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MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE (850) 222-0720
TELECOPIERS (850) 224-4359 (850) 425-1942

February 4, 1999

BY HAND DELIVERY
Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 981642-TP and 981745-TP

Dear Ms. Bayo:

Enclosed for filing on behalf of e.spire Communications, Inc. in the above captioned dockets are an original and fifteen copies of the following documents:

1. Revised Direct Testimony of Dr. Marvin Kahn on behalf of e.spire Communications, Inc.; 01459-99

2. Revised Direct Testimony of Tony Mazraani on behalf of e.spire Communications, Inc.; 01460-99

3. Revised Direct Testimony of C. William Stipe, III on behalf of e.spire Communications, Inc.; 01461-99

4. Revised Direct Testimony of James C. Falvey on behalf of e.spire Communications, Inc. 01462-99

The direct testimony of Dr. Kahn and Mr. Falvey is being revised to reflect the recent Supreme Court decision.

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Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Norman H. Horton, Jr.

NHH/amb
Enclosures
cc: James C. Falvey, Esq.
Parties of Record

CERTIFICATE OF SERVICE
Docket Nos. [redacted]-TP and [redacted]-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 12th day of February, 1999 to the following:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Brad E. Mutschelknaus
KELLEY DRYE & WARREN LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, D.C. 20036
Tel. No. (202) 955-9600

Norman H. Horton, Jr.
Floyd R. Self
MESSER CAPARELLO & SELF, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720

Riley M. Murphy
James C. Falvey
E.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 617-4200

Donna L. Canzano
Patrick Knight Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
P.O. Drawer 1657
Tallahassee, FL 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008

Jonathan E. Canis
Enrico C. Soriano
Kelley Drye and Warren LLP
1200 19th Street, N.W.
Fifth Floor
Washington, D.C. 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792

Scott A. Sapperstein
Senior Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923

Bennett L. Ross

Bennett L. Ross
(Pol)

ORIGINAL

e•spire Exhibit ____
Revised Testimony of C. William Stipe, III

BEFORE THE
STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	
Petition by E.SPIRE COMMUNICATIONS, INC., and ACSI LOCAL SWITCHED SERVICES, INC., AMERICAN COMMUNICATION SERVICES, OF TAMPA, INC., and AMERICAN COMMUNICATION SERVICES OF JACKSONVILLE, INC. for Arbitration of an Interconnection Agreement with BELLSOUTH TELECOMMUNICATIONS, INC. Pursuant to Section 252(b) of the Telecommunications Act of 1996	)	Docket No. 981745-TP

REVISED
DIRECT TESTIMONY
OF C. WILLIAM STIPE, III
ON BEHALF OF
E.SPIRE COMMUNICATIONS, INC.

FEBRUARY 4, 1999

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

A. My name is C. William Stipe III and I am Vice President - Network Engineering for e.spire Communications, Inc. ("e.spire"). My business address is 12701 Fair Lakes Circle, Suite 800, Fairfax, Virginia 22033.

Q. PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND BACKGROUND.

A. Since joining e.spire more than two years ago, I have been responsible for switch engineering and have overseen the company's installation of its first Lucent 5ESS switch and more than 20 others. For the past eight months, I also have been responsible for e.spire's SONET and network backbone electronics engineering. Prior to joining e.spire in 1996, I had twenty-three years of experience in the telecommunications industry working for Bell Atlantic Corporation. I held a number of positions with Bell Atlantic, and most recently, since 1994, was Director - Financial Systems. From 1991 to 1994, I served as Director - Product Profitability and Transfer Pricing and operated and enhanced a Product Profitability reporting system. I also developed and implemented a Transfer Pricing process for Line of Business financial reporting. From 1987 to 1991, I was the Director - Customer Business Services, responsible for pricing and costing multi-year service contracts in competitive proposals to Bell Atlantic's largest commercial and government customers. From 1972 to 1987, I held a variety of engineering and management positions of increasing responsibility. I received my Bachelor of Science in Electrical Engineering from Virginia Tech in 1972, and my M.B.A. from Virginia Commonwealth University in 1984.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I testified in e.spire's first arbitration with BellSouth (Docket No. 960916-TP).

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE OTHER STATE PUBLIC UTILITY COMMISSIONS?

A. Yes. I have testified before numerous Commissions, including Commissions in the BellSouth, Bell Atlantic, and U S West regions.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to explain the types and functionality of unbundled local loops ("ULLs") and other unbundled network elements ("UNEs") e.spire is interested in obtaining from BellSouth. During the course of negotiations that led to this arbitration proceeding, BellSouth already has agreed to provide some of the UNEs requested. However, even where BellSouth agreed to provide UNEs, in some cases, it often failed to propose rates, relied on interim rates, proposed rates that could not have a reasonable relation to cost, or proposed to limit the offering in a way that would deny e.spire the ability to use the UNE as intended.

Q. PLEASE SET FORTH THE NETWORK ELEMENTS TO WHICH E.SPIRE HAS REQUESTED BELLSOUTH TO PROVIDE UNBUNDLED ACCESS.

A. e.spire has requested access from BellSouth to various ULLs, including:

- 2-Wire Analog Voice Grade;
- 4-Wire Analog Voice Grade;
- 2-Wire ISDN Digital Grade;
- 4-Wire DS-1-Compatible;
- 2-Wire HDSL-Compatible;
- 2-Wire ADSL-Compatible;
- 2-Wire ADSL-Equipped;

- 4-Wire HDSL-Equipped;
- 56/64 kbps digital grade;
- DS-3;
- OC-3;
- OC-12; and
- OC-48.

e.spire also has requested unbundled access to Enhanced Extended Links ("EELs"), with no limits on the types of loops and transport that can be incorporated into an EEL; Dark Fiber loop plant; and a Bit-Stream Loop UNE.

So that e.spire can begin its roll-out of xDSL-based advanced services, e.spire also has requested unbundled access to xDSL-compatible (or "clean copper") loops, "loop conditioning", loop conditioning operations support systems ("OSS"), and "loop spectrum unbundling".

Where technically feasible, e.spire also has requested unbundled access to sub-loop elements. These sub-loop elements include:

- the network interface device ("NID");
- loop concentration equipment inside and outside the central office (including sub-loop concentration equipment and digital loop carriers of all kinds);
- feeder plant;
- distribution plant;
- dark fiber in the loop plant; and

- network terminating wires.

To ensure access to these sub-loop elements, e.spire also has requested BellSouth to provide access to remote terminals for collocation with and interconnection to equipment located in such remote terminals.

To complement its own switching capabilities, e.spire also has requested unbundled access to local switching, tandem switching and frame relay packet switching, including user-to-network interface ("UNI") and network-to-network interface ("NNI") switch ports.

e.spire also has requested unbundled access to a variety of unbundled transport options. These include shared transport and dedicated transport in various capacity levels, including DS-0, DS-1, DS-3, OC-3, OC-12, OC-48, OC-96 and SONET. e.spire also has requested unbundled access to dark fiber transport facilities on which it will supply its own electronics.

e.spire also has requested unbundled access to a host of other network elements, including digital cross-connect system ("DCS"), operator services and directory assistance, signaling, OSS and databases.

Finally, e.spire has requested unbundled access to a number of UNE combinations. These combinations include:

- an unbundled loop combination consisting of a loop, dedicated transport, STPs, signaling link transport, and service control points/databases;

- an unbundled loop/network combination consisting of a loop, shared transport, dedicated transport, STPs, signaling link transport, and service control points/databases;
- a switching combination referred to as "Switching Combination #1" which includes a NID, local switching, operator systems, dedicated transport, SS7 message transfer and connection control, signaling link transport, service control points/databases and tandem switching;
- a switching combination referred to as "Switching Combination #2" which includes a NID, local switching, shared transport, dedicated transport, SS7 message transfer and connection control, signaling link transport, service control points/databases, and tandem switching;
- a switching combination referred to as "Switching Combination #3" which includes a NID, local switching, operator systems, shared transport, dedicated transport, SS7 message transfer and connection control, signaling link transport, service control points/databases, and tandem switching;
- a switched data services combination which includes a NID, local switching, shared transport, dedicated transport and tandem switching;
- an unbundled loop with interoffice transport combination comprising a loop, cross-connect, and dedicated transport or an entrance facility;
- an unbundled element platform without operator services and directory assistance composed of a loop, local switching, shared

transport, dedicated transport, STPs, signaling link transport, service control points/databases, and tandem switching; and

- a frame relay combination consisting of a loop, dedicated transport, and frame relay switching.

Q. HAS E.SPIRE PROPOSED DESCRIPTIONS OF THE UNEs THAT IT WISHES TO ACCEPT?

A. Yes. The technical descriptions are introduced in Attachment 2 of the draft agreement. We ask that the Commission require BellSouth to make available to e.spire now each such UNE – at pre-designated TELRIC-based rates.

Q. DOES E.SPIRE HAVE A PARTICULAR OBJECTION TO BELLSOUTH'S PROPOSALS RELATING TO LOOP PROVISIONING?

A. Yes. e.spire believes that BellSouth's proposed intervals are unreasonably lengthy, and its nonrecurring charges ("NRCs") are unreasonably high.

Q. IS PROVISIONING A LOOP A COMPLICATED AND TIME CONSUMING UNDERTAKING?

A. No, actually, it is a rather simple task that can be completed in a few minutes or less. To provision a loop, all that is required is that a technician must attach "jumper cables" from BellSouth's point of termination bay ("POT bay") to e.spire's terminating equipment in e.spire's collocation space. (e.spire will provide a demonstration of this task at the hearing in this proceeding.) The loop cutover is analogous to the activity in turning up a BellSouth end user – it is the same function that BellSouth technicians have been performing every day, many times a day, for years. Indeed, BellSouth's own data submitted in support of its second Federal Communications Commission ("FCC")

Section 271 application for Louisiana suggests that BellSouth can complete coordinated loop cutovers in less than four and a half (4½) minutes. Despite this, BellSouth apparently bases its cost studies on the presumption that 15 minutes of frame work is involved. This assumption, however, cannot be supported by time and motion studies. Ordinarily, running jumper cables to cutover a loop should take roughly two minutes.

Q. IS IT IMPORTANT FOR COORDINATED CUTOVERS TO BE PERFORMED WITHIN A CERTAIN PERIOD OF TIME?

A. Yes. It is important that coordinated cutovers be performed as quickly as possible because the interval during which they are performed represents the time the customer is without phone service. Thus, if, as BellSouth claims, it is able to perform coordinated cutovers, on average, in under four and a half (4½) minutes, that means e.spire's new customers typically experience a period of service outage of that duration while their line(s) are switched from BellSouth to e.spire.

Q. HAVE E.SPIRE AND BELLSOUTH AGREED ON A LOOP CUTOVER INTERVAL?

A. No. e.spire proposes, and BellSouth refuses, to incorporate terms from its original interconnection agreement with BellSouth regarding loop cutover intervals. Thus, e.spire proposes to renew provisions which call for a five minute cutover interval, penalties in the event that BellSouth misses the target interval, and a 30 minute window during which the five minute cutover must take place. BellSouth has responded with a complicated SL1/SL2 loop proposal which, as best I can tell, is designed to inflate competitors' costs rather than meet their unbundling requests and needs.

Q. PLEASE EXPLAIN WHY E.SPIRE REJECTS BELLSOUTH'S "SL1/SL2" PROPOSAL.

A. e.spire rejects BellSouth's SL1/SL2 proposal because it is nothing more than an elaborate means by which BellSouth attempts to drive up the prices for obtaining access to a minimum level of loop functionality. There should be one basic voice grade loop type with one monthly recurring charge ("MRC") and one NRC to recover the associated costs. Nevertheless, BellSouth offers an SL1/S2 loop proposal by which it offers less functionality than e.spire was getting pursuant to its original interconnection agreement at prices that grossly exceed BellSouth's retail rates for turning up new service (which is the technical equivalent of provisioning a ULL).

SL1 is virtually useless because customers could be out of service for up to an hour during a loop cutover. Moreover, on a standard SL1 loop, a cutover is not scheduled to take place at a particular time, but may take place during two four-hour intervals. Obviously, e.spire cannot ask customers willing to switch to e.spire from BellSouth to endure a conversion during which their service will be out for up to an hour commencing at an unspecified four-hour window during the business day. BellSouth realizes this and proposes to provide functionalities previously included in the basic electronic order NRC at separate non-cost-based rates.

Thus, in addition to proposing an inflated basic NRC, BellSouth now seeks to impose an additional non-cost-based NRC for performing cutovers within a 15 minute interval. It will not agree to a five minute interval at any price – despite that this is (1) what BellSouth voluntarily agreed to two years ago in its first interconnection agreement with e.spire; (2) the interval which BellSouth claims to the FCC that it meets; and (3) the

minimum level of service Florida consumers will accept. BellSouth also seeks to tack on an additional non-cost-based NRC for allowing e.spire to schedule the 30 minute conversion window with its customers, again standard in the initial e.spire contract.

Taken together with inflated cross-connect, OSS, and interim number portability NRCs, BellSouth proposes to inflate the total installation cost of basic POTS loops to a level approximately three times higher than the retail rate paid for the same services, excluding number portability and OSS, by its own End Users. While Dr. Kahn and Mr. Falvey will have more to say on this point in each of their testimonies, my point here is that BellSouth proposes to back-out necessary functionalities from its basic loop offering in an effort to extract monopoly rents. As I understand it, the Telecommunications Act requires that all necessary functionalities be provided at TELRIC-based rates – BellSouth should not be able to extract premiums for provisioning loops in a way that allows e.spire to offer a service that is technically comparable to that offered by BellSouth to its own end users and affords e.spire a meaningful opportunity to compete.

Moving to BellSouth's SL2 loop, it is clear that behind BellSouth's proposal is the same strategy of trying to extract monopoly rents for provisioning a level of service that is necessary to allow e.spire to compete. Whereas an SL1 loop is the equivalent of a basic POTS loop (without the conveniences typically provided to and expected by Florida consumers), the SL2 loop is a designed loop which includes a design layout record ("DLR"), test access points (referred to as "SMAS points"), ground start facilities, repair of loops provisioned with test points, and a fifteen minute provisioning interval. Because of BellSouth's poor loop provisioning record, e.spire has had to use this type of functionality to determine why unbundled loops randomly were disconnected or had low

volume, static or noise. If BellSouth established that it could deliver high quality unbundled loops without such chronic deficiencies, then e.spire could do without the additional functionality offered by DLRs and SMAS points.

Thus, the point here is that BellSouth ought not be able to charge non-cost-based premiums for meeting its statutory and contractual unbundling obligations of delivering loops at a level of quality at parity with those it delivers to itself. It should unbundle the same loops over which a customer was served prior to switching from BellSouth and those loops should be technically capable of functioning without random disconnections, static, noise, low volume or other quality problems. BellSouth should not be permitted to turn its poor provisioning performance into an opportunity for it to extract additional monopoly profits from its competitors.

Q. ARE THERE OTHER BELLSOUTH RATES WHICH RAISE AN ISSUE – AT LEAST FROM A TECHNICAL STANDPOINT?

A. Yes. For example, BellSouth proposes to charge considerably more for DS-3 and DS-1 cross-connects than for a DS-0 cross connect. Although the circuit equipment itself might vary slightly, there is no actual difference in the work that is performed. As is the case in provisioning loops, it is simply a matter of connecting jumper cables from the point of termination bay to e.spire's collocated facilities. Thus, a substantial difference in cross-connect NRCs cannot be justified – at least from a technical standpoint. In fact, it appears that BellSouth's cross-connect rates appear to be reverse engineered so that the resulting UNE transport rates begin to approximate BellSouth's subsidy-laden special access tariff rates. Such an approach has no technical basis nor, as I understand it, does it have any foundation in the 1996 Act.

Q. ARE THERE OTHER RATES THAT CAN BE QUESTIONED, AT LEAST FROM A TECHNICAL PERSPECTIVE?

A. Yes. As Mr. Falvey describes in his testimony, the difference between original and first NRCs proposed by BellSouth does not appear to consistently reflect the efficiencies realized by BellSouth when a competitive local exchange carrier, such as e.spire, orders multiple UNEs. Indeed, there can be dramatic savings in time realized in back office "paper pushing" or computer entry functions. There also can be time savings in provisioning multiple UNEs pursuant to the same service order.

Q. ARE ANY OF E.SPIRE'S COLLOCATION PROPOSALS TECHNICALLY INFEASIBLE?

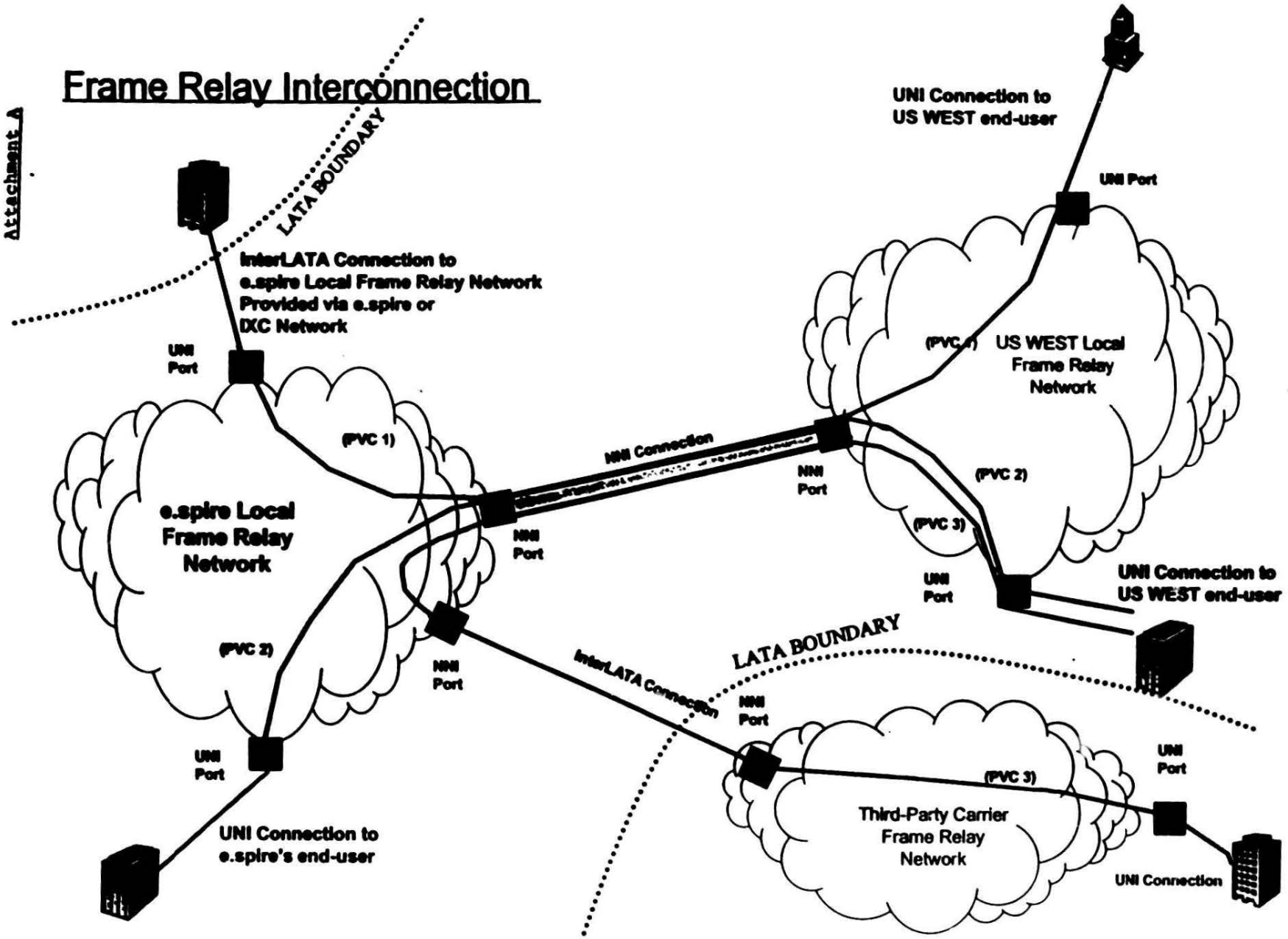
A. No. e.spire has requested solutions like shared space, small space/small increment, and adjacent collocation to reduce the cost and delay associated with physical collocation with BellSouth. None of these proposals – including adjacent collocation – raise any significant technical obstacles.

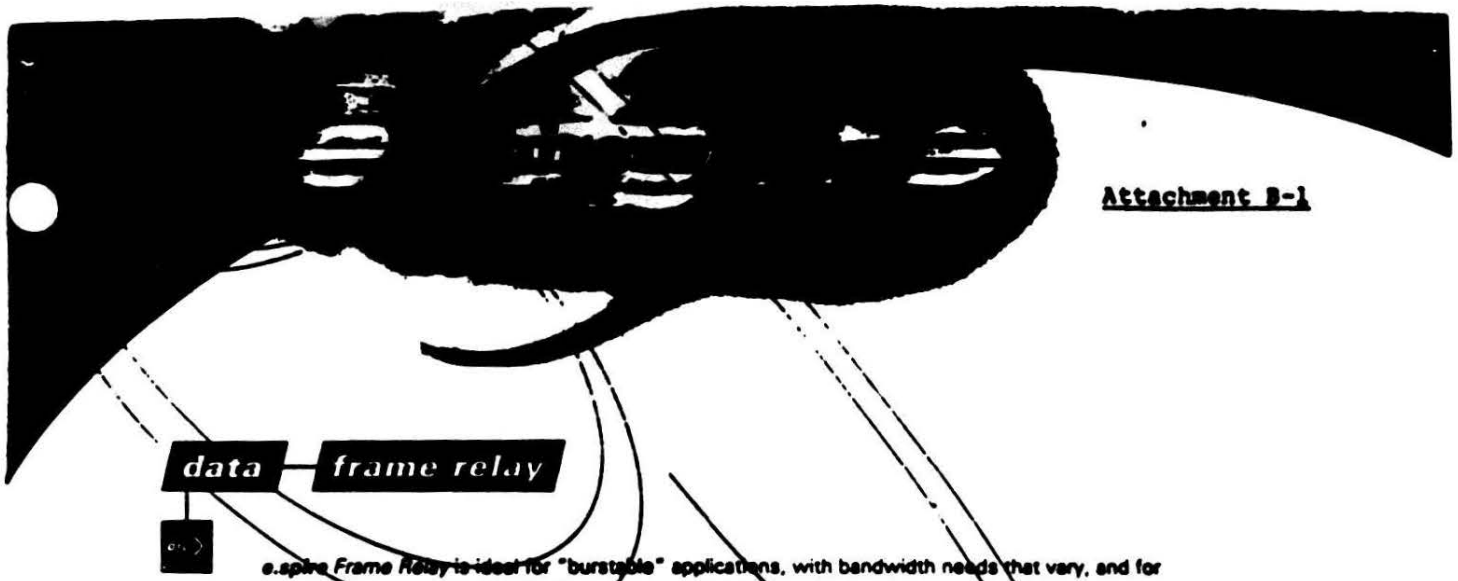
Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, although I do not waive an opportunity, if afforded one by the Commission, to file supplemental direct testimony.

Attachment A

Frame Relay Interconnection





data — frame relay

e.spire Frame Relay is ideal for "burstable" applications, with bandwidth needs that vary, and for interconnecting geographically dispersed networks and equipment. Businesses of any size can take advantage of *e.spire Frame Relay* for internetworking, application sharing, e-mail, file transfer, PC-to-PC and PC-to-Server communications, imaging, and multimedia data transmission.

Our internetworking strategy connects *e.spire Frame Relay* to frame relay networks of other key providers via NNIs (Network-to-Network Interfaces). Therefore, *e.spire Frame Relay* offers comprehensive solutions to transparently interconnect your local, regional, and national sites regardless of their location. Our support of multi-protocol encapsulation makes it easier to integrate new and legacy systems.

And since *e.spire Frame Relay* scales to a variety of port connections and Committed Information Rate (CIR), you have the flexibility to implement point-to-point, star, or fully meshed networks with potentially significant savings over private leased-line networks.

Service Levels

Our service is engineered for high-speed data transmission across e.spire's fully redundant ATM network, which is monitored 24 hours a day, 7 days a week, to the point of service demarcation. You benefit from continual service delivery because, in the event of network failure, we automatically reroute traffic.

With *e.spire Frame Relay*, you connect with the speed and service level that is right for your business, and right for your budget. When you subscribe to the level of service you need to meet normal and peak traffic loads, e.spire guarantees bandwidth availability and sustained throughput levels at the Committed Information Rate (CIR). And, when additional network capacity is available, your traffic "bursts" above the CIR, up to the maximum port speed, for even better performance.

Connectivity Options

With our service, you need only one physical connection per site. This connection, or local loop, connects your customer premise equipment (CPE) such as a router, CSU/DSU, or FRAD, to the *e.spire Frame Relay* node. We establish multiple Permanent Virtual Circuits (PVCs) to provide additional logical connections between ports.

for more information call e.spire Communications, Inc. at 1-888-6espire

133 National Business Parkway, Suite 200, Annapolis Junction, MD 20701

fax 301-361-2666

www.espire.net

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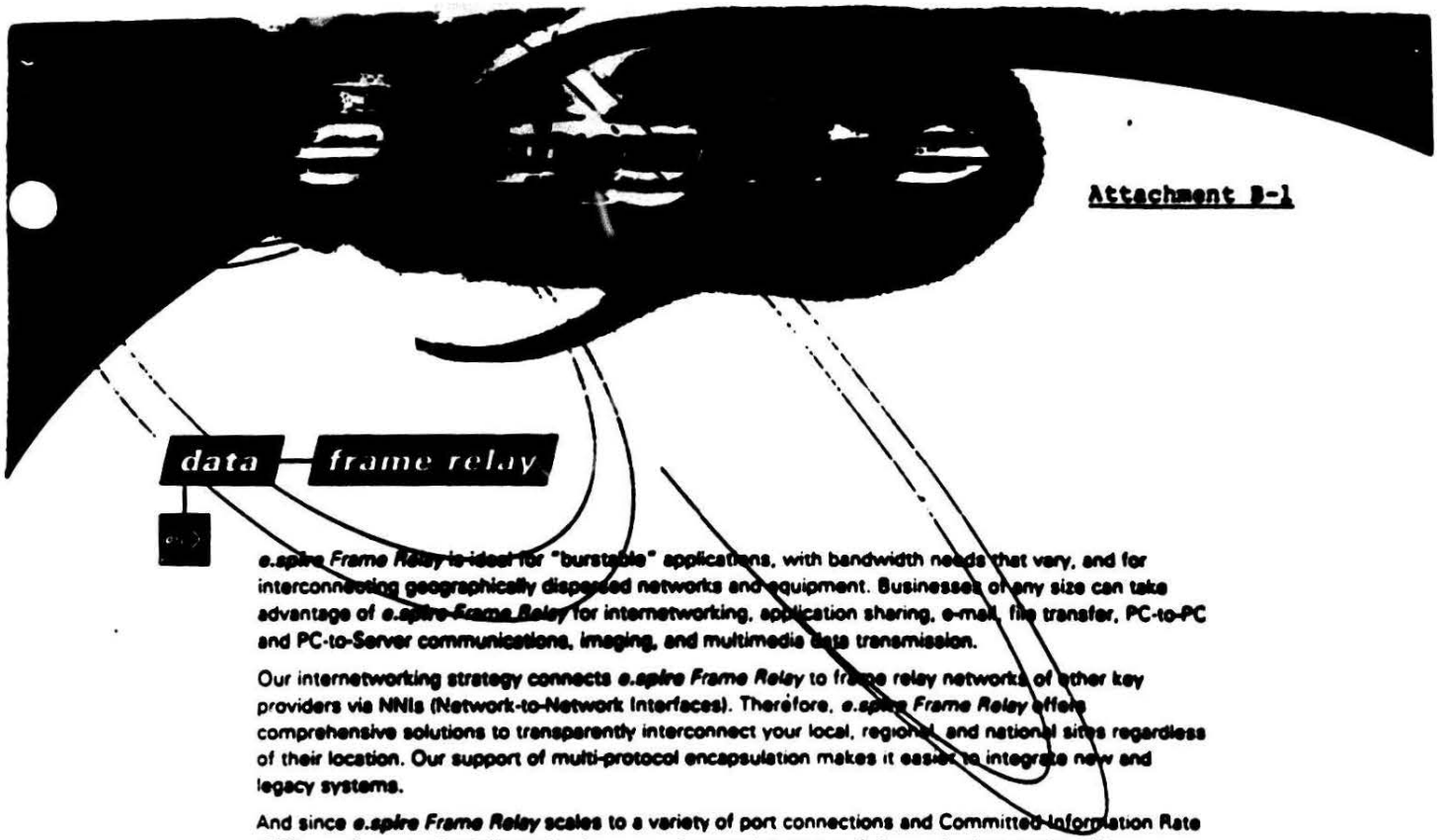

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for more information, call 1-888-e-spire
e.spire Communications, Inc. 133 National Business Parkway, Suite 200, Annapolis Junction, MD 20701
fax 301 361 2666
www.espire.net

frame relay

The physical connection, or local loop, connects customer premise equipment (CPE) and the ***e.spire Frame Relay*** node. Physical connection speeds are:

- 56/64 kbps
- 1.54 Mbps

The port connection represents the maximum port speed on the ***e.spire Frame Relay*** switch. Port speeds are available at:

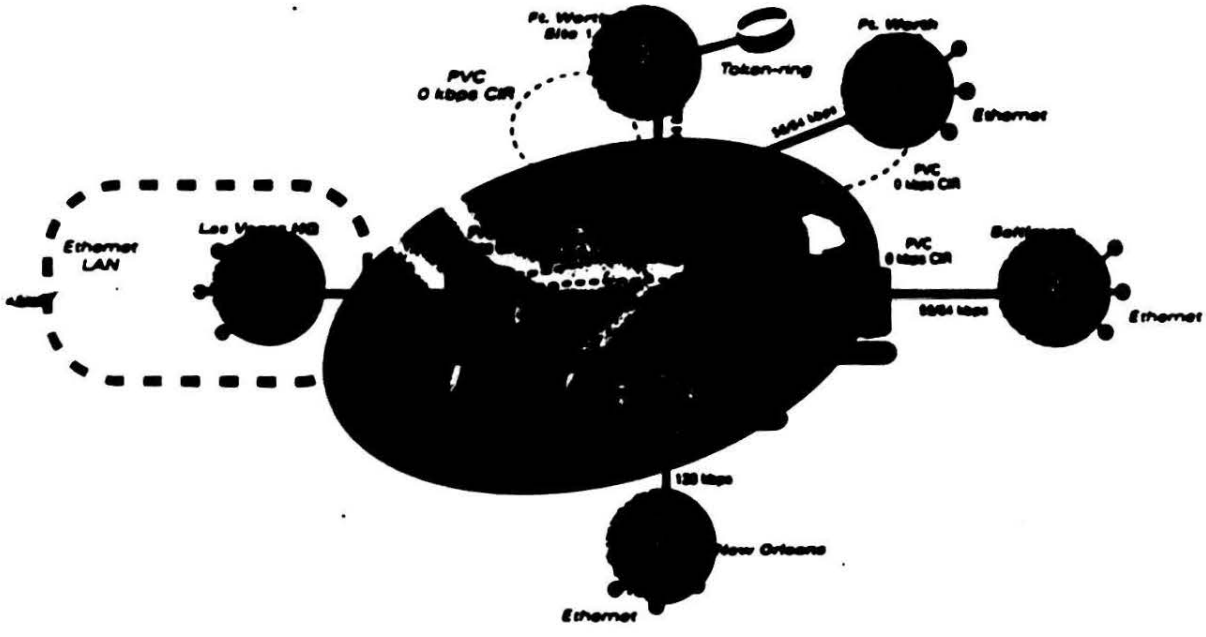
56/64 kbps	384 kbps	1024 kbps
128 kbps	512 kbps	1.54 Mbps
256 kbps	768 kbps	

The CIR is the guaranteed transmission capacity. Committed Information Rate (CIR) increments include:

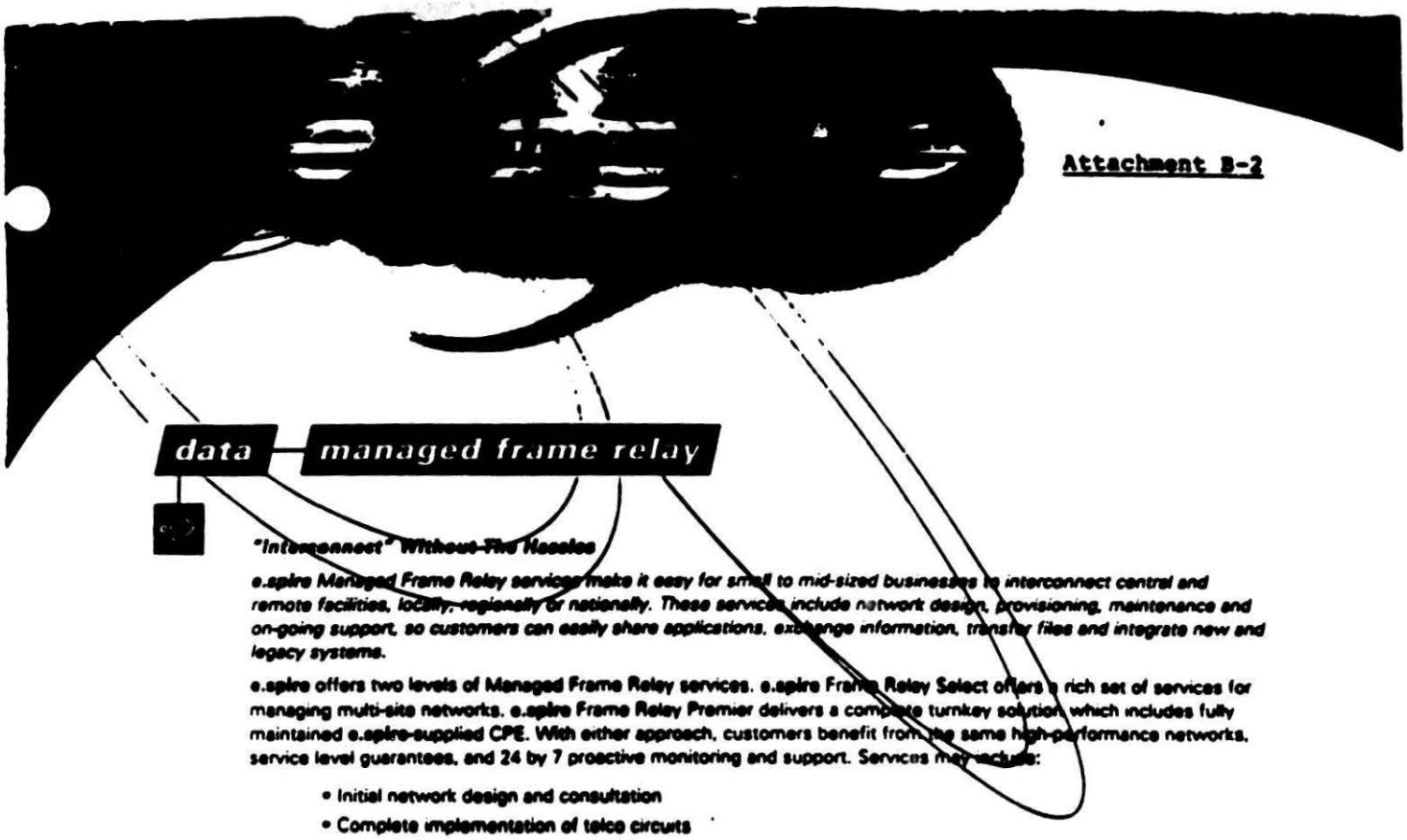
0 kbps	128 kbps	512 kbps
32 kbps	256 kbps	768 kbps
56/64 kbps	384 kbps	1024 kbps

This diagram depicts a five-site frame relay network. The headquarters site, in Las Vegas, connects to the ***e.spire Frame Relay*** service at 1.54 Mbps. It is connected to New Orleans, Ft. Worth Site 1, and Baltimore via Permanent Virtual Circuits (PVCs). While the two Fort Worth sites must communicate with one another, only Fort Worth Site 1 needs to communicate with headquarters. Legacy Ethernet and Token Ring LANs are connected to headquarters utilizing existing customer premise equipment (CPE).

For more information on ***e.spire Frame Relay***, or any of our other voice, data or Internet services, contact e.spire at 1-888-6espire.



e·spire



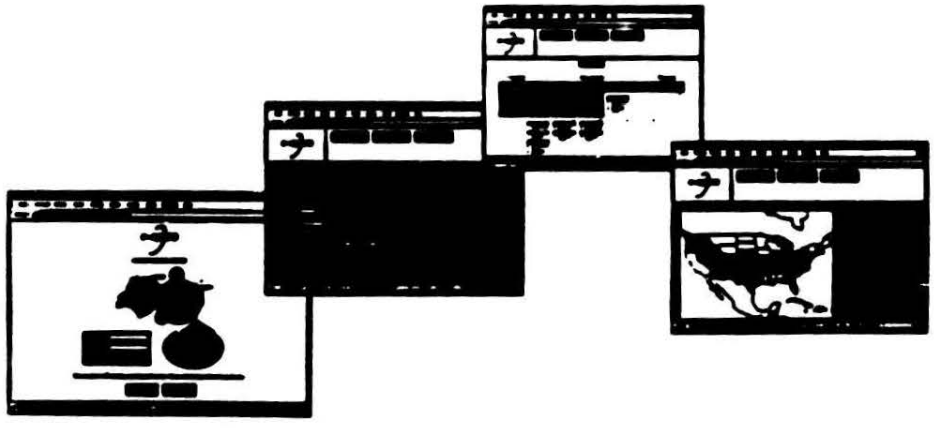
data — managed frame relay

"Interconnect" Without The Hassles

e.spire Managed Frame Relay services make it easy for small to mid-sized businesses to interconnect central and remote facilities, locally, regionally or nationally. These services include network design, provisioning, maintenance and on-going support, so customers can easily share applications, exchange information, transfer files and integrate new and legacy systems.

e.spire offers two levels of Managed Frame Relay services. e.spire Frame Relay Select offers a rich set of services for managing multi-site networks. e.spire Frame Relay Premier delivers a complete turnkey solution, which includes fully maintained e.spire-supplied CPE. With either approach, customers benefit from the same high-performance networks, service level guarantees, and 24 by 7 proactive monitoring and support. Services may include:

- Initial network design and consultation
- Complete implementation of telco circuits
- Customer Premise Equipment (CPE) and Frame Relay connectivity
- On-going maintenance and configuration management of CPE
- Management of problem escalation and resolution procedures
- On-line access to web-based reports
- Periodic network performance and capacity planning reviews



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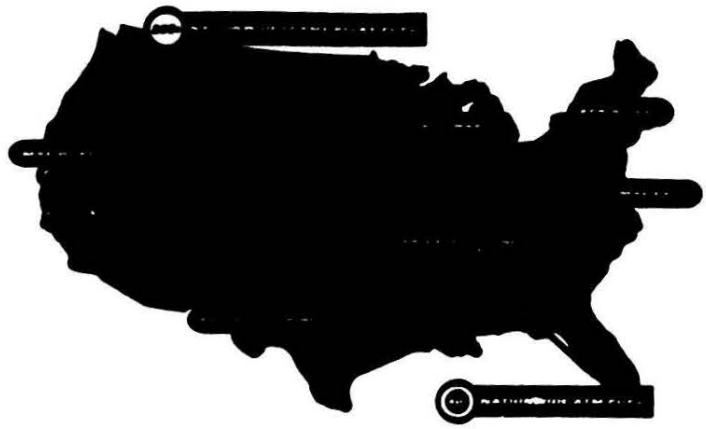
Suite 200
Annapolis Junction, MD 20701

fax 301-361-2666
www.espire.net

e·spire

managed frame relay



At e.spire, we've engineered an extensive coast-to-coast Frame Relay network, interconnecting over 300 points of presence. The backbone is a fully-redundant, meshed T3 network, designed for maximum throughput, availability and reliability. This allows for flexibility in both proactive capacity management and dynamic rerouting in the event of a failure.

With e.spire Managed Frame Relay, bandwidth availability and sustained throughput are guaranteed. Since the services offer a variety of port speeds with multiple connections to sites within your network, they deliver the flexibility businesses need to implement or integrate point-to-point, star, or fully meshed networks.

Customize e.spire service with Frame Relay Select or take advantage of Frame Relay Premier for a complete "internetworking" solution. Features below highlight offerings for both levels of service.

Service Features	Service Levels	
	Select	**Premier**
Speeds ranging from [illegible] to 1.5Mbps	●	●
Committed Information Rates (CIR) ranging from [illegible] to 1.5[illegible]Mbps	●	●
ACSI provided Customer Premise Equipment (CPE)	optional	●
Engineer-guided CPE Tele-installation assistance	●	●
On-going configuration management of CPE	●	●
In-band and out-of-band CPE monitoring	●	●
Implementation and testing of telco circuits, frame relay ports and virtual circuits	●	●
24 x 7 proactive service monitoring, including CPE	●	●
Periodic network performance and capacity planning reviews	●	●
Trouble ticket and fault isolation procedures initiated and managed to resolution	●	●
On-line, web-based reports including implementation status, network availability, network utilization and trouble ticket summaries	●	●
CPE maintenance	n/a	●
On-site CPE installation	optional	optional

The e.spire team is firmly committed to supporting our customers' "internetworking" needs as their environments evolve. Additional comprehensive managed services are available for establishing and maintaining global Internet access and secure Internet/Intranet connectivity. e.spire leverages communications technologies and services so customers can focus on their core business competencies.

For more information on *e.spire Managed Frame Relay*, or any of our other voice, data or Internet services, contact e.spire at 1-888-6espire.

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CERTIFICATE OF SERVICE

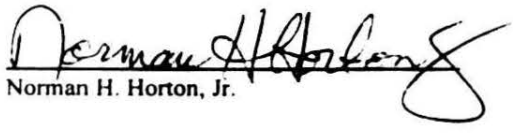
I HEREBY CERTIFY that true and correct copies of the Revised Direct Testimony of C. William Stipe, III on behalf of e.spire Communications, Inc. in Docket Nos. 981642-TP and 981745-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 4th day of February, 1999.

June McKinney, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ms. Nancy White
c/o Ms. Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Mary Jo Peed, Esq.
BellSouth Telecommunications, Inc.
675 West Peachtree Street, NE
Atlanta, GA 30375

Patrick K. Wiggins, Esq.
Donna Canzano, Esq.
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302



Norman H. Horton, Jr.