

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

LORRAINE BARRICK

ON BEHALF OF
QWEST CORPORATION

JANUARY 23, 2004

TABLE OF CONTENTS

INTRODUCTION	1
PURPOSE OF TESTIMONY	1
DESCRIPTION OF WORK	2
BATCH HOT CUT PROCESS CONCLUSIONS	3

1

INTRODUCTION

2 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

3 A. My name is Lorraine Barrick. My address is 1144 Federal Avenue East, Seattle,
4 WA 98102.

5 **Q. WHAT IS YOUR CURRENT BUSINESS OCCUPATION?**

6 A. I am the Sole Proprietor of Lorraine Barrick LLC and a certified public
7 accountant. I provide clients with business and financial consulting services.

8 **Q. WHAT IS YOUR BACKGROUND?**

9 A. My work experience includes nearly 18 years of auditing and consulting work, 15
10 years of which were at the public accounting and consulting firm of Arthur
11 Andersen, LLP. When I left Arthur Andersen in May of 2000, I was a partner in
12 the Consulting Division of the Seattle office. I have extensive experience
13 assisting companies in the telecommunications industry. See Exhibit 1 of my
14 attached Report for a copy of my resume.

15

PURPOSE OF TESTIMONY

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

17 A. I was retained by Qwest Corporation (Qwest) through Hitachi Consulting to
18 review and test its processes and procedures pertaining to the Batch Hot Cut
19 (BHC) process. I was assisted in my work by a team of telecommunications and
20 process consultants from Hitachi Consulting.

DESCRIPTION OF WORK

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

Q. WHAT WAS THE SCOPE OF YOUR ENGAGEMENT WITH QWEST COMMUNICATIONS?

A. We were engaged in a consulting capacity to review the proposed BHC process, observe commercial tests of the process, and make recommendations for process improvement. The scope of our BHC engagement with Qwest included the following:

- Gaining an understanding of the existing hot cut process;
- Studying Qwest’s hot cut performance to date;
- Reviewing the proposed BHC process, as well as public CLEC comments and concerns regarding that process;
- Comparing the current hot cut process to the proposed BHC process;
- Developing a testing plan to be used to judge the quality and efficiency of the proposed BHC process;
- Making recommendations for process improvements; and,
- Observing commercial tests of the BHC process.

The “Scope of Work” section in my attached Report contains a description of the Qwest facilities that we observed during the engagement. In addition, Exhibit 4 of my attached Report contains a list of the people we met with or interviewed over the course of our engagement with Qwest.

Q. WERE PROCESS IMPROVEMENT RECOMMENDATIONS MADE BY HITACHI CONSULTING?

1 A. Yes, we made several process improvement recommendations over the course of
2 our engagement. All of the material process improvement recommendations
3 made by Hitachi Consulting have been addressed to my satisfaction. Section 6 of
4 my Report sets forth examples of those recommendations. In addition, Exhibit 5
5 of the Report contains a detailed diagram of the proposed BHC process.

6 **BATCH HOT CUT PROCESS CONCLUSIONS**

7 **Q. HAS QWEST DEMONSTRATED THE ABILITY TO PROCESS LARGE**
8 **COMMERCIAL VOLUMES OF HOT CUTS?**

9 A. Qwest has demonstrated, based on historical data for the existing hot cut process,
10 that it can handle large volumes of UNE-P to UNE-Loop conversion requests.
11 Qwest has demonstrated on many occasions the ability to process more than 1,000
12 hot cut requests in a day. Qwest has also demonstrated the capability to
13 consistently perform between 25 and 100 hot cuts per day per central office and to
14 exceed these amounts when required, with new installation trouble rates (troubles
15 within 30-days of installation) of less than 1%. See Section 8 of the attached
16 Report for a detailed analysis of the historical hot cut volumes performed by
17 Qwest.

18 **Q. IS THE BHC PROCESS MORE EFFICIENT THAN THE EXISTING HOT**
19 **CUT PROCESS?**

20 A. The BHC process was created to make the hot cut process described above more
21 scalable and efficient for larger volumes of hot cuts. The process groups multiple
22 service orders for hot cuts into “batches”. A CLEC will be required to submit a

1 minimum of 25 lines and a maximum of 100 lines to create a batch. Significant
2 efficiencies over the existing hot cut process are created through front-end edit
3 checks, process automation, and streamlining of manual processes. We have
4 measured the benefit of several of these differences. The results indicate that the
5 process is substantially more efficient than the current process and the differences
6 we measured save many hours per day at the projected volumes. See Section 11
7 of the attached Report for the detailed results from our process efficiency
8 comparisons.

9 **Q. DISCUSS THE RESULTS FROM THE COMMERCIAL TESTS OF THE**
10 **BHC PROCESS**

11 A. We have tested this BHC process with live data, and the process works. Our
12 testing to date has included four batches of approximately 25 telephone numbers
13 per batch. In all cases, Qwest met 100% of its installation commitments, and no
14 troubles were Reported for the Preliminary Live Trial within the first 30 days. As
15 stated, Qwest met 100% of its installation commitments, which exceeds the
16 FCC's 90% on-time hot cut performance standard set forth in its Bell Atlantic
17 Section 271 decision. In fact, Qwest has demonstrated an ability to consistently
18 meet and exceed this benchmark. See Section 11 for a detailed explanation of test
19 results from the preliminary live trial and the second round live trial of the BHC
20 process.

21 **Q. WILL THE BATCH HOT CUT PROCESS SUPPORT THE**
22 **ANTICIPATED VOLUMES?**

1 A. In my opinion, the BHC process as proposed represents significant improvements
2 in efficiency with acceptable levels of quality when compared to the existing hot
3 cut process. Nothing has come to my attention to suggest that this process will
4 not scale to the forecasted volumes.

5

6 **Q. WHAT IS YOUR SUPPORT FOR THESE FINDINGS?**

7 A. My support for these findings is based upon analysis of the volumes of hot cuts
8 Qwest has successfully handled in the past using the existing hot cut process, the
9 significant efficiencies gained through the BHC process (and measurement of
10 some of the time savings associated with them), my understanding the volumes of
11 hot cuts that will be required during the 21 month migration period, and the
12 results of the live trials we conducted, all of which are documented in the attached
13 Report.

14 **Q. DO YOU HAVE ANYTHING TO ADD?**

15 A. All of the details supporting my conclusions are detailed in the attached Report.