

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

IN THE MATTER OF THE COMPLAINT
OF QWEST CORPORATION AGAINST
MCLEODUSA TELECOMMUNICATIONS
SERVICES, INC., d/b/a PAETEC BUSINESS
SERVICES

Docket No. 09-049-37

**DECLARATION
of
PATRICIA LYNOTT**

On Behalf of

McLeodUSA Telecommunications Service, Inc.
d/b/a PAETEC Business Services

January 28, 2010

I. INTRODUCTION

A. QUALIFICATION OF WITNESS

1. My name is Patricia Lynott. I am a Vice President of Service Delivery for McLeodUSA Telecommunications Services, Inc. d/b/a PAETEC Business Services (“McLeodUSA”). My business address is 1 Martha’s Way, Hiawatha, Iowa 52233.
2. I obtained a Bachelor of Arts degree from Loras College, Dubuque, Iowa, with a major in Communications/Public Relations and a minor in Computers. I started my business career in the Provisioning and Service Delivery fields at Teleconnect, which was subsequently purchased by MCI. I joined McLeodUSA in 1993 and have worked in Service Delivery, Network Operations, Provisioning and ILEC Relations. McLeodUSA was acquired by PAETEC Holdings, Inc. in February 2008. I have 22 years of experience in the telecommunications industry.
3. I am responsible for all aspects of service delivery, including order processing, order management, coordination, provisioning, installation, testing and activation for Central and West regions of PAETEC. This includes legacy McLeodUSA service areas, including the State of Washington.
4. I am responsible for managing a staff of approximately 120 employees. My duties also include setting departmental goals and expectations to achieve established corporate financial and operational targets. Finally, I am responsible for driving continuous process improvements in service delivery intervals, quality of delivered service and productivity.

5. At the time the wholesale service order charge (“WSOC”) was developed and implemented by McLeodUSA, the team responsible for processing orders submitted by local exchange carriers (“LECs”) to transition a customer away from McLeodUSA to the other LEC was under my direct supervision. Today, all Service Delivery West and Central employees responsible for processing local service requests (“LSRs”) submitted by other LECs to McLeodUSA work in my organization, and I am also engaged in coordination with our IT organization to maintain an operational support system (“OSS”) to process LSRs in a timely fashion.
6. From my personal knowledge, and from the results of my investigation into the knowledge of McLeodUSA, I am familiar with the WSOC that McLeodUSA assesses Qwest.

B. PURPOSE OF DECLARATION

7. The purpose of my Declaration is to describe the personnel resources and OSS that McLeodUSA has in place to process LSRs submitted by other LECs. I will also briefly discuss a comparison of our processes to what we experience when we submit a comparable LSR request to Qwest when we win a local exchange customer from Qwest.

II. MCLEODUSA INTERNALLY DEVELOPED A WEB INTERFACE, THE SOLE FUNCTION OF WHICH IS TO PROCESS LSRS

8. In 2002, McLeodUSA employed nearly 36 people, whose function was to process LSRs submitted by other LECs. These employees processed paper LSRs that were typically faxed or e-mailed to McLeodUSA. A decision was made to mechanize the processing of LSRs as much as practical to make the process more efficient and to provide timely acknowledgements and firm order commitments (“FOCs”) to the LECs. The McLeodUSA

IT department worked with Service Delivery to develop a web-based solution that enables another LEC to submit their LSRs to McLeodUSA, which system was implemented in 2005.

9. The web-based OSS takes the information completed by the LEC and flows that information into various internal systems. Based on a LEC LSR, the system initiates, and in some instances completes, various tasks that must be completed to ensure that end users can seamlessly move their local service (and other services as the case may be) to their new chosen service provider. Undertaking such steps to ensure a seamless transition is in the best interests of the end user. The development of this OSS was done solely to process LSRs submitted by other LECs such as Qwest.
10. Since the roll out of the web-based LSR, McLeodUSA has continued to make system enhancements to this OSS. Certain of these enhancements involved making related changes to improve WSOC invoicing in response to specific demands made by Qwest regarding the content of the invoicing.
11. Qwest has an OSS that also initiates or completes comparable steps within Qwest's internal systems when McLeodUSA wins a customer away from Qwest. In some states, Qwest has a direct charge McLeodUSA an OSS charge to compensate Qwest for the development and maintenance of these systems. I understand in other states, Qwest recovers its OSS costs indirectly, sometimes as a contributing cost element within a non-recurring charge.
12. The WSOC is intended to recover, in part, the cost of our continued web interface enhancements that benefit all LECs, including Qwest, as well as certain labor related costs associated with the LSR induced activities. For example, our current web interface is unable to handle orders of less than 500 lines. An enhancement scheduled for release in April 2010,

Release 4 will permit the web interface to assist in processing LSRs for a location with up to 999 affected lines. Qwest and other CLECs that will request McLeodUSA to process very large orders will directly benefit from our OSS enhancements.

13. In addition to the OSS, McLeodUSA personnel are involved in various aspects of completing the steps required to fully process an LSR. Among other tasks, these employees:

- Release of Triggers in the McLeodUSA switch
- Grant concurrence in the NPAC
- Pull the TN from the McLeodUSA switch once the line has ported out
- Change McLeodUSA's internal facility assignment to the correct status
- Delete our LIDB (outgoing caller ID) record
- Unlock the 911 record
- Send Care records
- Terminate McLeodUSA's billing to the end user

14. In what follows, I will describe each of these activities in more detail.

- Triggers are set up in the switches to determine how a call routes through the switch. When triggers are released this allows the gaining carrier to route the calls to the gaining carrier's switch. If we do not release the triggers the end user may not be able to receive all calls as some will be misrouted; NPAC stands for Number Portability Administration Center. To grant concurrence allows the gaining carrier to port the telephone number on the requested due date. If

concurrence is not granted, the gaining carrier will not be able to port the telephone number. McLeodUSA employees administer this via the Service Order Administration (“SOA”) tool. We acknowledge via this tool that we are ready to release these numbers to the gaining carrier.

- To pull the telephone numbers from the McLeodUSA switch means that the telephone number(s) are removed from the switch and the translations associated with these numbers are removed so that calls do not route to the McLeodUSA switch. “TN” stands for telephone number.
- After the gaining carrier has taken the telephone number(s) from McLeodUSA, McLeodUSA will update the facilities and equipment database to change the internal facilities to show disconnected so that the facilities can be used for a different customer. In addition, this activity initiates a process to disconnect the actual physical facilities in McLeodUSA switches and collocations.
- “LIDB” stands for Line Information Database. This is where the customers name and number are out-pulsed for caller ID. Records are deleted the day that the customer’s service has been moved to another carrier.
- A 911 Record is sent to unlock so that the gaining carrier can take over the end user’s 911 information. The information is not deleted so that the customer is not impacted by the change when porting to the new carrier.
- Send Care Records is for internal use to Unlock 911 or delete LIDB records. This is an electronic feed that goes to Intrado or Verisign to update.

- Billing termination involves placing cancel dates on a customer's telephone number(s) and account (if applicable) the day that the telephone numbers have been ported to the gaining carrier, which stops the McLeodUSA billing system from issuing an invoice to the customer for terminated services.

15. McLeodUSA assesses the WSOC under the following circumstances: (a) when another Local Exchange Carrier ("LEC") submits a Local Service Request via the McLeodUSA web interface seeking McLeodUSA personnel and systems to engage in a variety of activities to seamlessly transition an end user, who is currently a customer of McLeodUSA, to becoming an end user of the requesting LEC, and (b) provided the LEC submitting the LSR assesses a charge to McLeodUSA for performing comparable activities when McLeodUSA seeks to transition a customer to become its own end user.

16. Occasionally, a LEC will request expedited processing of an LSR by McLeodUSA.

Expediting the processing of an LSR can cause McLeodUSA to roll a truck to a switch site, otherwise or engage in special manual processes to complete the processing of an LSR in severely compressed amount of time.

17. Qwest is the only LEC in its region that assesses a service order fee to McLeodUSA that I understand is designed to compensate Qwest for performing like functionality in processing LSRs we submit to Qwest when we win a customer from Qwest. Every other LEC does so without assessing a fee, and, therefore, McLeodUSA and the other LECs operate effectively on a bill and keep basis.

18. I declare under penalty of perjury that the foregoing is true and correct.

Patricia Lynott
Executed this 15th day of October, 2009.