BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION OF	)	
DIECA COMMUNICATIONS, INC., D/B/A	)	
COVAD COMMUNICATIONS COMPANY,	)	**DOCKET NO. 04-2277-02**
FOR ARBITRATION TO RESOLVE	)	
ISSUES RELATING TO AN	)	
INTERCONNECTION AGREEMENT	)	
WITH QWEST CORPORATION	)	

DIRECT TESTIMONY

OF

RENÉE ALBERSHEIM

FOR

QWEST CORPORATION

[Issue 8: Single LSR]

OCTOBER 8, 2004

NON-CONFIDENTIAL AND NON-PROPRIETARY VERSION

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1   **I.   IDENTIFICATION OF WITNESS**

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

3   **QWEST CORPORATION.**

4   A.   My name is Renée Albersheim. I am employed by Qwest Corporation ("Qwest"), as a

5   Staff Witnessing Representative. My business address is 1801 California Street, 24th floor,

6   Denver, CO, 80202.

7   **Q.   PLEASE DESCRIBE YOUR EDUCATION, BACKGROUND AND EMPLOYMENT**

8   **EXPERIENCE.**

9   A.   I have been working in the Global Wholesale Markets organization since December, 2003.

10   Before December I worked in the Information Technologies Wholesale Systems

11   organization since joining Qwest in October 1999. As a Staff Advocate, I provide support

12   for Qwest's response to regulatory issues associated with the 1996 Act, FCC orders, state

13   commission decisions, and other legal and regulatory matters.

14   Prior to becoming a Qwest employee, I worked for 15 years as a consultant on many

15   systems development projects and in a variety of roles including the following:

16   programmer and systems developer, systems architect, project manager, information center

17   manager and software training consultant. I worked on projects in a number of industries

18   including: oil and gas; electric, water and telephone utilities; insurance; fast food; computer

19   hardware; and the military. I designed and developed a number of applications including

20   electronic interfaces like those described later in this testimony. During that time, I worked

21   on several of Qwest's Operations Support Systems ("OSS") as a consultant on Human

22   Resources and Interconnect Access Billing Systems ("IABS") projects.

1   In addition to working full-time at Qwest, I also earned a Juris Doctor degree from the

2   University of Denver College of Law and passed the Colorado Bar Examination in October

3   of 2001. Prior to attending law school, I received a Master of Business Administration in

4   Management Information Systems from the University of Colorado College of Business

5   and Administration in 1985 and I received a Bachelor of Arts degree from the University of

6   Colorado in 1983.

7   **II.   PURPOSE OF DIRECT TESTIMONY**

8   **Q.   WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

9   A.   The purpose of my testimony is to address the parties' dispute identified as Disputed Issue

10   8: Single Local Service Request ("LSR") processing for Line Splitting and Loop Splitting.

11   **Q.   PLEASE SUMMARIZE YOUR TESTIMONY.**

12   A.   This issue concerns a proposed change to Qwest's systems, which serve all CLECs. Qwest

13   already provides, or has system changes in progress, to allow Covad to place line splitting

14   or loop splitting orders on a single LSR. Accordingly, as Covad has conceded in

15   arbitration proceedings in Colorado, Washington and Minnesota, much of this dispute has

16   been resolved by the system changes that are already in place. The remainder of this

17   dispute will be mooted with the system changes that are now in progress and scheduled to

18   be implemented later this month. The system changes at issue affect the entire CLEC

19   community, Qwest's available resources to serve the entire CLEC community, and have

20   been and are currently being managed through the Change Management Process ("CMP").

21   There is no reason to upset and supplant the carefully-managed and timed work of the CMP

1   – which reflects the priorities and needs of all CLECs – with unilateral contract language

2   reflecting Covad's view that the sole remaining systems change must be accomplished on

3   Covad's schedule and/or Qwest must somehow make line splitting and loop splitting

4   available on a single LSR through manual processing.

5   As I set forth in detail below, there are a number of problems with Covad's proposed

6   language. First, Covad-specific demands and timing incorporated in an interconnection

7   agreement would trivialize the CMP and render much of its work meaningless. If, as

8   Covad proposes to do here, Covad may insert in its interconnection agreement system

9   requirements that place Covad's issue ahead of where it is currently being addressed in

10   CMP, other CLECs will have similar incentive to demand interconnection agreement

11   language regarding Qwest's systems specific to their view of a system issue's priority and

12   timing, irrespective of how the CMP is addressing the same issue. The resulting conflict

13   between individual CLEC demands incorporated in interconnection agreements and CLEC

14   community interests in implementation of prioritized systems changes would undermine

15   the CMP. Second, part of the system changes Covad desires have already been

16   accomplished through CMP: Covad currently has the ability to order line splitting and loop

17   splitting for new connections. The remainder of Covad's request (single LSR ordering for

18   conversions) has also been addressed in CMP and is scheduled to be implemented with

19   other systems changes in October in Interconnection Mediated Access ("IMA") Release

20   16.0. Third, Qwest initiated within CMP the automated systems changes to provide the

21   single LSR ordering capability that Covad seeks. There is no basis for any suggestion by

22   Covad that Qwest is not committed to the changes at issue. For all of these reasons, the

1   Commission should reject Covad's attempt to force systems changes through proposed

2   contract language.

3   **Q.   TO PUT THIS DISPUTE IN CONTEXT, WHAT PRODUCTS ARE AT ISSUE**

4   **HERE?**

5   A.   Only two products are at issue. They are line splitting and loop splitting for conversion

6   orders only.

7   **Q.   PLEASE COMMENT ON THE DEMAND FOR THE LINE SPLITTING AND**

8   **LOOP SPLITTING PRODUCTS IN QWEST'S LOCAL SERVICE REGION.**

9   A.   In August of 2003 there were 511 total line-split lines in service region-wide. There were

10   no loop-split lines in service region-wide. In August of 2004, there were 3,784 total line-

11   split lines in service region-wide. Line splitting orders represent about 5% of total shared

12   products ordered. There were no loop-split lines in service region-wide.

13   <mark>BEGIN CONFIDENTIAL</mark>

14   **<mark>Q. .</mark>**

15

16   <mark>A.</mark>

17   <mark>END CONFIDENTIAL</mark>

1   **III.   ISSUE NO. 8: LINE SPLITTING, LOOP SPLITTING AND SINGLE LSR**

2   **Q.   PLEASE EXPLAIN ISSUE 8.**

3   A.   In the Line Splitting and Loop Splitting sections of this Interconnection Agreement,

4   specifically sections 9.21.1, 9.21.4.1.6 and 9.24.1, Covad seeks language that requires

5   Qwest to provide Covad with the ability to submit orders for UNE-P combined with line

6   splitting or Unbundled Loop combined with Loop Splitting on a single LSR, instead of two

7   LSRs (one for the voice service and one for the data service). While Qwest is in the

8   process of providing this functionality, the ability to submit all such orders on a single LSR

9   does not exist today. Including language in this agreement that states that this function

10   does exist would put Qwest in breach of the agreement on the date it is signed.

11   The dispute here is over the timing of the process changes that will enable Covad to submit

12   orders for line splitting with UNE-P and loop splitting with unbundled loops. Covad's

13   petition discusses both ordering and provisioning of these products, and makes incorrect

14   assertions regarding the provisioning of these products. Ordering and provisioning are

15   separate processes, and there is no dispute here about the provisioning processes for line

16   splitting or loop splitting. It is important to understand the difference between the

17   processes. The single LSR ordering process at issue here is an ordering change that does

18   not affect the provisioning of these products. In other words, whether the line

19   splitting/loop splitting order is submitted on two LSRs (the LSR for voice submitted first

20   followed immediately by the LSR for the data) or on a single LSR, the provisioning of the

21   products remains the same.

1 **Q. SO IS THERE AN ISSUE HERE ABOUT THE PROVISIONING OF LINE**

2 **SPLITTING OR LOOP SPLITTING?**

3 A. No. The provisioning of these products is not affected by the use of two LSRs back-to-

4 back or the use of a single LSR. To the extent Covad suggests there are provisioning

5 delays caused by the two LSR process, Covad is incorrect.

6 **Q. UNTIL THE REMAINDER OF THE SINGLE LSR ORDER PROCESS IS**

7 **IMPLEMENTED IN IMA RELEASE 16.0 SCHEDULED FOR LATER THIS**

8 **MONTH, IS COVAD AT A COMPETITIVE DISADVANTAGE?**

9 A. No it is not. Covad has incorrectly claimed that for conversion orders today (and for new

10 connections or transfers prior to release 15.0), the order for voice service on the first LSR

11 has to be provisioned before the second LSR for data service may be submitted. That is

12 incorrect. Since August of 2003, Covad has had the ability to submit the two LSRs one

13 right after the other. There is no requirement that the voice LSR be provisioned before the

14 data LSR can be submitted. All that is required is that the voice LSR be submitted first, so

15 that there is an account for the shared service to be connected to. The data LSR may be

16 submitted immediately following the voice LSR, and can be provisioned at the same time

17 as the voice request. BEGIN CONFIDENTIAL

18

19

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21 END CONFIDENTIAL

1 **Q.   WHAT IS QWEST'S PROPOSED LANGUAGE FOR SECTION 9.21.1?**

2 A.   Qwest's proposed language for section 9.21.1 is as follows:

3   9.21.1 Line Splitting provides CLEC/DLEC with the opportunity to offer
4   advanced data service simultaneously with an existing UNE-P by using the
5   frequency range above the voice band on the copper portion of a Loop. By
6   defining "Line Splitting" as the provision of advanced data service simultaneous
7   with an existing UNE-P, this Agreement in no way precludes CLEC from
8   partnering with another CLEC in order to provide advanced data service
9   simultaneous with an existing UNE-P. The CLEC/DLEC may offer advanced
10   data service simultaneous with a new UNE-P order, on the same LSR, when that
11   capability becomes available through an IMA release. The advanced data service
12   may be provided by the customer of record or another data service provider
13   chosen by the customer of record. A POTS Splitter must be inserted into the
14   UNE-P to accommodate establishment of the advanced data service. The POTS
15   Splitter separates the voice and data traffic and allows the copper portion of the
16   Loop to be used for simultaneous DLEC data transmission and CLEC provided
17   voice service to the end user. "CLEC" will herein be referred to as the voice
18   service provider while "DLEC" will be referred to as the advanced data service
19   provider. CLEC and DLEC may be the same entity. Only one (1) customer of
20   record determined by the CLEC/DLEC partnership will be identified to Qwest.

21 **Q.   WHAT LANGUAGE DOES COVAD PROPOSE FOR SECTION 9.21.1?**

22 A.   Covad's proposed changes to section 9.21.1 are underlined below:

23   9.21.1 Line Splitting provides CLEC/DLEC with the opportunity to offer
24   advanced data service simultaneously with an̶ a new or existing UNE-P by using
25   the frequency range above the voice band on the copper portion of a Loop. The
26   advanced data service may be provided by the Customer of record or another data
27   service provider chosen by the Customer of record. A POTS Splitter must be
28   inserted into the UNE-P to accommodate establishment of the advanced data
29   service. The POTS Splitter separates the voice and data traffic and allows the
30   copper portion of the Loop to be used for simultaneous DLEC data transmission
31   and CLEC provided voice service to the end user. "CLEC" will herein be referred
32   to as the voice service provider while "DLEC" will be referred to as the advanced
33   data service provider. CLEC and DLEC may be the same entity. Only one (1)
34   Customer of record determined by the CLEC/DLEC partnership will be identified
35   to Qwest.

36

1   **Q.   WHAT IS QWEST'S PROPOSED LANGUAGE FOR SECTION 9.21.4.1.6?**

2   A.   Qwest's proposed language for section 9.21.4.1.6 is as follows:

3   9.21.4.1.6   The Customer of record shall submit the appropriate LSRs
4   associated with establishing UNE-P and Line Splitting. Customer of record may
5   offer advanced data service simultaneous with a new UNE-P order, on the same
6   LSR, when that capability becomes available through an IMA release.

7   **Q.   WHAT LANGUAGE DOES COVAD PROPOSE FOR SECTION 9.21.4.1.6?**

8   A.   Covad proposes changing the last sentence of section 9.21.4.1.6. This sentence is shown

9   below underlined.

10   9.21.4.1.6   The Customer of record shall submit the appropriate LSRs
11   associated with establishing UNE-P and Line Splitting. <u>A single LSR may be</u>
12   <u>used to establish both the UNE-P and Line Splitting service at the same time.</u>

13   **Q.   WHAT IS QWEST'S PROPOSED LANGUAGE FOR SECTION 9.24.1?**

14   A.   Qwest's proposed language for section 9.24.1 is as follows:

15   9.24.1 Loop Splitting provides CLEC/DLEC with the opportunity to offer
16   advanced data service simultaneously with voice over an existing Unbundled
17   Loop by using the frequency range above the voice band on the copper portion of
18   a Loop. By defining "Loop Splitting" as the provision of advanced data service
19   simultaneous with an existing Unbundled Loop, this Agreement in no way
20   precludes CLEC from partnering with another CLEC in order to provide
21   advanced data service simultaneous with an existing unbundled loop. The
22   CLEC/DLEC may offer advanced data service simultaneous with a new
23   unbundled loop order, on the same LSR, when that capability becomes available
24   through an IMA release. The advanced data service may be provided by the
25   Customer of record or another data service provider chosen by the Customer of
26   record. The POTS Splitter separates the voice and data traffic and allows the
27   copper portion of the Loop to be used for simultaneous DLEC data transmission
28   and CLEC provided voice service to the end user. "CLEC" will herein be referred
29   to as the voice service provider while "DLEC" will be referred to as the advanced
30   data service provider. CLEC and DLEC may be the same entity. Only one (1)
31   Customer of record determined by the CLEC/DLEC partnership will be identified
32   to Qwest.

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2   **Q.   WHAT LANGUAGE DOES COVAD PROPOSE FOR SECTION 9.24.1?**

3   A.   Covad's proposed changes to section 9.24.1 are underlined below:

4   9.24.1 Loop Splitting provides CLEC/DLEC with the opportunity to offer
5   advanced data service simultaneously with voice over an̶ a new or existing
6   Unbundled Loop by using the frequency range above the voice band on the
7   copper portion of a Loop. The advanced data service may be provided by the
8   Customer of record or another data service provider chosen by the Customer of
9   record. The POTS Splitter separates the voice and data traffic and allows the
10   copper portion of the Loop to be used for simultaneous DLEC data transmission
11   and CLEC provided voice service to the end user. "CLEC" will herein be referred
12   to as the voice service provider while "DLEC" will be referred to as the advanced
13   data service provider. CLEC and DLEC may be the same entity. Only one (1)
14   Customer of record determined by the CLEC/DLEC partnership will be identified
15   to Qwest.

16   **Q.   WHAT IS THE PRACTICAL EFFECT OF THE DIFFERENCES BETWEEN THE**

17   **LANGUAGE PROPOSED BY QWEST AND THE LANGUAGE PROPOSED BY**

18   **COVAD?**

19   A.   The changes Covad proposes to sections 9.21.1, 9.21.4.1.6 and 9.24.1 all require that a

20   single-LSR ordering capability (as described below) exist at the time this agreement takes

21   effect.

22   **Q.   IS THERE ANY SUBSTANTIVE ISSUE BETWEEN QWEST AND COVAD**

23   **REGARDING SINGLE LSR ORDERING?**

24   A.   No. Qwest has already committed to implementing a single LSR ordering capability in the

25   IMA ordering system.   Basically, the IMA is an electronic ordering system that allows

26   CLECs to submit LSRs to Qwest through an automated process as opposed to a manual

27   process.

1   There is no dispute between the parties about changing the ordering process to enable the

2   orders to be submitted on one LSR. Instead the dispute centers on the timing of the process

3   changes necessary to implement single LSR ordering. Qwest has already made the single

4   LSR ordering process available for line splitting/loop splitting for new connections and

5   transfers.

6   There is no dispute that the single LSR process for conversions and migrations is scheduled

7   to be implemented with IMA Release 16.0 on October 18, 2004. Covad's claim that

8   contract language is appropriate to ensure that Qwest will in fact implement the remaining

9   process change is misplaced as is Covad's claim that process changes should be mandated

10   in contract language.

11   **Q. WHAT IS MEANT BY "A SINGLE LSR ORDERING CAPABILITY?"**

12   A.   At the time Qwest and Covad began negotiating this agreement, requests for voice and data

13   services relating to line-splitting and loop-splitting had to be placed via separate LSRs in

14   IMA. That is, first an LSR had to be submitted for the voice service, whether for a new

15   connect or transfer or a product conversion or migration.[1]   Then a second LSR could be

16   submitted for associated data service (line-splitting for UNE-P or loop-splitting for

17   unbundled loops). The two LSRs could be linked via the entry of the related purchase

18   order number (PON) in the related PON (RPON) field on the LSR. The second LSR could

19   also be submitted immediately following the first LSR. In other words, contrary to

20   Covad's claim, it was not necessary to wait for the first LSR to complete before the second

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[1] A new connect is the creation of new service. A transfer, also known as an outside move, occurs when service is moved from one address to another. By contrast, a conversion order changes the carrier. The terms migration and conversion are used interchangeably by Qwest. Both terms refer to a change of service provider.

1   could be submitted. Even so, Qwest recognized the utility of being able to request both the

2   voice and data service on a single LSR. Therefore, on its own initiative, Qwest submitted

3   change requests to the CMP to implement this capability. It is only the timing of Qwest's

4   implementation of this capability that is at issue here. In fact, the single LSR capability for

5   new connections and transfers was implemented in April, making a large portion of

6   Covad's concerns moot.

7   **Q.   WHAT TECHNICAL CHANGE MADE IT POSSIBLE TO SUBMIT TWO LSRS IN**

8   **IMMEDIATE   SEQUENCE,   AND   MADE   THE   SINGLE   LSR   PROCESS**

9   **POSSIBLE?**

10   A.   Qwest made a change to its back office systems to address an issue specifically related to

11   new connections and transfers for customers that also wanted data service. To be able to

12   order data service, a loop must first be pre-qualified to provide this service. In the past, the

13   loop qualification could only be performed on a Telephone Number ("TN"). This posed a

14   problem for new connections, as a TN was not assigned to the loop until the account was

15   established. With this back office system change instituted in August 2003, it became

16   possible to qualify a loop based on its circuit identification. This allowed for simultaneous

17   ordering of new connections and transfers for voice and data service for qualified loops.

18   This allowed for two LSRs to be submitted in immediate sequence, and it allowed for the

19   subsequent development of the single LSR process for new connections and transfers.

1   Q.   **COVAD'S PETITION CLAIMS THAT THE TWO LSR ORDERING PROCESS**

2   **CREATES A DELAY IN THE PROVISIONING OF DSL SERVICE. IS COVAD**

3   **CORRECT?**

4   A.   No. Covad is not correct. As I set forth above, since August of 2003, Covad has had the

5   ability to submit the two LSRs one right after the other. As discussed in CMP meetings

6   introducing the first CR in March 2003, there is no requirement that the voice LSR be

7   provisioned before the data LSR can be submitted. All that is required is that the voice

8   LSR be submitted first. The data LSR may be submitted immediately following the voice

9   LSR, and can be provisioned at the same time as the voice request.

10   Q.   **GIVEN THAT WITH A TWO-LSR PROCESS, THE TWO LSRS MAY BE**

11   **SUBMITTED ONE IMMEDIATELY AFTER THE OTHER, WHAT IS THE**

12   **PRACTICAL EFFECT OF IMPLEMENTING THE SINGLE LSR PROCESS?**

13   A.   Single LSR ordering may save some of the time Covad would spend placing orders. Covad

14   would type one LSR instead of two, and depending on how Covad has designed its

15   ordering system, it may have fewer screens to navigate to type the order for the two

16   products. Whether or not the orders for voice and data are placed on one LSR or two, there

17   is still unique information that must be provided for the data order. Again, this is an

18   ordering change. Qwest's provisioning of these products is not affected by this ordering

19   change. And as of IMA Release 15.0, orders for new connections and transfers may be

20   submitted on a single LSR.

1   IV.   SINGLE-LSR ORDERING AND THE CMP

2   Q.   WHY HAS QWEST MANAGED THE SYSTEMS CHANGES FOR SINGLE LSR

3   ORDERING THROUGH THE CMP?

4   A.   CMP is the appropriate forum through which to process the systems changes to implement

5   a single LSR ordering capability. Importantly, the systems development work involved in

6   accommodating these changes to Qwest's ordering systems affects all CLECs, not only

7   Covad, and therefore the system changes to implement single LSR ordering are required to

8   be processed through CMP. The Wholesale Change Management Document, a consensus

9   document designed by Qwest and CLECs, mandates that "[a] CLEC or Qwest seeking to

10   change an existing OSS Interface, to establish a new OSS Interface, or retire an existing

11   OSS Interface must submit a CR."[2]   Since the creation of a single LSR ordering process

12   requires changes to an existing OSS Interface, CMP is the appropriate and required forum

13   for addressing such changes.

14   CMP was established for the specific purpose of ensuring that system and process changes

15   are clearly communicated to CLECs. It allows all CLECs to participate in CR clarification

16   and solution design meetings. CMP further provides detailed tracking of each CR through

17   to final disposition, so that any interested party can track the status of any particular CR.

18   Further, the CMP allows all CLECs to learn about and anticipate the impacts a change may

19   have on their operations, and to voice concerns and request changes to mitigate adverse

20   impacts associated with a change. CMP was created to allow such CLECs to voice their

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[2] Qwest Wholesale Change Management Process Document, which is publicly available at
http://www.qwest.com/wholesale/cmp/whatiscmp.html, Section 5.1 (emphasis added). See Exhibit RA-1.

1   concerns and work toward an equitable solution that better meets the larger community's

2   needs. Indeed, Covad was among the CLECs that participated with Qwest in designing the

3   CMP and that have accepted it as the mechanism for changing systems that affect multiple

4   CLECs. The CMP process provides an established forum and, more importantly, existing

5   procedures designed to ensure that the needs of the broader CLEC community are

6   addressed. Accordingly, the single LSR ordering issue is properly addressed in the CMP

7   forum, and not in an individual CLEC's ICA.

8   **Q.   WHAT IS THE STATUS OF THE SINGLE LSR ORDERING CAPABILITY?**

9   A.   Qwest, not Covad, submitted two CRs to the CMP. The first, SCR030603-01EXSC,

10   creates the single LSR ordering capability for new connections or transfer orders (Activity

11   types N and T).[3] This CR allows the customer of record to include in an order for a new

12   unbundled loop or UNE-P, a request for data service on the same LSR. The second CR,

13   SCR120303-01, will allow the customer of record to include in an order for a conversion

14   from retail or another product (Activity types Z and V) a request for data service on the

15   same LSR.[4]

16 **Q.   HAS THIS FIRST CR CREATING THE SINGLE LSR ORDERING CAPABILITY**

17   **FOR NEW CONNECTIONS FOR LINE SPLITTING AND LOOP SPLITTING**

18   **BEEN COMPLETED?**

19 A.   Yes it has. It was completed in April 2004 with IMA Release 15.0 and all CLECs may

20   now order line splitting and loop splitting on a single LSR for new connections or transfers.

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[3] See Exhibit RA-2 for a copy of change request SCR030603-01EXSC.

1   **Q.   DID QWEST MAKE AN EARLIER ATTEMPT TO PROVIDE A SINGLE LSR**

2   **CAPABILITY?**

3   A.   Yes. Qwest had intended to include the single LSR capability for ordering line splitting or

4   loop splitting with new connects and transfers for UNE-P or unbundled loops in IMA

5   Release 13.0. During development of the release, Qwest determined that creating the

6   single LSR capability for line splitting and loop splitting was much more complex than

7   originally thought. Qwest underestimated the complexity of the system enhancements

8   required to combine the products (UNE-P with line splitting and unbundled loop with loop

9   splitting) and this underestimate affected the implementation schedule. During the testing

10   of the IMA 13.0 Release, Qwest determined that it was necessary to create new REQTYPE

11   codes and Product Identifications in IMA to make these product offerings. Because these

12   changes required significant modifications to the Local Service Ordering Guide ("LSOG"),

13   it was necessary to include them in a major IMA release. This work was projected to take

14   over 10,000 man hours of additional work at an additional cost to Qwest of over $500,000.

15   Once these complexities were recognized, Qwest determined that it was not possible to

16   complete the changes in time for IMA Release 13.0. At that time, IMA Release 14.0 was

17   already closed to new changes, so the single LSR capability for new connections for line

18   splitting and loop splitting was added to IMA Release 15.0.

19   **Q.   ARE DELAYS OF IMA CRS COMMON?**

20   A.   No. The delay of the line/loop splitting portion of this CR was an aberration.

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[4] See Exhibit RA-3 for a copy of change request SCR120303-01.

1   **Q. WERE RESOURCES TAKEN FROM OTHER CLEC-SPONSORED CRS IN**

2   **ORDER TO INCLUDE THE FUNCTIONALITY IN IMA RELEASE 15.0?**

3   A. No. Qwest used internal resources to complete this CR, and all resources previously

4   allocated for CMP-prioritized CRs were left intact for IMA Release 15.0.

5   **Q. HAS QWEST ADDRESSED THE ISSUE OF A SINGLE LSR FOR**

6   **CONVERSIONS?**

7   A. Yes. Qwest issued an additional CR, SCR120303-01. This CR will allow the customer of

8   record to submit an LSR for a conversion to UNE-P or Unbundled loop to include a request

9   for line-splitting or loop-splitting.[5] This CR is targeted for implementation with IMA

10   Release 16.0 in October.

11   **Q. WAS A SEPARATE CR FOR CONVERSIONS NECESSARY?**

12   A. Yes. Qwest determined that the ability to submit orders on a single LSR was also going to

13   be needed for conversion orders. So Qwest submitted the second CR.

14   **Q. WHY WERE CONVERSIONS NOT INCLUDED IN THE FIRST CR?**

15   A. The first CR was created to address the back office ordering limitation that existed only for

16   new connections which required the voice circuit to be provisioned before a data order

17   could be submitted. Through the back office system change, Qwest removed this

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[5] See Exhibit RA-3. As set forth in the CR, the products which can be converted include: Line Splitting UNE-P POTS, Line Splitting-UNE-P PBX Designed Trunks, Line Splitting UNE-P Centrex 21, Line Splitting UNE-STAR, Line Splitting UNE-STAR Centrex 21, Loop Splitting - UBL. Conversion Activity will be allowed to and from listed products including Conversion from Retail to New UNE-P with Line Splitting with or without Number Port, Line Splitting to new UBL with Loop Splitting with or without Number Port, and Unbundled Analog Loop (LX--) to Unbundled Non-Loaded Loop (LX-N) with Loop Splitting.

1   limitation. Conversion orders were not considered for the first CR, since they were not part

2   of the original problem being addressed.

3   **Q.   WHAT IS THE STATUS OF THIS SECOND CR?**

4   A.   This CR is to be implemented with IMA Release 16.0 in October 2004.

5   **Q.   IS QWEST LIKELY TO ENCOUNTER THE SAME TECHNICAL DIFFICULTIES**

6   **WITH THE CR FOR CONVERSION ORDERS THAT IT EXPERIENCED WITH**

7   **THE CR FOR NEW CONNECTIONS?**

8   A.   No. The CR for conversions (SCR030603-01EXSC) builds on the solution implemented

9   with IMA Release 15.0 for new connections. As Qwest has figured out how to combine

10   the products, the second CR (SCR120303-02) adds to the activities that can be performed

11   with these product combinations.

12   **Q.   COVAD CLAIMS THAT AN IMA CHANGE IS NOT NECESSARY TO**

13   **IMPLEMENT SINGLE LSR PROCESSING, BECAUSE COVAD CLAIMS SINGLE**

14   **LSR PROCESSING CAN BE DONE MANUALLY. WHAT IS YOUR RESPONSE?**

15   A.   An IMA change might not be required were Covad willing to accept manual handling of

16   such orders, but a process change would certainly be required. And such a process change

17   would have to go through CMP. Qwest processes, prior to IMA Release 15.0, did not

18   permit a single LSR to contain an order for an unbundled loop and loop splitting, or for

19   UNE-P and line splitting, even if such an LSR were to be processed manually.

1   Neither Covad nor any other CLEC has asked Qwest to consider an interim process

2   through the CMP. The first indication to Qwest that Covad wanted an interim fax process

3   was in the parties' negotiations that preceded Covad's arbitration petition.

4   **Q.**   **WOULD IT MAKE SENSE FOR COVAD TO SUBMIT A CR TODAY FOR A**

5   **MANUAL PROCESS FOR SUBMITTING A SINGLE LSR FOR LINE/LOOP**

6   **SPLITTING?**

7   A.   No. As I stated above, the first Qwest-sponsored CR for an automated process for a single

8   LSR for new connects and transfers was implemented with IMA Release 15.0 in April.

9   And the second Qwest-sponsored CR for an automated process for a single LSR for

10   conversions is included in IMA Release 16.0 to be implemented on October 18, 2004. It

11   makes no sense to institute a process change through the CMP for a manual process that no

12   CLEC has requested, would only be necessary for conversions, and would only be needed

13   for a short time. And given that the current two-LSR process is electronic, a slower,

14   manual process makes even less sense.

15   **Q.**   **HAVE ANY SINGLE LSR ORDERS BEEN PLACED SINCE IMA RELEASE 15.0**

16   **WAS INSTALLED IN APRIL?**

17   A.   In Qwest's region, there has been one order for UNE-P with line splitting using the single

18   LSR process that was implemented with IMA Release 15.0. There have been no orders in

19   Qwest's region for loop splitting using the single LSR process that was implemented with

20   IMA Release 15.0.

1 **Q. IS COVAD USING IMA RELEASE 15.0?**

2 A. No. Based on testimony in prior proceedings on this issue, Covad has stated it does not

3   intend to use IMA Release 15.0 to submit LSRs using IMA EDI. Covad is currently using

4   IMA Release 14.0 to submit LSRs, and apparently has decided to skip IMA Release 15.0 in

5   favor of implementing IMA Release 16.0.

6 **Q. WHAT DOES THIS SUGGEST TO YOU?**

7 A. This suggests to me that Covad's assertions concerning its need for single LSR ordering are

8   overstated. Covad's assertions that contract language must require single LSR ordering to

9   accommodate Covad's needs are belied by the fact that Covad has yet to use the single LSR

10   ordering that is already available to it.

11   **V.   CONCLUSION**

12 **Q. IS CONTRACT LANGUAGE THE APPROPRIATE PLACE TO ADDRESS THE**

13   **IMA CHANGES COVAD DESIRES FROM QWEST?**

14 A. No. Changes to IMA impact all who use this ordering system. It is not appropriate for

15   Qwest's systems to be mandated by the terms of one CLEC's contract with Qwest. The

16   CMP was established so that all CLECs could determine how best to prioritize changes to

17   IMA, so that Qwest resources can be allocated to the benefit of all CLECs. If a change is

18   contractually mandated, Qwest has no choice but to make the change, diverting resources

19   that would otherwise be available to the greater CLEC community. It is the goal of the

20   CMP to ensure that all CLECs have a say in how Qwest's resources should best be used.

21   Individual contract provisions mandating systems changes subvert the purpose of the CMP,

1   and give an individual CLEC the ability to undermine CMP and obtain changes for its own

2   benefit that may conflict with priorities established in CMP.

3   **Q.   DOES COVAD NEED THE LANGUAGE CHANGES IT PROPOSES IN THIS**

4   **CONTRACT?**

5   A.   No. The first CR, which was sponsored by Qwest, not Covad, giving CLECs the ability to

6   send new connect orders for UNE-P with Line Splitting or Unbundled Loop with Loop

7   Splitting on a single LSR, was successfully implemented with release 15.0 of IMA on April

8   19, 2004. The second CR, also sponsored by Qwest, creating the same capability for

9   conversion orders, is scheduled to be implemented with IMA Release 16.0 in October

10 2004. Covad does not need to have language in its interconnection agreement requiring

11 Qwest to take actions that Qwest has already voluntarily taken through the CMP. As the

12 two CRs at issue here demonstrate, Qwest is motivated to work through the CMP to make

13 IMA changes as prioritized by the CLEC community.

14 **Q.   WHY SHOULD THE COMMISSION ADOPT QWEST'S PROPOSED LANGUAGE**

15 **FOR SECTIONS 9.21.1, 9.21.4.1.6 AND 9.24.1?**

16 A.   Qwest's language provides the systems functionality that Covad requires. The functionality

17 has been properly handled through CMP to date, with part of Covad's request already

18 accommodated. The remaining functionality is scheduled to be provided and should

19 remain subject to CMP, not subject to contract language. Covad should not be allowed to

20 set a precedent that subverts the CMP process nor should changes to Qwest's systems be

21 mandated through contract language.

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

2   A.   Yes, it does.