

ORIGINAL

DOCKET NOS. 980946-TL, 980947-TL, 980948-TL, 981011-TL, 981012-TL, 981250-TL: Petitions for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Daytona Beach Port Orange Central Office, the Boca Raton Boca Teeca Central Office, the Miami Palmetto Central Office, the West Palm Beach Gardens Central Office, the North Dade Golden Glades Central Office, and the Lake Mary Main Central Office, by BellSouth Telecommunications, Inc.

WITNESS: Direct Testimony Of Ruth K. Young, Appearing On Behalf Of Staff

DATE FILED: April 9, 1999

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FPSC-RECORDS/REPORTING

DIRECT TESTIMONY OF RUTH K. YOUNG

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Q. Please state your name and business address.

A. My name is Ruth K. Young and my business address is 3625 NW 82nd Ave, Suite 400, Miami, Florida, 33166.

Q. By whom are you presently employed and in what capacity?

A. I am employed by the Florida Public Service Commission as a Professional Accountant Specialist in the Division of Auditing and Financial Analysis.

Q. How long have you been employed by the Commission?

A. I have been employed by the Florida Public Service Commission since September, 1978.

Q. Briefly review your educational and professional background.

A. I have a Bachelor of Business Administration degree from Adelphi University and major in accounting from Florida Atlantic University. I am a Certified Fraud Examiner and a Certified Public Accountant licensed in the State of Florida. I was hired as a Public Utilities Auditor I by the Florida Public Service Commission in September of 1978. I am currently a Professional Accountant Specialist.

Q. Please describe your current responsibilities.

A. Currently, I am a Professional Accountant Specialist with the responsibilities of planning and directing the most complex investigative audits, such as audits of cross-subsidization issues. I also am responsible for creating audit work programs to meet a specific audit purpose and integrating electronic data processing (EDP) applications into these programs. I have specific authority to direct and control assigned staff work. I also participate as a staff auditor and audit manager with regular oversight

1 responsibility for more than one audit engagement. In addition, I serve as
2 the acting supervisor in the absence of the district office supervisor.

3 Q. Have you presented expert testimony before this Commission or any other
4 regulatory agency?

5 A. Yes. I testified in Docket No. 971140-TP, a BellSouth
6 Telecommunications, Inc. case to set non-recurring charges for combinations
7 of network elements.

8 Q. What is the purpose of your testimony today?

9 A. The purpose of my testimony is to sponsor the staff audit reports of
10 BellSouth Telecommunications, Inc., in Docket Nos. 980946-TL, 980948-TL, and
11 981011-TL. These audits examine the petitions for waiver and for temporary
12 waiver of the physical collocation requirements set forth in the 1996
13 Telecommunications Act and the Federal Communications Commission's (FCC) First
14 Report and Order, for the Daytona Beach Port Orange Central Office, the Miami
15 Palmetto Central Office, and the West Palm Beach Gardens Central Office.
16 These audit reports are filed with my testimony and are identified as RKY-1
17 (Docket No. 980946-TL), RKY-2 (Docket No. 980948-TL), and RKY-3 (Docket No.
18 981011-TL). Also attached to my testimony is Exhibit RKY-4 which includes
19 selections of the audit work papers.

20 Q. Were these audit reports prepared by you?

21 A. Yes, I was the audit manager in charge of these audits.

22 Q. Do you have any general comments regarding whether there is space
23 available for physical collocation at the central offices?

24 A. Yes. Whether there is space available is contingent on the resolution
25 of several issues. There are some empty spaces in the central offices. Some

1 of these spaces have been reserved for forecasted growth for the next few
2 years. Some, however, have not. To determine if these spaces can be used for
3 physical collocation, decisions need to be made on the following issues.

4 1. Some of the spaces are less than the 100 square feet required in
5 the BellSouth Collocation Handbook or the amounts included in the agreements
6 with the carriers. A decision on whether spaces smaller than these areas can
7 be used or would be permitted to be used needs to be made. (Disclosure 5 in
8 the audit reports discusses this issue in more detail.)

9 2. Many of the areas that are available within the equipment areas
10 have cable racks and cables above the area. Many also have extensive air
11 conditioning ductwork. Spaces that have been designated as administrative
12 space are also at issue. A decision needs to be made on whether BellSouth is
13 required to move equipment or administrative space and who would be
14 responsible for the costs involved. (Disclosure 1, Item 7 in the audit
15 reports discusses this issue in more detail.)

16 Because of the cable racks and air conditioning ductwork, the issue of
17 alternative forms of collocation also arises. Currently, all physical
18 collocation areas in BellSouth's central offices are contained in fire-rated
19 walled areas. If non-fire-rated caged areas that do not go to the ceiling
20 were permitted, space may be available. BellSouth indicated that it has not
21 obtained permitting for a caged physical collocation area. BellSouth also
22 indicated that it was denied permitting for hybrid wall construction in the
23 Palmetto office for walls within the fire-rated collocation area. BellSouth
24 requested that the walls connecting the collocators to the common area be
25 partially a wall and partially a cage. Although BellCore is assisting

1 | BellSouth in obtaining permitting for caged areas, no permits have currently
2 | been obtained. (Disclosure 1, Item 6 in the audit reports discusses this issue
3 | in more detail.)

4 | In some of the offices, the empty space that is not part of a forecast
5 | is in the middle of switch equipment. Mixing equipment that is on an
6 | integrated ground plane with equipment on an isolated ground plane requires
7 | either a 7 foot aisle, which would eliminate the possibility of using the
8 | space, or a physical barrier. Physical barriers may create a problem, because
9 | these areas usually have cabling overhead. Again, decisions need to be made
10 | to determine if the company is obligated to move the cables or mix equipment
11 | on different ground planes. (Disclosure 1, Item 1 in the audit reports
12 | discusses this issue in more detail.)

13 | 3. Some of the areas that are empty are narrow and would only allow
14 | for one line up of bays, even though the areas exceed 100 square feet.
15 | Because of the configurations of the space, the space may not be able to
16 | accommodate as many bays as the 10 by 10 areas. In addition, because of
17 | limited space in one area, point of termination bays would sometimes have to
18 | be placed in another area. Current collocation areas in these offices have
19 | been designed to hold two line ups of bays. A determination would have to be
20 | made on whether narrow areas are acceptable for physical collocation.

21 | 4. Some of the empty space has been designated by BellSouth for
22 | growth for a certain family of equipment. BellSouth contends that having to
23 | locate families of equipment in other parts of the office involves additional
24 | costs for cabling, repeaters and other types of equipment. (Disclosure 1,
25 | item 4 in the audit reports discusses this issue in more detail.) If

1 | alternative means of collocating are permitted, a determination needs to be
2 | made on whether BellSouth can reserve this space.

3 | Q. Please summarize the work you performed in these audits.

4 | A. The audit staff and I read orders, rules, and responses to production
5 | of documents and interrogatories related to collocation. We also interviewed
6 | switch, circuit, and common system planners for the offices involved, and
7 | geographical forecasters. We toured and measured portions of the central
8 | offices and obtained maps showing current and future use space and compared
9 | these to the applications for waiver. We read company procedures and
10 | supporting documents for the company assumptions. We compared the company's
11 | access line forecast to trends from population growth statistics and
12 | BellSouth's secondary line growth. We ran models and compared the outputs to
13 | the projected company growth. We reviewed the methodology used in the
14 | BellCore trunk forecasting program. We then reviewed reasons why large spaces
15 | would or would not be good candidates for collocation. We performed a limited
16 | review of the forecasts used to project the number of bays. We compared two
17 | to three years of historical growth (where provided by BellSouth) to current
18 | forecasts for potential spaces we considered in the collocation decision.

19 | Q. In assessing the availability of space in each of these offices, did you
20 | identify any assumptions used by BellSouth in its space planning?

21 | A. Yes, I did. I identified seven assumptions. These are addressed
22 | individually in disclosure 1 of each report. I also identified any source
23 | documentation that I was able to identify to support each of these
24 | assumptions.

25 | Q. Please discuss audit disclosures two through five in the reports.

1 A. These audit disclosures are the same in each of the reports, as is audit
2 disclosure 1. Audit disclosure No. 2 discusses the administrative space in
3 each of the central offices. Although the layout of the administrative space
4 does not always appear to be efficient, I have not made it an issue if there
5 is an existing footprint in that area for future equipment. Audit disclosure
6 3 discusses the accuracy of the space assessment worksheets. Audit disclosure
7 4 discusses obsolete equipment. Audit disclosure 5 discusses the space
8 enclosure options discussed in the BellSouth Collocation Handbook dated
9 January 2, 1999.

10 Q. Could you please discuss the individual audit disclosures in the three
11 audits you are sponsoring.

12 A. Yes, in each of the three audits, disclosures 6 through 11 discuss
13 potential space availability. These also include audit comments regarding the
14 feasibility of the space for collocation.

15 Q. Is there one more disclosure in each report?

16 A. Yes, disclosure 12 in each report discusses the access line and trunk
17 forecasts. The audit report does not intend to represent a validation of the
18 BellSouth forecasts, nor am I testifying as to the validity of the forecasts.
19 However, staff performed certain steps to try to determine whether the
20 forecasts were reasonable. Based on historical growth trends, we did not find
21 that any of the forecasts were unreasonable. However, the company forecast
22 of losses due to competition was not reviewed due to time constraints.

23 Q. In presenting this testimony and the audit reports, are you advocating
24 any particular type of physical collocation arrangement?

25 A. No.

1 | Q. Does this conclude your testimony?

2 | A. Yes, it does.

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