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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner

Arizona Corporation Commission

DOCKETED

MAY 15 2003

DOCKETED BY

ARIZONA CORPORATION COMMISSION,

Complainant,

v.

QWEST CORPORATION,

Respondent.

DOCKET NO. T-01051B-02-0871

QWEST CORPORATION'S NOTICE
OF FILING REBUTTAL TESTIMONY

Qwest Corporation ("Qwest") hereby provides notice of filing the William R. Easton Rebuttal Testimony in the above referenced matter.

DATED this 15th day of May 2003.

FENNEMORE CRAIG

By

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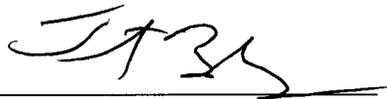


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I. EXECUTIVE SUMMARY

On June 12, 2002 the Arizona Corporation Commission adopted Decision No. 64922 authorizing revised wholesale rates. Due to the complexities involved in implementing the order and cost docket implementation work in other states, Qwest did not finish the implementation until December 2002. Qwest acknowledges that its communications with regard to the implementation process for the wholesale rate changes ordered by the Commission were inadequate. To properly fulfill its obligations to both its customers and this Commission, Qwest should have communicated its timeline for implementation of the Commission's order to the Commission Staff and other affected parties. Qwest is committed to proactively communicating future implementation timelines and plans with the Commission, its Staff and interested parties and to ensuring that future wholesale rate changes are made more quickly. In fact, Qwest has already undertaken system and process changes to provide for a quicker and more efficient method of rate implementation. Because Qwest has heard and responded to the Commission's concerns and because, as Staff has acknowledged, the CLECs were not harmed by Qwest's actions, Qwest respectfully submits that a finding that Qwest is in contempt and the imposition of fines is not necessary or appropriate.

1 Advocacy group, where I am currently responsible for advocacy related to
2 Wholesale products and services. In this role I work extensively with the Product
3 Management, Network and Costing organizations.
4

5 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE ARIZONA**
6 **CORPORATION COMMISSION?**

7 A. Yes. I have testified previously in Docket Nos. T-01051B-97-0689
8 and U-3021-96-448

9 **III. PURPOSE OF TESTIMONY**

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

11 A. The purpose of my testimony is to respond to the testimony of Matthew Rowell of
12 the Arizona Corporation Commission Staff and John Finnegan of AT&T. In my
13 testimony, I will discuss the background of the implementation of the Arizona cost
14 docket, the process that is followed in implementing a cost docket order and the
15 improvements that have been and are being made to this process. I will then
16 respond to the specific issues raised in the testimony of Staff and AT&T.

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IV. BACKGROUND

Q. PLEASE PROVIDE SOME BACKGROUND ON THE IMPLEMENTATION OF THE ARIZONA COST DOCKET ORDER?

A. On June 12, 2002 the Arizona Corporation Commission adopted Decision No. 64922 authorizing revised wholesale rates. The order did not specify an implementation date but did require Qwest to make a compliance filing containing the price list agreed to by the parties within 30 days. Qwest filed a Notice of Compliance on June 26, 2002 and began implementing the new rates. On October 7, 2002 AT&T sent a letter to the Arizona Corporation Commission expressing concerns about the amount of time the implementation of the Arizona wholesale rates was taking. Qwest responded to AT&T on October 16, 2002 that implementation of the Arizona rates was being dealt with as quickly as possible and that, based on the current implementation schedule, it was projected that the rate implementation would be completed sometime in mid-December 2002.

Qwest completed the rate implementation for all companies except five wireless companies on December 15, 2002. The rate changes for the wireless companies were completed on December 23, 2002. These new rates were applied back to the effective date of the Decision. As a part of this back billing process, CLECs were issued credits and were paid interest on the difference between what they had previously been billed and the billable amounts using the new rates.

1 Despite the fact that Qwest believes the above actions place Qwest in
2 compliance with the Commission's Order, Qwest acknowledges that its
3 communications with regard to the implementation process for the wholesale rate
4 changes ordered by the Commission were inadequate. To properly fulfill its
5 obligations to both its customers and this Commission, Qwest should have
6 communicated its timeline for implementation of the Commission's order to the
7 Commission Staff and other affected parties. Although Qwest's conduct in this
8 matter was not intentional, Qwest acknowledges the role it played in creating this
9 situation and pledges to work cooperatively with the Commission, its Staff and
10 interested parties to ensure that future rate changes are made in a timelier
11 manner. A later section in this testimony will discuss the steps Qwest has taken
12 and is taking to ensure that future wholesale rate changes go more smoothly and
13 quickly.

14
15 **V. COST DOCKET IMPLEMENTATION**

16 **Q. COULD YOU PLEASE DESCRIBE THE PROCESS THAT QWEST GOES**
17 **THROUGH TO IMPLEMENT COST DOCKET RATES?**

18 **A.** Implementation of a cost docket is an extremely complex undertaking. Qwest's
19 cost docket implementation process consists of three (3) primary phases: the
20 Initiation Phase, the Contract Implementation Phase, and the I.T. Rate
21 Implementation Phase. Once these Phases are completed there is an additional

1 work effort required to determine what, if any, true up is required pursuant to the
2 Commission's Decision or language in CLEC contracts.

3
4 The Initiation Phase occurs once the decision of the Commission in the cost
5 docket becomes final. This Phase involves at least 13 individuals representing
6 each of the business entities within Qwest that are charged with implementing
7 the Commission's decision. The entities include representatives from Wholesale,
8 Product Management, Business Development and Contract Development &
9 Services. During this Phase, the Commission's order is evaluated and analyzed
10 to determine the scope of work necessary to implement each of the rates. Issues
11 raised by the Decision are assigned for resolution within the appropriate business
12 units, legal interpretation is provided and operational impacts are also addressed
13 in this Phase. The rates are then mapped into existing CLEC contracts and the
14 new rate information is sent on to the departments charged with posting the new
15 rate information on internal websites, determining the application of the rates to
16 each CLEC and preparing the necessary documentation to incorporate the new
17 rates into the various billing systems. Twenty-five business days are normally
18 scheduled for the work required in this Phase. However, that time period may
19 vary depending on the size, scope and complexity of the docket to be
20 implemented, the number of CLEC contracts to which the rates need to be
21 applied and the workload of implementation activities associated with cost
22 dockets from other jurisdictions.

1 The Contract Implementation Phase involves over 23 individuals – again
2 representing the business units responsible for the tasks necessary to complete
3 this Phase including the Cost Docket Coordinator, the Contract Implementation
4 Team for IABS, the Contract Implementation Team for CRIS, representatives
5 from CPMC (collocation), Product Process representatives and the Program
6 Management Organization. Activities include preparing the documents
7 necessary to build new rate tables, performing quality and accuracy checks of
8 the rate information, data entry associated with inputting the rates into the
9 system, CLEC notification of updated rate sheets associated with their contract,
10 creating documentation necessary for any new rate elements or structure
11 changes, and determining cost of and establishing priority for the systems
12 modifications. Twenty business days are normally scheduled for the work
13 required in this Phase. Again, that time period may vary, depending on the size
14 and scope of the docket to be implemented, the number of CLEC contracts to
15 which the rates need to be applied and the workload of implementation activities
16 associated with cost dockets from other jurisdictions.

17
18 The I.T. Rate Implementation Phase involves at least 13 individuals representing
19 the various billing systems (CRIS, IABS, LEXCIS). These individuals receive all
20 of the documentation from work done in previous phases and are responsible for
21 updating the system tables, making system modifications where necessary to
22 accommodate the rate changes and completing the tasks necessary to have the
23 new rates reflected on the CLEC bills. This Phase is normally scheduled for

1 completion within 15 business days, with variance possible due to complexity or
2 workload demands.

3
4 This wholesale rate implementation process is followed in all fourteen Qwest
5 service states.

6
7 **Q. YOU MENTIONED THAT A "TRUE UP" MAY BE NECESSARY AFTER THE**
8 **ABOVE PROCESS IS FOLLOWED. PLEASE EXPLAIN.**

9 A. The process I have just described places rates into the billing systems on a going
10 forward basis and also provides for "back billing", which is the process of making
11 billing adjustments back to the effective date of the order or to a date designated
12 by the Commission. In addition to these two steps, there may also be a third
13 step called "true up", which would apply the new rates to a period prior to the
14 effective date of the order. A true up is necessary if individual interconnection
15 agreements call for interim rates to be adjusted to reflect a Commission decision
16 in a cost docket. The primary application of true ups is when a rate element is
17 being addressed for the first time by the Commission. To determine if a true up
18 is necessary, a review of all interconnection agreements in the state must be
19 conducted to see if there is contract language related to the retroactive
20 application of cost docket rates. If there is such language, true up adjustment
21 amounts are calculated for that carrier.

1 **Q. WHY IS THE COST DOCKET RATE IMPLEMENTATION PROCESS SO**
2 **COMPLEX?**

3 A. The process is complex due to the existence of a large number of rate elements,
4 multiple billing systems and the fact that changes must be made on a carrier by
5 carrier basis.

6
7 **Q. WHY IS IT NECESSARY TO MAKE THE CHANGES ON A CARRIER BY**
8 **CARRIER BASIS?**

9 A. Existing contracts with CLECs have been negotiated and arbitrated at various
10 points in time since the passage of the 1996 Telecommunications Act. As a
11 result, contractual provisions and structure concerning rates varies. When the
12 Commission orders a new rate element or changes a rate element structure,
13 each contract must be analyzed to determine how the change impacts that
14 particular contract. For example, an early interconnection agreement for CLEC
15 "XYZ" may have different product names or rate elements than those identified in
16 the Commission's cost docket decision, making a manual review of the contract
17 necessary to determine how the Commission's order applies to "XYZ." Such
18 review and analysis is critical to ensure that CLECs are treated fairly. This
19 makes implementing cost docket rates significantly more complicated than
20 merely changing rates in a table.

21
22 **Q. DO ALL COST DOCKET ORDERS TAKE THE SAME AMOUNT OF TIME TO**
23 **IMPLEMENT?**

1 A. No. The amount of time depends on numerous factors, including the number of
2 rate elements, the number of CLECs and whether system changes are required
3 to implement the new rates. Other factors include the number of other states
4 with cost docket orders to implement and the resources available to accomplish
5 the task.

6
7 **Q. HOW MANY RATE ELEMENTS WERE INVOLVED IN THE ARIZONA COST**
8 **DOCKET IMPLEMENTATION?**

9 A. There were 547 rate elements involved in the implementation of the Arizona
10 order. It is important to note that the implementation involved more than just a
11 change of rates. The Arizona order also involved a restructuring of rate elements
12 themselves, which necessitated further work effort and involved billing system
13 changes.

14
15 **Q. PLEASE EXPLAIN THE SYSTEM CHANGES ASSOCIATED WITH DECISION**
16 **NO. 64922?**

17 A. During the implementation process Qwest determined that billing system
18 modifications would be required to establish the capability to identify, provision
19 and bill for several elements ordered in Decision No. 64922. The Commission's
20 decision modified the methodology for deaveraging from distance-based to wire
21 center-based. This required system changes to accommodate the new structure
22 and allow for proper billing for EEL DS1, EEL DS3, Unbundled Loops, Sub

1 Loops, UNE-P PRI and UNE-P DSS. Approximately 255 hours of coding time
2 were required to make this system change.

3
4 **Q. HOW MANY CLECS WERE INVOLVED IN THE ARIZONA COST DOCKET**
5 **IMPLEMENTATION?**

6 A. 126 CLECs and 11 wireless service providers. As I mentioned previously,
7 implementation must take place at a CLEC by CLEC level. In Arizona this meant
8 researching and determining how the Commission ordered rates impacted each
9 of these 137 customers.

10
11 **Q. WAS QWEST ALSO WORKING ON IMPLEMENTING OTHER COST DOCKET**
12 **ORDERS DURING THIS SAME TIME FRAME?**

13 Yes. During this same time period Qwest was in the process of implementing
14 cost docket orders for a number of other states. Listed below are the cost docket
15 implementations that Qwest was working on during this time period and the
16 amount of time that each implementation took:

17
18 Arizona 122 Business Days
19 Colorado 122 Business Days
20 Iowa 110 Business Days
21 Montana 120 Business Days

1	Nebraska	73 Business Days ¹
2	Utah	81 Business Days
3	Washington	157 Business Days
4	Wyoming	138 Business Days

5

6 It should be noted that Qwest implemented all these comprehensive cost dockets
7 sequentially in the order of their effective dates.

8

9 **Q. WHAT DO YOU CONCLUDE FROM THIS LIST?**

10 A. Two conclusions can be drawn from this list. First, there was a significant
11 amount of implementation work going on during this period. Second, the times to
12 implement Arizona are comparable to those experienced in other states. The
13 next section of this testimony describes the steps Qwest has taken to expedite
14 the rate implementation process.

15

16

VI. PROCESS ENHANCEMENTS

17

18 **Q. WHAT STEPS HAS QWEST TAKEN TO SPEED UP THE IMPLEMENTATION**
19 **PROCESS FOR FUTURE COST DOCKET ORDERS?**

¹ The Nebraska PUC's order required implementation by a specific date.

1 A. Even before issues arose over the implementation of the Arizona rates, Qwest
2 began conducting a full re-examination of its rate implementation processes and
3 procedures with the goal to shorten the implementation cycle time through
4 process improvements and increased automation. Toward that end, Qwest has:

- 5
- 6 • Designated a Program Management Office to oversee the implementation
7 process – ensuring that implementation schedules are adhered to and
8 opportunities for process improvement are explored and acted upon.
- 9
- 10 • Established a Cost Docket Governance Team comprised of executive level
11 personnel from the organizations within the company with primary
12 involvement and responsibility for cost docket implementation. Those
13 organizations include: Wholesale Product Management, Wholesale Service
14 Delivery, and Public Policy. The purpose of the Governance Team is to
15 provide both an oversight role and to serve as an escalation point for issues
16 or obstacles that may arise during the implementation process. The Team
17 has scheduled meetings every two weeks, but may meet more frequently if
18 issues arise that require immediate resolution.
- 19
- 20 • Engaged outside consultants to provide recommendations for automation of
21 as many of the processes associated with cost docket implementation as
22 possible.
- 23

1 As to the question of fines, however, I would have to disagree with Staff.
2 Decision No. 64922 did not specify an implementation date. Page 13 of Mr.
3 Rowell's testimony states that it is Staff's opinion that Decision No. 64922
4 required Qwest to implement the rates "immediately". This conclusion is not
5 supported by the language in the order and, given the need for the parties to
6 agree upon the rates for the compliance filing, is not reasonable. In fact,
7 Decision No. 64922 stated that the rates shall be "effective" immediately, not
8 "implemented" as Staff contends, and gives the parties an additional 30 days to
9 agree to the ordered rates. In its implementation of the rates, Qwest followed the
10 order by using the date of the decision as the effective date.

11
12 The more important questions here are ones of intent and harm. Qwest did not
13 intentionally delay the implementation of the Arizona rates and, in fact, would
14 have no incentive to delay the implementation, as a delay would only increase
15 the amount of back billing work required by Qwest. As to the question of harm,
16 Mr. Rowell acknowledges on page 16 of his testimony that the CLECs have been
17 made whole. Based on this, as well as the actions Qwest has taken to improve
18 the process, I do not believe that fines are appropriate or necessary.

19
20 **Q. IF THE COMMISSION DOES DECIDE THAT FINES ARE NECESSARY, WHAT**
21 **DO YOU BELIEVE SHOULD BE THE STARTING POINT OF THE**
22 **CALCULATION?**

1 A. Although Staff recommends a starting point 60 days from the date of the order, a
2 more appropriate starting point would be 60 days from the date of the June 26,
3 2002 compliance filing.
4

5 **Q. STAFF CONTENDS THAT QWEST DELIBERATELY DELAYED THE**
6 **IMPLEMENTATION OF THE ARIZONA RATES UNTIL IT HAD IMPLEMENTED**
7 **WHOLESALE RATE CHANGES IN OTHER STATES WHERE 271**
8 **APPLICATIONS WERE PENDING AND THAT QWEST SHOULD BE FOUND**
9 **IN CONTEMPT. DO YOU AGREE?**

10 A. No. As I mentioned previously, Qwest implemented all comprehensive cost
11 dockets, such as Arizona, sequentially in the order of their effective dates. Only
12 certain voluntary rate reductions were implemented prior to the implementation of
13 the Arizona wholesale rates. Since these rate changes were made based on
14 reference to benchmark rates adopted in Colorado, it was more efficient to
15 implement the voluntary changes on an integrated basis. In addition, the
16 complexity of the benchmark rate changes was significantly less than that
17 required for a cost docket order such as the Arizona order. The number of
18 benchmark rate changes was substantially smaller in number than the changes
19 for Arizona: an average of 35 versus the 547 rate element changes in Arizona.
20 Most significantly, the benchmark changes did not require CLEC by CLEC true
21 ups, a determination of how the rate changes applied to a given CLEC's contract
22 or any restructuring of the rate elements and the necessary system changes that
23 restructuring entails.

1 **Q. PLEASE EXPLAIN WHAT IS MEANT BY “BENCHMARK RATES”?**

2 A. The FCC utilized a process they termed “Benchmarking” in its evaluation of UNE
3 prices for states that applied for 271 approval. This benchmarking process
4 compared rates from one state to another state’s rates. For example, when
5 Oklahoma’s rates were being evaluated for TELRIC compliance, the FCC was
6 not satisfied that Oklahoma’s rates were completely compliant with TELRIC
7 principles. The FCC then compared Oklahoma’s rates for basic UNE elements
8 to those same element rates from Texas, where UNE rates had already been
9 evaluated and deemed to be TELRIC compliant. When the FCC made the
10 comparison they found that Oklahoma’s rates were within a zone of
11 reasonableness when adjusted by the FCC Universal Service Fund (USF) cost
12 model for state cost differences. Qwest utilized the FCC benchmarking approach
13 proactively in its 271 (nine state) applications. Qwest made the same
14 comparison of rates as the FCC by comparing eight states rates to the Colorado
15 rates (which Qwest felt were TELRIC compliant). Where certain rates were
16 higher than the Colorado benchmark, Qwest voluntarily lowered the rate to be
17 the equivalent of the Colorado rate adjusted by the FCC USF cost model state
18 differences. The FCC accepted this approach and has found both the Colorado
19 rates to be TELRIC compliant, and each state’s evaluation and adjusted rates to
20 be within the zone of reasonableness of TELRIC. Qwest implemented these
21 limited rate changes as part of an integrated project.

22

1 **Q. SO YOU DO NOT FEEL THAT FINES ARE WARRANTED FOR**
2 **IMPLEMENTING THESE BENCHMARK RATES DURING THE SAME TIME**
3 **PERIOD ARIZONA WAS BEING IMPLEMENTED?**

4 **A.** No. Fines are not appropriate given the unique nature of the benchmark rate
5 reductions. To the extent that the Commission feels that fines are warranted,
6 however, it needs to consider the number of days for which fines apply. Staff has
7 not demonstrated that 126 days is the appropriate number. Given that Qwest
8 was working simultaneously on implementing a number of cost docket orders in
9 addition to the benchmark rate reductions, it is difficult to argue that the entire
10 delay of 126 days is attributable to the benchmark rate reductions.

11

12 **Q. STAFF RECOMMENDS THAT QWEST IMPLEMENT A BILLING AND**
13 **SYSTEMS PROCESS WHICH WILL ALLOW IT TO IMPLEMENT WHOLESALE**
14 **RATE CHANGES IN 30 DAYS. PLEASE COMMENT.**

15 **A.** Qwest has acknowledged the need for a revised process and, as I noted
16 previously, has taken steps to put such a process into place. However, the
17 requirement that the process allow for a rate change in 30 days appears to be
18 overly stringent. Given Staff's conclusion on page 14 of Mr. Rowell's testimony
19 that sixty days is a reasonable time period for the implementation of new rates,
20 Mr. Rowell's selection of 30 days on page 20 of his testimony is puzzling. Qwest
21 believes 90 calendar days, with a true up to follow, is a more reasonable time
22 frame for the implementation of new wholesale rates, balancing the needs for

1 timely implementation with the recognition that this is a complex, time consuming
2 process.

3
4 **Q. IS STAFF'S PROPOSAL THAT QWEST SHOULD HIRE AN INDEPENDENT**
5 **AUDITOR TO EVALUATE THE EFFECTIVENESS OF THE PROCESS AND**
6 **SYSTEMS CHANGES NECESSARY?**

7 **A.** No. The Commission's legitimate concern is that Qwest implement the rates in a
8 timely manner; the specifics of the system that Qwest uses to accomplish that
9 need not be the concern of Staff or the Commission or require review by an
10 outside auditor. In fact, as I noted previously, Qwest hired an outside consultant
11 to make process improvement recommendations. The best way for the
12 Commission to ensure timely implementation is to adopt Qwest's recommended
13 timeframe (90 days, with true up to follow) for use in future wholesale cost
14 dockets.

15
16 **VIII. TESTIMONY OF JOHN FINNEGAN**

17 **Q. MR. FINNEGAN CONCLUDES THAT THERE IS NO REASON WHY THE**
18 **PROCESS TO CHANGE WHOLESALE RATES NEEDS TO BE MORE**
19 **CUMBERSOME THAN THAT EMPLOYED TO CHANGE RETAIL RATES. DO**
20 **YOU AGREE?**

1 A. No. While this suggestion may appear reasonable on its face, it ignores the
2 significant differences that exist between the wholesale and retail billing
3 processes. Decision 94622 required Qwest to identify and implement hundreds
4 of changes to USOCs. Typical retail rate changes involve far fewer changes.
5 Given the nature of a cost docket, it is difficult to anticipate and plan for each
6 potential outcome prior to the final determination by the Commission, greatly
7 limiting the amount of preparation that can be done before a decision is issued.

8

9 A second major difference between wholesale and retail rate changes is that
10 there are no contract specific elements for retail customers. As I discussed
11 previously, wholesale rate implementation must occur at a CLEC by CLEC level
12 due to differences in the interconnection agreements.

13

14 **Q. ON PAGE 6 OF HIS TESTIMONY MR. FINNEGAN INSINUATES THAT**
15 **QWEST IS OFFERING DISCRIMINATORY PRICING BETWEEN CLECS.**
16 **PLEASE COMMENT.**

17 A. Mr. Finnegan is aware that the Telecommunications Act prohibits discriminatory
18 pricing. Mr. Finnegan is also aware that the FCC has concluded that Qwest's
19 prices and policies are in compliance with the Act.

20

21 **Q. IS THE PERFORMANCE MEASUREMENT THAT MR. FINNEGAN PROPOSES**
22 **ON PAGE 6 AND 7 OF HIS TESTIMONY NECESSARY?**

1 A. No. Qwest has taken the necessary steps to ensure future cost docket
2 implementation timelines are communicated to the Arizona Corporation
3 Commission, its Staff and other interested parties and subsequent rate changes
4 are implemented in a timely manner. Therefore, a specific performance
5 measurement is not necessary.
6

7 **IX. SUMMARY AND CONCLUSION**

8 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

9 A. Nothing can change the fact that Qwest did not communicate better with Staff
10 concerning its implementation plans and the time it took for Qwest to complete
11 implementation. It is, however, important for the Commission to ensure that
12 wholesale customers were not harmed by implementation delays and that future
13 implementations happen in a timelier manner. As Staff has noted, wholesale
14 customers have been compensated for any delay through the calculation of
15 interest amounts. In addition, Qwest has already undertaken system and
16 process improvements to ensure future rate changes go more smoothly and
17 quickly. Finally, Qwest is committed to proactively communicating future
18 implementation timelines and plans with the Commission, its Staff and interested
19 parties. Because Qwest has heard and responded to the Commissions
20 concerns and because, as Staff has acknowledged, the CLECs were not harmed

1 by Qwest's actions, Qwest respectfully submits that a finding that Qwest is in
2 contempt and the imposition of fines is not necessary or appropriate.

3

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

5 **A. Yes it does. Thank you.**

BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner

ARIZONA CORPORATION COMMISSION)
Complainant,) Docket No. T-01051B-02-0871
v.)
QWEST CORPORATION,)
Respondent.)
STATE OF WASHINGTON) AFFIDAVIT OF
COUNTY OF KING) WILLIAM R. EASTON

William R. Easton, of lawful age being first duly sworn, deposes and states:

- 1. My name is William R. Easton. I am Director – Wholesale Advocacy of Qwest Corporation in Seattle, Washington. I have caused to be filed written rebuttal testimony and exhibits in support of Qwest Corporation in Docket No. T-01051B-02-0871.
- 2. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

William R. Easton
William R. Easton

SUBSCRIBED AND SWORN to before me this 9th day of May, 2003.

Lori L. White
Notary Public residing at
Seattle, Washington

My Commission Expires: 7/10/03

