GTE FLORIDA INCORPORATED

REBUTTAL TESTIMONY OF LARRY HARTSHORN

DOCKET NO. 960847-TP

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Larry Hartshorn. My business address is One GTE Place, Thousand Oaks, California 91362.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by GTE California Incorporated (GTE) as Manager-Network Design.

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.

A. I received my Bachelor of Science degree in electrical engineering from the University of California at Davis. I have worked in the telecommunications industry for over 27 years. I have been with GTE for over 22 years, and have held positions in both manufacturing and telephone operations. I started with GTE as an applications engineer specializing in microwave radio and later served as Product Manager for transmission and radio products. Between 1987 and 1993, I held manager positions in both engineering and planning for GTE Hawaiian Telephone Company. I joined GTE California in 1993 as

Network Engineering Manager and assumed my current position of Network Design Manager in 1994.

Q. WHAT ARE YOUR RESPONSIBILITIES IN YOUR CURRENT POSITION?

A. I plan the growth and modernization of the network infrastructure for GTE, including outside plant cable and electronics, central office equipment, and interoffice facilities as well as developing infrastructure necessary to deliver new products and services to GTE customers.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE COMMISSIONS?

A. Yes. I have testified in several matters in both Hawaii and California.

Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING?

A. No. I did not. But I am hereby adopting the Direct Testimony of GTEFL witness Albert E. Wood, Jr. This witness substitution is necessary because the GTE Operating Companies are involved in so many arbitration hearings around the country at the same time. Given this situation, it is inevitable that conflicts will arise for the limited number of witnesses available to testify on any given subject matter.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I will respond to certain unbundling and related demands by AT&T and MCI.

Q. AT&T, AT LEAST, HAS ASKED FOR UNBUNDLED ACCESS AT THE USER NETWORK INTERFACE (UNI) DATA NETWORKING LEVEL. IS GTEFL WILLING TO PROVIDE SUCH ACCESS?

A. Yes. GTE has agreed to allow unbundled access at the UNI data networking level.

Q. DOES GTEFL AGREE TO ALLOW UNBUNDLED ACCESS AT THE NETWORK-TO-NETWORK INTERFACE (NNI) DATA NETWORKING LEVEL, AS AT&T HAS ALSO REQUESTED?

A. GTEFL has agreed to allow this type of unbundled access on a case-by-case, negotiated basis, due to potential protocol interface differences that may exist between network technologies.

Q. SHOULD GTEFL BE REQUIRED TO PROVIDE DARK FIBER AS REQUESTED BY MCI's WITNESS CAPLAN AND AT&T's WITNESS CRAFTON?

A. No. Dark or dim fiber is not a network element, and so is not subject to unbundling. The Act defines "network element" to include only those facilities that are "used in the provision of a telecommunications service." (Act at sec. 3(45) [emphasis added].) Because ILECs do not use dark fiber in their networks--transport circuits must be "lit" to

be used–dark fiber does not meet the statutory definition. Therefore, GTEFL should not be compelled to provide it to AT&T and MCI in this proceeding.

Q. CAN YOU RESPOND TO AT&T'S DEMAND FOR LOOP TESTING?

A. Yes. AT&T has requested that GTEFL perform loop testing in accordance with AT&T's standards on each of GTEFL's loops before AT&T initiates service. AT&T also demands that GTEFL provide complete reports of the test results. These are unreasonable demands. In a resale environment, GTEFL will provide the same quality service to AT&T's customers as it provides to other ALECs and to itself. GTEFL will ensure that the network meets it own parameters, but it should not be required to satisfy unique–different or higher--standards for each ALEC, as AT&T's would have it do. GTEFL does not routinely test every loop on a new installation, and should not be forced to do so by AT&T. Reporting parameter information to AT&T for its concurrence or validation in the instances GTEFL does perform tests is also unwarranted and unnecessary. As noted, the same standards will apply to service provided to both GTEFL and AT&T end users.

If AT&T raises the loop testing question in an unbundling, rather than resale, context, then AT&T must notify GTEFL of the service-enhancing technologies it plans to use, so that it does not interfere

with GTEFL or other network users as discussed more fully in my direct testimony.

Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.