

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 961537-TP

REBUTTAL TESTIMONY

OF

C. WILLIAM STIPE III

ON BEHALF OF

AMERICAN COMMUNICATIONS SERVICES, INC.

February 7, 1997

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY OF

C. WILLIAM STIPE, III

1

2 Q. PLEASE STATE YOUR NAME.

3 A. My name is C. William Stipe III.

4 Q. ARE YOU THE SAME C. WILLIAM STIPE THAT EARLIER PREPARED
5 DIRECT TESTIMONY THAT WAS FILED ON BEHALF OF AMERICAN
6 COMMUNICATIONS SERVICES, INC.?

7 A. Yes.

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

9 A. The purpose of my testimony is to respond to the initial testimony of Mr. Kirby D.
10 Cantrell of GTE Florida, Inc. ("GTE") regarding collocation. I will respond to Mr.
11 Cantrell's assertions regarding the collocation of remote switching modules ("RSMs").

12 COLLOCATION OF REMOTE SWITCHING MODULES

13
14 Q. ACSI HAS REQUESTED TO COLLOCATE RSMs AT SOME GTE FACILITIES.
15 PLEASE EXPLAIN BRIEFLY WHAT AN RSM IS AND DESCRIBE ITS
16 FUNCTION?

17 A. An RSM is a piece of equipment that may be used to connect individual subscriber loops

1 with a large "host" switch located at some distance from the switch. The RSM
2 concentrates the subscriber loops to a single trunk connecting with the host switch. In
3 limited circumstances, and at the direction of the host switch, the RSM also can perform
4 some switching functions between loops connected to it. For example, if one subscriber
5 connected to an RSM dialed the number of another subscriber also connected to the
6 equipment, the RSM could, upon instruction from the host switch, establish a
7 communications path directly between those two subscriber loops. This is more efficient
8 than other interconnection arrangements because it saves ACSI the need to transport the
9 call to the host switch and then back along the same trunk for termination. In fact, an
10 RSM operates in a way very similar to what Mr. Cantrell describes as a Remote Line Unit
11 ("RLU") at page 17 of his testimony.

12 **Q. MR. CANTRELL STATES (P. 13) THAT GTE IS WILLING TO ALLOW**
13 **COLLOCATION OF CONCENTRATION AND CIRCUIT TERMINATION**
14 **EQUIPMENT. DO RSMs PERFORM THESE FUNCTIONS?**

15 **A.** Yes. As explained above, an RSM connects a number of subscriber loops with a host
16 switch. The RSM does this by concentrating the loops into a single trunk connected to
17 the host. In addition, any digital/analog conversion that is necessary to transmit signals
18 across GTE unbundled loops is performed by the RSM. In essence, the RSM performs
19 the same functionality as a Digital Loop Carrier ("DLC") in most circumstances, but also
20 performs a limited switching function in some circumstances.

1 Q. MR. CANTRELL STATES THAT COLLOCATION OF RSMs WOULD EXHAUST
2 SPACE AVAILABLE FOR COLLOCATION (P. 11-12). DO YOU AGREE?

3 A. No. Collocation of RSMs should not place greater demands on GTE's space needs than
4 would collocation of other interconnection equipment. This is true for two reasons.

5 First, RSMs are not significantly larger than other types of equipment used for
6 interconnection. For example, an RSM requires approximately the same amount of space
7 as is needed for installation of a DLC. Moreover, because an RSM subtends to a larger
8 host switch, it is significantly smaller than switching equipment generally, which is what
9 Mr. Cantrell appears to be referring to in his testimony. Thus, Mr. Cantrell's implication
10 that ACSI seeks installation of "large" switches is unfounded. ACSI should be able to
11 install an RSM in the collocation space it has already requested from GTE.

12 Second, ACSI would install a RSM in the place of other equipment, not in addition
13 to it. That is, ACSI either must install an RSM or other equipment for interconnection,
14 but not both. Therefore, in a given location, the amount of space ACSI requests would
15 be approximately equal, regardless of what type of interconnection equipment it planned
16 to use..

17 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

18 A. Yes.

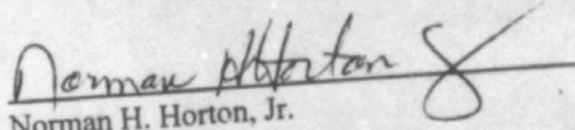
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Rebuttal Testimony of C. William Stipe, III on behalf of American Communications Services, Inc. in Docket No. 961537-TP has been furnished by Hand Delivery (*) and/or Overnight Delivery (**) on this 7th day of February, 1997 to the following parties of record:

Monica Barone, Esq.*
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February 7, 1997

Ms. Blanca Bayo, Director
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Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

BY HAND DELIVERY

Re: Docket No. 961537-TP

Dear Ms. Bayo:

Enclosed for filing is an original and fifteen copies of the Rebuttal Testimony of Dr. Marvin H. Kahn, the Rebuttal Testimony of C. William Stipe, III and the Rebuttal Testimony of Richard Robertson on behalf of American Communications Services, Inc. in the referenced docket.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Thank you for your assistance in this matter.

Sincerely,

Norman H. Horton, Jr.
Norman H. Horton, Jr.

NHH:amb
Enclosures

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Kahn
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Stipe *Robertson*
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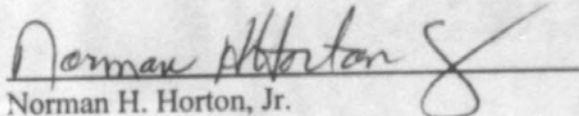
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