





1 Q. WILL YOU PLEASE IDENTIFY YOURSELF?

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3 A. My name is Mike Guedel and my business address is AT&T,  
4 1200 Peachtree Street, NE, Atlanta, Georgia 30309. I  
5 am employed by AT&T as Manager-Network Services  
6 Division.

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9 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK  
10 EXPERIENCE?

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12 A. I received a Bachelor of Science degree in Business  
13 Administration from Miami University, Oxford, Ohio.  
14 Over the past years, I have attended numerous Industry  
15 schools and seminars covering a variety of technical  
16 and regulatory issues. I joined the Rates and  
17 Economics department of South Central Bell in February  
18 of 1980. My initial assignments included cost analysis  
19 of terminal equipment and special assembly offerings.  
20 In 1982, I worked on access charge design and  
21 development. From May of 1983 through September of  
22 1983, as part of an AT&T task force, I developed local  
23 transport rates for the initial NECA interstate access  
24 filing. Post divestiture, I remained with South  
25 Central Bell with specific responsibility for cost

1 analysis, design, and development relating to switched  
2 access services and intraLATA toll. In June of 1985, I  
3 joined AT&T, assuming responsibility for cost analysis  
4 of network services including access charge impacts for  
5 the five South Central States (Alabama, Kentucky,  
6 Louisiana, Mississippi, and Tennessee).

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9 **Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES?**

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11 **A.** My current responsibilities include supervising  
12 analytical support activities necessary for intrastate  
13 communications services in Florida and other southern  
14 states. This includes detailed analysis of access  
15 charges and other LEC filings to assess their impact on  
16 AT&T and its customers. In this capacity, I have  
17 represented AT&T through formal testimony before the  
18 Florida Public Service Commission as well as the  
19 regulatory commissions in the states of Georgia and  
20 South Carolina.

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

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25 **A.** The purpose of my testimony is to recommend that the

1 Florida Public Service Commission find expanded  
2 interconnection to be in the public interest and to  
3 take the necessary steps to expedite its  
4 implementation.

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7 **Q. WHAT IS EXPANDED INTERCONNECTION?**

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9 **A.** Expanded interconnection is an interconnection  
10 arrangement that permits access providers other than  
11 the local exchange companies to interconnect with the  
12 local exchange companies' networks on the local  
13 exchange companies' premises. Under this arrangement,  
14 the local exchange companies are required to provide  
15 space at designated points within their networks for  
16 locating (either virtually or physically) the equipment  
17 of competing access providers. Therefore, with  
18 expanded interconnection, end user customers can  
19 utilize the loop facilities of the local exchange  
20 companies for connection to the LEC central office and  
21 then select among available access providers the  
22 special transport services connecting the local  
23 exchange office to the desired interexchange carrier  
24 (IXC) point of presence (POP). This interconnection  
25 arrangement offers to bring the benefits of special



1 access competition to greater number of end user  
2 customers than would be possible with traditional  
3 alternative access vendor (AAV) end to end service.  
4  
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6 Q. HOW DOES "PHYSICAL" COLLOCATION DIFFER FROM "VIRTUAL"  
7 COLLOCATION?  
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9 A. For purposes of expanded interconnection, the FCC has  
10 described "physical" collocation as an arrangement  
11 whereby the competitive access provider (CAP) leases  
12 floor space (and access to the floor space) within a  
13 LEC central office for purposes of installing,  
14 maintaining and managing telecommunications equipment  
15 used in the provision of competitive access services.  
16 Under this arrangement, the CAP personnel can gain  
17 entry to their designated space within the LEC central  
18 office (generally with security escort) to install,  
19 maintain, and/or repair their own equipment.  
20

21 The FCC has described "virtual" collocation (again for  
22 purposes of expanded interconnection) as an arrangement  
23 whereby the local exchange company installs, maintains  
24 and repairs CAP designated telecommunications equipment  
25 used in the provision of competitive access services

1 within the LEC central office. Under this arrangement,  
2 the CAP can maintain monitoring and control ability,  
3 but cannot physically access the equipment within the  
4 central office.

5  
6 In either case, however, the equipment used to  
7 terminate interconnected circuits would be located in  
8 the LEC central office.

9  
10  
11 **Q. WHO SHOULD BE ALLOWED TO INTERCONNECT?**

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13 **A.** Interconnection opportunities should be available to  
14 all third parties including CAPs and IXC's and end  
15 users. The purpose of expanded interconnection is to  
16 promote competition and to begin to challenge the local  
17 exchange monopoly. Creating artificial barriers to  
18 entry would preclude potential competitive alternatives  
19 and only slow the competitive process.

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22 **Q. SHOULD THE SAME TERMS AND CONDITIONS OF EXPANDED**  
23 **INTERCONNECTION APPLY TO AT&T AS APPLY TO OTHER**  
24 **INTERCONNECTORS?**

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1 A. Yes. AT&T should be allowed to interconnect to the  
2 same extent and under the same terms and conditions as  
3 any other third party user.  
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6 Q. HOW WOULD THE ADOPTION OF EXPANDED INTERCONNECTION  
7 SERVE THE PUBLIC INTEREST?  
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9 A. The adoption of expanded interconnection would  
10 facilitate the beginning of competition within the  
11 local exchange and would benefit customers in much the  
12 same way as competition in other aspects of the  
13 telecommunications industry (i.e., interexchange  
14 services or telephone sets) has benefited customers  
15 over the years. Competition facilitates customer  
16 choice and the development and production of new and  
17 innovative services designed or tailored to meet  
18 particular customer needs. Competition fosters better  
19 price performance as competing vendors vie for  
20 customers in the open market place. Competition will  
21 also assist the regulators in regulating the local  
22 exchange companies encouraging these companies to  
23 become more efficient and more responsive to customer  
24 needs.  
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1 Q. WILL THE ADOPTION OF EXPANDED INTERCONNECTION RENDER  
2 THE LOCAL EXCHANGE COMPETITIVE?

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4 A. No. The adoption of expanded interconnection through  
5 this docket will represent only an initial step in the  
6 efforts to create possibilities for real competition to  
7 develop in the market for local exchange access  
8 service. First, this immediate proceeding addresses  
9 only special access services - a very small part of the  
10 local exchange monopoly. The docket does not address  
11 the local loop and the end office switches - the real  
12 core of the local bottleneck monopoly. Second, it will  
13 take some time for competitors to respond to the new  
14 opportunities offered through expanded interconnection,  
15 to develop and deploy competitive networks,  
16 particularly on a statewide basis. Interconnection is  
17 a necessary initial step to begin the introduction of  
18 competition but it alone will not guarantee the  
19 development of competition within the state and it will  
20 not directly alter the existing local exchange monopoly  
21 held by the LECs.

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23

24 Q. WOULD THE ADOPTION OF EXPANDED INTERCONNECTION BE  
25 CONSISTENT WITH PREVIOUS COMMISSION DECISIONS?

1 A. Yes. The Florida Commission has consistently supported  
2 competition within the telecommunications industry  
3 where it has found that competition could work. This  
4 Commission was one of the first state commissions in  
5 the country to authorize limited IntraLATA (interEAEA)  
6 toll competition shortly after AT&T's divestiture of  
7 the local exchange companies. By Order No. 23540, the  
8 Commission expanded its prescription for intraLATA  
9 competition to include intraEAEA service, thus  
10 bringing to all Floridians the benefits of statewide  
11 interexchange (toll) competition. Through Docket No.  
12 890183-TL, the Commission recognized the benefits of  
13 bringing competition to private line and special access  
14 customers by establishing rules for the authorization  
15 of alternative access vendors (AAVs). The adoption of  
16 expanded interconnection would support this tradition  
17 by further facilitating the expansion of competition  
18 for special access services.

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21 Q. WOULD YOU SUMMARIZE YOUR TESTIMONY?

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23 A. Yes. Expanded interconnection is the next logical step  
24 toward the introduction of competition into one of the  
25 remaining monopoly preserves of the local exchange

1        companies. Expanded interconnection will facilitate  
2        competition in the market for special access services  
3        by allowing end user customers greater opportunity to  
4        reach competing access suppliers, thus bringing the  
5        benefits of competition to a larger number of special  
6        access customers. Expanded interconnection clearly  
7        serves the public interest, and its implementation  
8        should be immediately ordered by this Commission.

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11    Q.    DOES THIS CONCLUDE YOUR TESTIMONY?

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13    A.    Yes.

**CERTIFICATE OF SERVICE**

**DOCKET NO. 921074-TP**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties on this 24<sup>th</sup> day of June, 1993:

Lee L. Willis, Esq.  
Ausley, McMullen, McGehee,  
Carothers & Proctor  
P. O. Box 391  
Tallahassee, FL 32302

C. Dean Kurtz  
Central Telephone Company  
P. O. Box 2214  
Tallahassee, FL 32316

Steve Wilkerson  
Florida Cable Television Assoc.  
310 North Monroe Street  
Tallahassee, FL 32301

Joseph Gillan  
Gillan Associates  
P. O. Box 541038  
Orlando, FL 32854-7276

Thomas R. Parker, Esq.  
GTE Florida Incorporated  
P. O. Box 110, FLTC0007  
Tampa, FL 33601

Peter M. Dunbar, Esq.  
Haben, Culpepper, Dunbar,  
& French, P. A.  
306 North Monroe Street  
Tallahassee, FL 32301

Rachel Rothstein, Esq.  
Wiley Law Firm  
1776 K Street, NW  
Washington, DC 20006

Vicki Gordon Kaufman, Esq.  
McWhirter, Grandoff & Reeves  
315 S. Calhoun Street, Suite 716  
Tallahassee, FL 32301

Jack Shreve, Esq.  
Office of the Public Counsel  
Room 812, Claude Pepper Bldg.  
111 West Madison Street  
Tallahassee, FL 32399-1400

Marshall M. Criser, III  
Southern Bell Telephone Co.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301

Patrick Wiggins, Esq.  
Wiggins & Villacorta, PA  
P. O. Drawer 1657  
Tallahassee, FL 32302

Paul Jones  
Time Warner Cable  
Corporate Headquarters  
300 First Stamford Place  
Stamford, CT 06902-6732

David B. Erwin, Esq.  
P. O. Box 1833  
Tallahassee, FL 32302-1833

C. Everett Boyd, Jr., Esq.  
Ervin, Varn, Jacobs, et al  
305 S. Gadsden Street  
Tallahassee, Fl 32301

F. Ben Poag  
United Telephone Company  
of Florida  
P. O. Box 165000  
Altamonte Springs, FL 32716-5000

Jodie L. Donovan, Esq.  
Regulatory Counsel  
Teleport Communications Group, Inc.  
1 Teleport Drive, Suite 301  
Staten Island, New York 10311

Chanthina R. Bryant, Esq.  
US Sprint Communications  
3065 Cumberland Circle  
Atlanta, GA 30339

John P. Fons, Esq.  
Ausley, McMullen, McGehee,  
Carothers & Proctor  
P. O. Box 391  
Tallahassee, FL 32302

  
Michael W. Tye