

**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)

REBUTTAL TESTIMONY OF

DAVID J. KELLY

AND

JOHN WHITE

ON BEHALF OF

VERIZON FLORIDA INC.

FEBRUARY 20, 2003

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1 **REBUTTAL TESTIMONY OF DAVID J. KELLY AND JOHN WHITE**

2

3 **Q. ARE YOU THE SAME DAVID J. KELLY WHO TESTIFIED**
4 **PREVIOUSLY IN THIS PROCEEDING?**

5 A. Yes.

6

7 **Q. ARE YOU THE SAME JOHN WHITE WHO TESTIFIED PREVIOUSLY**
8 **IN THIS PROCEEDING?**

9 A. Yes.

10

11 **Q. PLEASE DESCRIBE THE PURPOSE OF YOUR REBUTTAL**
12 **TESTIMONY.**

13 A. The purpose of our rebuttal testimony is to address some of the
14 statements in the joint testimony of Covad's witnesses concerning
15 Verizon's provisioning of line-shared loops (Issue No. 34).

16

17 **Q. PLEASE DESCRIBE VERIZON'S CURRENT PROVISIONING**
18 **INTERVAL FOR ALECS' LINE-SHARED LOOP ORDERS.**

19 A. For line-shared loop orders, if no facility modifications are necessary,
20 Verizon's standard provisioning interval is three business days.
21 Because line-shared loops are offered on a standard-interval basis,
22 Verizon cannot adjust the due dates for these orders based on its
23 workload and its available work force. The three-business-day interval
24 provides Verizon with needed time in which to reallocate its work force
25 to meet spikes in demand for both line-shared loops and all of the other

1 wholesale and retail products and services that must be provisioned in
2 Verizon's central offices each day. When an ALEC orders a line-shared
3 loop, Verizon personnel in a central office receive that order on "Day 1."
4 Any necessary work force management tasks can take place on "Day
5 2," in order to enable Verizon to meet the provisioning interval on "Day
6 3."

7
8 If the interval for line-shared loops were reduced to two business days,
9 as Covad proposes in its testimony (though not in its arbitration petition
10 or its proposed language, where Covad proposed a three-business-day
11 interval), Verizon would be required to prioritize line-sharing orders over
12 other orders — including orders for voice service — in order to meet the
13 shortened standard interval. Verizon does, on occasion, complete an
14 ALEC's order for a line-shared loop within two business days, in which
15 case Verizon informs the ALEC that the provisioning work has been
16 completed.

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18 **Q. DOES THE SAME THREE-BUSINESS-DAY INTERVAL APPLY TO**
19 **RETAIL ORDERS?**

20 **A. Yes.**

21
22 **Q. COVAD CLAIMS THAT THE "CROSS-WIRING AND ASSIGNMENT**
23 **REQUIREMENTS FOR LINE SHARING ARE LESS THAN THOSE**
24 **REQUIRED FOR HOT CUTS." DO YOU AGREE? (Evans/Clancy**
25 **Joint Direct Testimony at 19)**

1 A. No. For one thing, there are more wires run for line sharing than there
2 are for hot cuts. For a hot cut, there is one cross-connection involved.
3 For line sharing, there are at least two cross-connections involved —
4 one to the splitter and one back from the splitter.

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

7 A. Yes.

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