across --

6 A I didn't look for that.

7 A.L.J. JENNINGS-FADER: Thank you,
8 ma'am. I have no additional questions, however,
9 I imagine your counsel may have one or two.

10 Any redirect?

11 I'm sorry. Let me be fair to
12 everybody. Does Covad any questions based on what
13 I've asked?

14 MR. NEWELL: May we have a moment,
15 Your Honor?

16 A.L.J. JENNINGS-FADER: Certainly.

17 (Discussion off the record.)

18 FURTHER CROSS-EXAMINATION

19 BY MS. FRAME:

20 Q We have a couple quick questions based
21 upon Judge Jennings-Fader's questions.

22 Does the CMP -- you stated you're
23 familiar with the CMP. Does the CMP allow Qwest to
24 unilaterally delay implementation of the change
25 request?

1 A I don't believe there's any provision
2 for that in the CMP. Really the delay of this CR was
3 not unilateral, it was unavoidable. As far as I know,
4 for IMA CRs this is the only one where this has
5 happened.

6 (Discussion off the record.)

7 BY MS. FRAME:

8 Q Are you familiar with event
9 notifications?

10 A Yes.

11 Q Is this event notification consistent
12 with the CMP?

13 A I believe we have provisions for
14 providing notifications in the CMP document itself.

15 Q But that's not through an event
16 notification, is it?

17 A How's that?

18 Q There's specific provisions within the
19 CMP that Qwest or the parties need to follow in order
20 to provide notice, correct?

21 A Yes.

22 Q And that was not followed in this
23 case, correct, or this instance?

24 A There was an event notification so it
25 would have been followed.

1 Q But not through the CMP, correct?

2 A I guess I don't follow you. I don't
3 think event notifications are submitted through the
4 CMP itself. They're sent directly to the CLEC
5 community.

6 MS. FRAME: Thank you.

7 A.L.J. JENNINGS-FADER: Qwest?

8 I'm sorry. Mr. Nocera, since you're
9 not sitting at the table, I overlook you.

10 MR. NOCERA: Nothing from staff.

11 A.L.J. JENNINGS-FADER: Qwest?

12 MS. WAXTER: Thank you, Your Honor.

13 REDIRECT EXAMINATION

14 BY MS. WAXTER:

15 Q Ms. Albersheim, let me refer you to
16 Exhibit 1, your Direct Testimony. On page 7, starting
17 with the question at line 26, your earlier testimony
18 was that you didn't know whether the CLEC community
19 had been notified that they could submit sequential
20 LSRs or simultaneous LSRs?

21 A Yes. The simultaneous. I didn't know
22 when they were given that information.

23 Q Has Covad specifically been instructed
24 that they could submit LSR one right after the other
25 without a delay?

1 MR. NEWELL: The same testimony we're
2 talking about starting on page 7, line 26, it refers
3 to the existence of the two LSR which says an ability
4 to put the same purchase order number, related
5 purchase order number in a certain field of the LSR.
6 I don't believe the testimony states that Covad or
7 anyone else was specifically notified of that fact.

8 A.L.J. JENNINGS-FADER: That's
9 certainly the way I read the testimony. So the
10 testimony with respect to Covad's notification is
11 stricken unless we have something else coming in.
12 But the testimony to which you refer does not say
13 that.

14 MS. WAXTER: Your Honor, the point
15 being, at least as of the filing of the testimony on
16 May 18, that Covad through the filing of the testimony
17 was specifically notified that the LSRs could be
18 submitted one right off the other.

19 A.L.J. JENNINGS-FADER: I misread the
20 testimony. That is a specific reference to page 8,
21 lines 3 and 4?

22 MS. WAXTER: That's correct.

23 A.L.J. JENNINGS-FADER: Thank you.
24 I unstrike it.

25 MS. WAXTER: Thank you, Your Honor.

1 BY MS. WAXTER:

2 Q Going back to my prior question. I
3 believe that we agree Mr. Zulevic's testimony suggests
4 that there would be a three- to five-day delay for
5 submitting the data LSR following a voice LSR,
6 correct?

7 A Yes.

8 Q Is that a correct statement?

9 A No, it's not.

10 Q Do you have any idea where Mr. Zulevic
11 may get this three- to five-day delay?

12 A I'm really not sure. It used to be
13 that there was a delay and that was because for new
14 connections you could -- first of all, you had to
15 qualify a loop for data and the loop qualification
16 could only be done on a telephone number, a TN. One
17 of the back office system enhancements that was made
18 was to allow a loop qualification on a circuit ID, and
19 that removed a delay in having to have the voice line
20 provision before the data line could be ordered. That
21 was what permitted the single LSR process in the first
22 place. So prior to August of 2003 there would have
23 been a delay. I don't know that it was three to five
24 days. But I don't know where else that information
25 could have come from.

1 Q Since August of 2003, has there been a
2 requirement that there be a delay for the submission
3 of the LSRs for data and voice?

4 A No.

5 MS. WAXTER: That's all I have.

6 Thank you.

7 A.L.J. JENNINGS-FADER: Ms.

8 Albersheim, thank you very much for taking your
9 time to come to the hearing today. Appreciate the
10 testimony and you're excused, ma'am. Please be sure
11 to leave everything on the table.

12 (Witness excused.)

13 A.L.J. JENNINGS-FADER: I now
14 understand that Covad -- I think that's all the
15 testimony on issue 12. Is Covad prepared to go
16 forward on issue 12?

17 MS. FRAME: Yes, Your Honor. We'd
18 like to call Mr. Zulevic to the stand.

19 MICHAEL ZULEVIC,
20 having been first duly sworn to state the whole truth,
21 was examined and testified as follows:

22 A.L.J. JENNINGS-FADER: Please state
23 your name and spell your last name for the record.

24 THE WITNESS: My name is Michael
25 Zulevic. Last name is spelled Z as in zebra, u-l-e-v