

ORIGINAL

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF GEORGE W. MAINER
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NOS. 980946-TL, 980947-TL, 980948-TL,
5 981011-TL, 981012-TL, AND 981250-TL

6 May 7, 1999
7
8

9 Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
10 BELL SOUTH TELECOMMUNICATIONS, INC.

11

12 A. My name is George W. Mainer. My business address is 600 N. W.
13 79th Avenue, Miami, Florida 33126. I am a director of Network
14 Operations - South Florida for BellSouth Telecommunications, Inc.
15 (herein after "BellSouth" or "the Company"). I have served in my
16 present role, which includes central office operations since August of
17 1997.

18

19 Q. ARE YOU THE SAME GEORGE W. MAINER WHO FILED DIRECT
20 TESTIMONY IN THESE PROCEEDINGS?

21

22 A. Yes.

23

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

25

1 A. I will provide rebuttal testimony to the direct testimony of Teleport
2 Communications Group Inc. ("TCG") witness Scott Stinson, e.spire
3 Communications, Inc. ("e.spire") witness James C. Falvey, WorldCom
4 Technologies, Inc. ("WorldCom") witness Ron Martinez, ACI Corp.
5 ("ACI") witness James D. Cuckler, Sprint Communications Company
6 Limited Partnership ("Sprint") witness Melissa L. Closz, Supra
7 Telecommunications and Information Systems, Inc. ("Supra") witness
8 David Nilson, and Sprint Communications Company Limited
9 Partnership ("Sprint") witness Michael D. West regarding maintenance
10 and provisioning areas in the central offices under discussion in these
11 proceedings.

12

13 Q. ON PAGE 10, LINES 32 THROUGH 34 OF HIS TESTIMONY, MR.
14 STINSON (TCG) STATES THAT THE COMMISSION SHOULD
15 EXAMINE WHETHER THERE IS NON-ESSENTIAL
16 ADMINISTRATIVE AND RECREATIONAL SPACE THAT COULD BE
17 RECLAIMED IN THE NORTH DADE GOLDEN GLADES CENTRAL
18 OFFICE. PLEASE COMMENT.

19

20 A. There is no "non-essential" administrative space in the North Dade
21 Golden Glades central office. In addition, no recreational space exists
22 in this office. There is an undersized break room, which is utilized by
23 employees, contractors and vendors for breaks and lunch. There are
24 no eating establishments close to this office, so many of BellSouth's
25 employees, contractors and vendors bring their lunches and eat them

1 in this break room. It is also used for group meetings. If Mr. Stinson's
2 use of the term "recreational" refers to this break room, it implies that
3 BellSouth uses space frivolously for "play." This is not the case.

4

5 Q. ON PAGE 16, LINE 12 THROUGH PAGE 17, LINE 5 OF HIS
6 TESTIMONY, MR. STINSON STATES THAT SPACES 10, 11, AND
7 12 IN THE NORTH DADE GOLDEN GLADES CENTRAL OFFICE
8 HOUSES TECHNICIAN WORK SPACE THAT COULD BE USED
9 MORE EFFICIENTLY. PLEASE COMMENT.

10

11 A. Space 10 is in the power room where no such equipment, as described
12 by Mr. Stinson, exists. His general recommendation that multiple
13 terminals, each dedicated to a switch, can be consolidated through one
14 or two "off the shelf terminal emulators" is absurd at best. With the size
15 and level of service that these switches support, no equipment vendor
16 would make such a ridiculous recommendation. It is not practical. In
17 addition, the suggestion that these "one or two terminals" can fit along
18 the wall, with corresponding documentation, will only create a fire
19 hazard since the aisles that run along these walls are used as fire exit
20 paths. He also avoided mentioning where BellSouth would put the
21 WFA/DI (Work Force Administration/Dispatch In) terminals, which are
22 located in the same area he wants to clear. While these terminals are
23 not related to the switch, they serve as critical tools in loading and
24 completing work and receiving trouble tickets. Additional items that
25 have been overlooked by Mr. Stinson are the dedicated printers for the

1 terminals that are an absolute necessity for troubleshooting and
2 analyzing error messages. Along with that, one would need tables to
3 place at least one terminal and printer, as well as space to lay out one's
4 documentation and drawings when working on a trouble report. It is
5 also interesting to note that any local municipality would fail such an
6 arrangement in a fire inspection.

7

8 Mr. Stinson's statement that Space 11 in the STP (Signal Transfer
9 Point) room can be moved within the occupied switch area or along the
10 wall is, again, not practical. He continues to place additional terminals,
11 printers, and documentation along the same wall that he suggests
12 other maintenance/provisioning areas can be moved to. For the same
13 fire hazard reasons noted above, this will not work. Mr. Stinson is very
14 specific in suggesting which areas to clear, but very vague as to where
15 existing equipment should be relocated. The reason for this is simple.
16 In regard to Space 11, Mr. Stinson suggests that the existing
17 equipment be relocated to an already "occupied switch area."

18

19 Space 12 on the second floor could not be found on the drawings.
20 However, Mr. Stinson's logic of consolidating dedicated terminals to
21 specific switches into one or two emulators does not make sense for
22 the same reasons cited above. Again, his testimony avoids addressing
23 the location of existing printers, WFA/DI terminals, and documentation.
24 Wall space, which has adjacent fire exit pathway aisles, cannot be
25 used for employee safety reasons. These aisles are continuously used

1 to carry small equipment, which would present a safety hazard if these
2 aisles were obstructed.

3

4 Q. ON PAGE 11, LINE 23 THROUGH PAGE 12, LINE 7 OF HIS
5 TESTIMONY, MR. FALVEY (e.spire) STATES THAT THERE ARE
6 SUBSTANTIAL AMOUNTS OF ADMINISTRATIVE SPACE
7 AVAILABLE IN EACH OF THE CENTRAL OFFICES IN THESE
8 PROCEEDINGS THAT COULD BE CONVERTED TO MORE
9 VALUABLE COLLOCATION SPACE. PLEASE COMMENT.

10

11 A. BellSouth asserts that the maintenance and provisioning workstations
12 are correctly positioned and adequately sized for the work required.
13 The removal of records to an off-site location would only jeopardize
14 customer service when these records are needed, but not immediately
15 available. Any records kept within the confines of a central office are
16 an essential part of providing customer service.

17

18 Q. ON PAGE 21, LINES 15-18, MR. MARTINEZ (WORLDCOM) STATES
19 THAT THE CIRCUIT CARDS COULD BE COMPUTERIZED, THUS
20 ELIMINATING LARGE TUBS OF PAPER. PLEASE COMMENT.

21

22 A. Tub files, in this or any other central office, are an essential and
23 efficient component of central office work. These files are copies of
24 circuit designs, which require some type of work within the office.
25 These paper copies come from a legacy database called TIRKS (Trunk

1 Inventory Record Keeping System), which does not contain specific
2 wiring information within an office (such as tie pairs). These files
3 contain hand-written information about each circuit, such as
4 maintenance, pending arrangements, options, and/or other
5 idiosyncrasies not captured anywhere else. For example, the Miami
6 Palmetto central office has over 14,000 of these circuits passing
7 through it. Any mechanization of these records would be costly,
8 inefficient, and time consuming. Each technician in a central office
9 interfaces with these records several times every hour. If these records
10 were mechanized, the number of terminals and printers required to
11 quickly access these records would not gain one additional space. As
12 an example, the Miami Palmetto office is constantly getting test assist
13 tickets on circuits and groups of circuits. This would require pulling the
14 appropriate circuit records from the mechanized database, printing
15 them (in many cases, this would be twenty-four circuits at a time), and
16 then throwing the paper records away when the job is completed.
17 Again, this is costly and inefficient. Any updates on in-house circuit
18 information would have to be done through a personal computer, as
19 opposed to BellSouth's present operations, where notes are quickly
20 placed on these cards and filed.

21

22 Q. ON PAGE 21, LINES 16-18, MR. MARTINEZ STATES THAT THERE
23 ARE AREAS IN THE MIAMI PALMETTO DEVOTED TO STORAGE
24 AND ADMINISTRATIVE FUNCTIONS THAT APPEAR HIGHLY
25 SUSPECT (PHOTOGRAPHS 99-2X-08, 99-2Y-02, 99-2Y-10, 99-2Y-

1 14, 99-2Z-11, AND 99-2Z-12). PLEASE COMMENT.

2

3 A. In order to meet acceptable customer service levels, the plugs shown in
4 Photographs 99-2X-08 and 99-2Y-02 are housed for maintenance
5 reasons to restore service. This is not considered "highly suspect."
6 The Miami Palmetto central office is a highly active office. This means
7 that it is always in a constant state of flux, with both growth and
8 removal activities going on simultaneously. Photograph 99-2Y-10
9 depicts material that was awaiting pick-up for removal and disposal.
10 This is not "highly suspect." Photograph 99-2Y-14 shows vacant space
11 and boxes. This area is now being utilized for equipment growth. A
12 new digital cross connect system has been installed and will be placed
13 in service this month. This is not "highly suspect." Photographs 99-2Z-
14 11 and 99-2Z-12 depict the digital loop carrier and trunking work area.
15 The Miami Palmetto central office has a tremendous amount of digital
16 loop carrier growth, which necessitates an area to perform this work.
17 Two to three technicians are devoted to this area. This is not "highly
18 suspect."

19

20 Q. ON PAGE 16, LINES 14-24, MR. NILSON (SUPRA) ALLEGES THAT
21 ADMINISTRATIVE SPACE IS SPREAD OUT OVER TOO LARGE AN
22 AREA TO BE CONSIDERED AN EFFICIENT USE OF SPACE
23 (Photographs 99-2X-12, 99-2Y-01, 99-2Y-02, 99-2Y-09 AND 99-2Y-
24 10). PLEASE COMMENT.

25

1 A. Photograph 99-2X-12 depicts the central office Quiet Room in the
2 Miami Palmetto central office. This office supports the communication
3 demands for many of BellSouth's business customers. As such, this
4 office is constantly deploying the latest in technologies and services.
5 To keep BellSouth's technician's training up-to-date and the
6 Company's costs down, BellSouth uses the Miami Palmetto central
7 office quite frequently for suitcase training from our equipment vendors.
8 Suitcase training requires space to provide classroom instruction and
9 lab work for up to twelve students. It is not feasible to hold these
10 classes off-site, since the equipment that the technicians are being
11 trained on is in this office and requires "hands-on" lab work. Classes
12 are frequently being held here, with two weeks worth of sessions going
13 on this month (May). During central office retrofits, BellSouth and
14 vendor technicians (anywhere from three to five technicians, depending
15 on the complexity of the work being performed) occupy this room.

16
17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18

19 A. Yes.

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