



Michael W. Tye  
Senior Attorney

Suite 1400  
106 East College Avenue  
Tallahassee, Florida 32301  
904 425-6360

July 15, 1994

**ORIGINAL**  
**FILE COPY**

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399

Re: Docket No. **921074-TP**

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of the Supplemental Direct Testimony of Mike Guedel on behalf of AT&T Communications of the Southern States, Inc. Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

ACK

AFA \_\_\_\_\_

APP \_\_\_\_\_

CIF \_\_\_\_\_

*Reith*

\_\_\_\_\_

\_\_\_\_\_

*Conzone*  
T: sad

*4 x 013*

Attachments

cc: J. P. Spooner, Jr.  
Parties of Record

Yours truly,

*Michael W. Tye*  
Michael W. Tye

RECEIVED & FILED

*[Signature]*  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07052 JUL 15 94

FPSC-RECORDS/REPORTING

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

IN RE: EXPANDED INTERCONNECTION      DOCKET NO. 921074-TP  
PHASE II AND LOCAL  
TRANSPORT RESTRUCTURE

SUPPLEMENTAL DIRECT  
TESTIMONY  
OF  
MIKE GUEDEL  
ON BEHALF OF AT&T COMMUNICATIONS  
OF THE SOUTHERN STATES, INC.  
JULY 15, 1994

DOCUMENT NUMBER-DATE

07052 JUL 15 1994

FPSC-RECORDS/REPORTING

1 Q. WILL YOU PLEASE IDENTIFY YOURSELF?

2

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.

7

8

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

11

12 A. I received a Master of Business Administration with a  
13 concentration in Finance from Kennesaw State College,  
14 Marietta, Georgia in 1994. I received a Bachelor of  
15 Science degree in Business Administration from Miami  
16 University, Oxford, Ohio. Over the past years, I have  
17 attended numerous industry schools and seminars  
18 covering a variety of technical and regulatory issues.  
19 I joined the Rates and Economics Department of South  
20 Central Bell in February of 1980. My initial  
21 assignments included cost analysis of terminal  
22 equipment and special assembly offerings. In 1982, I  
23 worked on access charge design and development. From  
24 May of 1983 through September of 1983, as part of an  
25 AT&T task force, I developed local transport rates for

1 the initial NECA interstate access filing. Post  
2 divestiture, I remained with South Central Bell with  
3 specific responsibility for cost analysis, design, and  
4 development relating to switched access services and  
5 intraLATA toll. In June of 1985, I joined AT&T,  
6 assuming responsibility for cost analysis of network  
7 services including access charge impacts for the five  
8 South Central States (Alabama, Kentucky, Louisiana,  
9 Mississippi, and Tennessee).

10

11

12 Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

13

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

24

25

1 Q. ARE YOU THE SAME MIKE GUEDEL WHO FILED DIRECT TESTIMONY  
2 IN THIS PROCEEDING ON MAY 23, 1994 AND REBUTTAL  
3 TESTIMONY ON JUNE 27, 1994?

4  
5 A. Yes.

6

7

8 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT  
9 TESTIMONY?

10

11 A. The purpose of my supplemental direct testimony is to  
12 present AT&T's positions regarding expanded  
13 interconnection in light of the U.S. Court of Appeals  
14 decision vacating the Federal Communications Commission  
15 (FCC) prescription for mandatory physical collocation.

16

17

18 Q. PLEASE DESCRIBE THE EFFECT OF THE U.S. COURT OF APPEALS  
19 RULING OF JUNE 10, 1994 REGARDING THE FCC'S  
20 PRESCRIPTION FOR EXPANDED INTERCONNECTION.

21

22 A. Through its decision, the Court of Appeals vacated the  
23 mandatory "physical collocation" provision of the FCC's  
24 expanded interconnection order, and remanded the  
25 concept of "virtual collocation" to the FCC for further

1 review and consideration. Therefore, at this point,  
2 there is no FCC (interstate) policy regarding  
3 collocation. The FCC is expected to formulate a new  
4 policy, but the time frame for the completion of that  
5 work has not been announced.

6  
7  
8 Q. SHOULD THE COMMISSION MODIFY ITS PHASE I ORDER IN LIGHT  
9 OF THE DECISION ISSUED BY THE U.S. COURT OF APPEALS FOR  
10 THE D.C. CIRCUIT ON JUNE 10, 1994?

11  
12 A. Yes. In Phase I of this docket, the Florida Public  
13 Service Commission adopted a mandatory physical  
14 collocation standard consistent with that of the FCC.  
15 The decision of the court renders the Phase I ruling  
16 inconsistent with whatever the interstate policy  
17 becomes and sets it up for possible similar legal  
18 challenges. For these reasons, the Commission needs to  
19 reconsider its order in Phase I.

20  
21 However, because there are advantages to having a  
22 consistent standard across the state and interstate  
23 jurisdictions, the Commission should defer the  
24 modification of its phase I order until the FCC has  
25 established a new interstate policy. That policy

1           should serve as a useful guide to the development of an  
2           intrastate standard.

3  
4

5   **Q.    SHOULD THE COMMISSION CONTINUE TO ENCOURAGE PHYSICAL**  
6   **COLLOCATION?**

7

8   **A.    Yes.   Expanded interconnection (collocation) is**  
9           **designed to facilitate the beginning of competition**  
10          **within the monopoly preserves of the local exchange**  
11          **companies.   Because "physical collocation" most closely**  
12          **duplicates the connecting arrangements of the incumbent**  
13          **monopolist, it offers the greatest hope for the**  
14          **development of some competition.   Other forms of**  
15          **interconnection arrangements offer less promise.**

16  
17

18   **Q.    SHOULD THE LECS BE GRANTED ADDITIONAL PRICING**  
19   **FLEXIBILITY IN CONJUNCTION WITH EXPANDED**  
20   **INTERCONNECTION?**

21

22   **A.    Additional pricing flexibility (zone density pricing)**  
23          **was originally granted to the LECs by this Commission**  
24          **in Phase I of this Docket concurrent with the mandate**  
25          **for physical collocation.   Through those proceedings,**



1 the LECs convinced the Commission that expanded  
2 interconnection would offer a competitive threat  
3 significant enough to justify this pricing flexibility.  
4 AT&T did not oppose the "zone density pricing"  
5 arrangements ultimately approved by this Commission.

6  
7 To the extent that LEC interconnection tariffs continue  
8 to meet the requirements of the Phase I order (and the  
9 original FCC order in CC Docket 91-141) including all  
10 requirements for physical collocation, AT&T will not  
11 oppose pricing flexibility similar to that granted by  
12 this Commission in Phase I of this Docket. However, if  
13 a LEC's tariff does not meet the Phase I requirements,  
14 then additional pricing flexibility should not be  
15 considered.

16  
17  
18 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

19  
20 A. Yes.

21  
22  
23  
24  
25



**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 15<sup>th</sup> day of July, 1994:

J. Jeffry Whalen, Esq.  
Macfarlane, Ausley,  
Ferguson & McMullen  
P. O. Box 391  
Tallahassee, FL 32302

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

Laura L. Wilson, Esq.  
Florida Cable Television Assoc.  
P. O. Box 10383  
Tallahassee, FL 32301

Joseph P. Gillan  
Gillan & Associates  
P. O. Box 541038  
Orlando, FL 32854-1038

Kimberly Caswell, Esq.  
GTE Florida Incorporated  
P. O. Box 110, FLTC0007  
Tampa, FL 33601

Patrick Wiggins, Esq.  
Wiggins & Villacorat, PA  
P. O. Box 1657  
Tallahassee, FL 32302

Brad E. Mutschelknaus, Esq.  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

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

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

J. Phillip Carver, Esq.  
c/o Marshall M. Criser, III  
Southern Bell Telephone Co.  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Ms. Janis Stahlhut  
Time Warner Communications  
Corporate Headquarters  
300 First Stamford Place  
Stamford, CT 06902-6732

Donna L. Canzano, Esq.  
Florida Public Service Comm.  
101 East Gaines Street  
Tallahassee, FL 32399

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  
Teleport Drive, Suite 301  
Staten Island, New York 10311

Michael J. Henry, Esq.  
MCI Telecommunications Corp.  
Suite 700  
780 Johnson Ferry Road  
Atlanta, GA 30342

Peter M. Dunbar, Esq.  
Pennington, Haben, P.A.  
P. O. Box 10095  
Tallahassee, FL 32302

Kenneth A. Hoffman, Esq.  
Rutledge, Ecenia, Underwood  
Purnell & Hoffman  
P. O. Box 551  
Tallahassee, FL 32302-0551

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

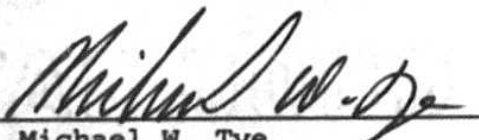
John P. Fons, Esq.  
Macfarlane, Ausley,  
Ferguson & McMullen  
P. O. Box 391  
Tallahassee, FL 32302

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis, et al  
P. O. Box 1876  
Tallahassee, FL 32302-1876

Richard D. Melson, Esq.  
Hopping Boyd Green & Sams  
P. O. Box 6526  
Tallahassee, FL 32314

Douglas S. Metcalf (Ad Hoc)  
Communications Consultants  
P. O. Box 1148  
Winter Park, FL 32790-1148

Tracy Hatch, Esq.  
Division of Legal Services  
Florida Public Service Comm.  
101 East Gaines Street  
Tallahassee, FL 32399

  
Michael W. Tye