BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1908, UM 2206

In the Matters of

LUMEN TECHNOLOGIES

Proposed Commission Action Pursuant to ORS 756.515 to Suspend and Investigate Price Plan (UM 1908), and

QWEST CORPORATION,

Investigation Regarding the Provision of Service in Jacksonville, Oregon and Surrounding Areas (UM 2206).

Hearing Relating to Order Nos. 22-340 and 22-422

PREFILED DIRECT TESTIMONY OF

PETER GOSE

ON BEHALF OF LUMEN TECHNOLOGIES

November 23, 2022

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Peter Gose. My business address is 14530 NW 63rd St, Parkville, Missouri, 64182-8703. My business email address is peter.gose@lumen.com

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Lumen Technologies, Inc., parent company of Qwest Corporation, CenturyTel of Oregon, CenturyTel of Eastern Oregon, and United Telephone Company of the Northwest (collectively, "CenturyLink"). For Lumen Technologies I work as Director of State and Local Government Affairs, with responsibilities for incumbent and competitive local exchange carrier regulatory matters in 18 states, Puerto Rico, and the United States Virgin Islands.

Q. HOW LONG HAVE YOU BEEN EMPLOYED BY LUMEN?

A. I have been employed by Lumen Technologies since March 2021.

Q. PLEASE STATE YOUR QUALIFICATIONS TO PROVIDE TESTIMONY IN THIS PROCEEDING.

A. My employment history spans 33 years of direct and relevant experience in the communications industry. I began my career as a management analyst with the Missouri Public Service Commission ("MoPSC") where I focused on state and federal telecommunications issues. During my tenure with the MoPSC I was twice loaned to the Federal Communications Commission for special projects. I continued my career with the National Exchange Carrier Association ("NECA") where I was responsible for interstate access tariff management, interpretation, and training for 14 western states and United

States territories. After enactment of the Telecommunications Act of 1996, I transitioned into a consulting role and co-founded QSI Consulting in 1999. Beginning in 2007 I took on the role of Government and Regulatory Affairs Director for Coral Wireless, LLC d/b/a Mobi PCS, which was a facilities-based regional wireless provider serving the entire state of Hawaii. While serving as the Government and Regulatory Affairs Director at Mobi PCS, I also concurrently held responsibilities as Director of Customer Care and as Director of Site Acquisition and Development at various times.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

A. I received a Bachelor of Science degree from Northwest Missouri State University with dual majors in Finance and Management, and a minor in Economics. I went on to earn a Master of Business Administration degree from Northwest Missouri State University. I also hold a Bachelor of Science degree in Accounting earned from Lincoln University. I am presently completing an A.A.Sc. degree in Cybersecurity at the Metropolitan Community College of Kansas City.

In addition to the aforementioned higher education, I have also participated in training germane to the subject matter of this docket. Specifically, I have completed the National Association of Regulatory Utility Commissioners ("NARUC") Annual Fundamentals Course in Regulatory Studies and the Practical Regulatory Principles Training taught by the New Mexico State University Center for Public Utilities. I have received training in telecommunications cost separations from Ernst & Young and the United States Telephone Association. Additionally, I completed the Modern Finance Theory for Regulated Industries training sponsored by the University of Missouri. While not specific

to utility industry oversight, I have also completed the Federal Bureau of Investigation Citizens' Academy sponsored by the United States Department of Justice.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE OR WORKED IN ANY CAPACITY FOR THE PUBLIC UTILITY COMMISSION OF OREGON?

A. I have not provided testimony before this Commission. In May 2005 I participated as an instructor in a training seminar held in Salem, Oregon, which was conducted exclusively for the Staff of the Public Utility Commission of Oregon. A copy of my curriculum vitae, which includes a listing of the telecommunications matters in which I have participated, is attached as Exhibit Lumen/101.

II. SCOPE AND SUMMARY OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to set forth a reasoned explanation as to why the Commission's Order 22-340 of September 23, 2022, as modified by Order 22-422, does not need to continue in effect. In my testimony I describe the sequence of events that have led to this proceeding, the actions taken by CenturyLink to improve services in the geographic area under study, and what the results of those activities have been. I In addition, I provide a summary of Lumen's substantial investment in Oregon, demonstrating that the company is committed to serving its customers in the state.

III. DISCUSSION

Q. ARE YOU FAMILIAR WITH THE SUBJECT MATTERS IN THE PRICE PLAN DOCKET (UM 1908) AND THE SERVICE INVESTIGATION DOCKET (UM 2206)?

A. In general, yes; however, certain events occurred prior to my employment with Lumen.

Q. AT THE OUTSET OF YOUR TESTIMONY, WOULD YOU PLEASE IDENTIFY AND DEFINE ANY KEY TECHNOLOGY TERMS SPECIFIC TO THE TELECOMMUNICATIONS INDUSTRY THAT YOU WILL USE IN THIS DOCUMENT?

A. Certainly. Primarily I will discuss at a high level network components specific to the central office, remote terminals, T-1 spans, metallic copper cables, pedestals, and bonding and grounding of cables. A brief definition of each of these network assets is set forth below.

Wire Center: Within the context of this testimony the term wire center refers to the 246 square mile geographic footprint served from the central office Jacksonville, Oregon and associated remote terminals where subscriber access lines converge and are provided access to the public switched telephone network. The terms wire center and exchange are often used synonymously.

Central Office: This refers to a building, in this case in the downtown area of Jacksonville, Oregon, where CenturyLink has its primary telephone switching system that can connect calls locally, or to long-distance carriers. All residential and business lines in the Jacksonville, Oregon area connect through the Jacksonville central office. The switch within a central office is often referred to as a host switch.

Remote Terminal: This is a piece of network equipment housed in an exterior cabinet which is located at some distance from the central office. In a particular geographic area, the copper wires serving homes and businesses may connect at a remote terminal. Calls in that area are aggregated at the remote terminal and then transmitted via a dedicated link back to a central office for switching and call completion. The remote terminal

cabinet houses sensitive electronics and batteries to withstand short-duration commercial power interruptions.

T-1 Spans: A T-1 is a dedicated transmission connection that is used in this instance to connect the Jacksonville central office switch to the various remote terminals that home off the switch. A T-1 transmits digital signals over pairs of twisted copper wire. Due to limitations on how far digital signals can be transmitted over copper wires, the signals must be amplified or repeated every 6,000 feet. For example, if you have a 13-mile T-1, there will be approximately 12 repeaters along the route. T-1 repeaters are frequently seen along roadways as pole mounted metallic silver cans or small white plastic enclosures.

Metallic Copper Cables: These cables are comprised of twisted pairs of copper wires and are used to terminate customer phone lines directly to a distribution frame in a central office. The cables may also be placed from a customer's location or premise to a smaller distribution terminal in a remote terminal. Metallic copper cables are also used for T-1 spans to connect remote terminals to a switch in a central office. Metallic copper cables manufactured prior to the 1960's are still in effective use today. Those cables were insulated internally with paper pulp which can become wet causing service issues. Most metallic copper cables manufactured from the 1960's and onward are insulated internally with plastic sheath coatings that are more impervious to moisture.

Pedestals: Metallic copper cables must be opened at certain points along a cable route to access pairs for customer use. Cables must also be spliced at various points along a route. When this work is done for plant buried underground, the cables are brought up into a short round or square pedestal for splicing or to extract cables for customer use.

Bonding and Grounding: Grounding refers to the intentional practice of making proper connections between electrical circuits and/or equipment to the earth. It is necessary to safely conduct voltages generated by lightning, line surges, or contact with high voltage lines to ground. Bonding is necessary for enclosures such as pedestals to effectively conduct any fault current to ground, and is also essential in mitigating interference that can impact or degrade telephone service.

Q. WHAT YOU DESCRIBE ABOVE SEEMS COMPLEX AND AS HAVING MULTIPLE OPPORTUNITIES FOR POINTS OF FAILURE. ARE TELEPHONE SWITCHES, T-1 SPANS, METALLIC COPPER CABLES, AND REMOTE TERMINALS EXPECTED TO OPERATE IN CONCERT WITHOUT ERROR AND NEVER EXPERIENCE SERVICE-IMPACTING CONDITIONS?

A. While that would be desirable in theory, in reality mechanical and electrical systems and components are prone to failure. As the various network components described above age, they become more susceptible to conditions that may result in service-impacting situations.

Q. ARE CIRCUMSTANCES EVER ENCOUNTERED THAT CAN IMPACT THE DELIVERY OF RETAIL TELECOMMUNICATIONS SERVICE THAT ARE BEYOND CENTURYLINK'S CONTROL?

A. The answer is absolutely yes. Protracted commercial power outages and inclement weather in the form of wind, rain, floods, snow and ice storms can impact service delivery. Likewise, inability to obtain necessary network components that are either manufacturer discontinued or unavailable due to global supply chain logistical challenges can also be factors outside of the company's control. Complexities such as third-party

utility location service companies accessing CenturyLink network assets and not correcting changes to grounding wires they initially disturb is yet another example of factors out of the ability of the company to control.

Q. PLEASE DESCRIBE WHEN YOU FIRST BECAME AWARE OF THE SERVICE QUALITY COMPLAINTS IN THE LITTLE APPLEGATE ROAD AREA WITHIN CENTURYLINK'S JACKSONVILLE, OREGON, WIRE CENTER THAT HAVE CULMINATED IN THIS SERIES OF PROCEEDINGS.

A. In September 2021 Lumen received a message from the legislative representative serving the Jacksonville, Oregon, area that forwarded an email message from two of CenturyLink's subscribers. That email described complaints about outages in the southern portion of CenturyLink's Jacksonville wire center ("Little Applegate Road") over the course of several months.

Q. WHAT ARE THE PRIMARY ROOT CAUSES OF THE SERVICE OUTAGES THAT HAVE OCCURRED IN THE LITTLE APPLEGATE ROAD AREA OF THE JACKSONVILLE, OREGON WIRE CENTER?

A. There have been four primary causes of the service issues that have occurred in the Little Applegate Road area. First, certain sections of older vintage copper cables with internal paper insulation were prone to periodically becoming wet which created service challenges. Second, the batteries providing back-up power at the remote terminals at 2600 Upper Applegate Road and at 2900 Little Applegate Road had approached the end of their useful life. These two remote terminals presently serve 75 voice customers and the subscribers in this limited geographic area comprise the preponderance of complaints received since I first became aware of the service issues in this area. During commercial

power interruptions in the area, which seemingly occur with greater frequency in the southern reaches of the Jacksonville wire center than in other locations, the batteries lacked sufficient capacity to withstand the duration of the power outages that occurred. Third, the remote terminals are in excess of 40 years of age and, periodically, internal modular components fail and must be replaced. Fourth, the cable plant providing the T-1 span connections from the host CenturyLink central office in Jacksonville to the remote terminals required occasional maintenance that impacted service. Additional causes of service outages are described later in my testimony.

Q. PRIOR TO THE ISSUANCE OF OPUC ORDER 22-340, WHAT WORK DID CENTURYLINK PERFORM TO IMPROVE SERVICE QUALITY IN THE AREA?

A. In August 2021, CenturyLink replaced sections of cable along Little Applegate Road that were prone to becoming wet during inclement weather. That work also required the placement of new individual pedestals and splicing activity to connect the remaining older yet still serviceable cable with the new cable segments. During the work, Lumen's third-party contractor did not correctly perform the splicing and by the time Lumen identified and repaired the problem, service to customers provided by the 2900 Little Applegate Road remote terminal had been impacted for approximately two weeks.

Initially the aging batteries in the remote terminal at 2900 Little Applegate Road were replaced with a temporary string in early January 2022 due to delays in receipt of new batteries that were experienced nationwide and globally as a result of pandemic-related supply chain disruptions. The new permanent batteries were installed in May 2022 immediately on receipt of the materials. Further, in June 2022 a multi-disciplinary group

of field technicians, switch surveillance engineers, and network operations center personnel worked to fine-tune the alarm-generation functions of the remote terminals such that swift dispatch of repair personnel would take place should a remote terminal require service. These steps have improved abilities to react to potential service-impacting conditions before they impact telecommunications services.

In order to ensure that a sufficient quantity of replacement electronic components for the remote terminals was immediately available, CenturyLink's spare sourcing group acquired and shipped two complete sets of 19 different cards and other components to the Jacksonville area for use in the event of a future card failure. It is important to understand that the electronics used to operate the decades-old copper telephone system are manufacturer discontinued, thus new parts are not available. Faulty cards must be refurbished for re-use.

Q. HAS CENTURYLINK TAKEN ANY OTHER RECENT ACTIONS TO ENHANCE THE STABILITY OF THE REMOTE TERMINALS CONNECTED TO ITS JACKSONVILLE, OREGON, CENTRAL OFFICE? IF SO, HAVE THOSE ACTIONS BEEN EFFICACIOUS?

A. Yes, it has. In September 2022, CenturyLink field operations personnel performed an extensive review of the T-1 span cable plant from the Jacksonville central office all the way to the 2900 Little Applegate Road remote terminal. That work consisted of a detailed inspection and where necessary correction of bonding, grounding, and connections of the cable plant. The work also included testing of the cable pairs used for the T-1 spans, and where necessary the T-1 spans were cut over to different cable pairs. This work required

several days for completion as isolating faults on antiquated copper carrier systems is a complex task. In addition to triaging the T-1 spans, switch software upgrades in the Jacksonville, Oregon central office devoted to remote terminal connectivity were also implemented in September 2022. At the same time in efforts to stabilize communications between the central office switch in Jacksonville and the remote terminals, a central office switch module was replaced. After this work was completed, connections to the remote have been fully functional.

Q. HAVE YOU PERSONALLY SEEN THE OUTSIDE PLANT IN THE LITTLE APPLEGATE ROAD AREA OF THE JACKSONVILLE, OREGON, WIRE CENTER, AND IF SO, WHAT WERE YOUR OBSERVATIONS?

A. Yes, I inspected the outside plant in this area in March 2022. Though I am not an outside plant engineer, I have observed numerous outside plant installations throughout my career and the facilities in the Jacksonville, Oregon area appeared to be in good condition.

Q. DID THE OREGON COMMISSION STAFF ACCOMPANY YOU WHEN THE OUTSIDE PLANT WAS REVIEWED, AND IF SO, DID THE STAFF EXPRESS ANY OPINIONS ABOUT THE CONDITION OF THE PLANT?

A. Yes, the Commission's Senior Telecommunications Analyst, Joseph Bartholomew, participated in a review of the Jacksonville central office, outside cable feeder plant, remote terminals, and customer distribution plant in March 2022 during the same review that I described above. In general, Mr. Bartholomew expressed that the condition of the

outside plant was in a reasonably good state and in better shape than he had anticipated finding.

Q. DID THE OREGON COMMISSION STAFF RECOMMEND PROCEDURES OR PRACTICES TO IMPROVE SERVICE QUALITY IN THE AREA?

A. Yes. During pedestal inspections in March 2022, Mr. Bartholomew identified several instances where the bonding and grounding required attention. He indicated that in many instances, the grounding connections are removed by utility location services (not affiliated with CenturyLink) during line locates and that those grounding connections are not reconnected at the conclusion of the location procedures.

Q. DID LUMEN IMPLEMENT THE AFOREMENTIONED RECOMMENDATIONS MADE BY THE COMMISSION STAFF?

A. Yes, after receiving Staff's recommendations in March 2022, CenturyLink field personnel opened all pedestals along the reviewed route and performed all necessary bonding and grounding activity as suggested by the Commission Staff. To the best of my recollection, fewer than ten pedestals were identified to require minor servicing.

Q. PLEASE DESCRIBE THE SERVICE QUALITY IN THE AREA AFTER THE COMPANY-INITIATED AND STAFF-RECOMMENDED ACTIVITIES WERE COMPLETED?

A. After the installation of the new battery strings in the remote terminals and completing the bonding and grounding work, services in the Little Applegate Road area from May 2022 through August 2022 were functioning well.

Q. DID THE COMMISSION'S STAFF CONCUR WITH YOUR OBSERVATIONS AT THAT TIME?

A. Yes. At the Commission's open meeting of August 30, 2022, both Staff and I represented to the Commission that the restorative efforts in the area, including installation of new batteries, and bonding and grounding maintenance to the cable plant that had taken place, appeared to have corrected the issues.

Q. AROUND THE TIME OF THE 2022 LABOR DAY WEEKEND ANOTHER SERVICE ISSUE WAS ENCOUNTERED. PLEASE DESCRIBE WHAT OCCURRED AND HOW THE ISSUE WAS SOLVED.

A. The T-1 spans that connect the 2900 Little Applegate Road remote terminal to the Jacksonville central office experienced a condition referred to as "bouncing" wherein the T-1 data circuit carrying voice and data communications had faults on the T-1 span lines that caused the data stream to turn off and turn on, thus interrupting communications. The T-1 span lines were investigated, and repairs were made to correct the bouncing which restored services.

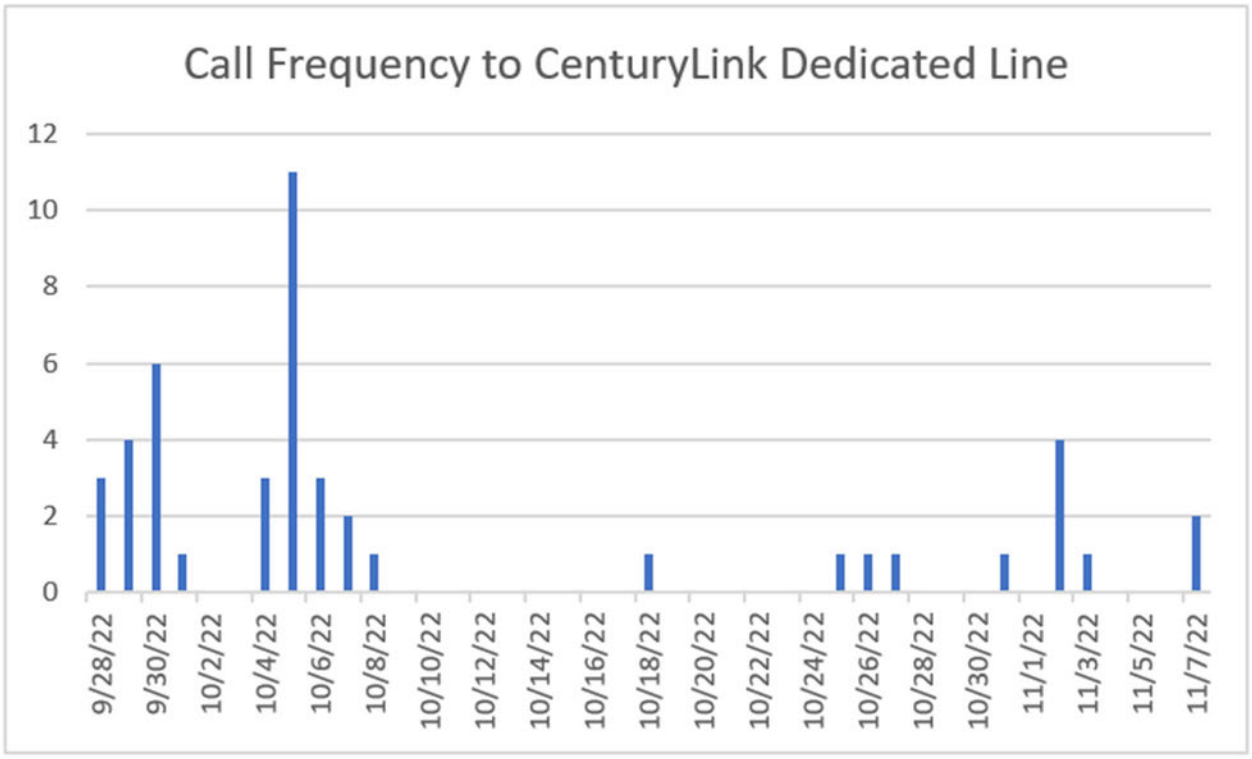
Q. ORDER 22-340 REQUIRED CENTURYLINK TO ESTABLISH A DEDICATED LINE FOR ITS CUSTOMERS IN THE JACKSONVILLE, OREGON, AREA. PLEASE DESCRIBE THAT PROCESS.

A. Within seven days from the Commission's Order 22-340, Lumen established a dedicated toll-free number which customers in the Jacksonville, Oregon area could call to establish a trouble ticket for their own service or multiple tickets for others experiencing service issues. The dedicated toll-free number has a separate interactive voice response system

that only collects the customer zip code before transferring the call to the front of the queue to be answered by Lumen's repair call center personnel. The dedicated line is currently available day and night, each day of the year, including holidays.

Q. SINCE THE DEDICATED LINE DESCRIBED ABOVE WENT INTO SERVICE, PLEASE PROVIDE AN ANALYSIS OF THE CALLS THAT HAVE COME INTO THAT LINE.

A. For the 49 days from the date the dedicated line went into service and through November 16, 2022, a total of 46 calls were placed to the dedicated toll-free line, which generated 10 tickets specific to the Little Applegate Road area, all of which have been closed. The total of 46 calls came from 38 unique phone numbers, some of which were from outside the Jacksonville area and some were not CenturyLink customers at all, but rather subscribers of other telephone carriers in Oregon. The graph below demonstrates that after an initial influx of calls during the first week of operation of the dedicated toll-free line, the calls have generally become infrequent in occurrence.



Q. ORDER 22-340 ALSO REQUIRED A 48-HOUR RESPONSE TO TROUBLE TICKETS GENERATED THROUGH THE DEDICATED LINE. PLEASE DESCRIBE HOW THE COMPANY HAS RESPONDED TO TICKETS IT HAS RECEIVED.

A. Depending on the time during the day that tickets are generated through incoming calls to the dedicated repair line, a ticket will receive a current day or next business day due date. Dispatch operations generate an open ticket report at 6 AM and 6 PM each day. The open ticket report is reviewed by field operations management and any open voice grade service tickets not already assigned to a technician are loaded to the next available technician to be worked.

In October 2022, 24 tickets were created from the calls received. Thus far in November 2022, 13 tickets have been created from incoming calls to the dedicated toll-free line. Each and every single ticket generated for voice grade service repair over the dedicated toll-free line has achieved a service resolution within 48 hours.

Q. DO YOU HAVE FURTHER OBSERVATIONS ABOUT THE TICKETS THAT HAVE BEEN CREATED AND RESOLVED THROUGH CUSTOMER CONTACT VIA THE DEDICATED TOLL-FREE LINE?

A. Yes, I do. Of the 24 tickets created in October 2022, only 7 were for service addresses homing back to the 2900 Little Applegate Road remote terminal. For November 2022 to date, only 2 of 13 total tickets were for service addresses homing back to the 2900 Little Applegate Road remote terminal and no trouble was found when CenturyLink technicians were dispatched on those 2 tickets. It is important to recall that CenturyLink presently has a total of 64 voice subscribers served from the 2900 Little Applegate Road remote terminal.

In October 2022, only 1 ticket was generated for a service address homing back to the 2600 Upper Applegate Road remote terminal. For November 2022 to date, zero tickets were created for service addresses homing back to the 2600 Upper Applegate Road remote terminal. It is important to recall that CenturyLink presently has a total of 11 voice subscribers served from the 2900 Little Applegate Road remote terminal.

These figures show that the majority of calls from the zip code 97530 to the dedicated customer service line are from outside the Little Applegate Area and do not represent the service issues that have been affecting that region. However, using the zip code to route

calls to that dedicated line is the only way CenturyLink can operate the line which the Commission required.

Q. IS THE COMMISSION'S ORDER REQUIRED TO REMAIN IN EFFECT FOR THE HEALTH AND SAFETY OF RESIDENTS GIVEN THE NETWORK ACTIONS TAKEN BY CENTURYLINK AND THE RESULTING LEVEL OF SERVICE ON LITTLE APPLEGATE ROAD?

A. Given the maintenance and repair efforts described in this testimony, which have resolved all service issues, and considering the small number of calls to the dedicated toll-free customer repair line from the Little Applegate area, continuation of Order 22-340 is no longer required. The geographic area covered by the zip code for the Jacksonville, Oregon area, 97530, is 362 square miles. The footprint of the CenturyLink Jacksonville, Oregon wire center is 246 square miles. As earlier noted in this testimony, only a small number of the calls received and tickets generated have come from the much smaller areas served by the remote terminals at 2600 Upper Applegate Road and 2900 Little Applegate Road. Hence, I submit that declining calls to a dedicated repair line and small numbers of trouble tickets do not rise to a general classification of a health and safety issue and that it would be appropriate for the Commission to sunset Order 22-340.

Q. DO THE CENTURYLINK TARIFFS PROVIDE CUSTOMERS REMEDIES WHEN SERVICES THEY PURCHASE ARE IMPACTED?

A. Yes, they do. For the Jacksonville, Oregon wire center that is served under the terms, conditions and rates as set forth in Qwest Corporation P.U.C. Oregon No. 33 tariff, approved by the Commission, customers may request credit where exchange access lines are out of service.

Q. DID THE PUBLIC UTILITY COMMISSION OF OREGON REQUIRE CENTURYLINK TO PROVIDE A PERFORMANCE IMPROVEMENT PLAN UNDER THE COMMISSION'S SERVICE STANDARDS AS SET FORTH AT OAR 860-023-0055(14) AND AS PROVIDED IN ORS 759.450(5) PRIOR TO ISSUING ORDER 22-340?

A. No.

Q. WHAT OBSERVATIONS HAVE YOU MADE WITH RESPECT TO THE STATE OF COMPETITION IN THE JACKSONVILLE, OREGON EXCHANGE?

A. There are a number of competitors present within the 246 square miles of the wire center. Specifically, there are 4 wire line providers, 4 fixed wireless providers, 3 commercial mobile radio service (cellular) providers, and 3 satellite providers[1] offering services within CenturyLink's Jacksonville, Oregon wire center.

IV. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, except for an important reiteration of few key constructs and final observations. Lumen sincerely regrets the inconveniences that have accrued to customers in the instances where service quality issues have arisen. The dedicated service line has shown that the number of issues in the Jacksonville, Oregon area, and the Little Applegate Road

[1] Source: FCC 477 Data: 2021Q2v1

Service Type	CLLI	WC	WC Pop	WC HH	Svc Available	Providers
Fixed Wireless	JCVLOR56	Jacksonville	7,094	3,235	3,092	4
Wireline	JCVLOR56	Jacksonville	7,094	3,235	2,922	4
Mobile Voice	JCVLOR56	Jacksonville	7,094	3,235	2,992	3
Satellite	JCVLOR56	Jacksonville	7,094	3,235	3,235	3

area in particular, are waning. Actions taken by the company including proactively acquiring scarce spare parts and fine-tuning alarm monitoring afford CenturyLink the ability to swiftly respond to service-impacting conditions that may arise. The company continues to invest significantly in Oregon and has no plans to operate in any other fashion. As such it is my testimony that the dedicated line should be permitted to expire on December 31, 2022, at which time the 48-hour service interval for clearing of all trouble reports should revert to the existing service quality standard of clearing 90 percent of all trouble reports within 48 hours of receipt of trouble tickets. And with those observations my testimony is concluded.

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

DOCKET UM 1908, UM 2206

In the Matters of LUMEN TECHNOLOGIES Proposed Commission Action Pursuant to ORS 756.515 to Suspend and Investigate Price Plan (UM 1908), and QWEST CORPORATION, Investigation Regarding the Provision of Service in Jacksonville, Oregon and Surrounding Areas (UM 2206). Hearing Relating to Order Nos. 22-340 and 22-422

FIRST EXHIBIT TO THE PREFILED DIRECT TESTIMONY OF

PETER GOSE

ON BEHALF OF LUMEN TECHNOLOGIES

November 23, 2022

Peter J. Gose — Curriculum Vitae

Contact Information

14530 NW 63rd Street
Parkville, Missouri 64152-8703
e-mail:peter.gose@lumen.com

Curent Position

CenturyLink / Lumen
Director – State and Local Government Affairs

Education and Telecommunications Regulation Training

B.S. Double Major Finance / Business Administration, Economics Minor
Northwest Missouri State University Maryville, Missouri

B.S. Accounting
Lincoln University Jefferson City, Missouri

M.B.A.
Northwest Missouri State University Maryville, Missouri

A.A.Sc. Cybersecurity / Secure Network Engineering and Administration
Metropolitan Community College of Kansas City - Completion May 2023

Annual Fundamentals Course in Regulatory Studies
National Association of Regulatory Utility Commissioners / Michigan State University

Practical Regulatory Principles Training
New Mexico State University Center for Public Utilities

Modern Finance Theory for Regulated Industries
University of Missouri

Telecommunications Training for Policy Makers and Public Advocates
Pennsylvania Public Utility Commission

Telecommunications Regulatory Seminar
Kansas Corporation Commission / Missouri Public Service Commission

Telecommunications Separations and Settlements Training
United States Telephone Association

Comprehensive Cost Separations Training for National Exchange Carrier Association
Ernst & Young

Utility Management Analysis Seminar
NARUC Management Analysis Subcommittee

Federal Bureau of Investigation Citizens Academy
United States Department of Justice

Peter J. Gose Curriculum Vitae

Past Professional Experience

Coral Wireless LLC, d/b/a Mobi PCS
Director – Regulatory Affairs
Director – Site Acquisition and Development
Director – Customer Care

QSI Consulting
Telecommunications Consulting Firm - *Founding Partner and Senior Vice President*

Competitive Strategies Group, Ltd.
Telecommunications Consulting Group - *Partner and Senior Consultant*

National Exchange Carrier Association
Industry Relations Division - *Manager of Tariffs and Training*

Missouri Public Service Commission
Policy and Planning Division - *Federal Telecommunications Analyst*

Missouri Public Service Commission
Policy and Planning Division - *Management Auditing Specialist*

Key Professional Activities

Member of the Kansas, Missouri, Oklahoma, Texas, and Arkansas five state Southwestern Bell Open Network Architecture (ONA) Oversight Conference.

Assistant to Federal – State Joint Board on Universal Service. Developed models to quantify effects of proposed changes to universal service programs.

Auditing of RBOC affiliate transactions and state universal service fund programs.

Chairman of the National Exchange Carrier Association Training Council. Responsible for maintaining and updating existing training materials and programs. Additionally tasked with oversight and development of new training programs focusing on interstate access settlement procedures and new telecommunications technologies.

Team leader in the redesign and update of the local area network and wide area network of the National Exchange Carrier Association.

Team leader in the research, design, procurement, and installation of the local area network and wide area network of the Missouri Public Service Commission.

Adjunct faculty member – Northwest Missouri State University.

Guest lecturer at Washington University – S. Louis, Missouri, speaking on telecommunications regulation, access charge development, and public policy.

Instructor – Executive MBA Program – University of Hawaii - Manoa

Co-Founder of the Universal Service for America Coalition.

Peter J. Gose Regulatory / Testimony Profile

Before the Arizona Corporation Commission
Docket Nos.T-01051B-18-0258 and AU-00000A-17-0379
In the Matter of the Application of Qwest Corporation d/b/a CenturyLink QC to Ament the Maximum Tariffed Rates for Certain Competitive Services; In the Matter of the Commission Inquiry Into Possible Modification of the Federal Income Tax Reform Rate Adjustment
On behalf of Qwest Corporation d/b/a CenturyLink QC
Rebuttal: April 2021
Rejoinder: October 2021

Before the Hawaii Public Utility Commission
Docket No. 2016-0417
In the Matter of the Public Utilities Commission Instituting a Proceeding to Approve the Application of CORAL WIRELESS dba MOBI PCS For Approval to Voluntarily Surrender its Certificate to Provide Wireless Services in Hawaii
On behalf of Coral Wireless, LLC d/b/a Mobi PCS upon sale of spectrum resources to Verizon Wireless
Docketed Matter: October 2017

Before the Federal Communications Commission
Docket: 10-90
In the Matter of the annual collection of information pertaining to section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254, sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: June 2017

Before the Hawaii Public Utility Commission
Docket No. 2016-0093
In the Matter of the Public Utilities Commission Instituting a Proceeding to Investigate Whether Designated Eligible Telecommunications Carriers Participating in the High-Cost Program of the Universal Service Fund Should be Certified By the Commission Pursuant to 47 C.F.R. § 54.314(a).
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: June 2017

Before the American Arbitration Association
Case No: 01-14-0000-9896
In the Matter of 3L Communications Missouri, LLC v. AT&T Corp.
Deposition and discovery in Arbitrated Matter: June 2015

Peter J. Gose **Regulatory / Testimony Profile**

Before the Federal Communications Commission
Docket: 10-90
In the Matter of the annual collection of information pertaining to section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254, sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: June 2015

Before the Hawaii Public Utility Commission
Docket No. 2015-0083
In the Matter of the Public Utilities Commission Instituting a Proceeding to Investigate Whether Designated Eligible Telecommunications Carriers Participating in the High-Cost Program of the Universal Service Fund Should be Certified By the Commission Pursuant to 47 C.F.R. § 54.314(a).
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: April 2015

Before the Hawaii Public Utility Commission
Docket No. 2015-0010
In the Matter of the application of Coral Wireless LLC for an amended certificate of registration.
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: April 2015

Before the Federal Communications Commission
Docket: 10-90
In the Matter of the annual collection of information pertaining to section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254, sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: June 2014

Before the Hawaii Public Utility Commission
Docket No. 2014-0126
In the Matter of the Public Utilities Commission Instituting a Proceeding to Investigate Whether Designated Eligible Telecommunications Carriers Participating in the High-Cost Program of the Universal Service Fund Should be Certified By the Commission Pursuant to 47 C.F.R. § 54.314(a).
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: July 2014

Before the Federal Communications Commission
Docket: 10-90
In the Matter of the annual collection of information pertaining to section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254, sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: October 2013

Before the Hawaii Public Utility Commission
Docket No. 2013-0066
In the Matter of the Public Utilities Commission Instituting a Proceeding to Investigate Whether Designated Eligible Telecommunications Carriers Participating in the High-Cost Program of the Universal Service Fund Should be Certified By the Commission Pursuant to 47 C.F.R. § 54.314(a).
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: April 2013

Before the Federal Communications Commission
Docket: WC 09-197 and 10-90
In the Matter of the 2012 Eligible Telecommunications Carrier Report to the FCC and USAC
For Designation as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: June 2012

Before the Hawaii Public Utility Commission
Docket No. 2012-0084
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: April 2012

Before the Federal Communications Commission
WC Docket No. 10-90, *Report & Order & FNPRM*, FCC 11-161 (rel. Nov. 18, 2011).
In the Matter of the Connect America Fund and Petition for Reconsideration filed by T-Mobile USA, Inc.
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Comments filed in Reconsideration Petition Docket: June 2011

Before the Hawaii Public Utility Commission
Docket No. 2011-0147
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS

Annual Report in Docketed Matter: June 2011

Before the Hawaii Public Utility Commission
Docket No. 2010-0305
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Annual Report in Docketed Matter: November 2010

Before the Hawaii Public Utility Commission
Docket No. 05-0300
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Informational Presentation: August 2010

Before the Hawaii Public Utility Commission
Docket No. 05-0300
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Informational Presentation: September 2009

Before the Circuit Court of Cook County, Illinois
Docket No. 06CR-12793
In the Matter of Authentication of Call Detail Records in Civil and Criminal Proceedings
On behalf of The People of the State of Illinois
Direct Testimony: September 2008 and February 2009

Before the Hawaii Public Utility Commission
Docket No. 05-0300
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Informational Presentation: August 2008

Before the Hawaii Public Utility Commission
Docket No. 05-0300
In the Matter of the Application of Coral Wireless, LLC d/b/a Mobi PCS to be Designated by the Commission as an Eligible Telecommunications Carrier
On behalf of Coral Wireless, LLC d/b/a Mobi PCS
Informational Presentation: September 2007

Before the South Dakota Public Service Commission
Docket No. TC01-098
In the Matter of Determining Prices for Unbundled Network Elements in Qwest Corporation's Statement of Generally Available Terms
On behalf of The Staff of the Public Utilities Commission of the State of South Dakota
Direct: June 2003

Before the North Dakota Public Service Commission
Case No. PU-2342-01-296
In the Matter of Qwest Corporation Interconnection / Wholesale Price Investigation
On behalf of The North Dakota CLEC Coalition; US Link, Inc.; VAL-ED Joint Venture LLP d/b/a/702 Communications; McLeodUSA Telecommunications, Inc.; and IdeaOne Telecom Group, LLC
Direct: May 2003

Before the New Mexico Public Regulation Commission
Utility Case No. 3495, Phase B
In the Matter of the Consideration of Costing and Pricing Rules for OSS, Collocation, Shared Transport, Non-recurring Charges, Spot Frames, Combination of Network Elements and Switching
On behalf of the New Mexico Public Regulation Commission Staff
Direct: September 2002

Before the Indiana Utility Regulatory Commission
Cause No. 41100
In the Matter of the Complaint of the Indiana Payphone Association for a Refund of Intrastate End User Common Line Charges
On behalf of the Indiana Payphone Association
Direct: January 2002

Before the Washington Utilities and Transportation Commission
Docket No. UT-003013
In the Matter of the Continued Costing and Pricing of Unbundled Network Elements, Transport, and Termination
On behalf of WorldCom Inc.
Direct and Supplemental Direct: December 2001

Before the Federal Communications Commission
In the Matter of the Formal Complaints of AT&T Corp. and Sprint Communications Company, L.P. vs. Business Telecom, Inc.
On behalf of Business Telecom, Inc.
Affidavit: February 2001

Before the North Carolina Utilities Commission
Docket No. P-100, Sub 133d, Phase I
In the Matter of Proceeding to Determine Permanent Pricing for Unbundled Network Elements
On behalf of Adelphia Business Solutions, BlueStar Networks, Inc., Broadslate Networks, Inc., Business Telecom, Inc., Covad Communications, CSTI, DSLnet, Inc., ICG Telecom Group, Inc., Intermedia Communications, Inc., KMC Telecom, Inc., Mpower Communications, Network Telephone, New Edge Networks, TriVergent Communications, and US LEC Inc. of North Carolina
Direct: August 2000

Before the Public Utility Commission of Colorado
Docket No. 99F-248T
In the Matter on a Complaint to Compel Respondents to Comply with Section 276 of the Federal Telecommunications Act
On behalf of MCI Worldcom
Direct: December 1999

Before the Michigan Public Service Commission
Docket No. U-11831
In the Matter on the Commission's Own Motion to Consider the Total Service Long Run Incremental Costs for All Access, Toll, and Local Exchange Services Provided by Ameritech, Michigan
On behalf of CoreComm Newco, Inc.
Affidavits: March 1999; June 1999; May 2000

Before the Public Utility Commission of Ohio
Case No. 96-899-TP-ALT
In the Matter of The Application of Cincinnati Bell Telephone Company for Approval of a Retail Pricing Plan Which May Result in Future Rate Increases and for a New Alternative Regulation Plan
On behalf of CoreComm Newco, Inc.
Direct and Supplemental Direct: December 1998

Before the Michigan Public Service Commission
Docket No. U-11756
In the Matter of a Complaint Pursuant to Sections 203 and 318 of the Michigan Telecommunications Act to Compel Respondents to Comply with Section 276 of the Federal Telecommunications Act.
On behalf of the Michigan Pay Telephone Association
Direct and Rebuttal: September 1998

Before the North Carolina Utilities Commission
Docket No. P-100, Sub 133d, Initial Generic Proceeding
In the Matter of Proceeding to Determine Permanent Pricing for Unbundled Network Elements
On behalf of Business Telecom, Inc., CaroNet, LLC, ICG Telecom Group, Inc., and KMC Telecom Group, Inc.
Direct and Rebuttal: March 1998

Before the Washington Utilities and Transportation Commission
Docket No. UT-970658
In the Matter of Formal Complaint and Petition for Declatory Order to Remove Payphone Investment from Access Charges
On behalf of MCI Telecommunications Corporation and AT&T Communications
Direct and Rebuttal: November 1998

Before the Public Service Commission of the State of Nebraska
Docket No. C-1519
In the Matter of the Emergency Petition of MCI Telecommunications Corporation and AT&T Communications of the Midwest, Inc., to Investigate Compliance of Nebraska LECs with FCC Payphone Orders
On behalf of MCI Telecommunications Corporation
Direct: January 1998

Before the Public Service Commission of Utah
Docket No. 97-049-08
In the Matter of the Request of U S West Communications, Inc., for Approval of an Increase in its Rates and Charges
On behalf of MCI Telecommunications Corporation
Direct: September 1997

Before the Wyoming Public Service Commission
Case No. 72000-TC-97-99
In the Matter of Compliance with Federal Regulations of Payphones
On behalf of MCI Telecommunications Corporation
Direct: May 1997

Presentations and Panels

Regional CMRS Implementation of the Commercial Mobile Alert System Presented to the Association of Public-Safety Communications Officials On behalf of the APCO/NENA Pacific Chapter
September 2011, Honolulu, Hawaii

Access Charge Reform Issues
Presented to the Telecommunications Law Continuing Legal Education Forum
On behalf of CLE International
December 2002, Denver, Colorado

Intercarrier Compensation and Clearing Mechanisms
Presented to the Washington University Olin School of Business: MBA Program
On behalf of *Olin School of Business: MBA Program*
In affiliation with the National Exchange Carrier Association
October 1996, St. Louis, Missouri

Role of State Regulatory Response to Federal Preemption
Presented to the Washington University Olin School of Business: MBA Program
On behalf of *Olin School of Business: MBA Program*
In affiliation with the Missouri Public Service Commission
September 1995, St. Louis, Missouri