

1 GTE FLORIDA INCORPORATED

2 REBUTTAL TESTIMONY OF KIRBY D. CANTRELL

3 DOCKET NO. 961173-TP 961173-9

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5 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

6 A. My name is Kirby D. Cantrell. My business address is 201 Franklin  
7 Street, Tampa, Florida 33601-0110.

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9 Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING?

10 A. Yes, I did.

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12 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

13 A. I address the collocation issues raised by Sprint's witness Tony H.  
14 Key.

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16 Q: WHY IS ADEQUATE CENTRAL OFFICE SPACE IMPORTANT FOR  
17 GTE?

18 A: GTE provides a host of network services; these services include but  
19 are not limited to local switching, switched access, special access,  
20 E911 services, ancillary services and enhanced services. The need  
21 for interoffice trunking capability and the recent requirement to  
22 provide unbundled network elements demands an efficient network  
23 and the ability to adequately plan for growth. Without the ability to  
24 reserve sufficient space, it may be difficult or impossible for an ILEC  
25 to meet the unique requirements imposed upon it.

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FPSC-RECORDS/REPORTING

1       **Q:    DOES A COLLOCATION CUSTOMER REQUIRE A SIMILAR NEED**  
2       **FOR SPACE RESERVATION?**

3       A:    No, the Act requires all collocation customers to interconnect with the  
4       incumbent LEC. Interconnection equipment does not necessitate  
5       switching functionality; only transmission, multiplexing, and  
6       concentration equipment is needed for connection to network  
7       elements. A collocation customer is not required to, nor will it, offer  
8       the vast array of services the ILEC does from its own central office.  
9       The relatively greater complexity of the ILEC planning process and  
10      the unique demands placed upon the ILEC justify different treatment  
11      with regard to space reservation. Because the interconnector does  
12      not have the space needs of an ILEC, it does not need a reservation  
13      right.

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15      **Q:    HOW DOES THE FCC ORDER INTERPRET SPACE**  
16      **REQUIREMENTS?**

17      A:    First, the FCC Order correctly concludes that switching equipment  
18      may not be collocated (Order ¶¶ 579-82). Second, the Order allows  
19      ILECs to reserve a limited amount of space for specific future uses  
20      and allows reasonable restrictions on the warehousing of space  
21      (Order ¶ 586).

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23      **Q:    WHAT IS GTE'S POSITION ON RESERVATION OF SPACE?**

24      A:    GTE believes a five-year planning horizon is just and reasonable for  
25      the ILEC to reserve space with documented plans. Although the

1 FCC has appropriately placed restrictions on the types of equipment  
2 which must be collocated, GTE will not restrict the maximum amount  
3 of floor space a collocator can request. However, GTE believes that  
4 if a collocator does not have documented plans to use its space  
5 within one year, it should be made available to other parties on a first-  
6 come first-serve basis.

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8 **Q. HAS THE FCC COMMENTED ON THE REASONABLENESS OF A**  
9 **FIVE-YEAR PLANNING HORIZON?**

10 A. Yes. On June 9, 1993, the FCC released its Order in CC Docket No.  
11 91-141 which established time periods for reservation of space for  
12 future use by LECs. That Docket addressed the issue of whether  
13 LECs should be required to expand their facilities or relinquish central  
14 office space reasonably reserved for future use. The FCC concluded  
15 that GTE's normal business practice of reserving space for future use  
16 based on a five-year forecasting period was reasonable.

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18 **Q: HOW DOES GTE MAKE SPACE AVAILABLE FOR COLLOCATION**  
19 **REQUESTS?**

20 A: Space is available to all parties on a first-come, first-served basis  
21 When a collocation request is received, GTE will determine if there  
22 is sufficient space available to meet the request. Within this process,  
23 GTE will determine what space GTE needs for specific projects that  
24 are planned within the five-year cycle. All remaining space is open  
25 for collocation requests

1 Q: WOULD GTE DENY PHYSICAL COLLOCATION TO AN ENTRANT  
2 IF A PORTION OF THE CENTRAL OFFICE SPACE WAS  
3 OCCUPIED BY INACTIVE EQUIPMENT?

4 A: No, GTE would not deny a request on this ground. The inactive  
5 equipment would be removed and physical collocation would be  
6 granted, assuming that the removal cleared available space and the  
7 arrangement was technically feasible.

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9 Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

10 A. Yes, it does.

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