

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Petition by DIECA Communications, Inc.)
d/b/a Covad Communications Company for)
Arbitration of Interconnection Rates, Terms,)
and Conditions and Related Arrangements) Docket No. 020960-TP
with Verizon Florida Inc. Pursuant to)
Section 252(b) of the Telecommunications)
Act of 1996)

**DIRECT TESTIMONY OF
ROSEMARIE CLAYTON
ON BEHALF OF
VERIZON FLORIDA INC.**

SUBJECT: ISSUE NOS. 23 and 27

JANUARY 17, 2003

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1 **DIRECT TESTIMONY OF ROSEMARIE CLAYTON**

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

4 A. My name is Rosemarie Clayton. My business address is 2107 Wilson
5 Boulevard, Arlington, Virginia.

6

7 **Q. BY WHOM ARE YOU CURRENTLY EMPLOYED?**

8 A. I am currently employed by Verizon Communications Inc. I am testifying
9 in this arbitration on behalf of Verizon Florida Inc. ("Verizon").

10

11 **Q. WHAT ARE YOUR CURRENT DUTIES AND RESPONSIBILITIES?**

12 A. I am a Senior Product Manager with responsibilities for Line Sharing
13 Digital Subscriber Line ("DSL") services. My responsibilities include the
14 oversight of policy and pricing issues related to DSL and Line Sharing,
15 negotiation of interconnection agreements with alternative local exchange
16 carriers ("ALECs"), and active participation in the DSL and Line Sharing
17 Collaborative in New York on product and provisioning issues. In
18 addition, I conduct xDSL and Line Sharing workshops for ALECs. I also
19 testify as a subject matter expert in hearings on xDSL, Line Sharing, Line
20 Splitting, and conditioned loops.

21

22 **Q. PLEASE SUMMARIZE YOUR WORK EXPERIENCE.**

23 A. I have more than 24 years of experience as an employee of Verizon and
24 its predecessor companies. Prior to my current assignment, I was
25 assigned to the Interconnection and Unbundled Services department,

1 where I was responsible for the development and implementation of
2 unbundled network elements, specifically unbundled loops and switching.

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4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. The purpose of my testimony is to provide Verizon's positions relative to
6 Issue Nos. 23 and 27 in this arbitration, which pertain to the offering of
7 advanced services.

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ISSUE NO. 23 — TECHNICAL DOCUMENTS

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11 **Q. WHAT IS THE DISPUTE REGARDING THIS ISSUE?**

12 A. This issue pertains to which technical documents should be referenced in
13 the agreement with respect to Integrated Service Digital Network ("ISDN")
14 and High-Speed Digital Subscriber Line ("HDSL") loops. Covad has
15 proposed that the agreement should reference industry standard
16 documents only. Verizon's position is that the agreement should also
17 reference Verizon's technical documents.

18

19 **Q. WHY DOES VERIZON OBJECT TO COVAD'S PROPOSAL?**

20 A. Although Verizon revises its technical documents from time-to-time to
21 remain current with industry standards, it is ultimately Verizon's
22 documents — and not the industry standards — that define the ISDN and
23 HDSL loops in Verizon's network and provide complete information about
24 Verizon's UNE loop products. Accordingly, interconnection agreements
25 should also reference the Verizon technical documents that define loop

1 characteristics specific to Verizon's network. If an ALEC believes that the
2 Verizon technical documents are in conflict with industry standards,
3 Verizon has offered to research the standard and area of conflict
4 identified by the ALEC. If necessary, Verizon will, based on its
5 investigation, negotiate specific aspects of the Verizon technical
6 documents to address areas of concern.

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8 **ISSUE NO. 27 — ADVANCED SERVICES NOTIFICATION OBLIGATIONS**

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10 **Q. WHAT IS THE DISPUTE REGARDING ISSUE NO. 27?**

11 A. This issue involves two disputes. The first dispute is over whether Covad
12 is required to notify Verizon of which advanced services it deploys over
13 the loops that it obtains from Verizon. Covad's position is that it is not
14 required to do so; Verizon's position is that federal law requires Covad to
15 do so and, in addition, that there are substantial operational advantages
16 when Covad does so. The second dispute is over what process Covad
17 must use if it wants to order new loop types or technologies. Covad's
18 position is that it may order such loop types and technologies through any
19 method that is compatible with a provision of federal law; Verizon's
20 position is that Covad should use the bona fide request ("BFR") process,
21 which is compatible with federal law and which is contained in an agreed-
22 upon section of the parties' agreement.

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1 Q. WHAT ARE THE OPERATIONAL BENEFITS OF COVAD INFORMING
2 VERIZON WHICH ADVANCED SERVICES IT DEPLOYS OVER THE
3 LOOPS THAT IT OBTAINS FROM VERIZON?

4 A. Verizon uses the information about which advanced service type Covad
5 deploys on a particular loop to ensure that the various services, such as
6 Asymmetric DSL ("ADSL") and T-1 lines, provided over loops in a binder
7 group, do not interfere with each other. If loops carrying these two types
8 of technologies are placed within the same binder group, interference will
9 occur. If Verizon knows that an ALEC is ordering the loop to deploy
10 ADSL, it will not place this loop in the same binder as existing loops
11 deploying T-1 technology. Without accurate information, Verizon's ability
12 to prevent interference within binder groups could be impeded. This is
13 especially true as new DSL and other data technologies are added to the
14 network.

15
16 In addition, due to the fact that different DSL technologies are provisioned
17 over different loop lengths, ALECs must order the type of technology by
18 ordering code that they will be deploying to ensure that Verizon delivers a
19 compatible copper loop. For example, ADSL as a general rule can work
20 on loops up to 18,000 feet in length. HDSL on the other hand works on
21 loops that are less than 12,000 feet. If ALECs did not order DSLs by loop
22 type, Verizon could potentially deliver what it believes to be a compatible
23 loop to the ALEC only to find out later that the DSL technology being
24 provisioned to the end user will work only on a shorter loop.

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1 Furthermore, this information is valuable for troubleshooting and repair
2 purposes. Without accurate loop information regarding the particular type
3 of advanced service or technology, Verizon's ability to troubleshoot and
4 make necessary repairs could be significantly delayed or hindered.

5

6 **Q. PLEASE DESCRIBE THE BONA FIDE REQUEST PROCESS.**

7 A. Currently, an agreed-upon portion of the interconnection agreement
8 contains a procedure for an ALEC to follow in the event it wants to deploy
9 a new loop type or technology, namely, the BFR process. Once an ALEC
10 initiates the BFR process, a preliminary analysis is conducted, including
11 an initial assessment of its technical feasibility, general product
12 availability, and expected delivery date. This preliminary analysis is
13 normally completed within 30 days. A full evaluation of each request,
14 including any product development activity and final pricing, is normally
15 completed within approximately 90 calendar days after Verizon receives
16 authorization from the ALEC to proceed. That process involves, among
17 other things, a detailed assessment of the technical feasibility of the
18 ALEC's request as well as joint product development activity between
19 Verizon and the ALEC. Successful provisioning of new loop types
20 requires coordination between Verizon and Covad that is provided for
21 through the BFR process.

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

24 A. Yes.

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