

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)

REBUTTAL TESTIMONY

OF

RENÉE ALBERSHEIM

FOR

QWEST CORPORATION

[Issue 10: Billing Time Frames]

NOVEMBER 12, 2004

(NON-CONFIDENTIAL VERSION)
(Excludes Confidential Exhibits 9 and 10)

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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 Advocate. My business address is 1801 California Street, 24th floor, Denver, CO,
6 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
3 October of 2001. Prior to attending law school, I received a Master of Business
4 Administration in Management Information Systems from the University of Colorado
5 College of Business and Administration in 1985 and I received a Bachelor of Arts degree
6 from the University of Colorado in 1983.

7 **II. PURPOSE OF REBUTTAL TESTIMONY**

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

9 A. The purpose of my testimony is to discuss Issue 10: Payment Time Frames, where I will
10 respond to the claims of Covad witness Megan Doberneck regarding the use of a circuit ID
11 to validate line sharing bills, Covad's testimony regarding Qwest's position on billing
12 change requests ("CRs") and the Change Management Process ("CMP"), and Covad's
13 concerns regarding validation of deaveraged rate zones.¹ I will also briefly address the
14 resolved issue regarding submitting single-LSRs for line splitting and loop splitting.

15 **III. RESOLVED ISSUE: ISSUE 8 - SINGLE LSR**

16 **Q. THE SINGLE-LSR ISSUE HAS BEEN RESOLVED.**

17 A. Covad filed direct testimony by its witness Mr. Zulevic regarding the single LSR issue.
18 Since that time, the parties have resolved this issue by agreeing to Covad's proposed
19 language, since Qwest has implemented the final piece of the single LSR process. Qwest
20 believes that Covad will formally withdraw this issue from this docket. In the event that

¹ Ms. Doberneck has identified this issue in her direct testimony as issue #9. Covad's petition for arbitration has identified this as issue #10. I will refer to this as issue #10 to be consistent with the petition for arbitration.

1 Covad does not withdraw this issue and continues to dispute the issue for some reason,
2 Qwest reserves the right to file rebuttal testimony on this issue.

3 **IV. ISSUE NO. 10: PAYMENT TIME FRAMES**

4 **A. COVAD'S CIRCUIT ID ISSUE**

5 **Q. COVAD CLAIMS THAT IT NEEDS MORE TIME TO PAY ITS BILLS BECAUSE**
6 **OF DIFFICULTIES IT EXPERIENCES TRYING TO VALIDATE QWEST'S**
7 **BILLS. PLEASE COMMENT GENERALLY.**

8 A. In the testimony that follows I will discuss the errors in the technical claims made by
9 Covad with regard to Qwest's bills. Qwest witness William Easton will cover all other
10 aspects of this topic. I have evaluated the technical claims made by Covad witness Megan
11 Doberneck, and it is my conclusion that Covad has the capability itself to resolve any
12 issues it experiences with Qwest bills. Moreover, as I will discuss in detail, it would cost a
13 great deal for Qwest to make changes to its systems just to accommodate Covad. It is my
14 conclusion that Covad's technical claims have no merit and do not warrant an increase in
15 time for Covad to pay its bills to Qwest.

16 **Q. ON PAGE 34 OF HER TESTIMONY, MS. DOBERNECK CLAIMS THAT QWEST**
17 **IS THE ONLY ILEC THAT DOES NOT PROVIDE CIRCUIT ID INFORMATION**
18 **ON ITS LINE SHARING BILLS. IS THIS RELEVANT?**

19 A. No. All of the ILECs have operational differences from each other. They even have
20 operational differences within their own territories. This arises from the fact that these
21 companies were formed from the combination of the original Bell Operating Companies

1 (“BOCs”) that were created following the divestiture from AT&T. Qwest’s current
2 operating territory, and therefore much of its OSS legacy architecture, is the product of the
3 merger of three predecessor Bell Operating Companies: Pacific Northwest Bell (covering
4 Washington and Oregon); Mountain Bell (covering Arizona, Colorado, Idaho, Montana,
5 New Mexico, Utah, and Wyoming); and Northwestern Bell (covering Iowa, Minnesota,
6 Nebraska, North Dakota, and South Dakota). Pacific Northwest Bell’s operating area is
7 now referred to as Qwest’s Western Region; Mountain Bell’s operating area is now
8 referred to as Qwest’s Central Region; and Northwestern Bell’s operating area is now
9 referred to as Qwest’s Eastern Region. A number of Qwest’s back office systems still exist
10 in three versions, such as the Customer Record Information System (“CRIS”) and the
11 Service Order Processors (“SOPS”). But Qwest has managed to create a single set of
12 electronic interfaces for the CLECs to use to access data in these back office systems.²
13 The fact that there are differences within and among the ILECs is nothing new.³

² A quick review of Verizon’s wholesale website at <http://www22.verizon.com/wholesale/local/order/0,19410,,00.html> demonstrates that its CLEC facing processes are actually physically divided between western and eastern regions: Verizon East - CT, DC, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VA, VT, WV; Verizon West - AZ, CA, FL, HI, ID, IL, IN, MI, NC, NV, OH, OR, SC, TX, WA, WI. Qwest has one set of CLEC facing processes that apply to all 14 in-region states, even though Qwest’s back office systems are divided by its three source regions.

³ In fact, during the 271 proceedings, during which claims were raised that Qwest systems included requirements not found in the systems of the other ILECs, the FCC stated “Our requirement is that the BOC provide nondiscriminatory access to unbundled network elements at rates, terms, and conditions that are just, reasonable, and nondiscriminatory, **which is not necessarily identical** in every BOC region.” *In the Matter of Application by Qwest Communications International, Inc. for Authorization To Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming, WC Docket No. 02 – 314, FCC 02-332, at ¶ 62, (“FCC Nine State Order”)* (Emphasis added).

1 **Q. COULD ANOTHER REASON FOR DIFFERENCES BETWEEN THE ILECS BE**
2 **THAT QWEST WAS THE FIRST ILEC TO PROVIDE THE LINE SHARING**
3 **PRODUCT?**

4 A. Yes. On October 8, 1999, the Minnesota Commission issued an order directing Qwest
5 (then US WEST) and CLECs interested in line sharing to conduct technical trials to
6 determine the feasibility of line sharing in Minnesota.⁴ Qwest and the participating
7 CLECs, which included Covad, presented a stipulation resolving issues regarding the
8 provisioning of line sharing.⁵ This stipulation became the first line sharing agreement in
9 the nation, and was filed before the FCC issued its line sharing order.⁶ One of the primary
10 decisions made by the joint team was to use what was then called the POTS provisioning
11 system flow (now known as the non-design provisioning system flow) as opposed to the
12 design provisioning system flow to provision the line sharing product even though the non-
13 design provisioning system flow did not contain the circuit ID. Apparently, the CLEC
14 members of the joint team believed that they would be able to implement service for their
15 customers more quickly if they were able to use the non-design provisioning system flow
16 instead of the design provisioning system flow, because they believed that the provisioning

⁴ See *Before the Minnesota Public Utilities Commission, In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access, Docket No. P-999/CI-99-678, Order Requiring Technical Trials, Good Faith Resolution of Operational Issues, and a Resulting Report, issued October 8, 1999.*

⁵ See *Before the Minnesota Public Utilities Commission, In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access, Docket No. P-999/CI-99-678, Joint Report to the Commission, filed November 22, 1999* (“Joint Report”). The commission ordered the adoption of the stipulation of the parties. See *Before the Minnesota Public Utilities Commission, In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access, Docket No. P-999/CI-99-678, Order Adopting Terms and Conditions for Provisioning of Line Sharing in Minnesota and Initiating a Cost Proceeding, Issued December 3rd, 1999.*

⁶ See *Third Report and Order in CC Doc. No. 98-147 and Fourth Report and Order in CC Doc. No. 96-98, 14 FCC Rcd 20912 (1999)* (“Line Sharing Order”), Dec. 9, 1999.

1 intervals for line sharing using the non-design flow would become shorter.⁷ Thus, Covad's
2 complaint about the missing circuit ID information on its line sharing bills, and the claim
3 that other ILECs provide this information, is nothing more than a red herring since Covad
4 itself was one of the CLECs who helped make the decision to have line sharing provisioned
5 by Qwest out of the non-design provisioning system flow.

6 **Q. WHAT IS THE PURPOSE OF THE CIRCUIT ID FIELD?**

7 A. The circuit ID field is used for the identification of unbundled loops, and was originally
8 created for use with designed services such as private lines and trunks. The use of the
9 circuit ID became an industry standard per the Ordering and Billing Forum ("OBF") for the
10 identification of unbundled loops. With the exception of designed services like unbundled
11 loops and private lines, Qwest has identified all customer lines by their telephone number
12 ("TN"), and Qwest's back office systems were designed on that basis. In fact, Qwest still
13 uses TNs to identify customers in its back office systems for non-designed services. The
14 inventory of unbundled loops, private lines and similar designed services is maintained in
15 the Trunk Inventory Record Keeping System ("TIRKS"). A comparison of the design and
16 non-design provisioning systems flow attached as Exhibit RA-01 demonstrates that the
17 TIRKS system, in which the circuit ID field resides, is only used for the provisioning of
18 products through the design systems flow. Thus, because line sharing was provisioned
19 out of the non-design provisioning systems flow the circuit ID information which Covad
20 now seeks is not available for inclusion on its line sharing bills.

⁷ The decision regarding use of the POTS provisioning flow is reflected in items 8 and 9 of the Decision Point List ("DPL"), attached as an exhibit to the Joint Report and filed with the Minnesota Commission on November 22, 1999.

1 **Q. WHAT IS THE SIGNIFICANCE OF THE JOINT TEAM’S DECISION TO USE**
2 **THE NON-DESIGN PROVISIONING SYSTEMS FLOW FOR LINE SHARING AT**
3 **QWEST?**

4 A. The choice of the non-design provisioning systems flow dictated that the circuit ID field
5 would not be available for use in pre-ordering, ordering, provisioning, billing or
6 maintenance and repair of line sharing at Qwest, because the circuit ID is not part of the
7 non-design provisioning systems flow. Keep in mind that when the Joint Team created the
8 parameters for line sharing at Qwest, there was no industry standard for the identification
9 of shared loops. Qwest was the first ILEC to implement a line sharing product.

10 **Q. SO IS MS. DOBERNECK’S CLAIM ON PAGE 35 OF HER DIRECT THAT THE**
11 **LACK OF AVAILABILITY OF THE CIRCUIT ID “IS SOLELY ATTRIBUTABLE**
12 **TO QWEST’S OWN DECISION-MAKING” CORRECT?**

13 A. No. The decision was made by the joint team that established the parameters for line
14 sharing, and this Joint Team included participants from Covad. The Joint Team, in
15 choosing the non-design provisioning systems flow determined that the circuit ID field
16 would not be available for use in pre-ordering, ordering, provisioning, billing or
17 maintenance and repair of line sharing at Qwest.

1 **Q. YOU STATED ABOVE THAT SHARED LOOPS ARE IDENTIFIED USING A TN**
2 **INSTEAD OF A CIRCUIT ID. IS THE TN USED TO IDENTIFY A SHARED**
3 **LOOP THE SAME AS THE VOICE TN ON WHICH THE DATA SERVICE**
4 **RESIDES?**

5 A. No. Qwest must be able to distinguish a shared loop, which is a data service sold to a
6 CLEC, from the Qwest retail voice service that the data service is attached to. So the
7 shared loop is assigned its own unique TN. This identifying TN is referred to by Qwest as
8 the sub-account number. Every shared loop purchased by a CLEC has this unique sub-
9 account number, and this sub-account number is provided to the CLEC at the time the
10 service is ordered. Every CLEC also has at least one account number. This is known as
11 the Billing Account Number (“BAN”). So Qwest bills a CLEC on the basis of its BANs
12 and the line items for the products and services ordered under these BANs are identified by
13 their sub-account numbers.

14 **Q. MS. DOBERNECK CLAIMS AT PAGE 35 OF HER DIRECT TESTIMONY THAT**
15 **SHE BELIEVES THAT QWEST HAS ACCESS TO THE CIRCUIT ID FIELD FOR**
16 **LINE SHARING. IS SHE CORRECT?**

17 A. No. As I noted above, line sharing is provisioned using the non-design (or POTS) systems
18 flow. The non-design flow uses a TN to identify shared loops. The circuit ID is only
19 available via the design provisioning systems flow. Therefore the circuit ID is not
20 available via Qwest’s back office systems for line sharing. This means, then, that the
21 circuit ID is not available to line sharing for pre-ordering, ordering, provisioning,

1 maintenance and repair, and, most pertinent to Ms. Doberneck's argument, the circuit ID is
2 not available for line sharing billing.

3 **Q. SO WHY DID MS. DOBERNECK'S REVIEW OF "LINE SHARING BILLING**
4 **INFORMATION" LEAD HER TO BELIEVE THAT THE CIRCUIT ID IS**
5 **AVAILABLE?**

6 A. The information Ms. Doberneck was reviewing, and which she included in exhibit KMD-6
7 was not billing information. The data provided on her exhibit KMD-6 is data from portions
8 of two Firm Order Confirmations ("FOC"), presumably for shared loop orders. An FOC is
9 not a bill but rather a message transmitted to a CLEC following the submission of a Local
10 Service Request ("LSR"). After the necessary service orders have been created for a CLEC
11 LSR in Qwest's back office systems, an FOC (indicating that the LSR has been received,
12 service orders have been generated, and a due date has been assigned) is returned to the
13 CLEC. Ms. Doberneck may have been misled by an informational feature added to the
14 FOC for the benefit of CLECs. FOCs are returned to CLECs in response to LSRs for all
15 products ordered via IMA, including unbundled loops and shared loops. Qwest has made
16 the FOC uniform in appearance no matter what product is ordered. The field in the Circuit
17 Detail Section of the FOC that Ms. Doberneck pointed to in her testimony is part of that
18 uniform appearance. ECCKT is another name for the circuit ID. The ECCKT field was
19 created in order to display the circuit ID of an unbundled loop. When the shared loop
20 product was created, Qwest decided to create a form of pseudo-circuit ID to display in the
21 FOC for a shared loop. On an FOC for shared loop, this value does not contain a true
22 circuit ID. Instead it is a combination of a state code, a service code, and the voice service

1 TN. When used for shared loops, the ECCKT value is not passed on to Qwest's back
2 office systems for ordering, provisioning, maintenance and repair, and billing. Therefore,
3 this pseudo-circuit ID is also not available for placement on Qwest's bills.

4 **Q. WHAT IS THE SIGNIFICANCE OF AN FOC FOR PURPOSES OF BILLING?**

5 A. The FOC gives the CLEC everything necessary not only to track the product ordered, but
6 also to validate subsequent bills from Qwest for that product. The FOC contains several
7 sections of data:

- 8 • Administration Section
- 9 • Order Information Section (multiple)
- 10 • Circuit Information Section

11 Included in the Administration Section, as illustrated by Ms. Doberneck's exhibit KMD-6,
12 is the Purchase Order Number ("PON"), which is a CLEC generated value that identifies an
13 order in the CLECs own systems. The PON is provided on the FOC, and on the first bill
14 for service, which includes non-recurring charges associated with the installation of that
15 service. This section also contains the end user TN, labeled AN (account number) on the
16 form. Finally the administrative section includes the summary bill account to which this
17 service will be billed. It is labeled BAN1 on Ms. Doberneck's exhibit.

18 Ms. Doberneck failed to include the associated Order Information Sections of the FOCs
19 excerpted in her exhibit. For a shared loop there are two order information sections. The
20 first contains the information necessary to add line sharing to the end user's account. The

1 end-user's complete account number is displayed here.⁸ The second order information
2 section contains the information necessary to establish billing for this shared loop. This
3 section includes the new sub-account number for the shared loop, which is the number that
4 appears on subsequent bills for shared loop service.⁹

5 **Q. IN HER DISCUSSION OF COVAD'S NEED FOR A CIRCUIT ID, MS**
6 **DOBERNECK QUESTIONS THE UTILITY OF WHAT SHE CALLS THE BTN.**
7 **BASED ON YOUR UNDERSTANDING OF MS. DOBERNECK'S TESTIMONY,**
8 **DOES QWEST PROVIDE THE INFORMATION THAT COVAD NEEDS?**

9 A. Yes. Ms. Doberneck states on page 33 of her direct that what Covad gets from Qwest is
10 the customer's BTN, and that is not the number associated with the circuit. Her statement
11 is not correct. The field she calls the BTN is actually the sub-account that I described
12 above. The sub-account is used throughout Qwest's systems to identify the line shared
13 loop, and as I discussed above, this number is provided to Covad in the FOC. It appears
14 from Ms. Doberneck's testimony that what she may prefer is the end user telephone
15 number assigned to the Qwest retail voice service that Covad's shared loop is being linked
16 to. As I discussed above, the end user telephone number is contained in multiple sections
17 of the FOC that is transmitted to Covad following submission of Covad's LSR for line
18 sharing. It is via the FOC that Covad may link the end user TN to the sub-account that is
19 used to bill Covad for the shared loop. So what Ms. Doberneck refers to as the BTN is

⁸ An end-user account number is the combination of the ten-digit TN plus a three-digit customer code.

1 actually the sub-account that Qwest has assigned to the line sharing service and to which
2 Qwest bills Covad for that service.

3 **Q. SO WHY CAN'T QWEST BILL COVAD FOR LINE SHARING USING THE END-
4 USER TN INSTEAD OF THE SUB-ACCOUNT NUMBER?**

5 A. The end-user TN is assigned to the Qwest retail voice service. Qwest does not bill the end-
6 user for line sharing. Qwest bills Covad. In order to properly bill for line sharing, it was
7 necessary for Qwest to create a unique number (the sub-account number) that could then be
8 billed to Covad's BAN instead of the end-user's TN.

9 **Q. ARE OTHER SHARED PRODUCTS IMPACTED BY THE USE OF THE NON-
10 DESIGN SYSTEMS FLOW FOR PRE-ORDERING, ORDERING,
11 PROVISIONING, BILLING AND MAINTENANCE AND REPAIR?**

12 A. Line splitting also uses the non-design systems flow. This is because it combines data
13 service with UNE-P, and UNE-P is provisioned using the non-design systems flow.

14 **Q. IS LOOP SPLITTING A NON-DESIGN PRODUCT?**

15 A. No. Loop splitting combines data service with an unbundled loop. Because unbundled
16 loops use the design systems flow, loop splitting does as well. As a result, loop splitting
17 bills contain a true circuit ID, as this data is available on the unbundled loop to which the
18 data service is attached.

⁹ Attached Confidential Exhibit RA-09 contains the complete FOC for LSR 10803937 which was excerpted on page two of Ms. Doberneck's Exhibit KMD-6. The sub-account number is circled. Attached Confidential Exhibit RA-10 is an excerpt of a bill to Covad with the line items for this same sub-account circled. As is apparent from a review of these two confidential exhibits, the sub-account provided by Qwest on the FOC is also the displayed in column #1 on the monthly recurring bills provided by Qwest to Covad.

1 **Q. MS. DOBERNECK SAYS THAT A MARCH 2003 REQUEST FOR THE CIRCUIT**
2 **ID WAS DENIED BY QWEST. PLEASE RESPOND.**

3 Ms. Doberneck overstates the circumstances. In response to a data request, Ms. Doberneck
4 provided an email from Qwest that is the basis for her claim that, with regard to the circuit
5 ID, Covad “was told, in no uncertain terms, that that information would not be provided.”
6 In fact, the email was a response to a request for information about circuit IDs from Covad
7 to its service manager. All that was provided in this response was a statement of the facts
8 regarding data contained on Covad bills: circuit IDs appear on unbundled loop bills and not
9 on shared loop bills. It was not a statement of position, nor was it a refusal to provide
10 information. Keep in mind that Covad was asking a question of its service manager.
11 Covad was not submitting a change request to the CMP. The response Covad received was
12 an answer to that question. It was not a denial of a change request.

13 **Q. MS. DOBERNECK STATES ON PAGE 36 OF HER TESTIMONY THAT QWEST**
14 **DENIED A PROVISIONING CR ASKING FOR THE CIRCUIT ID. PLEASE**
15 **COMMENT.**

16 A. Ms. Doberneck did not identify the CR. In reviewing the CMP records, I found CR
17 SCR021904: Line Share Family of Products Move Order Process, which I believe is the
18 CR in question.¹⁰ The CR was denied in July 2004. Qwest explained in its denial that the
19 circuit ID was not available for Line Sharing products because they follow the non-design
20 provisioning flow that I described above. In its denial, Qwest estimated that the cost of
21 redesigning the line sharing provisioning flow to include new unique Circuit IDs would

¹⁰ See Exhibit RA-02 SCR021904.

1 exceed \$1.2 Million, which was considered economically infeasible. This represents
2 approximately 23,500 hours of effort. If you consider that a single Interconnect Mediated
3 Access (“IMA”) Release takes from 20,000 to 30,000 hours, this one CR would have
4 required an exceptional commitment of resources.

5 **Q. MS. DOBERNECK NOTES ON PAGE 37 OF HER DIRECT THAT QWEST HAS**
6 **NOT YET RESPONDED TO COVAD’S LATEST CHANGE REQUEST. PLEASE**
7 **RESPOND.**

8 A. Ms. Doberneck’s statement is misleading. Ms. Doberneck filed her testimony on October
9 8, 2004. What she fails to state is that the latest CR from Covad requesting the circuit ID
10 was submitted to Qwest on October 1, 2004.¹¹ It is standard practice per the Change
11 Management Document that following receipt of a CR the parties hold a clarification call
12 to ensure Qwest’s accurate understanding of the CLEC’s requirements.¹² This call was
13 scheduled by the parties on October 6th and held on October 14, 2004. Qwest is now in the
14 process of analyzing the CR and calculating the Level of Effort (“LOE”) required to
15 implement Covad’s request. Ms. Doberneck’s statement implies some slowness or
16 unwillingness on Qwest’s part to respond. That is certainly not the case.

¹¹ See Exhibit RA-03 CR SCR100104.

¹² See Covad’s Exhibit KMD7 *Change Management Document* at page 27.

1 **Q. MS. DOBERNECK CLAIMS ON PAGE 35 OF HER DIRECT THAT IT WOULD**
2 **REQUIRE SIGNIFICANT MAN HOURS TO MANUALLY VALIDATE BILLS**
3 **USING THE FOC OR CSR. IS THIS COVAD'S ONLY OPTION?**

4 A. No. FOCs, Customer Service Records (“CSRs”) and Covad’s bills are all available
5 electronically. There is no reason that Covad should be forced to manually validate its bills
6 when all the data Covad requires for validation is available in electronic form.

7 **Q. ARE YOU SUGGESTING THAT COVAD COULD ELECTRONICALLY**
8 **VALIDATE ITS BILLS WITH THE INFORMATION ALREADY PROVIDED ON**
9 **THE BILLS COVAD RECEIVES FROM QWEST?**

10 A. Yes. There are a number of ways that Covad could use the information it already receives.
11 As a former computer programmer, I can think of several ways that Covad could use the
12 information that it already receives in order to validate its bills electronically. A primary
13 purpose of the FOC is to give CLECs all the information needed to validate bills. Ms.
14 Doberneck indicates that the circuit ID that she sees on the FOC is important to bill
15 validation since it “accurately reflects the line in question.” In other words, it is a unique
16 identifier. The sub-account number provided by Qwest is also a unique identifier, and it is
17 the unique identifier that Qwest uses for all subsequent activities related to each shared
18 loop account.¹³ Covad can include a function in its ordering systems to electronically
19 retrieve the sub-account number provided by Qwest on the FOC and relate that number to
20 the end-user TN also available on the FOC, and presumably available in COVAD’s own

¹³ Information regarding the use of the sub-account is well documented on Qwest’s CRIS Billing PCAT located on the wholesale website at <http://www.qwest.com/wholesale/clecs/cris.html>. This documentation notes that in the central region the CLEC is required to convert the first digit of the NPA portion of the sub-account from a character to a number. A simple table found on this web page illustrates how this conversion is accomplished.

1 ordering systems. Covad could add the sub-account field to its customer record, or store it
2 separately in a table that could then be used as a part of the bill validation process. Covad
3 could also relate that sub-account number to its PON, which Covad provides when it
4 requests the service. Again, that PON is provided to Covad along with the sub-account
5 number on both the FOC and the first bill. There are a variety of programming solutions
6 that could easily be used to allow for electronic bill validation using the sub-account
7 number provided by Qwest. In fact, Qwest believes other CLECs have created such
8 processes to allow them to validate their bills electronically. Remember that the decision to
9 use the non-design provisioning systems flow for line sharing, with its lack of circuit ID,
10 was jointly made with the CLECs. It is surprising that Covad did not program its systems
11 to do this sort of electronic bill validation years ago, as it was the first CLEC to order line
12 sharing from Qwest, and Covad played such an integral role in the implementation of line
13 sharing at Qwest.

14 **Q. MS. DOBERNECK SUGGESTS THAT COVAD SHOULD NOT BE REQUIRED**
15 **TO INCUR ANY PROGRAMMING EXPENSE TODAY TO CHANGE ITS**
16 **VALIDATION PROCESS AND THAT QWEST SHOULD BE REQUIRED TO**
17 **MAKE THE NECESSARY SYSTEMS CHANGES. IS THAT A VALID**
18 **EXPECTATION?**

19 **A.** No. First, let me restate that Qwest was the first ILEC to establish line sharing, and Covad
20 was a key participant in the design of the process that Qwest implemented in 1999. Qwest
21 has been providing line sharing bills without the circuit ID for quite some time now. This

1 begs the question as to why it has taken so long for Covad to determine that it is not
2 capable of electronically validating the line sharing bills it receives from Qwest.

3 Second, Ms. Doberneck claims that Covad has “state of the art billing reconciliation
4 software.” In my experience as a computer programmer, software that is state of the art is
5 flexible, and changing such software should be a straight-forward matter. Qwest does not
6 claim that its billing software is state of the art. That is not to say that Qwest’s billing
7 software is inefficient or ineffective. Quite the contrary. Qwest’s billing software handles
8 enormous volumes of data, producing bills for a wide variety of retail and wholesale
9 products to a wide variety of retail and wholesale customers. Therein is the issue. Qwest’s
10 back office billing systems are incredibly complex. They receive data from a variety of
11 systems, and transmit data to a variety of systems. They produce bills not just for CLECs
12 but for all of Qwest’s customers, including end-user customers, and other wholesale
13 customers. Any programming change made to a Qwest back office system must be
14 evaluated for its potential to impact more than just one kind of bill, and must be thoroughly
15 tested to ensure that no unintended impacts result from the change.

16 Third, and most critical, a change to the format of the line sharing bill is likely to impact
17 other CLECs. If Qwest adds information in the column of the bill where Covad expects to
18 find a Circuit ID, that new data will be transmitted to all CLECs. It is very possible other
19 CLECs will have to make changes to their billing validation programs to account for the
20 new data that would then be encountered on their bills.

1 Finally, it would not be realistic to suggest that Qwest could make such a software change
2 just for Covad's bills. The cost to Qwest to program and administer unique bills for every
3 CLEC would be astronomical. Qwest cannot be expected to create separate methods and
4 operating procedures for every CLEC that it does business with.

5 **B. CMP AND BILLING CRS**

6 **Q. MS. DOBERNECK CLAIMS THAT COVAD SHOULD BE GIVEN MORE TIME**
7 **TO PAY ITS BILLS IN PART BECAUSE OF DIFFICULTIES COVAD HAS**
8 **EXPERIENCED WITH THE CMP PROCESS AT QWEST. PLEASE COMMENT**
9 **GENERALLY.**

10 A. Ms. Doberneck's statements regarding the Change Management Process ("CMP") are
11 inaccurate. I will demonstrate that Qwest has been and continues to be very responsive to
12 CLEC needs via the CMP, that Qwest does accept change requests for billing, and that
13 denials of CRs are reasonable and justified. More importantly, none of the assertions made
14 by Ms. Doberneck with regard to the CMP provide support for her assertion that Covad
15 needs more time to pay its bills.

16 **Q. MS. DOBERNECK STATES ON PAGE 36 OF HER DIRECT THAT "QWEST**
17 **TOOK THE NOVEL AND UNPRECEDENTED POSITION THAT BILLING**
18 **CHANGE REQUESTS ARE OUTSIDE THE SCOPE OF CMP." IS THAT AN**
19 **ACCURATE REFLECTION OF QWEST'S POSITION?**

20 A. No, it is not. Qwest has never stated that billing change requests were outside the scope of
21 the CMP. Ms. Doberneck is apparently referring to Qwest's response to Covad's

1 escalation of certain billing change requests. Qwest's precise response to Covad's
2 escalation was,

3 Qwest's position is that billing and repair changes are not OSS
4 system interfaces as defined by the CMP governing document, and
5 therefore *the issue of prioritization* of billing and repair is outside
6 the scope of CMP. Billing and repair are functionalities of the
7 OSS, not interfaces (Emphasis added).¹⁴

8 Qwest did not say that billing CRs were outside the scope of CMP. Qwest stated that
9 prioritization of those CRs was outside the scope of CMP. Up to that point, prioritization
10 was only done for IMA CRs. Qwest had simply implemented accepted billing CRs within
11 timeframes dictated by the time required to make the necessary programming changes, and
12 within the parameters established by the billing software release schedule. Qwest has
13 never stated that billing CRs were not a part of CMP. Qwest has never stopped accepting
14 or implementing billing CRs. Ms. Doberneck's statement is not an accurate reflection of
15 Qwest's position at the time Qwest responded to Covad's escalation.

16 **Q. HAS QWEST'S POSITION REGARDING THE PRIORITIZATION OF BILLING**
17 **AND REPAIR CRS CHANGED?**

18 A. Yes. As Ms. Doberneck correctly points out, Covad's request to prioritize billing CRs was
19 taken to the CMP Oversight Committee. At the Oversight Committee meeting held on
20 October 14, 2004, Qwest proposed a prioritization process for billing and repair change

¹⁴ See Exhibit RA-04 Qwest Response to Escalation #31.

1 requests. Qwest has since submitted a change request to modify the Change Management
2 Document to reflect this new process.¹⁵

3 **Q. MS. DOBERNECK INCLUDED HER ASSERTION THAT QWEST HAS YET TO**
4 **RESPOND TO COVAD'S LATEST CR IN HER DISCUSSION OF QWEST'S**
5 **'NOVEL' POSITION REGARDING BILLING CRS. IS QWEST'S LACK OF**
6 **RESPONSE EVIDENCE OF A CHANGE IN QWEST'S POSITION REGARDING**
7 **BILLING CRS?**

8 A. No, absolutely not. As I stated above, Covad submitted the latest CR just days before Ms.
9 Doberneck filed her testimony. Qwest is following the standard CMP procedure with this
10 new CR. This CR does not provide evidence of a change in Qwest's position regarding
11 whether billing CRs are within the scope of the CMP, as there has been no change in
12 Qwest's position. Billing CRs have been and will continue to be within the scope of the
13 CMP. Qwest has changed its position with regard to the *prioritization* of billing and repair
14 CRs. As I stated above, billing and repair CRs will now be prioritized in the CMP.

15 **Q. IS MS. DOBERNECK'S DISCUSSION OF REGULATORY CRS ON PAGE 37 OF**
16 **HER DIRECT RELEVANT TO THE ISSUE OF PAYMENT TIME PERIODS?**

17 A. No. An argument regarding whether or not a regulatory CR undermines the CMP has no
18 bearing on whether or not Covad should be given more time to pay what it owes to Qwest.
19 Ms. Doberneck's argument about regulatory CR's is also a new argument by Covad and is
20 outside the scope of this arbitration. Her regulatory CR argument was not raised by Covad
21 during the parties' negotiations over the terms and conditions to be included in the

¹⁵ See Exhibit RA-05 CR PC101804-1 and associated supplemental information.

1 interconnection agreement at issue in this proceeding, nor was it raised by Covad in the
2 initial pleading they filed in this docket. As a result, it is simply beyond the scope of this
3 docket and is not a relevant consideration for the Commission in the context of this docket.
4 A discussion of regulatory CRs might potentially be relevant if this Commission were
5 being asked to order Qwest to implement a CR. However, that is not the case here.
6 Instead, Covad is requesting that language be included in its interconnection agreement
7 with Qwest that would give Covad an additional fifteen days to pay its bills. Covad has not
8 availed itself of the dispute resolution process in the CMP for any CR that I am aware of,
9 and Covad has not brought such a CMP dispute to this Commission for resolution.
10 Moreover, seeking dispute resolution for the new Circuit ID CR would certainly be
11 premature since that CR was only just submitted to the CMP. Since a regulatory CR is not
12 at issue, a discussion of whether or not regulatory CRs undermine the CMP is not relevant
13 to the issue at hand.

14 **Q. MS. DOBERNECK CONTINUES HER DISCUSSION OF QWEST'S POSITION**
15 **ON BILLING CRS ON PAGE 38 OF HER DIRECT, CALLING IT 'NOVEL AND**
16 **UNPRECEDENTED' AND 'NONSENSICAL'. PLEASE COMMENT.**

17 A. As I have stated above, Ms. Doberneck's statements are not an accurate reflection of
18 Qwest's position regarding billing CRs. I will reiterate that Qwest never stated that billing
19 CRs were outside the scope of the CMP. But in this continued discussion, Ms. Doberneck
20 includes another mischaracterization of Qwest's position with regard to billing change
21 requests that must be corrected. She states that "Qwest has now taken the position that
22 billing change requests are outside the scope of CMP because they impact backend

1 systems.” This is NOT Qwest’s position. The precise statement from Qwest was, “Billing
2 and repair are functionalities of the OSS, not interfaces.” Again, Qwest was speaking of
3 whether or not billing CRs should be prioritized. It was Qwest’s position that interfaces,
4 such as IMA should be prioritized as these are CLEC facing systems. Qwest’s statement in
5 no way can be taken to suggest that it considered billing CRs outside the scope of the CMP.
6 As I discussed above, since Qwest has agreed to allow prioritization of billing CRs, this
7 whole issue should now be considered moot.

8 **Q. SO IS MS. DOBERNECK’S COMPARISON OF QWEST’S POSITION ON PAGE**
9 **39 OF HER DIRECT TO THAT OF A BANK RESTRICTING ACCESS TO HER**
10 **OWN BANK ACCOUNT VALID?**

11 A. No, not at all. Qwest has not denied CLECs access to anything. I repeat, Qwest has never
12 stated that billing CRs are outside the scope of CMP. Therefore, Qwest has never denied
13 CLECs the ability to submit billing CRs to the CMP, nor does Qwest intend to do so now.
14 Ms. Doberneck has misread Qwest’s position, and mischaracterized it in this arbitration.
15 Qwest has not denied Covad access to anything with regard to billing CRs. There is no
16 basis for Ms. Doberneck’s claim that Qwest’s position is “profoundly anticompetitive.” So
17 again, there is no basis for a claim that Qwest’s actions with regard to the CMP give Covad
18 a reason to have more time to pay its bills.

1 **Q. ON PAGE 44 OF HER DIRECT, MS. DOBERNECK SPEAKS TO QWEST'S**
2 **INABILITY TO MEET 'COMMITMENTS' AND REFERS TO THE SINGLE LSR**
3 **ISSUE AS AN EXAMPLE. IS HER CHARACTERIZATION FAIR?**

4 A. No. When the single-LSR was at issue in this proceeding, Covad based much of its
5 criticism on the fact that a portion of one IMA CR was delayed. That is the only time that
6 such a delay has occurred for an IMA CR. I think it is particularly relevant that the
7 remaining CR at issue, which implemented single-LSR processing of migration and
8 conversion orders for line splitting and loop splitting, was implemented on October 18,
9 2004, on time, as scheduled. There was no delay whatsoever to the CR.

10 **C. DEAVERAGED RATE ZONES**

11 **Q. MS. DOBERNECK CLAIMS ON PAGE 41 OF HER DIRECT THAT THE USE OF**
12 **A SINGLE USOC FOR PROCUCTS THAT HAVE DEAVERAGED RATES IS A**
13 **DEFICIENCY IN QWEST'S BILLING SYSTEM. DO YOU AGREE?**

14 A. No. When Qwest implemented deaveraging, Qwest created a field containing each
15 customer's rate zone in the customer's address. This information is found in the field
16 RATEZONE which is displayed when a CLEC performs an Address Validation Query
17 ("AVQ"). CLECs use the Address Validation pre-ordering function to determine if a
18 customer address provided to the CLEC matches the address in Qwest's OSS. Qwest
19 recommends that CLECs perform the AVQ in order to ensure an accurate address on a
20 subsequent order, as the address returned by the AVQ is the address used to validate the
21 CLEC's order in Qwest's back office systems.

1 **Q. IF THE RATE ZONE IS CONTAINED IN THE AVQ CAN A CLEC USE THIS**
2 **FIELD TO VALIDATE ITS BILLS?**

3 A. Yes. Again, as a former computer programmer, I can think of a number of ways to
4 maintain the rate zone information and then use that information as a part of the bill
5 validation process. It would make the most sense for Covad to capture the rate zone as a
6 part of its ordering process. This value could then be stored with the customer's address, as
7 it is stored at Qwest. It could also be saved in a reference table designed specifically for
8 the bill validation process.

9 **Q. PLEASE DESCRIBE AN ELECTRONIC BILL VALIDATION PROCESS USING**
10 **THE RATE ZONE RETRIEVED FROM THE AVQ.**

11 A. Covad could include a link between its billing system and either its customer information
12 database, or a special table containing the Rate Zone as I described above. Simply
13 combining that with a table containing the valid rates for each zone in each state, Covad
14 could then electronically validate that the rate on the bill matches the rate it expects for
15 each specific customer.

16 **Q. DOES QWEST PROVIDE ANY OTHER INFORMATION THAT COVAD COULD**
17 **USE WITHIN A BILL VALIDATION PROCESS?**

18 A. Yes. Qwest's public website contains detailed information regarding deaveraging.¹⁶
19 Included in this information are links to downloadable spreadsheets that identify the rate
20 zones by wire center. Utah, and eleven other states in Qwest's territory, deaveraged rates

¹⁶ See Exhibit RA-06 Geographic Deaveraging General Information and Exhibit RA-07 MSA & Geographic Zone Data.

1 by assigning wire centers to rate zones. The wire center assignments that have been
2 ordered in each state are listed by each wire center. The wire centers are identified by a
3 Common Language Location Identifier (“CLLI”) Code.¹⁷ Covad has the CLLI code
4 information for the wire centers in which it collocates and would presumably keep track of
5 which customers it serves out of these wire centers. Given all of this available information,
6 Covad could easily validate bill rates using reference tables containing the rate zone
7 assignments by wire center, and customers assigned in each wire center.

8 **Q. SO DOES THE USE OF A SINGLE USOC FOR PRODUCTS WITH**
9 **DEAVERAGED RATES PREVENT COVAD FROM ELECTRONICALLY**
10 **VALIDATING BILLS FOR THESE PRODUCTS?**

11 A. No. In fact, the use of a single USOC, rather than multiple USOCs, decreases the
12 complexity of the validation process.

13 V. CONCLUSION

14 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

15 A. Covad has presented no credible evidence that Qwest fails to provide sufficient information
16 for Covad to perform electronic validation of the line sharing bills it receives from Qwest.
17 Covad has also misrepresented Qwest’s position with regard to billing CRs presented to the
18 CMP. Qwest has and will continue to accept and implement billing CRs via the CMP, and
19 as Qwest has now agreed to prioritize billing and repair CRs, Qwest reiterates that the CMP
20 is an appropriate and viable forum through which Covad may seek reasonable changes to
21 its bills. Finally, Covad has not demonstrated that the use of a single USOC for products

¹⁷ See Exhibit RA-08 Utah Wire Center Rate Zone Assignments.

1 with deaveraged rates creates a deficiency in Qwest's bills. In conclusion, Covad has
2 provided no technical basis by which it may claim that it needs more time to pay its bills.

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

4 A. Yes, it does.