

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 SURREBUTTAL TESTIMONY OF ALFRED A. HEARTLEY
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 030851-TP
5 JANUARY 28, 2003
6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR
8 POSITION WITH BELL SOUTH TELECOMMUNICATIONS, INC.
9 ("BELL SOUTH").
10

11 A. My name is Alfred A. Heartley. My business address is 754 Peachtree Street,
12 Atlanta, Georgia 30308. My title is General Manager – Wholesale Performance
13 and Regional Centers for BellSouth.
14

15 Q. ARE YOU THE SAME ALFRED HEARTLEY WHO EARLIER FILED DIRECT
16 AND REBUTTAL TESTIMONY IN THIS DOCKET?
17

18 A. Yes.
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20 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED
21 TODAY?
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23 A. I will respond to portions of the rebuttal testimony of Mr. Mark David Van de
24 Water on behalf of AT&T regarding the batch hot cut process.
25

1 Q. MR. VAN DE WATER, ON PAGE 22 OF HIS REBUTTAL TESTIMONY, STATES
2 THAT IT IS UNCLEAR IF AND HOW BELL SOUTH ACCOUNTED FOR
3 CERTAIN ITEMS IN ITS FORECAST. CAN YOU ADDRESS THOSE ITEMS?
4

5 A. Yes. First, Mr. Van de Water claimed that BellSouth did not include travel time to
6 unmanned central offices. He is incorrect – the model did account for work to be
7 performed in so-called “unmanned” central offices. BellSouth does not have
8 employees report to work daily at each and every central office simply for the
9 reason that there are some central offices in which there would be no work to be
10 performed. Instead, for those offices with a low volume of work, technicians are
11 dispatched as needed to work the pending load, daily if required. These tend to
12 be small offices and therefore would not have large numbers of UNE-P lines to
13 convert. Technicians would report to work in those offices when the cutovers are
14 required and in most cases the technician would travel on his own time directly to
15 the office as a first assignment. BellSouth took these scenarios into account in
16 the model.

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18 Second, Mr. Van de Water claimed BellSouth did not consider the number of
19 shifts worked per day per central office. While BellSouth did not explicitly
20 address this point, it was not necessary to do so because BellSouth
21 demonstrated it had the capability to handle a worst-case scenario load
22 projection. To directly respond to Mr. Van de Water’s criticism, however, we
23 have run a different version of our force model to include the number of
24 technicians that can work safely and efficiently on the frame in each of the central
25 offices. These numbers are based on BellSouth’s response to Interrogatory -45,

1 which Mr. Van de Water cites on page 24 of his rebuttal testimony. To fully rebut
2 Mr. Van de Water, BellSouth also increased the cutover load in the model to the
3 5635 hot cuts per day load that Mr. Van de Water recommended in his direct
4 testimony and again on page 20 of his rebuttal testimony. The results showed
5 that BellSouth would have to work 2 shifts in 21 to 30 of the 198 central offices in
6 Florida to handle the increased load. BellSouth would have to work 3 shifts in
7 only 2 to 6 offices in Florida. The load did not exceed 3 shifts in any central
8 office in Florida. We even considered the load if a central office technician cut 10
9 lines per day or 12 lines per day. This accounted for Mr. Van de Water's
10 estimate of 12 cuts per day in his direct testimony and our estimate of 10 cuts per
11 day in my rebuttal testimony. Notably, these force/load calculations account for
12 both the pre-wiring and the actual cuts necessary to handle his anticipated load.
13 Finally, BellSouth further considered the impact on the central office force and
14 installation and maintenance force of the higher load. The increase in load to
15 5635 hot cuts per day increased the number of employees required in Florida
16 from 759 to 952.

17
18 I have included a revised force model, Exhibit AH-2, which shows the available
19 technicians and number of shifts required for all central offices in Florida. We
20 increased the churn in the model to 30.4% per month or 365% per year to reach
21 the 5635 hot cuts required per day that Mr. Van de Water suggested.

22
23 Third, Mr. Van de Water questioned whether BellSouth considered all lines after
24 the first one in the batch as additional lines for purposes of staffing. We
25 considered all hot cuts as if they were the first line to keep the model simple and

1 to demonstrate the worse case scenario. The actual hot cuts will go faster than
2 the model predicts.

3
4 Fourth, Mr. Van de Water questioned whether the ratio of supervision to
5 employees was applied evenly across BellSouth territory or accounted for the
6 geographic dispersion of the central offices. The ratio of supervision to
7 employees was applied to the total technicians required. The supervision will be
8 dispersed along with the technicians. In large metro areas, we anticipate that
9 technicians will be grouped for this particular project and will gain expertise from
10 the daily hot cut repetition. However, in some dispersed areas, technicians may
11 be added to existing groups. We will staff the areas where the hot cuts are
12 required with the appropriate technicians and supervisors.

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14 Q. ON PAGES 23-25 OF HIS TESTIMONY, MR. VAN DE WATER DISCUSSES A
15 RECENT BELLSOUTH RESPONSE TO AN AT&T INTERROGATORY
16 REGARDING AN EXHIBIT AND CITES APPARENT INCONSISTENCIES. CAN
17 YOU ADDRESS THOSE INCONSISTENCIES?

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19 A. The table on page 24 of Mr. Van de Water's testimony shows a difference in the
20 maximum number of technicians that can work simultaneously on a frame.
21 Since the time BellSouth filed the information with the FCC contained in
22 Interrogatory-44, BellSouth has done an office-by-office analysis upon which it
23 relies, the results of which were set forth in Interrogatory-45.

24
25 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

1

2 A. Yes.

