STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

DOCKET NO. DT 10-025

DIRECT TESTIMONY

OF

KATH MULLHOLAND

ON BEHALF OF

segTEL, INC.

APRIL 9, 2010

1   Q. Please state your name, place of employment and position.

2   A. My name is Kath Mullholand. I am currently employed by segTEL, Inc. (segTEL) as
3   Director of Operations at 325 Mount Support Road in Lebanon, NH.

4   Q. What are your duties at segTEL relevant to this proceeding?

5   A. At segTEL, I have broad responsibility for customer ordering, provisioning and
6   billing. I am also segTEL's regulatory liaison. In my official capacity, among other
7   things, I oversee and am familiar with the provisioning of wholesale services from
8   Northern New England Telephone Operations LLC d/b/a FairPoint Communications-
9   NNE (FairPoint), as well as other ordering and ticketing processes.

10   Q. Are you the same Kath Mullholand that filed testimony with this Commission in
11   Docket No. DT 07-011 on November 20, 2008?

12   A. Yes.

13   Q. Is this testimony an update to your testimony (hereinafter November 20 Testimony)
14   in that docket?

15   A. Yes.

16   Q. Please summarize the relevant parts of your November 20 Testimony.

17   A. In November, 2008, it was my considered opinion that FairPoint's Wholesale
18   Customer OSS (herein referred to as the CLEC OSS) was not ready for cutover, and
19   that the CLEC OSS was not at parity with FairPoint's Operations Support System for
20   its retail services (FairPoint's OSS). At the time my concerns could only include
21   those things that were made evident in the limited testing environment that was made
22   available to me by FairPoint. These concerns included the fact that the testing did not
23   use real data, that testing was not integrated, and did not test actual system

1   functionality. In my earlier testimony, I was concerned with the readiness of the

2   FairPoint's CLEC OSS. Specifically, in segTEL's testing we found significant clues

3   that the trouble ticketing system had not been adequately tested in conjunction with

4   other systems. I have attached a copy of my November 2008 testimony for your

5   convenience.

6   Q. What did you recommend to the Commission at the time?

7   A. I recommended first that the Commission deny FairPoint's request to issue its

8   irrevocable notice of readiness be denied. Second, I recommended that FairPoint's

9   CLEC OSS be given more thorough scrutiny and that each function in the CLEC OSS

10   should be compared to its retail analog in the FairPoint OSS.

11 Q. What were your primary underlying concerns that led you to those recommendations?

12 A. I was afraid that I was seeing in testing meant that segTEL would be unable to enter

13   trouble tickets, that trouble tickets would be delayed in getting to FairPoint, that some

14   data might not be accurate, that FairPoint technicians would not have all the

15   information they needed to effect a repair and that, as a result, our customers would

16   suffer unnecessarily protracted outages. I was also concerned that our ability to

17   process orders would be impaired.

18 Q. Were your fears realized when the system went live?

19 A. Yes. Due to CLEC OSS outages, there were several days when trouble tickets and

20   orders could not in fact be entered and orders could not be confirmed. In addition,

21   there were serious conflicts between the various FairPoint systems such that a trouble

22   ticket, an order, or other transactions entered by CLECs would not in fact be received

23   by FairPoint, despite indications in the system that the transaction had been both

24   acknowledged and received, and there were many instances where information

25   entered by segTEL did not match up with data in FairPoint's systems, resulting in, for

1   instance, bad customer address or customer contact information, causing delays in

2   repairs, dispatches and installations. Finally, there were occasions when FairPoint

3   technicians complained that our trouble tickets and orders were incomplete, despite

4   our having entered into the system the very information the technician was saying

5   was not on the ticket. As bad as that was, more crippling was the inability to do any

6   pre-order transactions whatsoever.

7   Q. Were there other issues?

8   A. Yes, there were, in fact, many other issues, too numerous to be detailed here. My

9   testimony is not meant to be a comprehensive list of all the failures that segTEL and

10   other CLECs experienced. However, two weeks after cutover, segTEL provided this

11   Commission with an update of how cutover was going. Our update included the

12   following:

13   1) Caller ID. Caller ID dips were not working on an intermittent basis. Apparently

14   there was some mismatch in pointers such that a call from caller A is identified as a

15   call from unrelated caller B.

16   2) PreOrder. There was no ability to do preorder transactions. Two weeks after

17   cutover segTEL was unable to pull a customer service record (CSR), directory listing,

18   or loop qualification information.

19   3) Orders. Two weeks after cutover, segTEL was still unable to place any orders for

20   any kind of services.

21   4) Trouble Ticketing. The trouble ticketing system had been off-line repeatedly.

22   Q. Did you try to address these concerns with FairPoint and did they rectify them?

23   A. Yes. segTEL and other CLECs reported each of these concerns on the daily calls that

24   took place at that time. In addition our concerns were typically emailed to FairPoint

1   and/or CapGemini personnel who requested more information and specific examples.

2   Yet, when Peter Nixon provided an update on Operational Support Systems Cutover

3   to the Staff of the Commission, he did not mention system downtime at all, did not

4   mention Caller ID problems, mentioned trouble ticketing and pre-order only in the

5   most general terms, and stated that the primary problem with ordering was the lack of

6   flow-through. In fact, Nixon stated, "I am pleased to report that the cutover itself

7   went according to our plans."

8   Q. Do these problems still occur more than a year after cutover?

9   A. Yes. The problems do not occur at the same rate and severity as they did immediately

10   post-cutover, but yes, significant problems still occur. FairPoint has addressed the

11   issues that made the systems largely unusable, but has failed to address the many

12   issues that would make the system fully functional. BayRing Communications, a

13   New-Hampshire based CLEC, has done significant documentation and analysis of the

14   issues that continue to plague the CLEC OSS. Wendy Wilusz of BayRing will be

15   testifying to those matters.

16   Q. Were there other concerns that were not raised in your November 20 testimony?

17   A. Yes. During cross-examination of FairPoint witness, Rich Murtha, before this

18   Commission, segTEL realized that the CLEC OSS had not been tested to ensure it

19   could handle the initial expected CLEC load. Mike Haga testified that the system had

20   been subjected to performance tests with no more than 50 simultaneous transactions.

21   Rich Murtha testified that the normal CLEC load was 18,000 transactions a day,

22   primarily processed over five hours (between 9:00 AM and 2:00 PM). We realized

23   that FairPoint's testing had been limited to stress testing that did not even exceed

24   normal CLEC volumes of approximately 3600 transactions an hour.

25   Yet at the same time, FairPoint was calling for an eight-day embargo period in all

26   three states (during which CLECs were asked to refrain from placing orders), as well

1   as planning on seven "dark" days, for a total of fifteen days in which CLECs would

2   create no transactions. This combined embargo/dark period would potentially create

3   a backlog of orders in excess of 250,000 transactions. Even if that potential load

4   were spread out over an entire eight-hour business day, such a backlog could result in

5   nearly 600 transactions per MINUTE – more than ten times the number of

6   transactions FairPoint subjected its systems to in preparation for cutover. Since my

7   testing indicated that most individual transactions took nearly a full minute to

8   process, segTEL was concerned that fifty transactions would not sufficiently test for

9   expected transaction volumes.

10   Q. Why was that important?

11   A. Multi-user computer systems are designed to handle only so much simultaneous

12   work. One of the primary tasks in sizing a system is to ensure that it can handle the

13   expected volume of transactions. Now that doesn't mean that you go all out and

14   create a system that can handle every once-in-a-lifetime event that might come up,

15   but when you know that a particularly high load is a certainty, it is prudent to plan for

16   it by fully understanding where the weak spots are – what's likely to break under

17   stress, and what load the system can reasonably handle.

18   Once you have that data, you can either size the system to handle the expected

19   volume, or you can restrict user access to reduce volumes to what the system can

20   handle. If you take no steps to control the volume of transactions, you risk system

21   failure due to overload.

22   Q. Is that what happened?

23   A. To the best of my knowledge, yes. Trouble ticketing went off-line within a few hours

24   of cutover, and the CLEC OSS went off-line altogether within three days of cutover.

1   Q. How has the system worked once the underlying cause of the initial problems was

2   addressed?

3   A. As is well known by now, FairPoint's systems failed in many respects. Based on my

4   attendance at the daily FairPoint Wholesale Cutover phone calls, I am aware of

5   several issues. Many CLECs were unable to use their credentials to log into the

6   system at all; others, including segTEL, could login, but not actually use the system,

7   while still others could use the system, but their orders would stall, be rejected, or

8   fall out. Systemic login failures probably saved the systems the first day; but once

9   CLECs were actually able to logon, the systems, particularly trouble ticketing, went

10   down and were unavailable for long stretches of time.

11   Q. What impact did this have on segTEL?

12   A. segTEL, like other CLECs, was unable to place orders or enter trouble tickets at all

13   for several days. Slowly, over the course of several weeks, small improvements were

14   made, so that eventually, segTEL is now able to use FairPoint's systems for many,

15   but not all, of the functions we had available to us with Verizon's OSS.

16   Q. How would you sum up the current state of FairPoint's systems today?

17   A. Despite more than a year of asserted industrious activity on the part of FairPoint and

18   CapGemini, FairPoint's systems still fail in many key areas. Based on my own

19   observations, and on cross-examination of FairPoint witnesses at a public hearing

20   held by the Commission in July 2009, FairPoint's systems are still inadequate in at

21   least the following ways:

22   1. Address validation and updates;

23   2. Customer service record discrepancies;

24   3. Billing completion notices;

25   4. Lack of validation and integration;

26   5. Lack of coordination between trouble ticketing and billing;

1   6. The order "blackhole;" and

2   7. DSL qualification.

3   Q. Tell me the current issues with address validation and updates.

4   A. New addresses still take five or more days to cycle through the system. What this

5   means in real time is that when a new building is built, Fairpoint gets the "jump" on

6   being able to service the customers there, to the detriment of CLECs like segTEL.

7   For instance, in an actual segTEL example, a new town police building was

8   constructed that required telephone service and internet access. The Town selected

9   FairPoint for voice services and segTEL for data services. FairPoint was able to book

10   the retail order and provide service to the end user immediately upon installing the

11   drop cables to the new building. segTEL's order for circuits to provide Internet were

12   rejected repeatedly for address validation errors, despite multiple escalations. As a

13   result, the police station had to divide its personnel for more than ten days before it

14   could complete its move. Not only was this situation inconvenient for the end user, it

15   was harmful to segTEL's reputation. This event also serves as evidence of segTEL's

16   contention that FairPoint provides superior service and support to its retail customers,

17   to the detriment of its wholesale customers.

18   Q. Have you reported this issue to FairPoint?

19   A. Yes, both in the specific situation I cited above, and in general. At the 2009 hearing

20   before this Commission, I asked Jeff Allen, FairPoint's Executive Vice President for

21   Northern New England, about this issue:

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22          2   "... Are you aware that
23          3 there is a significant lag between the time that a
24          4 FairPoint customer gets service under that situation
25          5 and the time a CLEC can place an order to get service
26          6 for a customer under that situation?
27          7 A. (Allen) I don't know if there is a difference at all.
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28   Q. Tell me the current issues with customer service record discrepancies.

1   A. segTEL has evidence that the customer service records provided to CLECs are not the

2   same customer service records provided to FairPoint personnel. I will provide one

3   example. A city received UNE-P service for about twenty telephone lines from a

4   CLEC. Upon request from the city, segTEL requested CSRs on every line, and

5   attempted to enter orders using those CSRs. The orders failed. segTEL continued to

6   follow up, and only eventually after repeated escalations and many dozens of hours of

7   effort was provided customer service information on the city's lines directly from

8   FairPoint's internal systems. The CSRs from FairPoint's internal systems were

9   significantly different than those segTEL was able to retrieve using the CLEC OSS.

10   Q. Please enumerate how the CSRs differed.

11   A. The major difference was the relationships between the Billing Account Numbers

12   (BANs) and the Telephone Numbers (TNs) were completely different. For instance,

13   on the segTEL CSR, BAN A had TNs A, B, C, and D. On the FairPoint CSR, there

14   were three BANs, corresponding to TNs A, B and C, and TN D was associated with

15   BAN C, not BAN A. In addition, the segTEL CSRs had radically different

16   information regarding the existence and composition of hunt groups, and, in at least

17   one instance, had a TN that didn't belong to the city at all.

18   Q. Why is that important?

19   A. Because orders placed must match what is in the system exactly. If the BAN or the

20   TN is incorrect, or if the relationship between them is incorrect, or if the order placed

21   doesn't acknowledge the existence of all of the TNs associated with the BAN, the

22   order will fail, and the CLEC has no way to determine why it's failing.

23   Q: What is the practical impact of this?

24   A: The practical impact is that a CLEC like segTEL is faced with the unpalatable choice:

25   we can either refuse to attempt orders to convert a customer of this sort to our

1   services, or expend such inordinate amounts of time and effort to do so that the

2   endeavor is completely unprofitable. Because the CLEC CSRs did not contain the

3   data that FairPoint's CLEC OSS requires to process a wholesale order, the CLEC

4   CSRs were inferior. Again this is evidence that FairPoint provides superior service to

5   itself to the detriment of competitors.

6 Q. Is the inability to place these orders efficiently the only concern?

7 A. No. The fact that different systems have different information is an indication that

8   there is a severe lack of coordination of the data. Depending on which system has

9   which data, this lack of coordination can lead to a wide variety of consequences.

10   These consequences can be as benign as a billing error, for instance the TN segTEL

11   orders and now owns could end up being billed to both segTEL and the original

12   CLEC. On the other hand, the consequences could be as serious as putting the

13   customer out of service, and, due to data complications, being unable to enter a

14   trouble ticket or place an order to get the customer back in service in a timely manner.

15 Q. Has FairPoint proposed a fix for this issue?

16 A. No. Despite being provided with information and copies about this issue on three

17   separate occasions, FairPoint has consistently denied that this problem exists.

18 Q. Describe the current issues with billing completion notices.

19 A. Billing completion notices are the final record in the order process. A post-order

20   function, the purpose of a billing completion notice under Local Service Order

21   Guidelines (LSOG) is to notify the CLEC that all service order activity associated

22   with a CLEC order has been completed and is ready for billing. There are two issues

23   with completion notices.

24   The first is that completion notices do not post in a timely manner, and too often do

25   not post at all.

1   The second is that segTEL has noticed that even when an order has completed, and a

2   billing completion notice has been issued, not all aspects of the order have, in fact,

3   been completed.

4   For instance, segTEL entered orders for directory listing changes and received billing

5   completion notices. Yet, fourteen days after the billing completion notice was

6   received, when segTEL pulled the directory listing information from the CLEC OSS,

7   the changes were not reflected there.

8   Q. Is FairPoint aware of this problem?

9   A. Yes. I brought this to FairPoint's attention at the hearing before the Commission

10   Staff on July 30. At that hearing, I had the opportunity to question Rich Murtha about

11   this issue. Mr. Murtha explained that the billing completion notice is only intended to

12   show that billing for the order has been posted. He went on to explain that the actual

13   change in directory listing would normally occur 48 hours after the billing completion

14   notice issued. Mr. Murtha also confirmed that this was "business as usual."

15   However, segTEL's experience is that directory listings do not update within 48, 72,

16   or even 96 hours. segTEL has waited as much as two weeks for such updates. While

17   in most cases, this could indicate a delay in 411 information, when an order is placed

18   just prior to the cutoff date for directly listing changes in the physical phone book, the

19   lack of predictable and accurate feedback means that we cannot provide our

20   customers with assurance that their directory listing changes will be reflected in their

21   local phone book.

22 Q. Describe the current issues with lack of coordination between trouble ticketing and

23   billing?

24 A. In my November 2008 testimony, I mentioned segTEL's concerns that the testing

25   environment for trouble tickets didn't appear to be integrated with other systems. In

26   the past, with both Verizon and FairPoint, we have been able to enter trouble tickets

1   for issues with any of our circuits. Just two weeks ago, while escalating a request for

2   a vendor meet on a problem circuits, we were asked to instead submit a paper form to

3   a particular FairPoint employee. When we questioned the use of a paper form instead

4   of using FairPoint's CLEC OSS for this function for this circuit, segTEL personnel

5   were told this was now the procedure for this type of circuit. segTEL escalated

6   further, and I participated in a conference call on this issue along with Ann Morrison,

7   FairPoint counsel, and segTEL counsel. At that time, Ann Morrison stated that

8   FairPoint needed to use a manual system for this function because there was no way

9   to capture billable events in FairPoint's CLEC OSS trouble ticketing system.

10   Q: Why would a billable event need to be captured by FairPoint's CLEC OSS trouble

11   ticketing system?

12   A: On occasion, a CLEC might enter a trouble ticket for a service defect which, upon

13   dispatch, is found to be a defect under the CLEC's control. For instance, a no dial

14   tone situation could turn out to be a misallocation of facilities in the switch itself. If

15   FairPoint dispatches a technician in such an instance, the dispatch is then billable to

16   the CLEC.

17   Q: Do you believe that there is a policy or priority selection being made by this newly

18   proposed procedure?

19   A: Yes. I believe that four things have been implemented here:

20   a)   First, by implementing this scheme, FairPoint has prioritized catching the

21   remote chance of a billable event over the importance of restoring service to CLECs

22   during outages.

23   b)   Second, by creating a paper-driven process addressed to an individual,

24   FairPoint has ensured that audit-trails are removed, PAP reporting is avoided, and,

25   potentially, response times may be increased. If the single individual charged with

1   receiving these requests is out of the office due to emergencies in the field, or on

2   vacation, a reported outage might languish for hours or even days. In the electronic

3   world there is proof of a reported problem indelibly entered into a system, where in

4   the manual world there is not.

5   c)   Third, there is no evidence that FairPoint's own internal procedures

6   mandate a similarly protracted and inefficient process for trouble reporting in order to

7   ensure billing capture for the occasional retail trouble ticket that might generate a

8   billable event. Therefore, once again, FairPoint is electing to create a disparity

9   between wholesale and retail operations, to the detriment of the CLEC.

10   Q. Describe the current issues with the order "blackhole".

11   A. There are many instances in which errors continue to cause orders to simply stall.

12   Often when an order hits an error, for instance, if the facilities proposed are already in

13   use, the order, which has already posted a confirmation, will remain in that status

14   indefinitely.

15   Q. What should happen in that case?

16   A. Under Verizon's local service order guidelines, electronic jeopardy notifications issue

17   when a confirmed order is in danger of missing its due date. A jeopardy notification

18   lets the CLEC know that the order will not be completed without some intervention

19   on the part of the CLEC. In FairPoint's CLEC OSS, these orders continue to look as

20   if the services being ordered will be provided on time.

21   Q. Has FairPoint proposed a fix for this problem?

22   A. FairPoint continues to provide manual workarounds for many of the existing system

23   problems. segTEL has a single point of contact (SPOC) and FairPoint provides order

24   status reports on LSR and ASR orders every few days. At one point, FairPoint

25   proposed to address segTEL's problems on a "more proactive basis." FairPoint's

1   proposed solution involved segTEL spending two to three hours a day checking the

2   status of every order, putting an update on a spreadsheet, providing it to our account

3   manager and to our SPOC and waiting for a resolution.

4   Q. How did that work out for you?

5   A. After about a month, we determined that the amount of hours we were expending

6   were not creating any solutions, but gathering more excuses about why things weren't

7   progressing. It is simply not cost effective for us to monitor FairPoint's progress. In

8   fact, as a result segTEL determined it was more viable to cease doing business with

9   FairPoint than to continue this exercise.

10 Q. Your final issue is DSL qualification. What is DSL qualification?

11 A. DSL qualification involves checking the status and composition of a copper loop to

12   determine whether it can be used to provide DSL service. Adequate DSL

13   qualification results include information regarding the length of the loop, the

14   existence of bridged taps on the loop, and whether the loop has conditioning. This

15   information is commonly called "loop make-up" information. With Verizon's

16   systems, loop make-up was readily available, both as a downloaded feed of

17   information for an entire central office, and on a real-time, one-by-one query through

18   the OSS.

19 Q. Please describe your issues with DSL qualification?

20 A. Many of the answers that we receive from the automated system are unreliable or

21   disproved in the field. The distances reported from the central office vary wildly for

22   customers who are literally across the street from one another. For a while, all DSL

23   qualifications came back with identical loop lengths. Further, the results are often

24   incorrect in other respects, such that pre-qualifying a loop is far less valuable than it

25   should be.

1   Q. Is that the only issue?

2   A. No. segTEL believes that FairPoint has used loop qualification information to

3   hamper competition.

4   Q. Please give an example.

5   A. segTEL deployed broadband facilities in Thetford, Vermont and Lyme, New

6   Hampshire. Shortly after cutover, when FairPoint could not provide automated loop

7   qualification information at all, FairPoint established a workaround that consisted of

8   sending an email and requested a so-called "manual" qualification. After sending in

9   multiple email requests for manual loop qualifications, segTEL was notified that

10   FairPoint would no longer provide qualification information for Thetford and Lyme.

11   Q. Did FairPoint provide a rationale for its decision?

12   A. Yes. FairPoint personnel told me that they would only provide DSL loop

13   qualifications in places where *FairPoint itself* was already providing DSL. In other

14   words, since FairPoint did not sell DSL broadband in those markets, they intended to

15   prohibit segTEL from doing so as well.

16   It would be harder to identify a more anti-competitive activity than refusing to

17   provide a particular UNE simply because the ILEC itself had not gotten around to

18   providing the services that the competitor was proposing to provide.

19   Q. Was this ever resolved?

20   A. Yes, this was eventually resolved after segTEL escalated this to FairPoint's

21   regulatory personnel.

22   Q. What is your overall assessment of FairPoint's current CLEC OSS?

1   A. It is my opinion that FairPoint, despite a great deal of apparent activity, lists of
2   problems, meetings with CLECs, and repeated fixes to the systems, still lacks a basic
3   understanding of the problems CLECs are facing on a daily basis.

4   Q. What would you like the Commission to take away from your testimony?

5   A. When cutover was approved, the Commission relied on testimony from Rich Murtha,
6   Brian Lippold, Peter Nixon, and Mike Haga that FairPoint's systems were ready to be
7   deployed. The evidence, extending far beyond my very limited testimony and
8   observations, is overwhelming that those systems were not, in fact, ready.

9   Now, the Commission is being asked to trust FairPoint's assurances once again.
10   Once again, Peter Nixon, Brian Lippoled and Rich Murtha appear before you, asking
11   you to believe them when they say their actions will have no impact on competition.
12   Rich Murtha, in his testimony to the Commission, states unequivocally that
13   FairPoint's Reorganization will have no adverse affect on the wholesale community.

14   Substantially the same management exists post-bankruptcy as existed pre-cutover. I
15   want to ask the Commission by what measure has FairPoint's management has
16   demonstrated that it has the technical, financial and managerial competence to admit
17   problems exist, accurately assess those problems, develop efficient and
18   comprehensive solutions, and effectively implement those solutions on a
19   competitively neutral basis? The evidence is before us that they cannot.

20   Q. What is your recommendation?

21   A. I recommend that the Commission deny approval of FairPoint's reorganization on
22   the basis that the plan, as filed, does not comprehensively address the extensive
23   failings of the company's wholesale operations.

1   In the alternative that the plan is approved, I would recommend that *at a minimum* the

2   Commission act to mitigate and reverse the continuing deterioration of wholesale

3   performance by:

4   1) Requiring FairPoint to keep the existing Performance Assurance Plan (PAP) in

5   place for at least five years;

6   2) Restoring the dollars at risk under the PAP to the levels that were established when

7   Verizon's PAP was first approved in New Hampshire;

8   3) Ordering an investigation to determine whether the PAP currently measures and

9   reports all the relevant metrics that were required of Verizon (segTEL believes it does

10   not.);

11   4) Establishing a 60-day timetable to initiate a complete audit of the existing PAP by

12   a reputable independent third-party acceptable to the CLEC community, to include in-

13   depth validation and verification of 100% of the PAP metrics, reporting methods and

14   penalty calculations;

15   5) Requiring FairPoint, within thirty days of approval of the reorganization plan, to

16   update its dark fiber offering in New Hampshire to comply with FCC rules for the

17   provision of dark fiber as a UNE;

18   6) Ordering FairPoint to cease collection efforts and threats of disconnection on all

19   pre-petition CLEC invoices;

20   7) Petitioning the Federal Communications Commission to revoke FairPoint's

21   Section 271 authority to provide interLATA services unless and until FairPoint can

22   show that its CLEC OSS is functioning in complete compliance with LSOG rules and

23   Verizon's stated service guidelines prior to April 1, 2007;

1   8) Requiring FairPoint to continue to honor its current agreements with CLECs for at

2   least five years; and

3   9) Such other conditions as the Commission may find reasonable.

4   While these measures will not make CLECs whole for the harms they have suffered

5   due to FairPoint's failure to live up to its obligations as a wholesale provider of

6   service, they will help to ensure that FairPoint, not CLECs, bears the brunt of its

7   repeated and systemic failures to live up to its wholesale obligations as a regional Bell

8   operating carrier.

9   Q. Is this the end of your testimony?

10   A. Yes.