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**GTE FLORIDA INCORPORATED**

**REBUTTAL TESTIMONY OF KIRBY D. CANTRELL**

**DOCKET NO. 960847-TP**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Kirby D. Cantrell. My business address is 201 N. Franklin Street, Tampa, Florida 33601.

**Q. WHO IS YOUR EMPLOYER AND WHAT IS YOUR POSITION?**

A. I am employed by GTE Florida Incorporated (GTEFL) as Technical Support Administrator in Carrier Markets.

**Q. PLEASE DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.**

A. I graduated from the University of Florida in 1972 with a Bachelor of Science degree in Business Administration. I joined GTEFL in 1973 and have held management positions in Sales, Product Management and Carrier Markets.

**Q. WHAT ARE YOUR RESPONSIBILITIES IN YOUR CURRENT POSITION?**

A. I am responsible for providing technical support for alternative local exchange carriers accessing GTEFL's network, and I am the GTE collocation administrator for Florida.

**Q. DID YOU SUBMIT DIRECT TESTIMONY IN THIS PROCEEDING?**

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1       A.    No, I did not, but I am hereby adopting the Direct Testimony of  
2            John W. Ries. Given the large number of arbitration proceedings  
3            GTE Operating Companies must participate in throughout the  
4            country, scheduling conflicts are inevitable for the limited number  
5            of witnesses who can testify on a particular subject. Therefore,  
6            witness substitutions, as in this case, are sometimes necessary.

7

8       **Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

9       A.    I will respond to certain of AT&T's positions on various aspects  
10           of collocation.

11

12       **Q.    AT&T BELIEVES THAT ALECS SHOULD BE ALLOWED TO**  
13           **RESERVE SPACE FOR FUTURE USE UNDER THE SAME**  
14           **PLANNING HORIZONS THE ILEC USES. IS THIS A REASONABLE**  
15           **POSITION?**

16       A.    No. The planning horizon for an ILEC that offers switching  
17            functionality is necessarily much more complex and involved than  
18            the planning horizon an interconnector requires for deployment of  
19            equipment necessary for interconnection. Thus, GTEFL believes  
20            a 5-year planning horizon is reasonable for reserving space for  
21            future uses. GTEFL is offering numerous unbundled network  
22            components (i.e., loops, ports, switching) and therefore must  
23            adequately plan the growth of existing services along with  
24            accommodating new services. Moreover, any enhanced  
25            switching functionality will be available for all end users and will

1 benefit all entrants that purchase network services. The more  
2 services sold to an ALEC, the more room GTEFL will need for  
3 expansion.

4

5 **Q. DOES A COLLOCATION CUSTOMER HAVE SIMILAR NEEDS FOR**  
6 **SPACE RESERVATION?**

7 A. No. The Act requires all collocation customers to interconnect  
8 with the ILEC; the collocation customers have no analogous  
9 requirement. Further, interconnection equipment does not  
10 necessitate switching functionality; only transmission,  
11 multiplexing, and concentration equipment is needed for  
12 connection to network elements. Therefore, the amount of floor  
13 space, and the associated planning horizon of a collocating ALEC  
14 is much different from that of GTEFL.

15

16 **Q. HOW DOES THE FCC ORDER INTERPRET SPACE**  
17 **REQUIREMENTS?**

18 A. The FCC Order is internally inconsistent on this point. First, the  
19 FCC correctly concludes that switching equipment may not be  
20 collocated (at ¶579-82). Second, the Order allows ILECs to  
21 reserve a limited amount of space for specific future uses and  
22 allows reasonable restrictions on the warehousing of space (at  
23 ¶586). However, the Order also states that an ILEC may not  
24 reserve space for future use on terms more favorable than those  
25 that apply to other telecommunications carriers seeking to hold

1 collocation space for their own future use. (Order at ¶604.) This  
2 statement is puzzling given that both parties have different  
3 requirements for equipment deployment.  
4

5 **Q. WHAT IS GTEFL'S SOLUTION TO THIS SITUATION?**

6 A. GTEFL maintains that a 5-year planning horizon is just and  
7 reasonable for the ILEC to reserve space with documented plans.  
8 GTEFL does not believe that it is necessary to place restrictions  
9 on the amount of floor space a collocator can request. However,  
10 GTEFL believes that if the collocator does not have documented  
11 plans to use their collocation space within a one-year cycle, such  
12 space should be subject to other parties' claims on a first come-  
13 first served basis.  
14

15 **Q. WHAT HAS AT&T SUGGESTED IN THE EVENT THAT ADEQUATE  
16 SPACE FOR COLLOCATING IS NOT AVAILABLE?**

17 A. AT&T proposes that if GTEFL does not have space available for  
18 either physical or virtual collocation, it should provide and pay for  
19 the trunking necessary for AT&T to connect designated  
20 equipment in alternative locations. AT&T also believes that  
21 GTEFL should implement build-out requests based upon AT&T's  
22 needs.  
23

24 **Q. WHAT IS GTEFL'S RESPONSE TO AT&T'S DEMAND FOR FREE  
25 TRUNKING?**

1       A.     GTEFL offers unbundled network elements, but it is not required  
2             to give these elements away free of charge. In this case, GTEFL  
3             certainly cannot be penalized for not having foreseen the  
4             collocation requirement and not having forecasted its competitors'  
5             space demands. GTEFL must continue to grow its operation to  
6             support its own end users; doing so in an office where space is  
7             limited will require alternative network configurations that may  
8             cost more to deploy. It is not equitable to give one party--in this  
9             case, the collocating ALEC--preferential cost treatment by  
10            imposing requirements on the ILEC that will unnecessarily raise its  
11            costs.

12  
13       Q.     **HOW DOES GTEFL RESPOND TO AT&T'S DEMAND FOR BUILD-**  
14             **OUTS?**

15       A.     The FCC Order concluded that an ILEC is not required to  
16             construct additional plant in order to satisfy a collocation request.  
17             (Order at ¶585.) The FCC also requires the ILEC to account for  
18             collocation demands--just as they do any other service demands--  
19             when renovating existing facilities and constructing or leasing  
20             new facilities. GTEFL supports these requirements. However,  
21             AT&T suggests that GTEFL implement build-outs when and where  
22             AT&T requests them. This is tantamount to giving AT&T control  
23             over the ILEC's expansion of its own network. This is not the  
24             intention of the Act, which clearly states that virtual collocation  
25             is a viable option if space limitations do not allow for physical

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collocation. If GTEFL were forced to build out based simply upon AT&T's wish list, but AT&T was not required to fully compensate GTEFL for the additional space or forced to inhabit the build-out, GTEFL may in fact be adding inefficient, vacant real estate.

**Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?**

**A. Yes, it does.**