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AT&T

Michael W. Tye
Sr. Attorney

Suite 700
101 N. Monroe Street
Tallahassee, FL 32301
904 425-6360
FAX: 904 425-6361

November 27, 1995

Mrs. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

ORIGINAL
FILE COPY

Re: Docket No. 950984-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of the Direct Testimony of Mike Guedel on behalf of AT&T.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Michael W. Tye

Attachments

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

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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

IN RE: RESOLUTION OF PETITION(S) TO ESTABLISH NONDISCRIMINATORY RATES, TERMS, AND CONDITIONS FOR RESALE INVOLVING LOCAL EXCHANGE COMPANIES AND ALTERNATE LOCAL EXCHANGE COMPANIES PURSUANT TO SECTION 364.161, FLORIDA STATUTES

DOCKET NO. 950984-TP

DIRECT TESTIMONY OF

MIKE GUEDEL

ON BEHALF OF AT&T COMMUNICATIONS

OF THE SOUTHERN STATES, INC.

NOVEMBER 27, 1995

Q. WILL YOU PLEASE IDENTIFY YOURSELF?

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

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCES.

A. I received a Master of Business Administration with a concentration in Finance from Kennesaw State College, Marietta, GA in 1994. I received a Bachelor of Science degree in Business Administration from Miami University, Oxford, Ohio. Over the past years, I have attended numerous industry schools and seminars covering a variety of technical and regulatory issues. I joined the Rates and Economics Department of South Central Bell in February of 1980. My initial assignments included cost analysis of terminal equipment and special assembly offerings. In 1982, I began working on access charge design and development. From

May of 1983 through September of 1983, as part of an AT&T task force, I developed local transport rates for the initial NECA interstate filing. Post divestiture, I remained with South Central Bell with specific responsibility for cost analysis, design, and development relating to switched access services and intraLATA toll. In June of 1985, I joined AT&T, assuming responsibility for cost analysis of network services including access charge impacts for the five South Central States (Alabama, Kentucky, Louisiana, Mississippi, and Tennessee).

Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. My current responsibilities include directing analytical support activities necessary for intrastate communications service in Florida and other southern states. This includes detailed analysis of access charges and other LEC filings to assess their impact on AT&T and its customers. In this capacity, I have represented AT&T through formal testimony

before the Florida Public Service Commission, as well as regulatory commissions in the states of South Carolina and Georgia.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is threefold:

First, I will describe in a generic sense the concept of "unbundling" and its role in interconnection arrangements,

Second, I will demonstrate why it is necessary for the incumbent local exchange companies (LECs) to unbundle their local networks.

Third, I will recommend specific guidelines for the technical arrangement and pricing of the unbundled network elements.

Q. WHAT IS MEANT BY THE TERM INTERCONNECTION?

A. Interconnection refers to the act of linking two networks together such that calls or messages that originate on one of the networks may transit or terminate on the other network. Traditionally, in the switched environment, interconnection has taken place on either the line-side or the trunk-side of a local exchange company's switch. Typical interconnection arrangements have included switched access, cellular interconnection, Enhanced Service Provider(ESP) interconnection, and the interconnection of end user Customer Provided Equipment (CPE) through local service arrangements.

In the implementation of local competition, these traditional types of interconnection will still be useful, but may not be sufficient to meet the all of the needs of all potential interconnectors. A more open or "unbundled" set of interconnection options and interconnection architectures will need to be made available.

Q. WOULD YOU DESCRIBE WHAT YOU MEAN BY "UNBUNDLED" INTERCONNECTION ARRANGEMENTS?

A. Unbundling is the identification and disaggregation of useful components of the local exchange network into a set of elements, or Basic Network Functions (BNFs) which can be individually provided, costed, priced, and interconnected in such a manner as to provide other telecommunications service offerings. For example, local exchange service can be "unbundled" into loops, local switching, and transport.

AT&T has identified 11 components or BNFs associated with local exchange services which may be effectively and usefully unbundled. These include: loop distribution, loop concentration, loop feeder, switching, operator systems, dedicated transport links, common transport links, tandem switching, signaling links, signal transfer points, and signal control points.

Further, it must be noted that the list of BNFs described above must not be considered static or necessarily complete. Additional functional elements may continue to be identified as telecommunications technology evolves.

Q. WHAT GENERAL CRITERIA CAN BE USED TO DEFINE OR DETERMINE THE VIABILITY AND POTENTIAL USEFULNESS OF BNFs?

A. Several criteria can be used in defining BNFs. First, the unbundled element must represent a discrete stand-alone logical component. Second, the unbundled element must be separately measurable and billable. Third, the unbundled elements must be associated with clearly identified interface standards.

Q. WHY IS NETWORK UNBUNDLING ESSENTIAL TO THE POTENTIAL DEVELOPMENT OF LOCAL COMPETITION?

A. The incumbent local exchange companies (like BellSouth) currently hold a monopoly on the

provision of local exchange service within their respective operating territories. While competition has developed with respect to interexchange services and some enhanced telecommunications services over the past 15 years, final access to the customer (the last mile) effectively remains the sole province of the incumbent LECs. Under the protection of local franchise, the LECs have spent hundreds of millions of dollars over the years constructing networks to reach every potential local exchange customer.

It is unlikely that a potential competitor would be willing or able to invest the capital required to duplicate this existing LEC network simply on the chance that it might attract some local service customers. Further, even if the financial resources were available, significant time would be required to obtain necessary "right of way" authorizations and to construct the duplicative network. With the requirement of building a new network, competition, if it developed at all, would develop slowly, and it

would likely benefit only a very limited number of customers.

Unbundling will allow potential competitors to begin providing limited local service arrangements without incurring all of the expense of duplicating the LECs ubiquitous local network. A new entrant, for example, could begin providing service within a geographic area by installing local switching capability and purchasing unbundled loops (or links) from BellSouth. This arrangement would have several advantages over the option of building all new facilities: 1) it would be far less capital intensive, 2) it would allow competition to develop much faster, and 3) it would likely bring the benefits of competition to a much larger group of customers.

Q. WILL THE UNBUNDLING OF THE INCUMBENT LEC FACILITIES/SERVICES ENSURE THAT COMPETITION WILL DEVELOP IN THE LOCAL EXCHANGE?

A. No. At this time it is not clear as to whether or not the local exchange market will ever become effectively competitive. While, unbundling, if appropriately implemented, will tend to mitigate one of the major barrier to the development of local competition, it will not in and of itself guarantee that competition will develop.

Q. WHAT IS THE SCOPE OF THIS DOCKET WITH RESPECT TO UNBUNDLING?

A. This docket has been established to consider the unbundling of local loops (or links), and the unbundling of local switching functions including the associated cross connect arrangements.

Q. PLEASE DESCRIBE THE LOCAL LOOP FACILITY.

A. The local loop functions to connect an end user premises to the serving wire center of the local exchange company. The traditional local

loop facility can be divided into three functional sub-elements: 1) local distribution, which connects the end user premises to the feeder distribution BNF or a concentrator /multiplexor , 2) the concentrator multiplexor which connects the distribution BNF to the feeder facility, and 3) the feeder facility which completes the connection back to the serving wire center or central office.

Q. PLEASE DESCRIBE THE LOCAL SWITCHING FUNCTIONS?

A. The primary function of the local switch is to create on demand temporary paths connecting local loops to other local loops or local loops to interoffice transport facilities. Typical switching functions include: 1) recognizing service requests, 2) obtaining call specific information, 3) data analysis, 4) route selection, 5) call completion, 6) testing and recording, etc. Further, the local switching BNF must include access to unbundled Advanced Intelligent Network (AIN) triggers. These triggers will offer a new entrant certain call

control capability within the LEC switch allowing it to customize its end user offerings without having to duplicate the LEC switch.

Q. WOULD YOU DESCRIBE THE CROSS CONNECTION FUNCTION?

A. Yes. The cross connect function completes the connection between an unbundled loop and a LEC switch, a new entrant switch, or a direct transport facility. This function effectively facilitates the unbundling process by allowing a new entrant to purchases (and interconnect with) the particular pieces (and only those pieces) of the LEC network that it requires.

Q. WHAT ARE THE APPROPRIATE TECHNICAL ARRANGEMENTS FOR THE PROVISION OF SUCH UNBUNDLED ELEMENTS?

A. The overarching guideline should be to provide the unbundled elements in such a manner as to not inhibit the new entrant from providing the same quality of service as the incumbent LEC.

That means that the technical arrangements used to connect the unbundled element(s) to a new entrant's network should be equal to those currently used to connect the element(s) within the LEC's own network. New entrants should have cooperatively engineered interconnection arrangements, equal service quality or performance parity, and the opportunity to interconnect at the same points or virtually the same points where practicable as the incumbent LEC.

Q. WHAT ARE THE APPROPRIATE FINANCIAL ARRANGEMENTS FOR SUCH UNBUNDLED ELEMENTS?

A. The target price for the unbundled elements should be the Total Service Long Run Incremental cost (TSLRIC) that the LEC incurs in providing them. Pricing at the TSLRIC will simultaneously ensure that the incumbent LEC recovers all of the costs that it incurs in providing the unbundled element(s) (including cost of money), while it encourages the potential development of competition by

offering the unbundled element(s) (at least from a price perspective) in a competitively neutral manner.

Q. HOW WILL PRICING THE UNBUNDLED ELEMENTS AT TSLRIC PROMOTE A COMPETITIVELY NEUTRAL OFFERING?

The actual cost that the LEC incurs in providing the unbundled element, either to itself or to a new entrant, is represented by the TSLRIC. The actual cost that a new entrant incurs is the price that it has to pay to the LEC for the unbundled element.

Therefore, if the incumbent LEC offers the unbundled element(s) at TSLRIC, then both the incumbent LEC and the new entrant will incur the same cost with respect to that unbundled element(s). With prices set at TSLRIC, neither the LEC nor the new entrant is disadvantaged. Thus the price is competitively neutral.

On the other hand, if the LEC's price is set above its TSLRIC, then the new entrant's costs (i.e., the price charged by the LEC) becomes higher than the LEC's cost. Because retail (end user) prices (of both the LEC and the new entrant) must cover all of the costs incurred in providing the respective services, pricing unbundled elements in excess of TSLRIC would provide the LEC with a competitive advantage in the retail market.

Q. WOULD YOU SUMMARIZE YOUR TESTIMONY?

A. Yes. Attempts to promote the development of local exchange competition serve the public interest. Further, it must be recognized that the general availability of facility based competition, while desirable, is not likely to develop in the near term.

Therefore, to encourage the development of potential local competition, and to encourage the breadth of competitive availability, the

Commission must order BellSouth to unbundle its services into the underlying BNFs.

The unbundled elements (BNFs) should be offered to new entrants under the same basic arrangements and with the same technical capabilities as they are used by BellSouth in the provision of its services. To further encourage the potential development of competition, the unbundled elements should be priced at the TSLRIC incurred by BellSouth in providing each element.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

CERTIFICATE OF SERVICE

DOCKET NO. 950984-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 of record this 27th day of November, 1995:

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

C. Everett Boyd, Jr., Esq.
Ervin Varn Jacobs & Odom
Post Office Drawer 1170
Tallahassee, FL 32302

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

Kenneth Hoffman, Esq.
Rutledge Ecenia et al
215 S. Monroe St., Ste. 420
Tallahassee, FL 32301

James Falvey, Esq.
Swidler & Berlin
3000 K St., NW, Ste. 300
Washington, DC 20007

Lee Willis, Esq.
Jeffry Wahlen, Esq.
Macfarlane Ausley et al
228 S. Calhoun Street
Tallahassee, FL 32301

Donna Canzano, Esq.
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0863

Floyd Self, Esq.
Messer Vickers et al
215 S. Monroe St., Ste. 701
Tallahassee, FL 32301

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32301

Peter Dunbar, Esq.
Pennington Law Firm
215 S. Monroe St., Ste 200
Tallahassee, FL 32301

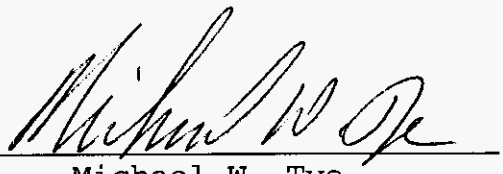
Laura Wilson, Esq.
FL Cable Telecommunications
310 N. Monroe Street
Tallahassee, FL 32301

Anthony P. Gillman, Esq.
Kimberly Caswell, Esq.
GTE Florida, Incorporated
201 N. Franklin Street
Tampa, FL 33601

Nancy H. Sims
Southern Bell Telephone
150 S. Monroe St., Ste. 400
Tallahassee, FL 32301

David B. Erwin, Esq.
Young, VanAssenderp, Varnadoe
225 S. Adams St., Ste 200
Tallahassee, FL 32301

Lynn B. Hall
Vista-United Telecommunications
3100 Bonnett Creek Parkway
Lake Buena Vista, FL 32830



Michael W. Tye