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GTE FLORIDA INCORPORATED
DIRECT TESTIMONY OF KIRBY D. CANTRELL
DOCKET NO. 961537-TP

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

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

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

A. I am employed by GTE Florida Telephone Operations 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 GTE Florida Incorporated in 1973 and have held management positions in Sales, Product Management and Carrier Markets.

Q. WHAT ARE THE RESPONSIBILITIES OF YOUR CURRENT POSITION?

A. I am responsible for providing technical help to alternative local exchange carriers (ALECs), and I am the GTE collocation administrator for Florida.

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1 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
2 DOCKET?

3 A. The purpose of my testimony is to identify the disputed issues
4 between GTE and ACSI related to collocation and then set forth
5 GTE's position on those issues.

6

7 Q. HOW IS YOUR TESTIMONY STRUCTURED?

8 A. My testimony is separated into five sections as follows: Section A is
9 a general overview of collocation; Section B sets out the collocation
10 provision of the Telecommunications Act of 1996 (Act); Section C
11 provides a list of the issues presented and a summary of the
12 respective parties' positions; Section D presents GTE's position in
13 detail; and Section E summarizes my testimony.

14

15 SECTION A: AN OVERVIEW OF COLLOCATION

16

17 Q. WHAT IS COLLOCATION?

18 A. A central objective of the Act is to facilitate competition in local
19 exchange markets by allowing new entrants to interconnect with
20 unbundled elements of the network of the incumbent local exchange
21 carrier (ILEC). For example, an ALEC may wish to terminate its own
22 transmission links and interconnect them with an ILEC's switch,
23 located in the central office, for routing to individual customers. In
24 doing so, it may want to utilize its own circuit termination equipment
25 rather than purchase termination and transport service from the ILEC.

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For technical reasons (e.g., the cable required to cross-connect two communications circuits cannot exceed a certain length), the CLEC's circuit termination equipment must be very near the ILEC's network equipment. In these circumstances, it may be necessary to allow the CLEC to "collocate" its equipment on the ILEC's premises.

Collocation can take two forms, "physical collocation" and "virtual collocation."

Q. PLEASE DESCRIBE PHYSICAL COLLOCATION.

A. Essentially, physical collocation enables an interconnector to set up a mini-facility on the premises of a local exchange carrier (LEC). The LEC leases a portion of the space in its facility to the interconnector, which then places its own equipment in the segregated space. Typically, that space is enclosed by "cages" or similar structures to provide security for the ILEC facilities and the installed equipment. The interconnector is permitted to enter the facility to install, maintain, and repair collocated equipment.

Q. WHAT IS VIRTUAL COLLOCATION?

A. In the case of virtual collocation, the interconnector does not occupy a portion of the ILEC's facility, nor does it own the equipment that is used to interconnect with the ILEC's network. Instead, the ILEC owns or leases the equipment necessary to terminate the interconnector's circuits and dedicates that equipment to the exclusive use of the

1 interconnector. This dedicated equipment is housed inside the
2 ILEC's facility (usually the central office) and is linked to the
3 interconnector's circuits outside the facility (typically at a manhole).
4 As opposed to physical collocation, the ILEC provides installation,
5 maintenance and repair services for the equipment.

6
7 **SECTION B: COLLOCATION AND THE ACT**

8
9 **Q. IS COLLOCATION ADDRESSED IN THE ACT?**

10 **A.** Yes. The Act takes account of the technical need to provide some
11 level of collocation to enable ALECs to interconnect with an ILEC's
12 network and access unbundled network elements. Section 251(c)(6)
13 of the Act sets out an ILEC's collocation obligations:

14 **COLLOCATION.**— The duty to provide, on rates, terms, and conditions
15 that are just, reasonable, and nondiscriminatory, for physical
16 collocation of equipment necessary for interconnection or access to
17 unbundled network elements at the premises of the local exchange
18 carrier, except that the carrier may provide for virtual collocation if the
19 local exchange carrier demonstrates to the State commission that
20 physical collocation is not practical for technical reasons or because
21 of space limitations.

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23 47 U.S.C. § 251(c)(6) (1996).
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The FCC has interpreted this provision to require collocation to be provided:

- on a physical or virtual basis at the request of an ALEC;
- at "all buildings or similar structures owned or leased by the incumbent LEC that house LEC network facilities";
- for transmission equipment "used" or "useful" for interconnection or access to unbundled elements, but not for switching equipment;
- for "cross-connects" between collocated CLEC equipment; and
- consistent with reasonable security measures, including cages.

See In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, CC Docket No. 96-98, FCC 96-325 (released Aug. 8, 1996) (the "Order") ¶ 555, et seq.

GTE and ACSI appear to disagree on just a few issues regarding implementation of the statutory provision.

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SECTION C: POSITIONS OF THE PARTIES

Q. WHAT ARE THE POSITIONS OF ACSI AND GTE CONCERNING COLLOCATIONS ISSUES?

A. The issues presented in this arbitration are very few. The questions which must be resolved are:

(1) *What types of equipment are necessary for interconnection?*

ACSI's Position: ACSI states that it must be permitted to locate its remote switching modules at GTE's premises.

GTE's Position: ACSI should be allowed to place on GTE's premises only equipment that is technically necessary to provide basic transmission service, such as circuit termination equipment. It should not be permitted to collocate remote switching modules, switches, enhanced services equipment or customer premises equipment.

(2) *Must GTE permit two collocators to cross-connect with each other, with equipment collocated at GTE's central office?*

ACSI's Position: ACSI believes there should be no prohibitions against non-GTE carriers interconnecting with one another on GTE's premises.

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GTE's Position: The Act does not require collocators housed on GTE property to cross-connect with each other in order to bypass GTE's network. GTE will provide the cross-connection ACSI seeks through the purchase of an unbundled network element.

Pending judicial review of the FCC's Order, GTE will permit the interconnection via cross-connects of the collocated equipment of different ALECs under the following conditions: (1) the provisioning of the cross-connect by GTE or the ALECs shall be at the option of GTE, (2) the connected equipment is used for interconnection with GTE or access to GTE's unbundled network elements, (3) adequate space is available, (4) reasonable security arrangements can be provided, and (5) the ALECs pay all costs associated with the cross-connect.

(3) *What rate should be established for cross-connections to other collocated entities?*

ACSI's Position: ACSI believes it should be able to make arrangements directly with the other entity, at no charge by GTE, or by contracting with GTE to perform the arrangement on a time and material basis.

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GTE's Position: GTE will perform the cross-connect arrangement through an unbundled network element. This element will be priced using TELRIC methodology.

SECTION D: GTE'S POSITION RELATIVE TO THE DISPUTED ISSUES

Q. WHAT IS GTE'S GENERAL POSITION RELATIVE TO ACSI'S COLLOCATION REQUESTS?

A. GTE is concerned that ACSI may be seeking to more than simply collocate equipment "necessary for interconnection or access to unbundled network elements" on GTE premises, as the Act directs. Apparently, ACSI seeks to use GTE's property whenever it is to ACSI's convenience or advantage to do so. Section 251(c)(6) of the Act does not support the positions ACSI has taken in negotiations with respect to collocation.

It is important to keep in mind that collocation is a limited measure, designed to remove technical barriers to new local exchange providers entering the local telephone market and effectively competing with ILECs. Collocation is not intended as a vehicle by which new entrants may avoid offering true facilities-based competition by building their business on the premises of their competitors. GTE sets out in greater detail below the justifications for its positions with respect to the disputed collocation issues.

1 Q. WHAT IS GTE'S POSITION CONCERNING WHAT TYPES OF
2 EQUIPMENT ARE NECESSARY FOR INTERCONNECTION VIA
3 COLLOCATION?

4 A. ACSI should not be permitted to collocate on GTE premises any
5 equipment it chooses. ACSI has taken the position that a collocator
6 should be permitted to place any type of equipment (including
7 switches) on GTE's premises. This position disregards the language
8 of the Act, which limits collocated equipment to that "necessary for
9 interconnection or access to unbundled network elements." 47
10 U.S.C. § 251(c)(6) (emphasis added). While the FCC's interpretation
11 of the "necessary" qualifier as "used or useful" is questionable, the
12 FCC correctly concludes that switching equipment, enhanced
13 services equipment and CPE may not be collocated. Order, ¶¶ 579-
14 82. Thus, both the Act and the Order foreclose ACSI's request to
15 collocate on GTE premises equipment that is not necessary.
16 Necessity, not convenience, is the touchstone for collocation under
17 the Act.

18
19 The fundamental purpose of the "interconnection and access"
20 provisions is to enable an interconnector to use ILEC network
21 components without having to purchase complete switched access or
22 exchange service. See Expanded Interconnection with Local
23 Telephone Company Facilities, CC Docket No. 91-141, and
24 Amendment of Part 36, CC Docket No. 80-286, Second Report and
25 Order and Third Notice of Proposed Rulemaking, 8 FCC Rcd. 7374

1 (1993) (the "Switched Access Order") ¶ 62 (a "fundamental purpose
2 of expanded interconnection . . . is to allow interconnectors to use
3 LEC switches without having to purchase the LECs' end-to-end
4 switched access services. If interconnectors want to do their own
5 switching, they may place switches on their own property") (quoting
6 PacTel Comments at 46-47)), vacated insofar as it requires physical
7 collocation, Bell Atlantic Tel. Cos. v. FCC, No. 93-1743 (D.C. Cir. Apr.
8 17, 1995), rules modified on remand, 9 FCC Rcd 5154 (1994).

9
10 The FCC has recognized the importance of limiting the types of
11 equipment that must be collocated on a LEC's premises to equipment
12 that is necessary and directly related to the competitive provision of
13 basic transmission service, and it has consistently rejected
14 suggestions that LECs be required to provide collocation of enhanced
15 services equipment, customer premises equipment, switches, or other
16 non-transmission equipment. See Special Access Order, ¶ 63 ("LECs
17 are not required to provide collocation of enhanced services,
18 customer premises, or other non-transmission equipment."); In re
19 Expanded Interconnection with Local Telephone Company Facilities,
20 Memorandum Opinion and Order, 9 FCC Rcd 5154 (1994) ("Virtual
21 Collocation Memorandum and Order") ¶ 94 ("In our earlier orders, we
22 required LECs to permit interconnectors to place . . . in LEC central
23 offices only equipment needed to terminate basic transmission
24 facilities . . . [w]e conclude that the same principles should apply [for
25

1 the policies] we adopt in this order"). Congress was clearly aware of
2 this history when it enacted Section 251(c)(6).
3

4 If a collocator were permitted to place any type of equipment it
5 wished on GTE's premises, it would quickly exhaust existing space
6 available for collocation. For example, if the first party seeking
7 collocation were allowed to install remote switching modules (as ACSI
8 requests) or other large switches, circuit termination equipment,
9 enhanced services equipment, and customer premises equipment,
10 there would not be enough space for other competitors to collocate
11 equipment essential to offering basic services. That first collocator--
12 perhaps ACSI--would be able to monopolize the limited amount of
13 usable space in GTE's facilities, and deny other interconnectors the
14 opportunity to collocate on GTE's premises in order to compete
15 directly with ACSI and GTE. This result would contravene the goals
16 of the Act.
17

18
19 **Q. DOES COLLOCATION OF A REMOTE SWITCHING MODULE**
20 **REQUIRE MORE FLOOR SPACE THAN A DIGITAL LOOP**
21 **CARRIER (DLC)?**

22 **A.** Yes, a remote switching module (RSM) does require additional floor
23 space. In fact, Mr. Stipe states in his testimony that an RSM is larger
24 than a DLC. He also asserts that an RSM will serve many more lines
25 (4000 vs. 760) than a DLC. However, Mr. Stipe fails to mention that

1 the 760 lines of the DLC will fit into 1 equipment bay, whereas the
2 4000 lines of the RSM will take up several bays.

3
4 **Q. ARE THERE ANY OTHER CONCERNS WITH THE FLOOR SPACE**
5 **REQUIREMENTS OF AN RSM VS. A DLC?**

6 **A.** Yes, since the DLC is a wholly contained unit within a single
7 transmission equipment bay, growth of this unit into larger line
8 quantities does not require contiguous space. In contrast, there are
9 distance limitations with the RSM between the line unit and the
10 common control bay which necessitates growth into contiguous
11 space. Thus, DLCs more efficiently utilize limited floor space—an
12 important goal in accommodating multiple collocators in a given
13 central office.

14
15 **Q. WOULD ACSI'S PROPOSAL, IF ADOPTED, PRESENT OTHER**
16 **ADVERSE CONSEQUENCES?**

17 **A.** Yes. First, it would impinge on GTE's ability to upgrade its equipment
18 and expand its services. Second, the placement of extraneous
19 equipment would place additional demands on the facility's power
20 supply. Switches, for example, demand an inordinate amount of
21 power, and significant modifications would be required to power that
22 equipment. Third, similar modifications would be required to maintain
23 the environmental stability required by central office equipment. The
24 public ultimately would bear these unnecessary costs in exchange for
25 limited or no competitive benefits.

1 Q. PLEASE DESCRIBE THE TYPES OF EQUIPMENT THAT CAN BE
2 COLLOCATED.

3 A. Collocation equipment is limited to concentration and circuit
4 termination equipment (including optical line terminating equipment
5 and multiplexers). Concentration equipment aggregates multiple
6 loops to a single loop for more efficient transport. Termination
7 equipment allows an ALEC to convert the optical signals on its loops
8 to electrical signals that can be used by GTE's network equipment.
9 Because current cross-connection technology limits the maximum
10 distance between these various pieces of equipment, collocation is
11 necessary and should be permitted for concentration and termination
12 equipment.

13
14 Q. DOES THE FCC'S ORDER CALL FOR THE BROAD KIND OF
15 COLLOCATION THAT ACSI SEEKS?

16 A. No. There is no justification for collocating remote switching modules,
17 switches, enhanced services equipment or customer premises
18 equipment. Thus, to the extent the FCC's "used or useful" test may
19 be viewed as broader than GTE's position or may be argued in the
20 future to require collocation of additional or different equipment than
21 that described above, GTE submits that such a construction would be
22 contrary to the Act itself. The FCC left to State commissions the
23 determination of whether particular equipment not discussed in the
24 Order is entitled to collocation. Order, ¶ 581.

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Q. WHAT IS GTE'S POSITION RELATIVE TO ACSI CROSS-CONNECTING TO ANOTHER PARTY COLLOCATED IN GTE'S FACILITY?

A. ACSI should not be permitted to cross-connect with non-GTE collocators on GTE property in order to completely bypass GTE's network. Although nothing in the language of the Act suggests that Congress contemplated such action, the FCC recently has required that, at the option of the ILEC, such cross-connects be made available through ILEC-provided or ALEC-provided facilities. Order, ¶ 595.

I have been advised by my lawyers that this requirement works a "taking" of ILEC property in excess of the FCC's authority under the Act under Bell Atlantic v. FCC. (The takings issue is discussed in more detail in the Takings Report included with GTE's Response to ACSI's Petition for Arbitration.)

The Act imposes a duty on ILECs only to interconnect their network elements with a requesting party's collocated equipment. It does not impose a duty to facilitate interconnection between third-parties anywhere, much less on the ILEC's own premises. In other words, collocation authorized under section 251 permits third parties to make use of their competitors' private property only for the limited purpose of gaining access to critical network elements that are in the ILEC's

1 control. Collocation is not an open invitation for ALECs to use ILEC
2 property for purposes wholly unrelated to the ILEC's network.

3 GTE recognizes that this Commission has ordered ILECs to allow
4 third-party cross-connections in its Order number PSC-96-0445-FOF-
5 TP, but that Order has been challenged in the Florida Supreme Court.
6 Nonetheless, should the Commission deem itself bound to follow its
7 own decision and the FCC's Order pending judicial review, GTE will
8 permit the interconnection via cross-connects of the collocated
9 equipment of different ALECs as long as the provisioning of the
10 cross-connect by GTE or the ALECs shall be at the option of GTE,
11 the connected equipment is used for interconnection with GTE or
12 access to GTE's unbundled network elements, space is available,
13 reasonable security arrangements can be provided, and the ALECs
14 pay all costs associated with the cross-connect.

15
16 **Q. IF THE COMMISSION FEELS BOUND TO PERMIT THIRD PARTIES
17 TO CROSS-CONNECT, WHO WILL PERFORM THIS
18 CONNECTION?**

19 **A.** The FCC Order (¶ 595) states that the ILEC is required to provide the
20 connection unless it permits the collocating parties to provide this
21 connection for themselves. GTE would choose to provide this
22 connection through an unbundled network element.
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1 Q. PLEASE DESCRIBE HOW GTE DETERMINED COSTS AND RATES
2 FOR THE COLLOCATION ELEMENTS.

3 A. Costing and pricing for the collocation rate elements were established
4 as follows: forward-looking costs were determined for each cost item.
5 A monthly rate was established to recover the monthly recurring costs
6 along with a reasonable allocation towards the Company's common
7 costs.

8 Q. WOULD GTE USE THE SAME METHODOLOGY TO ESTABLISH
9 THIS RATE AS IT USED TO DEVELOP THE OTHER
10 COLLOCATION RATE ELEMENTS?

11 A. Yes, GTE would use the forward-looking costs of the elements with
12 a reasonable contribution to the Company's common costs.

13 Q. DO YOU HAVE ANY OTHER REMARKS THAT ARE PERTINENT
14 TO COLLOCATION?

15 A. Yes, I will offer general remarks concerning structures where ILECs
16 can collocate and on safety and security measures.

17 Q. SHOULD A NEW ENTRANT BE PERMITTED TO COLLOCATE AT
18 ANY AND EVERY STRUCTURE OWNED BY GTE, IRRESPECTIVE
19 OF ITS PURPOSE AND CAPABILITIES?

20 A. No. A new entrant should not be permitted to have access to any and
21 all of GTE's buildings and structures. This type of request is not
22 limited to what is necessary for interconnection and fails to consider
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1 space limitations. Many of GTE's buildings and structures are very
2 small and house network elements that do not perform routing or
3 rating functions. Therefore, interconnection and collocation at many
4 of those points offers few benefits that cannot be obtained by
5 collocating either at a central office (where calls are routed to and
6 from customers), a serving wire center (the office closest to an
7 interexchange carrier's point of presence which serves as a rating
8 point, but provides no switching), or a tandem switch (which routes
9 calls from one central office to another). These latter facilities offer
10 much greater space, the proper environmental conditions, and allow
11 more efficient maintenance and repair of equipment.

12 Remote units, which are smaller structures housing certain network
13 elements located some distance away from the central office, must be
14 evaluated on an ad hoc basis. GTE maintains two types of remote
15 units. Remote switching units have some independent switching
16 capability and may direct local transmission traffic within a particular
17 area. Remote line units, by contrast, contain no such independent
18 capability. These line units interact with the switch at the central
19 office, which acts as the host computer, directing transmission traffic.
20 Host switches and remote line units often share NXX codes, making
21 it impossible to route terminating traffic to a remote line unit. Many
22 remote units also lack "rating" capability—the ability to measure and
23 record traffic flow data for billing and other purposes.
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1 Remote units are very small and offer very little space to
2 accommodate collocators. The cramped confines of these facilities
3 also make it difficult to segregate adequately different companies'
4 equipment and to limit third-party access. Consequently, few, if any,
5 ALECs will be able to place equipment in these structures. Since
6 "dumb" remote units, such as line units, offer no significant benefits
7 over central offices, serving wire centers and tandem switches (which
8 contain routing and switching functions, have greater space, and offer
9 the proper environmental conditions) GTE believes that collocation
10 should not be permitted at such locations. For the same reasons,
11 GTE opposes collocation at vaults and manholes which also have
12 very limited space and which, like remote lines units, house no
13 routing or rating equipment.

14
15 **Q. DOES THE FCC'S ORDER REQUIRE COLLOCATION AT ALL**
16 **STRUCTURES THAT HOUSE NETWORK ELEMENTS?**

17 **A.** GTE recognizes that the FCC's Order requires collocation to be
18 provided at all structures that house GTE network facilities, including
19 "any structures that house LEC network facilities on public rights-of-
20 way, such as vaults containing loop concentrators or similar
21 structures." Order, ¶¶ 573-75. GTE submits, however, that such an
22 expansion of the FCC's earlier collocation requirements is
23 unauthorized under the Act. To the extent the Commission deems
24 itself to be bound by the FCC's holding in this regard, GTE would be
25 willing, pending judicial review of the FCC's determination, to provide

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collocation at such structures to the extent space is available, the interconnection requested is technically feasible, security concerns can be adequately addressed, and the collocator bears the costs of the collocation arrangement.

Collocation at remote switching units or remote units that offer independent routing or rating capability do provide greater interconnection benefits, but they too suffer from severe space limitations. Nonetheless, because remote switching units contain some unique network functions, GTE will provide collocation at these sites where space is available, the requested interconnection is technically feasible, security concerns can be adequately addressed, and the collocator pays all costs of the collocation arrangement. This position is consistent with the FCC's prior collocation policies. See Special Access Order, ¶¶ 53-57.

Q. ARE SAFETY AND SECURITY MEASURES RELATIVE TO COLLOCATION NECESSARY?

A. Yes. GTE should be permitted to implement reasonable safety and security measures to protect its systems, and this is especially true where GTE permits a third party competitor to have access to GTE's private facilities which house highly sensitive equipment and proprietary information. It is reasonable in this situation to establish security measures, such as partitioning areas for collocating parties and installing fencing within the partitioned areas for each collocator.

1 This ensures that no party has access to any other party's equipment.
2 As the FCC has recognized, such measures minimize the risk of harm
3 to the public-switched telephone network and are in the best interests
4 of all the parties. Order, ¶ 598.

5 **SECTION E: SUMMARY**

6
7 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

8 **A.** The Act was passed to introduce competition into the local telephone
9 market. It recognizes that certain functions of the traditional local
10 exchange network cannot be quickly or easily duplicated by new
11 market entrants, and that competing providers will have to be
12 interconnected in order to switch traffic among their customers.
13 Collocation is a limited measure designed to remove technical and
14 market barriers to interconnection and access to network elements.
15 Because state-mandated physical occupation of a company's private
16 property may offend the Constitution, Congress was careful to limit
17 collocation to equipment "necessary for interconnection." ACSI,
18 however, goes far beyond what is necessary and seeks to collocate
19 whenever ACSI finds it convenient and advantageous to do so.
20 Accordingly, the Commission should adopt GTE's preferred positions
21 as set out above or, at a minimum, GTE's alternative positions as
22 conditioned herein and subject to judicial review of the FCC's Order.
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1 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

2 A. Yes, it does.

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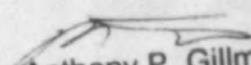
January 24, 1997

Re: Docket No. 961537-TP
Petition by American Communications Services, Inc., and its local exchange
operating subsidiaries, for Arbitration with GTE Florida Incorporated pursuant to
the Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of the direct testimony of
Kirby D. Cantrell, Michael J. Doane, Gregory M. Duncan, Donald W. McLeod,
Beverly Y. Menard, William E. Munsell, Bert I. Steele, and Dennis B. Trimble on behalf
of GTE Florida Incorporated in the above matter. Service has been made as indicated
on the Certificate of Service. If there are any questions regarding this matter, please
contact me at (813) 483-2615.

Very truly yours,


Anthony P. Gillman
APG:tas
Enclosures

Cantrell - 00930-97
Doane - 00931-97
Duncan - 00932-97
McLeod - 00933-97
Menard - 00934-97
Munsell - 00935-97
Steele - 00936-97
Trimble - 00937-97

CERTIFICATE OF SERVICE

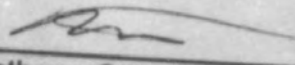
I HEREBY CERTIFY that copies of the direct testimony of Kirby D. Cantrell, Michael J. Doane, Gregory M. Duncan, Donald W. McLeod, Beverly Y. Menard, William E. Munsell, Bert I. Steele, and Dennis B. Trimble on behalf of GTE Florida Incorporated in Docket No. 961537-TP were sent via overnight delivery on January 23, 1997, to the parties listed below.

Monica Barone
Division of Legal Services
Florida Public Service Commission
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