6 guidelines, essentially, were to develop a process that

7 would work, and that would result again in the provision

8 and billing of service.

9 Q. When you commenced this position about two years

10 ago, a hundred percent of your time was devoted to this

11 task; is that right?

12 A. Yes.

13 Q. Since then, has your job responsibility changed,

14 away from being responsible for LISC processes?

15 A. No. It has narrowed somewhat in scope down to,

16 specifically, resale services, because the scope of resale

17 since the CPUC's order and the FCC's order has gotten so

18 large that they felt it was necessary to narrow the scope

19 down to allow that kind of focus on resale services. So

20 myself and my staff are responsible, specifically, now for

21 the development of business processes for resale.

22 Q. And when did that change occur?

23 A. Third or fourth quarter last year, yeah.

24 Q. And prior to that time, your responsibilities

25 had included what besides resale?

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1 A. Local interconnection unbundled services, all of

2 what we call the facilities based side of local

3 competition.

4 Q. And then there's someone else who is performing

5 that function?

6 A. Yes.

7 Q. Maybe we could sort of work through

8 chronologically how you developed the processes.

9 So it was in early 1995 when you commenced the

10 effort to devise these processes. Over what period of

11 time did you work to develop the various processes prior

12 to implementation of sort of a trial run? Is there any

13 kind of a description you can give to me to explain what

14 process or -- how you went about developing the processes,

15 say, through calendar year 1995?

16 A. Well, as I said, we started off with the

17 development of process models which laid out the total

18 end-to-end business process for all of the local

19 competition products. Then essentially, we focused on

20 those things that would be effective the earliest.

21 So those things that were going to become

22 effective, those products that were going to become

23 effective by end of year or first of the year '96 were the

24 areas that we focused on.

25 And we moved from process modeling into the

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1 development of Methods and Procedures for the Local

2 Interconnection Service Center, and then on testing or

3 trial internally within Pacific's Methods and Procedures

4 to ensure that they would work through all of the

5 different work groups as well as systems.

6 Q. And that was through '95 and early 1996?

7 A. Yeah, it was through -- I would say it's

8 through -- yes, '95 and early '96. Concurrent with that,

9 in late 1995, we began a detail business process

10 development, working with the competitive local carriers

11 on the processes associated with resale. That was in

12 about October, November of '95 that we started that

13 process, so it was concurrent, you know, it was an overlap

14 and I picked up additional staff, et cetera.

15 Q. In the development of the processes, was it

16 important for you to have information about the expected

17 volume of orders that Pacific would receive from CLC's?

18 A. From a business process development perspective,

19 it's important in terms of prioritization of the process

20 development effort, but a business process is developed

21 regardless, essentially, of volume. If you have a need to

22 provision a particular type of service, then you have a

23 need to develop a business process, certainly, you use

24 volumes estimated for forecasted volumes to prioritize

25 that development effort, going after those that are

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1 expected to be in high volume first.

2 Q. Is volume not a significant factor if you are

3 trying to determine which process to choose? For example,

4 if you were to expect a relatively small volume of certain

5 kind of orders, then you might say, we can make do with a

6 manual process of some kind for that type of order, but if

7 we anticipate a larger volume of orders for another

8 product, maybe we should come up with a process that would

9 make use of the computer system that would expedite our --

10 and to process quickly those types of orders. Does that

11 make sense?

12 A. Yes.

13 Q. Was that kind of analysis done when you were in

14 the process of developing processes for the LISC?

15 A. In late 1995, we were looking at largely how are

16 we going to exchange information with our customers and

17 how are we going to provision service, given this

18 information exchange.

19 So although the volume, again, certainly impacts

20 the priorities in terms of which projects we work on, my

21 organization, my staff is not responsible for systems

22 development. So that would have been something that was

23 more on the systems development side of the business than

24 the process development.

25 We would look to see what do we need to go after

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1 first in terms of process development, based on volume and

2 what we expect to get a large volume of, but everything

3 has to have a business process, so ultimately you end up

4 addressing them all.

5 Q. Let me try to come at it a different way. Were

6 you, essentially, told here are the systems that will be

7 available to you, now make a business process that will

8 work with these systems. So, for example, there may not

9 be an existing computer system for, say, the tracking of

10 orders as they come in and we will just work out a manual

11 system. Is that the kind of thing you were prepped with?

12 A. Systems development was largely concurrent with

13 the process development effort. They were happening

14 almost at the same time. This is a very, very short time

15 line in the live cycle of process and system development.

16 This period of time is extremely short, so that systems

17 development was occurring at about the same time that we

18 were doing process development, and that continues today.

19 Q. Well, when you first -- and it's true that you

20 worked with Mr. Torretta?

21 A. Yes.

22 Q. And he was responsible for the systems?

23 A. Yes.

24 Q. And so the two of you worked together in trying

25 to determine how the LISC should be set up with its

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1 systems and processes in order to make it function; is

2 that fair?

3 A. Yes.

4 Q. And am I correct to understand, also, there was

5 a Mr. Hough who was involved in determining the staffing

6 that would be put at the LISC?

7 A. Yes.

8 Q. And is that described, essentially, in the three

9 elements that went into the planning of the LISC, that you

10 were responsible for planning the processes, Mr. Torretta

11 was responsible for planning the systems, and Mr. Hough

12 was responsible for planning the personnel staffing?

13 A. Yes.

14 Q. Let's focus on one element, the incoming orders.

15 There's been a fair amount of testimony on that. As I

16 understand it, when the LISC was first operational and

17 into the fall, the system for tracking orders coming in

18 was a manual one; is that correct?

19 A. Yes.

20 Q. Was that established on the basis of a

21 determination that you and Mr. Torretta had made, that

22 that was the most appropriate way to keep track of the

23 orders as they come in?

24 A. No.

25 Q. Now, what was the reason for using that kind of

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1 a process?

2 A. Essentially, the reason for using a manual

3 process was because we did not have a system that we could

4 use for that function, and we had expected to have a

5 system at that point in time to use with that function,

6 but did not.

7 Q. So when you were doing your initial planning,

8 did you plan on there -- if you could choose whatever

9 process you wanted, you would have chosen a computerized

10 system that would have tracked the incoming orders; is

11 that right?

12 A. Yes.

13 Q. But there was some limitation placed upon you,

14 because that system either wasn't in existence or wouldn't

15 be ready by the time some significant volume of orders

16 started coming in?

17 A. Correct.

18 Q. And were you apprised of that early in the

19 planning process in 1995, or do you know when you were

20 apprised as to what system would be available, if any, for

21 the tracking of orders?

22 A. The expectation was that we would have a system

23 available in early 1996. Just prior to that, I'd say

24 right around the first of the year, the end of 1995, in

25 the systems community, it was determined that the system

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1 would not be ready in the time frame that they had

2 previously laid out.

3 Q. So during 1995, when you were in the -- when you

4 were developing processes, you had the expectations that

5 there would be a system in place to track incoming orders

6 and that would be available in early 1996, but you learned

7 very early in 1996 that wouldn't be the case?

8 A. Correct.

9 Q. And were you told why that would not be

10 available, why that tracking system would not be

11 available?

12 A. I am sure it was part of the discussion, and I

13 am also sure that it was probably fairly technical in

14 nature. And not being a technical expert, I would have to

15 defer to Greg Torretta for that explanation.

16 Q. To your knowledge -- I mean, you are not aware

17 of any restriction that was placed on you or your people

18 that would have impaired there being a computerized system

19 in place to track the orders?

20 A. No.

21 Q. Are you aware of any restriction that was placed

22 on Mr. Torretta's group that precluded his group from

23 being able to develop that?

24 A. I know that it's an extremely complicated

25 process in terms of the systems development. Beyond that,

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1 I don't have specifics as to any restrictions or

2 limitations, but they would be largely of a technical

3 nature and of a complexity nature.

4 Q. Did they tell you they were focusing on other

5 elements of the resale system dealing with moving a

6 customer from the CABS -- or from CRIS to CABS billing and

7 that kind of thing, and they were focusing their efforts

8 on those systems rather than the intake?

9 A. No.

10 Q. So you were given no explanation, that you can

11 recall then, something other than a technical nature as to

12 why the system for intake was not developed by early '96?

13 A. Largely, the explanation was one again of

14 complexity, that it was a very complicated and difficult

15 task to get the system into place.

16 Q. To your knowledge, you had an expectation that

17 that was going to be in place by early 1996, correct?

18 A. Yes.

19 Q. And presumably, in the systems side, likewise

20 had that expectation. Was there a report or something

21 generated to say, we are not going to meet this milestone

22 or this deadline because, and set forth here are the

23 various reasons, and here is what we are going to do to

24 try the meet the deadline or to make the system

25 operational?

1 MR. KOLTO-WININGER: I will object to it as

2 lacking foundation and calling for speculation. But go

3 ahead and answer whether you know there was a report.

4 THE WITNESS: Quite frankly, I don't recall if

5 there was a report. There was certainly a lot of

6 documentation on the progress of systems development

7 effort, but it came out to us from the business process

8 side at a meeting -- in a group meeting between business

9 process and systems, and that's where we discussed the

10 difficulties and what was going on relative to systems

11 development.

12 MR. McDONALD: Q. In preparation for the

13 deposition today, did you review Ann Long's deposition

14 transcript?

15 A. No. Unfortunately, I didn't have an opportunity

16 to.

17 Q. Did you review any materials for this

18 deposition?

19 A. No.

20 Q. Have you had discussions with anyone besides

21 Mr. Kolto-Wininger about the deposition?

22 A. No.

23 Q. At Ann Long's deposition, she described for us

24 in some detail the -- what I think what her testimony

25 states is that sort of a typical sequence of events when

1 an order comes in and how it's handled at the LISC. And

2 with that preface, based on your knowledge of Ms. Long's

3 understanding of those processes, is it your belief,

4 despite the fact that you have not reviewed that

5 transcript, that she actually could convey the sequence of

6 events?

7 A. Yes, I --

8 MR. KOLTO-WININGER: I will object. Calling for

9 speculation, but go ahead.

10 THE WITNESS: Yes.

11 MR. McDONALD: Q. To your knowledge?

12 A. Yes.

13 Q. She is a knowledgeable person who knows how the

14 LISC processes orders?

15 A. Yes.

16 Q. Do you want me to go through the entire exercise

17 with her?

18 MR. KOLTO-WININGER: Let's go off the record for

19 a second.

20 (Discussion off the record.)

21 MR. McDONALD: Back on the record.

22 Q. Let's sort of briefly run through the processes

23 that are used when a migration order comes in. And the

24 hypothetical we've given Ms. Long was a small business

25 order, I think there were three locations and ten lines.

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1 MR. KOLTO-WININGER: Hunting.

2 MR. McDONALD: Q. Hunting group, but -- and you

3 tell me if the variables matter. But what I am trying to

4 figure out is, for somebody like you who deals with the

5 processes in detail, do you divide up this entire sequence

6 of events in a series of -- do you have names for intake

7 processing and completion or something like that? Can you

8 give me some sense about how you characterize the various

9 elements of the sequence of events?

10 A. I would characterize the elements as receipt of

11 request, response, provision of service, completion

12 response, and billing.

13 Q. And then, within each of those categories, what

14 systems or what processes in systems are involved in

15 receipt of an order?

16 A. With the receipt of the order, it's the Resale

17 Mechanized Interface, or RMI, and it is a batch interface

18 where the resale requests come in in multiples, into the

19 LISC. It comes into their Cleo system, where, through the

20 progress of request, it's called POA, based on the name

21 that they used in the access environment. So it actually

22 stands for progress of ASR, or Access Service Request, but

23 in this case, they are not Access Service Requests; they

24 are resale requests.

25 So needless to say, it comes into the POA

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1 system, where it is assigned to the work group within the

2 LISC that's going to process the requests. The service

3 rep gets those assignments on her smart screen, I don't

4 know what smart stands for, but it probably doesn't stand

5 for anything.

6 And at that point, the service rep knows what

7 work he or she has to do and is ready to begin keying the

8 orders into the SORD system, Service Order Retrieval and

9 Distribution system, for purposes of provision of service.

10 Q. So are these finely defined so, at one point, we

11 have left the receipt function and we are now into the

12 response function?

13 A. Yes.

14 Q. What would you call that?

15 A. At the point of issuing the service orders into

16 the service order system, I would say it's at that point

17 we've hit response.

18 Q. Is there anything else that's part of the

19 response element?

20 A. Response consists of sending a Firm Order

21 Confirmation to the customer or a reject notification in

22 the event that the request contains inaccuracies and

23 prohibited the service rep from processing the service

24 orders.

25 Q. And then, is that the end of the response --

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1 A. Yes.

2 Q. -- part of the cycle, and then we go into the

3 provisioning element?

4 A. Yes.

5 Q. And what happens there? Is that entirely a

6 systems process?

7 A. No. That's both systems and work groups.

8 That's where you get into the big picture of Pacific

9 Bell's business process in terms of the exchange of

10 information between both work groups and systems, and for

11 most of the services. There's anywhere from, I'd say, 20

12 to 25 work groups and systems.

13 Q. We've heard testimony about a change order and

14 disconnect order and all that, that's what's put into the

15 SORD system. Is that in the response stage?

16 A. That's just prior to response.

17 Q. But then the actual implementation of those

18 orders, is that what occurs in the provisioning stage?

19 A. Correct.

20 Q. And after the various information exchange

21 within work groups at Pacific Bell is completed, do you

22 then go into the completion response stage?

23 A. Yes.

24 Q. And is that when a completion notice would be

25 issued to the customer?

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1 A. Yes.

2 Q. Would anything else happen?

3 A. The service orders are completed in SORD and go

4 off to the billing system.

5 Q. And then that leads to the final stage which is

6 billing, where Pacific bills the CRC?

7 A. Correct.

8 Q. Why don't we go through these five stages, maybe

9 in terms of the receipt stage. When the LISC -- as I

10 understand testimony has been, that the LISC began on

11 resale -- began operating, perhaps even as late as

12 sometime late '95, did some test runs in the summer of

13 '96, and really started receiving significant volumes of

14 orders in the fall of '96; is that your understanding?

15 A. Yes.

16 Q. Now, let's say, from the summer of '96 to the

17 current time, have the processes dealing with the receipt

18 of orders changed?

19 A. Give me that time frame again.

20 Q. Say, from June of '96 to the current time.

21 A. Yes.

22 Q. And how have they changed?

23 A. We have implemented a mechanized tracking system

24 within the LISC that does the tracking and assignment

25 capability that I reviewed earlier.

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1 Q. Excuse me, is that the LTD we heard something

2 about, tracking database?

3 A. No. This is part of Cleo.

4 MR. KOLTO-WININGER: When you and he are trying

5 to clarify an issue like that, really at any time, will

6 you let him finish speaking before you start responding.

7 MR. McDONALD: Q. I'm sorry I interrupted you.

8 So you were telling us there was a mechanized tracking

9 system that was developed. Do you remember when that was

10 done?

11 A. November of '96 was when the mechanized tracking

12 was put into Cleo. LTD was implemented prior to that.

13 Exact date, I am not sure of, but it seems to me it was

14 about mid-year '96, about the summer of '96 is when we got

15 LTD and the fall of '96 was when we got the mechanized

16 tracking and Cleo.

17 Q. Is LTD part of the receipt stage, in your mind?

18 A. For those requests that come in over fax rather

19 than through the batch interface or RMI, LTD is used for

20 tracking.

21 Q. Again, maybe just for convenience so that the

22 transcript can be read, when you talk about RMI, are you

23 referring to what many of the witnesses have talked about

24 as NDM?

25 A. Correct.

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1 Q. So in November of 1996, this mechanized tracking

2 process went into place, is that right, or is it a system?

3 A. It's a system.

4 Q. And why did that go into place?

5 A. Now we are talking about the Cleo mechanized

6 tracking associated with the NDM?

7 Q. Right.

8 MR. KOLTO-WININGER: Is the question why did it

9 go into place?

10 MR. McDONALD: Yes.

11 MR. KOLTO-WININGER: I will object as vague, but

12 go ahead.

13 THE WITNESS: Because there is a need to know.

14 Because of the volumes that started coming into the LISC

15 in late 1996, there is a need to know where the requests

16 are at any given time within the process, and we've

17 generally tracked that stuff through the process to ensure

18 that we know what's where.

19 MR. McDONALD: Q. Prior to implementing the

20 mechanized tracking system, Pacific had been using a

21 manual system; is that right?

22 A. Pacific had used LTD prior to the implementation

23 of the tracking function within Cleo.

24 Q. I thought you said earlier the LTD was used for

25 the faxed orders.

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1 A. Correct, today.

2 Q. Had there been difficulty locating orders or

3 determining the status of some orders prior to the

4 implementation of this mechanized tracking system?

5 A. Yes.

6 Q. And so the mechanized tracking system was

7 implemented, in order to address a problem that Pacific

8 had experienced with determining the status of the

9 existing orders?

10 A. It's not -- we had always intended to implement

11 a mechanized tracking vehicle. It addressed the issue of

12 ensuring that we know what's where at any given point.

13 Q. Was this mechanized tracking system the system

14 that you had expected would be in place in early 1996?

15 A. Yes.

16 Q. NDM, you told us, was already in place as of

17 June 17, '96, is that right, so there was no change to add

18 NDM as part of the receipt stage of the process and

19 systems for dealing with resale orders?

20 A. Well, now NDM was available prior to June of

21 1996. It was available, I believe, in March of '96, as

22 early as March of '96.

23 Q. Were there any other changes from June to the

24 current time in the receipt stage, other than the addition

25 of the mechanized tracking system in November of '96?

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1 A. I am trying to think of the different releases

2 that have come out since mid-year 1996. There was a

3 release in November, due to the tracking, and then, we've

4 had system interface changes on almost -- I'd say monthly

5 or every other month basis to enhance the interface

6 between Pacific and the CLC's, and then additional

7 tracking system enhancements in March of '97.

8 Q. Well, in the course of your work at the LISC,

9 have you been informed of problems that were identified,

10 whether by CLC's or by Pacific, with some of the

11 operations at the LISC?

12 A. Yes.

13 Q. One of the problems, am I correct, was the

14 inability, at least early on in the fall of 1996, of being

15 able to determine the status of pending orders; is that

16 right?

17 A. Correct.

18 Q. So the mechanized tracking system was designed

19 to alleviate -- at least in part, was designed to

20 alleviate that problem?

21 A. Correct.

22 Q. With respect to the receipt stage of the

23 process, was there any other problem, that you became

24 aware of, for which some alteration of the process or

25 systems was implemented?

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1 MR. KOLTO-WININGER: Wait for a second.

2 (Discussion between counsel and

3 witness.)

4 MR. KOLTO-WININGER: We were talking about

5 something else. Go ahead and answer this last question.

6 Can we --

7 MR. McDONALD: Sure. Read it back.

8 (Record read.)

9 MR. KOLTO-WININGER: I am going to object that

10 it mischaracterizes early testimony, but go ahead and

11 answer.

12 THE WITNESS: I don't know if this is going to

13 get at the answer, but essentially, the enhancements to

14 Cleo, including interface enhancements to accommodate the

15 customers as well as enhancements to the tracking

16 subsystem, if you want to call it that, of Cleo have been

17 phased in, and were intended, essentially, to address the

18 receipt, tracking, distribution of work within LISC.

19 So when we say -- when we say were they put in

20 place to address a specific requirement or need within the

21 LISC, they were not developed or designed specifically for

22 that purpose. They were developed and designed as a

23 result of our assessment as to what was going to be

24 required to exchange information between customer and

25 company, track the stuff -- the requests that were coming

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1 into the service center, and ultimately provide service
2 and bill those services. So it's -- that component is
3 part of the grand design, you might say.
4 MR. McDONALD: Q. Did you have interaction with
5 CLC's, to talk to the CLC's about processes or system
6 changes that would be -- that were, you know, sort of in
7 process, that were coming down the pike, that they would
8 be in place soon to address concerns that were being
9 raised by CLC's?
10 A. My work and communications with the CLC's was
11 largely along the process level rather than the systems
12 level.
13 Q. And in talking about processes, were you
14 involved in conversations with CLC's where the CLC's
15 identified issues that they characterized as problems in
16 the LISC processing?
17 A. Yes.
18 Q. And one of those problems, I think we already
19 talked about in the receipt stage, was the inability to
20 determine the status of pending orders; is that right?
21 A. Yes.
22 Q. At the receipt stage, were there any other
23 problems that were identified to you that addressed a
24 processing problem?
25 A. Response timeliness, I would say, would be the
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1 other one.
2 Q. When you say response timeliness, that's the

3 issuing of a FOC back to the customer or rejection notice?

4 A. Correct.

5 Q. So those were the two primary ones at the early

6 intake stage, where the receipt and the response for

7 migration orders were processed?

8 A. Yes.

9 Q. Were there any changes implemented from June of

10 '96 to the current time in order to -- well, that had the

11 effect, whether intended or otherwise, of improving the

12 timeliness of the issuance of FOC's?

13 A. Yes, there was. In 1996, LTD, FOC mechanization

14 was established for, essentially, to fax back to those

15 customers who sent their requests in via fax. That was

16 established in 1996, as well as the response capability

17 within Cleo to provide Firm Order Confirmations over the

18 RMI or NDM, as it's called, back to the CLC's who are on

19 the mechanized interface.

20 Q. When did that latter capability, do you remember

21 when that was established, sometime --

22 A. No, I don't remember.

23 Q. Sometime in 1996; is your recollection?

24 A. Yes.

25 Q. And to your knowledge -- well, let's describe

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1 the problem first.

2 The problem was that CLC's complained that

3 orders would be submitted to the LISC, and then FOC's were

4 not issued within four hours; is that right?

5 A. Correct.

6 Q. And the expectation was that FOC's would be

7 issued within four hours of receipt of the order?

8 MR. KOLTO-WININGER: Objection. Calls for

9 speculation as to whose expectation, but go ahead.

10 THE WITNESS: Correct.

11 MR. McDONALD: Q. Now, with these two

12 revisions, the fax back for the faxed orders and the NDM

13 response of FOC's, did that resolve the FOC untimeliness

14 problem?

15 A. No, it did not.

16 Q. And to your knowledge, has that problem been

17 resolved to date?

18 A. No, it has not.

19 Q. Have you attempted to determine what process

20 revisions could be implemented in order to improve

21 Pacific's performance on issuing timely FOC's?

22 A. Yes.

23 Q. What have you done in order to try to do that?

24 A. Essentially, we are, and continue -- we have and

25 continue to look at the process to see what additional

1 mechanization can be installed or implemented that will

2 facilitate a more timely process. In addition, we are

3 looking at the, you know, increasing staff within the

4 LISC, those types of things.

5 Q. Now, when you were working on the planning for

6 the LISC in '95 and '96, I think you told us you worked on

7 various process models in order to try to determine the --

8 or try to establish a process by which Pacific could

9 respond to orders for all the products that would be

10 resold; is that right?

11 A. Yes.

12 Q. When you were designing those processes, did you

13 make any effort to ensure that various time frames, time

14 intervals would be met?

15 A. Yes.

16 Q. And what time intervals did you have -- what

17 time intervals did you use?

18 A. For what aspect of the process?

19 Q. Why don't we walk through it. An order comes

20 in, and then there's supposed to be some kind of response

21 that goes back to the customer, right?

22 A. Yes.

23 Q. And was there a time interval that was

24 established in your planning, that you were using as a

25 measure, that you would try to establish a process to meet

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1 that time interval?

2 A. Yes.

3 Q. And what was that?

4 A. That would be the four-hour intervals.

5 Q. Were there other intervals prior to the

6 four-hour FOC that you used in your planning?

7 A. Initially, we looked at what is being done in an

8 access environment today with the inter-exchange carriers,

9 and in that environment, there's approximately a 24-hour

10 interval for Firm Order Confirmations, but recognizing

11 that this is not access service, that it's local service

12 provided to an end user, we recognized -- and after

13 discussions with our customers, realized that the 24-hour

14 interval was not going to be adequate to their needs, and

15 so we benchmarked the four-hour interval.

16 Q. So then, in establishing the processes to

17 receive these orders and then to respond, did your

18 planning process try to establish processes that would

19 satisfy that four-hour FOC interval?

20 A. Yes.

21 Q. And in doing that, was the volume of orders that

22 would be received a factor that you considered?

23 A. Oh, yes.

24 Q. Now, in the fall of 1996, I think testimony has

25 been -- you have also given testimony to the effect --

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1 that the four-hour FOC interval was regularly not met;

2 isn't that correct?

3 A. Correct.

4 Q. And did you identify a deficiency in the process

5 that undermined Pacific's ability to meet that time

6 interval?

7 A. Not within the business process, no.

8 Q. Did you identify any deficiency that caused the

9 interval not to be met?

10 A. Mechanization, largely, mechanization and

11 staffing.

12 Q. So it was based on -- your analysis was that the

13 system feed had to be enhanced, and that the number of

14 personnel needed to be increased in order to meet the

15 four-hour interval?

16 A. Yes, more of the latter than the former.

17 Q. Just more people?

18 A. Right.

19 Q. When did you make that determination yourself?

20 A. Late 1996, when the volumes began to increase

21 significantly in a very short time frame.

22 Q. Now, when you were doing the planning, did you

23 look at any forecasts, any expectations of volume, in

24 order to try to work with Mr. Torretta on the systems and

25 Mr. Hough on the staffing, in order to make some

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1 assessment that the entire LISC operation and the

2 processes and systems and personnel would be sufficient to

3 handle the demand that might be placed upon it?

4 A. While I have certainly met with Mr. Hough on the

5 forecast and the staffing requirements of the LISC, again,

6 from -- because I am not part of the LISC itself in terms

7 of -- I am not one of the -- either human resources or

8 management team of the LISC itself. The issues around

9 staffing would be more an issue of that management team

10 than they would be an issue of a business process

11 development effort. So I am aware of what the forecast

12 was, what the staffing forecast was, and I certainly have

13 had discussions with Mr. Hough and others about that, but

14 again, it's not directly within my realm of

15 responsibility, ultimately.

16 Q. But is it fair to characterize the planning that

17 went in place that you and Mr. Torretta and Mr. Hough were

18 the three people with responsibilities for those three

19 elements that we've already talked about, the systems

20 processes and personnel?

21 A. Yes, again, my focus being on business process

22 development.

23 Q. Right. And in the planning process, if you had

24 anticipated that the volume in the fall of 1996 would be

25 what it actually turned out to be, and you looked at it

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1 and concluded that the processes were as good as they were

2 capable of being, but there were potential systemic

3 problems or personnel problems, would you alert the other

4 members of your team to your concerns?

5 MR. KOLTO-WININGER: I am going to object that

6 that's vague and lacks foundation, but go ahead.

7 THE WITNESS: Certainly in theory, yes, and -- I

8 am trying to understand what it is that you are getting at

9 here, so that I can --

10 MR. McDONALD: Q. If you don't understand, let

11 me try it again.

12 A. Yeah, okay.

13 Q. When you were undertaking the planning for the

14 LISC, did you anticipate that the LISC was established

15 with adequate processes, systems and personnel sufficient

16 to handle volume that reasonably could be expected for it

17 to receive?