

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF ENO LANDRY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NOS. 960833-TP/960846-TP/960916-TP

960757-TP/971140-TP

DECEMBER 9, 1997

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND
EMPLOYMENT.

A. My name is Eno Landry. My business address is Suite
500, 3000 Riverchase Galleria, Birmingham, Alabama.
I am employed by BellSouth Telecommunications, Inc.,
hereinafter referred to as "BellSouth" or "the
Company".

Q. PLEASE STATE YOUR BACKGROUND AND QUALIFICATIONS.

A. I have been employed by BellSouth for the past 24
years and have worked in various network capacities.
For the past three years I have been responsible for
the development of collocation and unbundled network
element (UNE) provisioning and maintenance processes.

1 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2

3 A. The purpose of my testimony is to respond to
4 allegations made by various intervenors in
5 association with BellSouth cost studies.

6

7 Q. CAN YOU DESCRIBE THE MAJOR COMPONENTS CONTRIBUTING TO
8 THE NONRECURRING CHARGES ASSOCIATED WITH UNBUNDLED
9 LOOPS?

10

11 A. The major components associated with turning up
12 unbundled loops are as follows:

13

14 1. Functions associated with performing physical work
15 on the UNE. These involve the basic work activities
16 which are required to complete loop functionality.
17 They involve time to perform cross connects in the
18 field and at the premise. If the service requests a
19 collocation cross connect then that work would also
20 be reflected in the specific charges.

21

22 2. Functions specifically requested by the ALECs.

23 These involve coordination of turn-up and testing of
24 the unbundled components. They represent specific

25

1 additional functions requested by the ALECs in
2 interconnect agreements.

3

4 **Functions associated with fall-out.** These represent center
5 work activity where processes would normally be
6 automated but because of errors on the service
7 requests submitted by the ALECs, the service request
8 must be processed manually. Service requests that
9 contain service design and service connectivity
10 errors are a direct contributor to the nonrecurring
11 costs.

12

13 **Q. MR. PORTER RAISES CONCERNS ABOUT THE BELLSOUTH**
14 **NONRECURRING COSTS ASSOCIATED WITH HIGH SPEED DIGITAL**
15 **DATA LINES. CAN YOU ADDRESS HIS CONCERNS?**

16

17 **A.** Yes. The process of providing an unbundled loop
18 capable of supporting high speed digital data
19 involves several steps.

20

21 The digital loops are divided into various categories
22 which require different types of facilities to
23 function. Some of these loops, the 64KB and 56KB and
24 below bit speeds can be operated on fairly normal
25 facilities and can even be operated over universal

1 digital loop carrier systems. The higher speed lines
2 require much more specialized designs. ADSL and
3 HDSL technology not only require these specialized
4 transport processes but also require very limited
5 amounts of bridged tap on the copper cable and
6 exclusion of load coils. These very specialized
7 requirements must be met as part of the design
8 process and very specific testing must be done so
9 that BellSouth can turn over the service to the ALEC
10 with assurance that the service will function as
11 ordered.

12
13 Without the appropriate level of testing, which does
14 require a dispatch to the customer premise, BellSouth
15 cannot turn over the digital services Mr. Porter
16 describes with any level of assurance that it will
17 function as ordered.

18
19 The nonrecurring costs presented in BellSouth's cost
20 studies are representative of the effort required to
21 meet the requirements of the service that has been
22 ordered and to make sure that we are in compliance
23 with the ALECs' interconnection agreements.

24
25

1 The times that Mr. Porter has stated in his testimony
2 do not reflect the very specific requirements that,
3 by necessity, are associated with digital unbundled
4 loops.

5

6 **Q. MR. LYNOTT ASSUMES A VERY SIMPLIFIED PROCESS FOR**
7 **UNBUNDLED ELEMENTS. CAN YOU ADDRESS WHY THIS IS**
8 **INACCURATE?**

9

10 A. Mr. Lynott compares providing unbundled elements to
11 PIC changes. PIC changes are a simple electronic
12 translation change and are not reflective of the
13 complexity of separating a loop facility from the
14 switch and providing it as an unbundled element.
15 This process of separating a loop and connecting it
16 to a collocated provider requires very specific
17 physical steps to provide the connection and to
18 activate it with some level of functional assurance.

19

20 **Q. MR. LYNOTT ALSO DISCUSSES HIS ASSUMPTIONS ON FALL-**
21 **OUT. CAN YOU ADDRESS THESE?**

22

23 A. Mr. Lynott's assumptions reflect a very simplified
24 flow that are more representative of retail and
25 resale processes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Unlike resale, the unbundled element process requires by definition some very specific parameters for interconnection.

Because of the need to interconnect an unbundled loop to a collocated provider, the UNE process has many similarities to the access process. Like the connectivity at an access pop, the meet point at the collocator's space requires specific definition for ALEC facility assignment, and for signaling and transmission level parameters. In the access environment the carriers submit service requests with a high error rate and, after an order has been placed today, approximately 70% of access orders require some manual intervention in the provisioning process. There is no reason to believe the UNE environment will be significantly different. Although it is expected that some UNE errors will be mechanically detected and returned to the ALEC by the new operational support ordering systems, not all of the errors can be detected by these systems. Some of the errors will propagate downstream to the provisioning systems and will fallout during the assignment and design process.

1
2 Indeed, the post Firm Order Confirmation (FOC)
3 fallout that BellSouth has been experiencing in both
4 the UNE process and its parallel access process are
5 substantially increased by the Connecting Facility
6 Assignment (CFA), Common Language Location Indicator
7 (CLLI) and Network Channel Interface (NCI)
8 synchronization issues. We have experienced this
9 problem since 1984 in the access process. Because of
10 ALEC requirements, the UNE process is at least as
11 complex as the interexchange process. It is indeed
12 hard to believe that that fall-out of UNE orders will
13 be any less.

14
15 In fact from my experience, I expect the downstream
16 fall-out to be worse for UNEs than for access because
17 of the specific ALEC requirements for CFA control and
18 for processing non-design services. Thus, the 20%
19 fallout rate assumed by BellSouth is forward-looking
20 and from my perspective is a conservative estimate.

21
22 Q. DO THE NONRECURRING WORK TIMES USED IN BELLSOUTH'S
23 STUDY REPRESENT THE TRUE FORWARD-LOOKING FUNCTIONS
24 REQUIRED TO SUPPORT THE SPECIFIC REQUIREMENTS OF
25 THESE UNBUNDLED ELEMENTS?

1

2 A. Yes they are.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes it does.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25