

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Petition By Global NAPs, Inc. for)
arbitration pursuant to 47 U.S.C. 252(b) of)
interconnection rates, terms, and) Docket No. 011666-TP
conditions with Verizon Florida Inc.)

**REBUTTAL TESTIMONY OF
PETER D'AMICO ON BEHALF OF
VERIZON FLORIDA INC.**

January 16, 2003

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1 Q. ARE YOU THE SAME PETER D'AMICO THAT OFFERED DIRECT
2 TESTIMONY ON BEHALF OF VERIZON FLORIDA INC. ("VERIZON")
3 ON MAY 8, 2002 AND SUPPLEMENTAL DIRECT TESTIMONY ON
4 DECEMBER 18, 2002?

5 A. Yes, and my education and background are described in my direct
6 testimony.

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8 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

9 A. The purpose of my rebuttal testimony is to respond to the May 8, 2002
10 direct testimony filed by Lee L. Selwyn, testifying on behalf of Global
11 NAPs, Inc. ("Global"), as his testimony relates to Issue 1 (the POI issue).
12 Global witness Selwyn did not file any supplemental direct testimony on
13 December 18, 2002.

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15 Q. IS DR. SELWYN'S "*DE MINIMIS*" COST ANALYSIS HELPFUL TO
16 DECIDING ANY ISSUE IN THIS ARBITRATION?

17 A. No, it is not. Dr. Selwyn's costs analysis provides the basis on which he
18 criticized Verizon's virtual geographically relevant interconnection point
19 ("VGRIP") proposal (Issue 1). See Direct Testimony of Selwyn at 20-46.
20 As I explained in my May 8, 2002 direct testimony, the issue with VGRIP
21 was never *what* the costs were, but which carrier should bear them.
22 However, as I explained in my supplemental direct testimony, Verizon is
23 no longer pursuing its VGRIP proposal in this proceeding. Rather,
24 Verizon updated its contract proposal to permit Global to interconnect in
25 at least one point on Verizon's network in a LATA (Issue 1(a)), with each

1 party bearing responsibility for facilities on its side of the POI (Issue
2 1(b)). Verizon's updated proposal makes Dr. Selwyn's transport costs
3 analysis even less pertinent.

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5 **Q. DID VERIZON PROVIDE GLOBAL ITS UPDATED PROPOSAL PRIOR**
6 **TO FILING YOUR DECEMBER 18, 2002 SUPPLEMENTAL DIRECT**
7 **TESTIMONY?**

8 A. Yes. Verizon provided Global its updated contract proposal on
9 December 2, 2002. Global, however, did not respond to this proposal or
10 submit any supplemental direct testimony addressing Verizon's
11 proposal.

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13 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

14 A. Yes it does.

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