

DEPOSITION OF JEROME JENSON - MAY 18, 2007

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DEPOSITION OF JEROME JENSON
BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
OF THE STATE OF MINNESOTA

In the Matter of Qwest Corporation's Application
for Commission Review of TELRIC Rates Pursuant to
47 U.S.C. 251

PUC DOCKET NO. P-421/AM-06-713
OAH DOCKET NO. 3-2500-17511-2

DEPOSITION OF JEROME JENSON,
taken pursuant to Notice, before Janet Shaddix Eling,
Registered Professional Reporter and Notary Public, at
1500 Bremer Tower, 445 Minnesota Street, on May 18, 2007,
commencing at approximately 8:30 a.m.

* * *

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1 APPEARANCES:
 2 ERIC F. SWANSON, Attorney at Law,
 3 Winthrop & Weinstine, 225 South Sixth Street, Suite
 4 3500, Minneapolis, Minnesota 55402, appeared for
 5 and on behalf of Qwest Corporation.
 6 DENNIS AHLERS, Attorney at Law,
 7 730 Second Avenue South, Suite 900, Minneapolis,
 8 Minnesota 55402, appeared for and on behalf of
 9 Eschelon.
 10 DAN LIPSCHULTZ, Attorney at Law,
 11 Moss & Barnett, 4800 Wells Fargo Center, 90 South
 12 Seventh Street, Minneapolis, Minnesota 55402,
 13 appeared for and on behalf of the CLEC Coalition.
 14 LINDA S. JENSEN, Assistant Attorney
 15 General, 1400 Bremer Tower, 445 Minnesota Street,
 16 St. Paul, Minnesota 55101, appeared for and on
 17 behalf of the Department of Commerce.
 18 ALSO PRESENT:
 19 Doug Denney, Sid Morrison,
 20 Ed Fagerlund, John Grinager
 21
 22
 23 WHEREUPON, the following proceedings were
 24 duly had and entered of record, to wit:
 25

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WITNESS	PAGE
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1 (Whereupon, Minnesota Statute 486.10 was
 2 complied with.)
 3 JEROME JENSON,
 4 after having been first duly sworn, was
 5 examined and testified on his oath as follows:
 6 EXAMINATION
 7 BY MS. JENSEN:
 8 Q Good morning, Mr. Jenson, I'm Linda Jensen, I
 9 represent the Department of Commerce. Can we start
 10 with just putting your name on, you know, state your
 11 name, your employer, and your job title for us?
 12 A Okay. My formal name is Jerome Allen Jenson, and
 13 I'm employed at Qwest Communications.
 14 Q And what's your job there?
 15 A The title is lead process analyst.
 16 Q Okay. I'd like to just briefly go through some of
 17 your background, if I may. How long ago -- what
 18 year did you start with Qwest?
 19 A I started with, actually, Northwestern Bell, in
 20 1979.
 21 Q What was your job then?
 22 A Central office technician.
 23 Q What did that involve at that time?
 24 A At that time, many things. Doing wiring on the
 25 frame, wiring orders, shooting trouble in the

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1 switch, repairing, doing routines, pretty much the
 2 typical kinds of things a central office technician
 3 would do.
 4 Q Okay. How long did you have that job?
 5 A The first three years -- well, actually, let's say
 6 the first two years, I think it was, I was working
 7 downtown Minneapolis, and then I worked on some
 8 conversions of switches for a couple of years. And
 9 then I worked as a central office technician out of
 10 what was at that time the south SCC out of
 11 Bloomington, Minnesota, and then in 1987 I took a
 12 job in management, and I was -- at that time in
 13 management, it was called a complex translation
 14 support.
 15 Q Before you go ahead with that, you said you were
 16 doing conversion of switches for a couple of years.
 17 Can you generally tell us what that entailed?
 18 A Okay. Back in those days there was a great number
 19 of analog switches, which were step by step and
 20 crossbar offices, and we had conversions going on at
 21 that time, converting them to electronic switches,
 22 such as 1 ESS or 1A ESS.
 23 Q And were you based out of an office here in the Twin
 24 Cities?
 25 A During the time we were doing conversions?

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1 Q I'm sorry. Tell me again, DVA is?
 2 A Design, verify and assign.
 3 Q Is it possible for, for example, step 2 and step 8
 4 to be done as one activity?
 5 A It is if it's not a basic reuse. If it's a basic
 6 new, if you look across it says NA for the lift and
 7 lay.
 8 Q For the basic new?
 9 A Um-hum.
 10 Q Okay. I'm going to ask you to take a look at
 11 Exhibit 2. You'll notice that on those pages on the
 12 left-hand column is a series of numbers, and I'd
 13 like you to turn down to number 3041, which is on
 14 page 68 of 516.
 15 You'll notice at page 3015 there's a
 16 caption, loop basic install first - install
 17 continued, and at 3034 is subtotal for design, 3036,
 18 central office frames, and then line 3041 is
 19 complete cross-connect. And as you go across the
 20 page there's a column for time of four minutes and
 21 then there's a probability number one column with a
 22 value of two. Do you know what that probability of
 23 two refers to?
 24 MR. SWANSON: Just as foundation,
 25 Mr. Jenson, have you seen Exhibit 2 before?

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1 THE WITNESS: No, I haven't.
 2 MR. SWANSON: Answer the question, if you
 3 can.
 4 THE WITNESS: I would say that I believe
 5 the two stands for the probability of two jumpers.
 6 BY MS. JENSEN:
 7 Q Okay. And why do you say that? Maybe I should say,
 8 why does that make sense to you?
 9 A That would be one jumper placed on an interconnect
 10 distributing frame and one jumper placed on the main
 11 distributing frame.
 12 Q Okay, thank you. Is that configuration of an
 13 intermediate distribution frame connect always used
 14 with CLECs?
 15 A I'm sorry, I didn't catch that.
 16 Q Is that configuration always used with CLECs where
 17 there's the two jumpers?
 18 A Again, I have to go back to the different variations
 19 of central offices and frames and layout. There can
 20 be some places where they have a shared ICDF and an
 21 MDF where it's all on the same frame, in which case
 22 there could be one jumper.
 23 Q What kinds of central offices would that be the case
 24 in?
 25 A It would probably be more common in some of the

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1 smaller frames that don't have the low profile.
 2 Q What do you --
 3 A Low profile meaning like a COSMIC frame. Telephone
 4 lingo. A low profile is a COSMIC frame and on a low
 5 profile COSMIC frame we have punchdown terminations.
 6 Typically, when we have that, then, we have a
 7 secondary or a tie frame or an interconnect frame.
 8 CLECs don't terminate, or we don't place their
 9 terminations on a COSMIC frame. So in a smaller
 10 office where they don't have the low profile frame,
 11 they have a ladder, they have, say, a nine-foot
 12 frame or an 11-foot frame, and we've got the wire
 13 wrap terminations, and if there's room on there and
 14 they don't have the space to add an interconnect
 15 frame in that central office, then they will place
 16 the CLEC's CFA terminations on that frame. On those
 17 kinds of frames, you can have one jumper.
 18 Q Can you describe from where exactly to where the IDF
 19 jumper goes in any more detail?
 20 A Are you saying the ICDF?
 21 Q Yeah. An ICDF stands for intermediate connection?
 22 A ICDF stands for interconnect distributing frame,
 23 which is where CLECs typically terminate their CFAs.
 24 Q Yes, please.
 25 A Okay. On that frame there is a cross-connect placed

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1 from the CLEC's CFA to a tie pair.
 2 Q And when the CLEC termination is to a tie pair, the
 3 tie pair is from where to where?
 4 A Tie pairs are used to connect distributing frames
 5 together and that's a hard-wired tie pair. Meaning
 6 it's placed there by vendors or Qwest installers to
 7 tie two frames together, and that's an assignable
 8 piece of -- well, that's an assignable tie pair that
 9 comes out of TIRKS on the design. So that's -- it's
 10 there, it doesn't have to be run, it's hard-wired,
 11 it's in place.
 12 Q And where there's an MDF jumper, where does that go
 13 to, from where to where?
 14 A Okay. The tie pair from the ICDF is hard-wired to
 15 the MDF. Meaning at the other end of that tie pair
 16 will appear on the MDF. So then we place a jumper
 17 from that appearance to the cable and pair.
 18 Q I'd like to move to the 2A on the list of
 19 provisioning steps. What is that?
 20 A 2A is a provisioning step, it's a DVA provisioning
 21 step, and we check the CLEC 's CFA for dial tone, we
 22 check it to make sure that the telephone number
 23 that's on the order or on the WORD document is the
 24 same one that's assigned to that CFA by the CLEC by
 25 doing an ANI test, and we also make a test to make

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1 technician, and it's an area I wouldn't want to put
2 my foot in.
3 Q Item number 6. Analyze DD WFA-DI work requests.
4 First of all, what is DD?
5 A DD is due date.
6 Q Okay. And what does step 6 entail?
7 A It entails details -- I should say it's a work
8 request coming out of WFA-DI to work a conversion, a
9 UNE conversion, and it can be, depending upon the
10 type of product and the type of installation option
11 chosen by the CLEC, it could be non-time specific,
12 it could be time specific, it could be, you know,
13 whatever the CLEC wants us to do, for the most part,
14 when we do the conversion.
15 Q Why does it take two minutes to do that?
16 A Okay. When they get a work request like that it may
17 or may not be the same technician that did the DVA
18 work, it could be another technician. They would
19 get that work request, they would either go find the
20 WORD document that's in a pending file that had been
21 used previously, they would look at that WORD
22 document to find out what kind of service it is,
23 find some circuit detail, find out some circuit
24 details.
25 They would look at the work request that

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1 they got, whether it was like a all-day cut, meaning
2 they can do it any time during the day, or if it's
3 time specific and they want it done at 8:00 in the
4 morning, or 9:00 in the morning, they would pull a
5 current copy of it up out of WFA to make sure that
6 the copy that's on record in TIRKS is the same issue
7 as the one that's in their pending file, to make
8 sure that there have been no supps or revisions done
9 on that order. And then they would determine
10 whether or not they have to arrange their schedule
11 or, you know, work it into their work load so that
12 they can get that cut done at whatever time
13 requested by the CLEC.
14 Q Do you know what percentage of requests are time
15 specific?
16 A I don't have that information.
17 Q Do you know what percentage of requests are being
18 done by a tech other than the tech who did the DVA
19 work?
20 A I don't have that information either.
21 Q Did you take those things into account, though, in
22 making your time estimate?
23 A No, because essentially the same thing happens
24 whether it's the same tech or a different tech.
25 Q And so you did not take that into account, either of

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1 those factors into account in doing your time
2 estimates?
3 A No, I did not, because there was no difference.
4 Q Let's see. What is the next item? The next
5 provisioning step?
6 A The next one is a due date pre-service CFA dial tone
7 check. We're checking the CLEC's service for dial
8 tone, ANI, and polarity. And it's usually done
9 prior to when we do the conversion. Typically one
10 hour before.
11 Q Can you explain the difference between the work
12 being done in item 7 with the work being done in
13 item 2A of the provisioning steps?
14 A Essentially, it's the same thing.
15 Q Why is it done on the due date?
16 A Well, what we find is that normally on step 2A it is
17 usually DVA. Typically, and in most cases, a CLEC
18 does not have their dial tone on it and working on
19 DVA. So step 2 is just a check of it and we notify
20 the CLEC by the entries in the OSSLOG, and I believe
21 the QCCC also gives a call or some notification to
22 the CLEC to say we've checked for dial tone on DVA,
23 there is no dial tone. If there is more than two
24 days between DVA and due date and a CLEC has
25 subscribed to PTA notification, we also give them a

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1 48-hour dial tone check. That's not mentioned in
2 here, and my understanding is that we do that as a
3 courtesy.
4 The QCCC will create a handoff on what we
5 call a 48-hour dial tone check. If that CLEC has
6 subscribed to PTA notification then we'll check that
7 CFA again. If there's still no dial tone, which is
8 pretty common, we'll give the CLEC another
9 notification of no dial tone. On due date we have
10 to do it again most of the time to make sure that
11 the CLEC is ready to do the conversion. So we
12 usually do it one hour before, if it's a coordinated
13 cut, and generally we do it prior to when we began
14 doing a conversion of a basic reuse. We do it
15 again, and if there is still no dial tone, we notify
16 the CLEC, and they have the option of doing a verbal
17 CFA change if they want, or they can try and make an
18 attempt to fix their problem.
19 So there's just a lot of stuff built in
20 here to make the CLEC successful on due date, and
21 we're trying to help them make them successful and
22 do a conversion that's, you know, problem free. We
23 give them every opportunity to be successful, and it
24 seems like we end up doing these checks for dial
25 tone more often than once.

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1 Q You said that on step 2A for most CLECs there isn't
2 dial tone; is that right?
3 A That's what we seem to find.
4 Q What's the value of that check at that point --
5 A Well --
6 Q -- if you know going in that most times you're not
7 going to find dial tone?
8 A DVA, again, stands for design, verify and assign.
9 We want to make sure we've got a circuit that's
10 designed properly, we want to verify that it's got a
11 signal on it, it's got dial tone on it, it's got
12 whatever is going to be put over that circuit, and
13 we make sure that it's wired correctly and assigned
14 correctly and it's ready to go on due date so we
15 don't have any unexpected problems.
16 Q I'm sorry, maybe my question was clumsy. But you
17 know that most of those -- you're not going to have
18 dial tone following that test?
19 A Well, it's not true in every case, but it seems to
20 be more common than not.
21 Q How does a tech actually do the CFA dial tone check?
22 What does he do?
23 A They have a test set and they will check for dial
24 tone. They'll -- they will pull dial tone, they'll
25 dial the CLEC's ANI number, and they'll ANI the

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1 number to make sure that it matches up to the number
2 that's on the WORD document, and then they also test
3 for polarity, tip and ring polarity, from the CLEC
4 at the CFA.
5 Q So the CFA dial tone check is the tech dials the ANI
6 of the CLEC using the test set?
7 A Using a test set or a handset, correct.
8 Q Anything else that's done at that point to complete
9 the CFA dial tone check?
10 A They will put the results of their tests in the
11 OSSLOG again.
12 Q And how is that done?
13 A At a WFA terminal.
14 Q It's a data entry at a WFA terminal?
15 A On that order number, yes.
16 Q And is it a check the box, is there some narrative
17 written in?
18 A No, it's pretty much entered in by typing.
19 Q Typing, ran the test, looks good? I mean, is it a
20 field that's entered, is it either a plus or minus,
21 on or off, I mean, literally, what's done?
22 A We just ask them to put the results of the
23 pre-service dial tone checks in OSSLOG. I guess how
24 they want to enter that in there is up to them. I
25 mean, there's no prescribed format. They can type

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1 it in just as long as it can be understood by the
2 QCCC and by anybody else that wants to go into
3 OSSLOG and look at that.
4 Q So OSSLOG just allows the tech to make
5 handwritten -- or not handwritten, typed-in
6 narrative descriptions of things, there's no special
7 field for recording the results of a dial tone
8 check?
9 A There's not like a box or anything you would check,
10 no.
11 Q Just so I understand, is OSSLOG literally just a log
12 of running events?
13 A OSSLOG is associated to the order in WFA-C. And
14 OSSLOG starts as soon as the order hits WFA. And
15 there's a record of everything that happens.
16 Handoffs, if somebody does something, notes are put
17 in there, comments, if something is -- is going to
18 be jeoped for some reason that is put in there.
19 That way there's history. If somebody picks it up
20 at some point down the road then they can go back
21 and read the OSSLOG to know what has or hasn't
22 happened, what the tests were, what the results
23 were, does action need to be taken.
24 Q But my question is it's just a running log of events
25 that's not preformatted in some fashion?

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1 A No. Some of the interactions between WFA-C and
2 WFA-DI, those internal things in the operating
3 system happen automatically, but any human
4 interface, you'd have to access it and manually put
5 it in.
6 Q Is there anything else done besides what you've
7 already described of dialing the ANI to see if
8 there's dial tone and then making an entry in OSSLOG
9 that's part of step 7 of the provisioning steps?
10 A I -- can you repeat that question?
11 Q You've said that the tech dials ANI in order to
12 complete the CFA dial tone check, and then records
13 the results of that in the OSSLOG. Is there
14 anything else that's part of step 7 of the
15 provisioning steps?
16 A On step 7, because it's due date, they will make a
17 call in to the QCCC and let the implementor in the
18 QCCC know that there is no dial tone on the CLEC's
19 CFA. And if that's the case, usually with the
20 CLEC -- with a COT on the line with the implementor,
21 they'll call the CLEC, and if the CLEC wants to do a
22 verbal CFA change, or I guess it's up to them what
23 they want to do, they would stay on the line, if it
24 was a verbal CFA, they would give us a new CFA, and
25 we would rewire it to a new CFA and hopefully that

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1 new CFA would have dial tone on it.
 2 Q And that's if there was no dial tone. What if there
 3 is dial tone, is there anything else that's part of
 4 step 7 that you have mentioned already?
 5 A They would enter that into the results of their dial
 6 tone checks into OSSLOG again.
 7 Q Right. And that's if there's no dial tone; correct?
 8 Let me rephrase the question. Other than what
 9 you've already described, is there anything else
 10 that's part of step 7?
 11 A Oh, boy. I'm kind of having a blank right here, I
 12 can't recall right now.
 13 Q There's nothing else that you can think of right
 14 now?
 15 A No.
 16 Q Okay. Step 8 we talked a little bit about before, I
 17 think you indicated that this is where the tech
 18 completes the lift and lay process. Step 9, setup
 19 of DD test with I&M tech. What is that again? What
 20 does step 9 entail?
 21 A Step 9?
 22 Q Yes.
 23 A Setup of due date test with I&M tech?
 24 Q Right.
 25 A Okay. That is on a -- if the installation happens

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1 to be a basic new, for example, it's a new cable
 2 pair, and we will test with the outside technician
 3 to make sure that they're getting dial tone out
 4 there, everything is working good. They'll do some
 5 transmission tests on it to make sure that the
 6 parameters are within standards.
 7 Q So item 9 includes not only -- well, when you say
 8 the setup of the due date test, what do you mean by
 9 that?
 10 A We'll do what's referred to as head-to-head tests
 11 with the outside tech, meaning we have a test set,
 12 they have a test set, and we send tests back and
 13 forth.
 14 Q How many tests are part of this?
 15 A We'll usually -- we'll usually do one test. Well,
 16 it's going to depend. It depends on if there's any
 17 special equipment on it, like an FMT or loop
 18 extender. Those require some more transmission
 19 tests. If it's just a bare cable pair, then we just
 20 generally just do -- I may not name them all, but
 21 we'll do like a thousand and four, and I think we do
 22 like a C notch message, test it for noise, and there
 23 may be another one or two, I just can't recall.
 24 Q On item number 10. Complete due date work status
 25 with CCTI. What is CCTI again?

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1 A I forget what that stands for, but it's a test and
 2 turnup implementor in the QCCC.
 3 Q And what does it mean to complete the due date work
 4 status?
 5 A We're giving them a verbal that it has been -- the
 6 cutover or the turnup or whatever it is that we're
 7 working on has been complete and then they notify
 8 the CLEC so the CLEC can go ahead and do their
 9 tests.
 10 Q And this is only done under certain circumstances
 11 according to the columns. So a new install with
 12 performance testing, a new install with cooperative
 13 testing, and a new coordinated install with
 14 cooperative testing, and not otherwise. Why is
 15 that? I take that back. Also the new coordinated
 16 without cooperative testing. So it's not done on
 17 the reuse; right? Let me rephrase that.
 18 This is only done in some circumstances,
 19 what are those circumstances?
 20 A I'm trying to remember what the responsibilities are
 21 with performance testing and it's just not coming to
 22 mind here, I'm drawing a blank. But there are
 23 certain things that are required for each one of
 24 these, like performance testing, cooperative
 25 testing, and there's feedback that has to be given

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1 to the CLEC and the QCCC does that at the time that
 2 we finish the due date work. So on these that
 3 require feedback and whether the cutover is
 4 successful, it may be test results, it may be, yeah,
 5 we finished the cut, we did the cut at 10:30 a.m.,
 6 we were done at 10:35, these things require some
 7 kind of feedback to the CLEC.
 8 Q And you think it's related to the performance
 9 testing or cooperative testing?
 10 A Yeah, without having the product catalog in front of
 11 me I'm just kind of drawing a blank right now on
 12 what the requirements are in each one of these.
 13 Q Okay. The last item is number 11, post due date
 14 work complete in WFA-DI, what does that entail?
 15 A Okay. Again, in WFA-DI it's -- they're going to get
 16 a work request for that due date work and that will
 17 be a handoff, like a SPLI-5, SPLI-B, something on
 18 that order, that tells them what the requirements
 19 are for that particular order. And once they've
 20 done the conversion and made the whatever, then they
 21 would go into WFA-DI and they would complete that
 22 work item, that work request.
 23 Q And, I'm sorry, tell me again, why is this only done
 24 on reuse where there's a conversion?
 25 A Okay. It's done on a reuse and it's done on a

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1 a process and build a system and build a -- we had
 2 to put efficiencies in to trying to do batch cuts,
 3 which could be a minimum of 25 per day and a maximum
 4 of 100 per day per CO for all CLECs. In order to do
 5 that many a day, to do, you know, do all the lift
 6 and lays and try to get wiring done and everything
 7 else, we had to try to add some efficiencies.
 8 And we asked IT to develop the batch
 9 status tool, which is the tool that the CLECs can
 10 interface to find out the status of orders, and then
 11 our techs, our central office techs would status
 12 their work in there, whether to jeep something or
 13 complete something or start something, whatever the
 14 case might be. That eliminated having to go into
 15 WFA, to enter things into OSSLOG. However, they
 16 still had work steps that they had to complete in
 17 DI. So it took away some of the WFA work, but not
 18 all of it.
 19 Q Can you think of and give us any other examples in
 20 your long experience at Qwest where you or someone
 21 you know has brought that to someone's attention and
 22 then achieved a change or enhancement in the
 23 process?
 24 A No.
 25 Q I'm almost done, so bear with me. I wrote a note

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1 here, I think you referred earlier to some work you
 2 did at some point in your long career at Qwest
 3 dealing with collocations. And can you tell me,
 4 very briefly, what collocation work you did?
 5 A You're talking about the physical collocation work
 6 or --
 7 Q I'm talking about --
 8 A Okay.
 9 Q I don't have my notes here. The time period at
 10 Qwest where I think you said as one of your
 11 assignments you were doing collocation work, that's
 12 at least what I wrote down, so I'm wondering what
 13 collocation work you did, and that's the best I can
 14 do to frame the question for you.
 15 A That goes back a long ways. Some of the things I
 16 did was write some processes on how to do job
 17 surveys on site for collocation requests. We asked
 18 our central office techs to do some of that work
 19 instead of having to fly an engineer in from
 20 wherever, and we asked the central office tech to do
 21 a little bit of engineering, almost, to look at an
 22 area in the central office where the engineer
 23 thought they could place a collocation.
 24 We asked the technician to look at the
 25 overhead racking, in the process we asked the

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1 technician to look to make sure it wasn't blocking
 2 egress, doorways, or fire escape routes. We asked
 3 them to measure the floor out to make sure that the
 4 space that they were requesting was available and it
 5 would work there, and if there were any obstructions
 6 or reasons why something wouldn't work in that
 7 location, and then they would go back to the
 8 planning engineer, collocation planning engineer,
 9 and get back what they found.
 10 Q Did any of that work involve issues related to
 11 collocation power?
 12 A Yeah, there was, now that you say that. There was
 13 also another job aid, or process, if you will, that
 14 asked them to check the availability of vacant fuse
 15 positions on power boards, or BF -- boy, BF -- gosh
 16 darn it.
 17 Q I can't remember that third letter either, but I
 18 know exactly what you're talking about.
 19 A BDFBs, there you go, which are distribution bays for
 20 power feeds. And then they would say, yeah, there's
 21 a vacant spot here to put a 20 amp or 50 amp or 100
 22 amp, whatever the request was. And basically we
 23 were just providing them their eyes, is all we were
 24 doing.
 25 Q So you did not have any input into the collocation

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1 cost study in this case, did you?
 2 A On the placement of --
 3 Q Well, let me ask you this. Did you have any input
 4 into the collocation cost study that's at issue in
 5 this case that you're aware of?
 6 A I'm sorry, I still don't understand.
 7 Q And you may have just answered my question. So
 8 that's fine. There's another study in this case and
 9 it's called a collocation cost study and I was just
 10 wondering if you provided any inputs into that study
 11 and I think your answer is no.
 12 A No.
 13 MR. LIPSCHULTZ: That's all I have,
 14 thanks.
 15 EXAMINATION
 16 BY MR. AHLERS:
 17 Q Hi, Mr. Jenson, I'm Dennis Ahlers with Eschelon
 18 Telecom, and I have a few questions for you.
 19 Referring to page 105 of Exhibit 1, and
 20 step 7, there was some discussion earlier about
 21 that, and as I understand it you do a dial tone
 22 check in step 2A and then you do another one in step
 23 7; is that right?
 24 A Yes.
 25 Q And briefly what is the reason that you do the

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<p>1 second dial tone check? 2 A Well, first of all, we want to make sure we don't 3 have any problems on due date, when we actually do 4 the conversion, that the CLEC is ready, they have 5 dial tone on their CFA, and that way we don't have 6 to delay the conversion or change the due date or 7 push it out or supp the order. 8 Q And do you do that second dial tone check even if 9 there is dial tone the first time? 10 A In our process we do, yes. 11 Q And why is that? 12 A Things can change. I can say from experience with 13 one CLEC that things would change sometimes from DVA 14 to due date, on DVA they'd be working and on due 15 date they wouldn't. Well, they were having switch 16 trouble, part of their switch was not working and 17 there was no dial tone. So we'd catch things like 18 that. Or I've seen situations where stuff has been 19 typed out, and suddenly it was working one day and 20 not the next. I assume it got typed out, 'cause 21 nothing really changed as far as the wiring, but 22 there's just no dial tone at the CFA. 23 Q What does the term typed out mean? 24 A I use it in -- somebody, or some system, most likely 25 a person, types in the order into a switch, and says</p>	<p>1 A I don't have the data on that. 2 Q What would be -- when that happens, what additional 3 steps do you have to go through? 4 A Well, we would get on -- the central office 5 technician, if there was no dial tone on the due 6 date, the central office technician would get on the 7 phone and call the QCCC and get the implementor, and 8 then they would add on the CLEC and tell them, you 9 know, we got this cut, there's no dial tone, what do 10 you want to do. I mean, it's up to the CLEC to 11 decide. 12 Q And at that point, when they tell you what they want 13 to do, what happens next? 14 A Well, it depends on what they tell us to do. 15 Q Well, if they tell you they want to go forward or 16 make a change on the spot, what happens then? 17 A For example, they give us a new CFA to wire to? 18 Q Correct. 19 A Okay. We would take that verbally and we would go 20 to the -- wherever the CFA was terminated, most of 21 the time on the ICDF, and we would move the jumper. 22 Sometimes you have to run a new jumper. But in any 23 case, we would rewire it to the new CFA that they 24 gave us on a verbal, and then there's some other 25 things that happen as far as the CLEC resubmitting</p>
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<p>1 this CFA is going to have this phone number with 2 these features, et cetera, et cetera, so the person 3 that would actually be doing the -- we call them 4 line recent changes. 5 Q Would that person be a Qwest person? 6 A It would be a CLEC. 7 Q A CLEC person? 8 A Um-hum. 9 Q Is there anything that could happen in between the 10 first dial tone and the second dial tone test on the 11 Qwest side of things? 12 A It's possible a jumper might get removed 13 accidentally or somebody was placing a jumper and 14 something broke. I mean, it's not -- it's not 15 something we like to see but, I mean, it's possible. 16 Q I think you said in step 7 that one of the things 17 you'd take into account and commit with times is 18 that CLECs would sometimes make a verbal change to a 19 CFA; is that correct? 20 A On due date, we give the -- if there's no dial tone 21 on the CFA and it's something they can't fix on the 22 spot over the phone, such as a defective CFA, we 23 give them the -- we give them the opportunity to do 24 a verbal CFA. 25 Q And how often does that happen?</p>	<p>1 or supping the order, but I'm not familiar with how 2 that works upfront because we do require that the 3 order be redesigned to reflect the new CFA on it. 4 Q And in the time reflected for doing that, is that 5 included in step 7? 6 A I haven't included that. 7 Q Okay. So would it be included in one of the other 8 steps? 9 A I have not included it anyplace. 10 Q So earlier I thought you said you had taken that -- 11 it was one of the things you had taken into account 12 in including it in your times. 13 A A defective CFA? 14 Q Yeah. 15 A No, I don't believe I said that. 16 Q Okay. If I could have you turn to 135. And this is 17 just a question so that I can understand the 18 entire -- or make sure I understand the entire 19 chart. The very last column on the right side, what 20 does that column represent? 21 A Okay. This is supposed to represent just a high 22 level description of these provisioning activities. 23 I noticed on 136 there is a list of definitions, 24 however, I never supplied that, and I don't know who 25 put that in there, but those definitions don't --</p>

DEPOSITION OF MARY MADILL - MAY 17, 2007

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DEPOSITION OF MARY MADILL
BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
OF THE STATE OF MINNESOTA

In the Matter of Qwest Corporation's Application
for Commission Review of TELRIC Rates Pursuant to
47 U.S.C. 251

PUC DOCKET NO. P-421/AM-06-713
OAH DOCKET NO. 3-2500-17511-2

DEPOSITION OF MARY MADILL,
taken pursuant to Notice, before Janet Shaddix Eling,
Registered Professional Reporter and Notary Public, at
1500 Bremer Tower, 445 Minnesota Street, St. Paul,
Minnesota, on May 17, 2007, commencing at approximately
9:00 a.m.

* * *

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Page 2

1 APPEARANCES:
 2 DAVID AAFEDT, Attorney at Law,
 3 Winthrop & Weinstine, 225 South Sixth Street, Suite
 4 3500, Minneapolis, Minnesota 55402, and JOAN C.
 5 PETERSON, Attorney at Law, 200 South Fifth Street,
 6 Room 2200, Minneapolis, Minnesota 55402, appeared
 7 for and on behalf of Qwest Corporation.
 8 DENNIS AHLERS, Attorney at Law,
 9 730 Second Avenue South, Suite 900, Minneapolis,
 10 Minnesota 55402, appeared for and on behalf of
 11 Eschelon.
 12 DAN LIPSCHULTZ, Attorney at Law,
 13 Moss & Barnett, 4800 Wells Fargo Center, 90 South
 14 Seventh Street, Minneapolis, Minnesota 55402,
 15 appeared for and on behalf of the CLEC Coalition.
 16 LINDA S. JENSEN, Assistant Attorney
 17 General, 1400 Bremer Tower, 445 Minnesota Street,
 18 St. Paul, Minnesota 55101, appeared for and on
 19 behalf of the Department of Commerce.
 20 ALSO PRESENT:
 21 Doug Denney, Sid Morrison, Terri Million
 22 Ed Fagerlund, John Grinager
 23
 24 WHEREUPON, the following proceedings were
 25 duly had and entered of record, to wit:

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WITNESS	PAGE
MARY MADILL	
Examination By Ms. Jensen	4
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Examination By Mr. Lipschultz	147

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1 (Whereupon, Minnesota Statute 486.10 was
 2 complied with.)
 3 MARY MADILL,
 4 after having been first duly sworn, was
 5 examined and testified on her oath as follows:
 6 EXAMINATION
 7 BY MS. JENSEN:
 8 Q Good morning.
 9 A Good morning.
 10 Q I'm Linda Jensen and I represent the Department of
 11 Commerce. I have a number of questions that I'd
 12 like to ask you, but why don't we start with you
 13 just identifying yourself for the record, your name,
 14 your employer, your position?
 15 A Okay. I'm Mary Madill, I work for Qwest
 16 Communications. I have been there for almost 36
 17 years, the last nine of which have been in the
 18 wholesale department. Prior to that it was the
 19 consumer retail side of the house, residence,
 20 business, billing, sales, so that's kind of my
 21 background. I manage the Duluth center that
 22 processes the unbundled loop orders, as well as EEL
 23 orders, some private line orders. Other things,
 24 too, but they're not covered in what you're looking
 25 at at this point in time.

Page 5

1 Q All right. Why don't we back up. Tell me, when did
 2 you start with Qwest?
 3 A Oh, gosh, I think it was 1971. I've been there 36
 4 years, actually this past January would have been 36
 5 years.
 6 Q And had you worked for any telephone company prior
 7 to that?
 8 A No.
 9 Q What was your educational background prior to coming
 10 to Qwest?
 11 A High school and I had started college and then got
 12 married and went with my husband in the service, and
 13 didn't go back to school, came back, and started
 14 with Qwest when my husband went overseas.
 15 Q And when you were with Qwest initially, was that in
 16 Duluth?
 17 A Yes.
 18 Q Have you been employed at the Duluth location ever
 19 since?
 20 A No, I've been surplus a few times, I've worked in
 21 St. Paul in a building not far from here for
 22 two-and-a-half years.
 23 Q All right. Let's step through chronologically then.
 24 When you first started with Qwest in 1971, what was
 25 your first position?

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<p>1 information, the same information for all centers is 2 populated on that report. 3 Q How many centers are there? 4 A Des Moines, Minneapolis, Duluth, and then Aegis has 5 their Sierra Vista location, they also have an 6 offshore location in Bangalore, India, and those are 7 the centers that would be processing the wholesale. 8 We also have national wholesale work that's 9 processed in Thornton, Colorado, and Dublin, Ohio. 10 Q National wholesale products, did you say? 11 A Yes. 12 Q And how is that different from the wholesale 13 products that you process in the other centers? 14 A The Des Moines, Minneapolis, Duluth, and the two 15 Aegis centers are primarily processing orders that 16 are within our region, our 14-state region, and the 17 national group is processing wholesale locations 18 outside of those 14 states. 19 Q Do you know if any differences -- let me back up. 20 You indicated that Aegis is using essentially the 21 same systems and taking -- making the same steps to 22 process orders as you use in Duluth. Do you know if 23 that's true of the national centers as well? 24 Understanding that they're different products. 25 A I know just enough about national that I know they</p>	<p>1 Q And who -- where is Paula out of? 2 A She's located in Denver. 3 Q And do you know if she oversees both national 4 centers? 5 A Yes, she does. 6 Q The Duluth center, do you know whether you handle a 7 loop MUX combination? 8 A Yes, we do. 9 Q And can you explain your understanding of what that 10 is? 11 A I cannot give you an explanation of what that is. 12 Q Tell me why. 13 A Because I don't process those specific type of 14 orders. 15 Q Do you have even a colloquial understanding of what 16 that is? 17 MS. PETERSON: Can I ask for a 18 clarification? Are you asking for the function of 19 the product? 20 BY MS. JENSEN: 21 Q I'm asking her for her understanding of what she 22 knows about this, what it is, whatever that might 23 be. 24 A No, I don't have an explanation for that product. 25 Q Do you know that it's handled manually or is it</p>
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<p>1 use different systems than we have. 2 Q Can you describe generally what you understand about 3 that? 4 A I do not know anything about their systems other 5 than I know they don't use IMA, which is the 6 electronic route that carriers send their requests 7 in to us for LSRs. They have a different system 8 that they type in to process an order, they're not 9 using the same systems that we have. 10 Q And you don't really know anything about the 11 differences? 12 A I don't. 13 Q Do you know what they use instead of IMA? 14 A I do not. 15 Q Do you get reports on them? 16 A I don't recall that they're on the report that I get 17 on a monthly basis. I do believe it's just our 18 in-region centers that are on that report that I 19 get. 20 Q How many national centers are there? There's two, 21 did you say, Ohio -- 22 A And in Thornton, Colorado. 23 Q Do you know who would have -- do you know who your 24 counterpart would be in the national centers? 25 A Paula Rozzi, R-O-Z-Z-I.</p>	<p>1 automated? 2 A That is handled manually. 3 Q And is it handled manually by the same group of -- 4 by some subset of the 72 SDCs? 5 A Yes. 6 Q Is that subset of people distinguished in any way? 7 A No. Is your question is there a separate group that 8 handles loop MUX? 9 Q Yeah, or a separate group that handles that type of 10 thing, and that type of thing includes the loop MUX, 11 is there some distinction that's relevant to you? 12 A If those are EELs, then yes, they would be -- 13 there's a separate group of people that handles EEL 14 orders. Not all of the SDCs are trained on EELs. 15 And that's a piece of the work that would not be 16 handled in Sierra Vista, that is not handled in 17 Sierra Vista. EELs are not done at contract 18 locations. 19 Q Earlier I think you said you did some training of 20 the SDCs; is that correct? 21 A I myself didn't, no, have not done training of SDCs. 22 Q You develop training plans? 23 A Correct. 24 Q Okay. Can you tell me if the Duluth center handles 25 ASRs as well as LSRs?</p>

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<p>1 A Yes, some types of ASRs. 2 Q Do you know what types? 3 A Private line. 4 Q Anything else? 5 A No. 6 Q Do you know whether the Duluth center handles 7 commingled EELs, or commingled LMC, loop MUX combo? 8 A The Duluth center would handle any type of EEL that 9 could be ordered. 10 Q Including commingled ones? 11 A If that's a type of EEL that could be requested, 12 then yes, we would be able to process that order. 13 Q You say if that's a type that is ordered. You're 14 not certain if it is? 15 A Correct. 16 Q And why do you say that you handle it if it's a type 17 of EEL? Is that because you handle all types -- you 18 know that you handle all types of EELs? 19 A Yes. 20 Q Do you know what the term commingle refers to? 21 A No, I don't. 22 Q Do you have -- I used the term ASR earlier and you 23 described that one of the ASRs you handle is a 24 private line. What does the term ASR mean to you? 25 A ASR is access service request, versus LSR being</p>	<p>1 typing. 2 Q So, for example, all of the EELs are manual? 3 A EEL is all manual, there's no flow through, but EEL 4 is actually an LSR product, it comes in on an LSR, 5 it does not come in on an ASR. 6 Q I'm sorry. Private line is the example you used, 7 those are all handled manually? 8 A Yes. 9 Q Do you know what EXACT stands for? 10 A I don't. 11 Q Or IABS? 12 A I don't. 13 Q You said that when the SDC goes in to look for the 14 oldest orders, are you describing a screen that 15 they're looking at? 16 A Yes. 17 Q And in order to look at the ASRs and the LSRs, are 18 they looking at two different screens? 19 A Yes. Those two products come in via two different 20 electronic interfaces to the company. So I'm either 21 looking at one or the other, there's no place that 22 they're combined. 23 Q And for people who handle -- are there -- 24 A SDCs? 25 Q SDCs who handle both?</p>
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<p>1 local service request. 2 Q Do you have an understanding of how ASRs and LSRs 3 may be handled differently in your center? 4 A Yes, there are different systems that are used to 5 process the orders. 6 Q Can you describe that in a little more detail, 7 please? 8 A Are you looking for the types of systems that -- 9 Q Yeah. You tell me there are different systems used, 10 what do you mean by that? 11 A Okay. In the LSR world the request from the 12 carriers come to us in IMA, and in the ASR side of 13 wholesale those requests come in via EXACT, it's 14 another acronym, E-X-A-C-T. So the work lists are 15 presented differently. As the SDCs go in to select 16 their work it looks a little bit different in how 17 you select your work to make sure that we're pulling 18 the oldest work first. They also issue the orders 19 into a different system. The order is created in an 20 IABS, I-A-B-S system, versus on the other side of 21 the world we're typing into WEBSOP, which is 22 creating that order for us. The ASR side of the 23 world does not have flow through orders like we have 24 with unbundled, there are no completely or partially 25 created orders on the ASR side, it's all manual</p>	<p>1 A Yes. 2 Q And how do they choose what's the oldest order to 3 take when they have the two different systems that 4 they're working on? 5 A We would normally have them assigned to a specific 6 product, to the ASR product. We would have a 7 manager looking at the two lists to see where we 8 need help, and if we need -- if one has greater 9 volume than the other we would then move some of 10 those head count resources over and have them start 11 working LSR work, rather than ASR work, or vice 12 versa. 13 Q Can you give me some sense of how often that change 14 might occur? Is that something you monitor 15 continuously and at 3:00 you might change something 16 over? 17 A I have a manager who monitors that pretty much 18 throughout the day. We pull a report up three times 19 a day and it's sent to all of the managers in the 20 center, should we not have the screens up ourselves 21 and have the chance to be checking, we can see a 22 report that's in front of us as far as the volumes 23 and the current currency of the work that's out 24 there. 25 Q And you might make adjustments in the work that any</p>

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<p>1 SDC is doing to reflect the type of work coming in 2 at that point? 3 A Yes. 4 Q Okay. 5 A Normally we are not moving very frequently between 6 ASR work and LSR work. There's a lot of movement 7 between the different products within the LSR 8 systems that we're using. 9 Q And I guess my question is would you make a change 10 midday for a given SDC? 11 A We could. 12 Q Is it more typical that it would be done like at the 13 beginning of the day or the beginning -- I'm just 14 trying to get some sense. Is it a change you would 15 make at the beginning of a day, the beginning of a 16 week, at the beginning of a month? 17 A Because volumes aren't predictable it could happen 18 at any of the times you're saying. 19 Q Including during the course of a work shift? 20 A Yes. 21 Q Do you know whether the LSRs or ASRs in general, one 22 or the other, is more complicated? 23 A There's complexity to both. I think there are some 24 unbundled loops that are easier unbundled loops. 25 But I think there are also unbundled loops and EELs</p>	<p>1 private line and they're going to an -- they're 2 going to turn it into an EEL or an unbundled loop, 3 that comes in to us as an LSR. But we're actually 4 issuing a disconnect order on the private line side 5 and a connection order on the LSR side for either 6 the new EEL or the unbundled loop. So it comes in 7 to us as one element, it's coming in to us as an 8 LSR, but we're actually processing an order as an 9 ASR and as an LSR. I'm not sure if that's what you 10 were asking. 11 Q I had asked you earlier if you knew what the term 12 commingled EEL meant and I think you said no, you 13 didn't. And so I'm not going to ask you about how 14 commingled EELs are handled, unless you know. 15 A No, I don't. 16 Q Are you aware of any circumstances where an order 17 would -- would include an order for a -- what I'm 18 going to call a commingled product, but it's a 19 product that includes both an ASR and an LSR 20 element. Have you ever heard of that before? 21 A I'm not aware. 22 Q Is there any -- are you aware of any system tools or 23 resources that would allow either the SDC or a 24 supervisor or anyone else in the manual processing 25 to coordinate the processing of an ASR and an LSR</p>
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<p>1 that are just as complex as some of the private line 2 orders that we see too. It's still utilizing a lot 3 of the same Qwest systems. The orders come in to us 4 differently, but internally we're still looking for 5 design orders, we're still looking at some of the 6 same information to validate those orders before we 7 can process them. 8 Q I'm sorry. When you say design order, what do you 9 mean by that? 10 A The orders when they flow out of our center after 11 they've been provisioned to go to the design center 12 within the network group. 13 Q All of them? 14 A Yes. 15 Q Are you aware of any products that entail both an 16 ASR and an LSR element? 17 A We have customers who would be moving from an ASR, 18 from a private line, they're disconnecting a private 19 line and turning it into an unbundled loop or an 20 EEL, but it's not simultaneous, they're normally a 21 conversion from private line to EEL or unbundled. 22 Q And do you know whether Qwest provisions any 23 products for CLECs that involve both an ASR and an 24 LSR element? 25 A I need to clarify that. If they presently have a</p>	<p>1 that were part of a single order or were going to be 2 used by the customer as a single resource? 3 A And your question was is there a tool? 4 Q Yeah. Is there anything that either the CSR or a 5 supervisor could do to allow the provisioning of 6 that to occur essentially simultaneously? 7 A No, because they're built in two different systems, 8 they're different billing systems, and the orders 9 are input into entirely different systems. 10 Q Is there anything like WEBSOP that allows those 11 systems to talk to one another that translates 12 information? 13 A Not that I'm aware of. 14 Q Okay. And I think you said on the ASR side, the 15 billing system is IABS? 16 A Yes. 17 Q And what was the billing system on the LSR side? 18 A CRIS. 19 Q Do the CSRs, or any of the other employees 20 supervising or training the CSRs, depend on the 21 productivity measures? 22 MS. PETERSON: Can I ask what you mean by 23 CSRs? Are you meaning -- 24 MS. JENSEN: I'm sorry. Am I using the 25 wrong --</p>