



CenturyLink™

805 Broadway, 8th Floor
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June 22, 2010

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street NE, Ste 215
Salem, Oregon 97301-2551

RE: UM-1484 – Application for Approval of Merger between CenturyTel,
Inc. and Qwest Communications International, Inc.

Dear Commission:

CenturyLink hereby supplements its testimony with the Direct Testimony of Michael R. Hunsucker, pursuant to the schedule agreed to by the parties and adopted by the Commission in its corrected Prehearing Conference Report.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



William E. Hendricks

Encl.

WEH/rk

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BEFORE THE OREGON STATE UTILITIES AND TRANSPORTATION

COMMISSION

UM-1484

In the Matter of

CENTURYTEL, INC.

Application for an Order to Approve the
Indirect Transfer of Control of QWEST
CORPORATION

DIRECT TESTIMONY OF

MICHAEL R. HUNSUCKER

DIRECTOR-CLEC MANAGEMENT

ON BEHALF OF

CENTURYLINK, INC.

June 22, 2010

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Michael R. Hunsucker. My business address is 5454 W. 110th
3 St., Overland Park, Kansas 66211.

4
5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6 A. I am currently employed by CenturyLink (CTL) as Director-CLEC
7 Management. I was named to the position in April 2008 in legacy Embarq
8 (EQ) and have continued in the same capacity after the
9 CenturyTel/Embarq merger.

10

11 **Q. ON WHOSE BEHALF ARE YOU SUBMITTING DIRECT**
12 **TESTIMONY?**

13 A I am submitting direct testimony on behalf of CTL and its (need to state
14 the correct legal entities)

15

16 **Q WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

17 A. The purpose of my direct testimony is to; 1) provide an overview of the
18 CTL Wholesale Operations organization, 2) provide a high level overview
19 of CTL's ability to service our wholesale customers via our Operations

1 Support System (OSS), and 3) provide assurances relative to the current
2 obligations of Qwest relative to the CLEC market.

3

4 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE**
5 **COMMISSIONS?**

6 A. Yes. I have testified before regulatory agencies in Florida, North Carolina,
7 South Carolina, Tennessee, Virginia Pennsylvania, Ohio, Illinois,
8 Maryland, Nebraska, Georgia, Texas and Nevada.

9

10 **Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR-CLEC**
11 **MANAGEMENT?**

12 A. I and my team manage CTL's Section 251/252 interconnection agreement
13 (ICA) negotiations, the implementation of ICAs and all account
14 management relations with our CLEC customers. My group is also
15 responsible for managing revenue assurance, reciprocal
16 compensation/access expense, wholesale service performance reporting
17 and dispute resolution.

18

19 **Q. WHAT POSITIONS DID YOU HOLD BEFORE BECOMING**
20 **DIRECTOR-CLEC MANAGEMENT?**

1 A. I was Embarq's State Executive for Texas from 2002 and Tennessee from
2 2007 until I accepted my current position. As State Executive, I managed
3 Embarq's relationship with public utility commissions and state
4 legislatures. I also managed Embarq's public affairs activities in the two
5 states. Prior to being named to that position, I was Director-Policy for
6 Sprint Corporation from 1992 until 2002. As Director-Policy, I developed
7 regulatory and legislative policy for the corporation and provided written
8 and oral testimony before state regulatory commissions for Sprint and its
9 operating subsidiaries including its incumbent local exchange carriers
10 (ILECs), and interexchange/competitive local exchange carrier (CLEC).
11 Prior to being named Director-Policy, I held a variety of management
12 positions with Sprint and its predecessor companies, primarily dealing
13 with regulatory matters. I began my telecommunications career in 1979.

14
15 Q. PLEASE DESCRIBE THE CENTURYLINK WHOLESALE
16 OPERATIONS ORGANIZATION AS IT EXISTS TODAY.

17 A. The Wholesale Operations Organization is a separate business unit within
18 CTL that is led by Bill Cheek, President - Wholesale Operations. Mr.
19 Cheek reports directly to Glen Post, the CEO of CTL. Prior to Mr. Cheek's
20 current position, he served in the same capacity for the legacy Embarq

1 company and its predecessors for more than 10 years. Wholesale
2 Operations is organized around five functional areas; 1) product
3 management and marketing, 2) wholesale operations, 3) national public
4 access, 4) wholesale sales and account management and 5) CLEC
5 management and service reporting.

6

7 Product Management and Marketing

8 The product management and marketing group is responsible for the
9 development and implementation of all wholesale products including
10 CLEC services such as resale, Local Wholesale Service (CTL's unbundled
11 network element – platform product), unbundled network elements,
12 collocation, etc.

13

14 Wholesale Operations

15 The wholesale operations group is responsible for CTL's wholesale OSS
16 system called EASE and its operation centers in Decatur, Indiana,
17 Leesburg, Florida, Wentzville, Missouri and La Crosse, Wisconsin.

18

19 National Public Access

1 The national public access group is responsible for management of CTL's
2 public payphones as well as payphone services provided to state, county
3 and local correctional facilities across the country.

4

5 Wholesale Sales and Account Management

6 The wholesale sales and account management group is responsible for the
7 direct sales of CTL's data and special access products, sales engineering
8 and account management to non-CLEC wholesale customers. This
9 includes both in-territory sales and out-of-territory sales on CTL's 17,500
10 route mile fiber optic facilities.

11

12 CLEC Management and Service Reporting

13 The CLEC management and service reporting group is responsible for
14 managing the ICA negotiations process, the implementation of the ICAs,
15 account management and in-territory sales to CLEC wholesale customers.
16 In addition, this group is responsible for managing revenue assurance,
17 jurisdictional compliance, reciprocal compensation/access expense and
18 performance service reporting for special access and CLEC service across
19 the CTL 33-state territory.

20

1 CTL recognizes the value of its wholesale customers to our business
2 operations and created the current organizational structure to ensure high
3 quality services for our customers.

4

5 **Q. PLEASE PROVIDE AN OVERVIEW OF CENTURYLINK'S**
6 **OPERATIONS SUPPORT SYSTEM.**

7 A. As I mentioned before, CTL utilizes a system called EASE in its legacy
8 Embarq territories. EASE is used to process both access service requests
9 (ASRs) and local service requests (LSRs) and provides all pre-ordering
10 and ordering functionality and provides the carrier with the ability to
11 track the status of their orders throughout the provisioning process. EASE
12 was implemented by legacy Embarq in May 2008 to process ASRs and in
13 December 2009 to process LSRs. The system provides a common industry
14 standard interface and eliminates a significant amount of duplicate order
15 entry. EASE provides wholesale customers with both a web based GUI
16 (graphical user interface) as well as electronic data interface options to
17 allow flexibility to our customers in placing orders with CTL. In addition,
18 the system utilizes a workflow management platform to provide
19 centralized and automated control of all workflow steps required to
20 complete each provisioning request. In smaller legacy CenturyTel

1 markets, CLECs generally submit orders via an electronic interface called
2 eZLocal. At the current time in legacy CenturyTel markets, the actual
3 order processing is then completed via a manual process internal to
4 CenturyLink. Integration efforts are underway and should be completed
5 later this year to migrate legacy CenturyTel markets to the EASE platform.
6 Relative to maintenance and repair, CenturyLink provides CLECs with
7 access to WebRRS, via the wholesale website, as a means to report and
8 track trouble tickets or CLECs have the option of utilizing "800" access
9 numbers to reach the appropriate repair center. In summary, CTL
10 remains committed to a quality customer experience in all states and has
11 staffed its wholesale operations team with the resources necessary to
12 deliver CLEC service in a timely, high quality manner.

13
14 **Q. WILL THERE BE ANY IMMEDIATE CHANGES TO EITHER THE**
15 **QWEST OR CENTURYLINK OPERATIONS SUPPORT SYSTEMS?**

16 **A.** No, upon merger closing, there will be no immediate changes to Qwest's
17 or CTL's Operations Support Systems. The merger is intended to bring
18 about improved efficiencies and practices in all parts of the combined
19 company, so changes could be expected over time. However, any
20 changes will occur only after a thorough and methodical review of both

1 companies' systems and processes to determine the best system to be used
2 on a go-forward basis from both a combined company and a wholesale
3 customer perspective. In addition, the combined company will continue
4 to employ highly skilled and experienced personnel in its wholesale
5 operations group.

6

7 **Q. IS CENTURYLINK COMMITED TO PROVIDING QUALITY SERVICE**
8 **TO ITS WHOLESALE CUSTOMERS?**

9 A. Certainly. CTL's Wholesale Operations Organization is sufficiently
10 staffed with experienced employees who are well-equipped to provide
11 quality service to wholesale customers. CTL has a long-standing history
12 of and commitment to provide quality wholesale services. In fact, CTL
13 won four "Best in Class" awards based on the 2009 Metro Wholesale
14 Carrier Report Card study from Atlantic-ACM. The awards were in four
15 key areas: customer service, sales representatives, provisioning, and
16 billing. CTL has won the award for provisioning for three consecutive
17 years and the award for customer service and sales representatives for
18 two consecutive years. These awards do not represent CTL's opinion of
19 the service provided to its wholesale customers, rather they represent the
20 customer's view of the services provided. The provision of quality service

1 to wholesale customers is a priority and will remain so after the merger
2 closing.

3

4 **Q. DOES CENTURYLINK HAVE THE REQUISITE EXPERIENCE AND**
5 **EXPERTISE TO CONTINUE TO PROVIDE QUALITY WHOLESALE**
6 **SERVICE IN THE COMBINED COMPANY?**

7 A. Absolutely. As stated above, CTL has a very highly skilled and
8 experienced employee base in the wholesale organization. This is not a
9 new market to our company and the facts speak for themselves; 1) CTL
10 currently has almost two thousand active CLEC interconnection and
11 resale agreements and in excess of five hundred interconnection
12 agreements with wireless carriers across its 33-state region, 2) based on
13 May 2010 YTD order volumes, CTL is on pace to process almost one
14 million ASRs and LSRs in 2010 with volumes in excess of one million
15 orders in prior years, and 3) CTL has a CLEC performance assurance plan
16 in its largest CLEC market, Las Vegas, Nevada. In addition, legacy EQ
17 maintains a system called CSPRS (CLEC Service Performance Reporting
18 System) which provides all CLECs with access to the service performance
19 reports on the service provided to their respective companies. Access to
20 the system is provided upon request from the CLEC. Providing high

1 quality service in the CLEC market is not new to CTL; the company has
2 the requisite experience and expertise and will have similar experience
3 and expertise as a combined company. Simply put, high quality
4 wholesale service is a priority at CTL today and will continue to be a high
5 priority in the future.
6

7 **Q. HAVE YOU REVIEWED THE TESTIMONY OF CHRIS VIVEROS ON**
8 **BEHALF OF QWEST?**

9 A. Yes, I have.
10

11 **Q. DOES CENTURYLINK OPERATE UNDER THE SAME SECTION**
12 **251/252 FCC RULES AS QWEST?**

13 A. Certainly, as Mr. Viveros explains, wholesale obligations are a direct
14 result of the Telecommunications Act (Telecom Act) of 1996 and the
15 Federal Communications Commission (FCC) orders and decisions
16 implementing the Telecom Act. Section 251 imposes certain obligations
17 on all telecommunications carriers, both incumbent local exchange carriers
18 (ILECs) and CLECs with certain additional obligations placed on ILECs
19 only. Anticipating that CLECs may have concerns about CTL operating in
20 additional ILEC territories in Oregon after the merger, CTL is fully

1 compliant with all applicable Section 251 and Section 252 requirements as
2 required by the Telecom Act and any associated orders and decisions of
3 the Public Utility Commission of Oregon. In addition, CTL fully
4 understands that these obligations will continue to apply as they do today
5 after the merger closing. As such, the closing of the merger does not
6 change, in any way, the Section 251 and 252 obligations that the Act
7 imposes on CTL.

8

9 **Q. MR. VIVEROS ALSO OUTLINES THE ADDITIONAL 271**
10 **OBLIGATIONS THAT APPLY TO QWEST. DO 271 OBLIGATIONS**
11 **ALSO APPLY TO CENTURYLINK?**

12 A. No, they do not. As Mr. Viveros explains, Qwest's wholesale obligations
13 also include the 271-related obligations, applicable to Bell Operating
14 Companies ("BOCs") only, that were put in place to open up the local
15 markets to competition in BOC territories. CTL is not a BOC and as such
16 has no similar 271 obligations that apply to its territories nor should there
17 be any 271 obligations placed on the legacy CTL territories in Oregon post
18 merger closing. However, the legacy Qwest territories will continue to
19 have 271 obligations. The combined company will continue to meet these

1 obligations through its wholesale operations leveraging the key resources
2 and expertise of both entities.

3

4 **Q. DOES THE MERGER HAVE AN IMMEDIATE IMPACT ON QWEST'S**
5 **251, 252 OR 271 OBLIGATIONS?**

6 A. Absolutely not. The merger, in and of itself, has no immediate impact on
7 the statutory and regulatory obligations placed on Qwest. While certain
8 of the obligations, such as the Change Management Process (CMP) and
9 the Qwest Performance Assurance Plans (PAPs) do allow for changes to
10 the current requirements of these plans, any future changes to the plans,
11 post merger closing, will be made consistent with the terms and
12 conditions outlined in these plans under the process that would have been
13 used if this transaction had not occurred.

14

15 **Q. GIVEN YOUR REVIEW OF THE QWEST SECTION 251/252/271**
16 **OBLIGATIONS AND COMMITMENTS, IS CENTURYLINK WILLING**
17 **AND ABLE TO ABIDE BY THESE OBLIGATIONS AND**
18 **COMMITMENTS OUTLINED IN MR. VIVEROS' TESTIMONY?**

19 A. Absolutely. As I have stated previously, approval of this merger has no
20 impact on any statutory or regulatory obligations regarding the provision

1 of wholesale service to CLEC customers. CenturyLink is truly committed
2 to providing quality service to our CLEC customers today and in the
3 future.

4

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

6 **A.** Yes, it does.

CERTIFICATE OF SERVICE

Docket No. UM-1484

CenturyLink Direct Testimony of Michael R. Hunsucker


I certify that I have served a true and correct copy of CenturyLink's Direct Testimony of Michael R. Hunsucker was served on the following parties via electronic mail and US mail:

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DATED this 22nd day of June, 2010.


Rhonda Kent