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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

November 19, 1999

Re: Docket No. 981834-TP - Petition of Competitive Carriers for Commission action to support local competition in BellSouth's service territory

Docket No. 990321-TP - Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of the Rebuttal Testimony of John W. Ries on behalf of GTE Florida Incorporated for filing in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

Sincerely,

AFA	_____
APP	_____
CAF	_____
GMU	_____ Kimberly Caswell
CTR	_____
EAG	_____
LEG	2 KC:tas
MAS	37 Enclosures
OPC	_____
PAI	_____
SEC	1
WAW	_____
OTH	_____

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for)
Commission action to support local competition) Docket No. 981834-TP
in BellSouth Telecommunications, Inc.'s service)
territory.)

In re: Petition of ACI Corp. d/b/a Accelerated)
Connections, Inc. for generic investigation to)
ensure that BellSouth Telecommunications,)
Inc., Sprint-Florida, Incorporated, and GTE) Docket No. 990321-TP
Florida Incorporated comply with obligation to)
provide alternative local exchange carriers)
with flexible, timely, and cost-efficient physical)
collocation.)

REBUTTAL TESTIMONY OF

JOHN W. RIES

ON BEHALF OF

GTE FLORIDA INCORPORATED

NOVEMBER 19, 1999

GTE FLORIDA INCORPORATED
REBUTTAL TESTIMONY OF JOHN W. RIES
DOCKET NOS. 990321-TP AND 981834-TP

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Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is John W. Ries. My business address is 600 Hidden Ridge, Irving, TX 75038.

Q. ARE YOU THE SAME JOHN W. RIES WHO FILED DIRECT TESTIMONY IN THIS CASE?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL?

A I will respond to certain points discussed in other parties' Direct Testimony.

Q. ALL OF THE ALECS SEEM TO FAVOR COLLOCATION TARIFFS, RATHER THAN THE INDIVIDUAL CASE BASIS (ICB) PRICING THAT IS USED NOW. WILL GTE AGREE TO TARIFF ITS COLLOCATION OFFERINGS?

A. Yes. By the end of this year, GTE plans to modify its existing, federal tariff for traditional, physical collocation to reflect an averaged price for collocation site preparation, security and other non-recurring costs that had formerly been determined on a case-by-case basis. This tariffed price will apply to the great majority of collocations. GTE will

1 also revise its state tariffs to reflect an averaged price for site
2 preparation charges. In addition, GTE plans to file a cageless
3 collocation tariff in the Florida jurisdiction, again with similar pricing for
4 such charges.

5
6 As the ALECs have testified, tariffing will introduce greater simplicity,
7 speed, and certainty into the collocation process. (See, e.g., Levy DT
8 at 3-4; Gillan DT at 6; Cloz DT at 22, 24.)

9

10 **Q. THE TIMING AND CONTENT OF THE ILEC'S RESPONSE TO THE**
11 **ALECS' COLLOCATION APPLICATIONS HAVE BEEN VERY**
12 **CONTROVERSIAL SUBJECTS IN THIS DOCKET. HOW WILL**
13 **GTE'S TARIFFING APPROACH AFFECT THESE ISSUES?**

14 A. Tariffing of collocation rates should largely moot these issues. The
15 fundamental concern of the ALECs in this docket appears to be
16 reducing collocation implementation intervals. In this regard, they
17 want price quote information as quickly as possible to allow them to
18 place a firm order, which will trigger the space preparation process.
19 The Commission's Proposed Agency Action Order in this case
20 contemplates a two-step response, which has been widely used by
21 ILECs, including GTE. Under this approach, the ILEC gives an
22 answer as to space availability in an initial response (e.g., within 15
23 days), then provides a price quote later (e.g., in 15 more days).

24

25

1 GTE's new approach will collapse this process into just one response.
2 Without the need to calculate ICB prices for each collocation, GTE will
3 be able to provide both space availability and price information in 15
4 days in most cases. The ALEC can then place a firm order at that
5 point. I believe this timetable is consistent with or even more
6 ambitious than some that the ALECs have recommended.

7

8 **Q. IS FCCA WITNESS GILLAN CORRECT THAT TARIFFING**
9 **CAGELESS COLLOCATION ELIMINATES THE NEED FOR AN**
10 **APPLICATION PROCESS? (GILLAN DT AT 13.)**

11 A. No. An initial application for cageless or any other type of collocation
12 is necessary to properly provision and implement the request. The
13 ALEC's application quantifies the request and begins the processing
14 interval. Specifically, it indicates how much space the ALEC needs,
15 the type of equipment to be installed, power requirements, and the
16 like. The ILEC will need to do the same availability, engineering, and
17 cost analysis whether prices are set by a tariff or through an ICB
18 approach. The only step that is eliminated though the tariff process
19 is the pricing analysis.

20

21 **Q. MCG'S WITNESS LEVY, LIKEWISE, CONTENDS THAT TARIFFING**
22 **OBVIATES THE NEED FOR A RESPONSE BY THE ILEC AND A**
23 **FIRM ORDER FROM THE ALEC. (LEVY DT AT 10.) DO YOU**
24 **AGREE?**

25 A. No. Mr. Levy appears to incorrectly assume that there will always be

1 space available to fulfill the ALEC's particular request. An ILEC
2 response is necessary to tell the ALEC whether or not space
3 conforming to the ALEC's requirements is, in fact, available. Through
4 the firm order, the ILEC receives a definite confirmation from the
5 ALEC (in the form of a financial commitment) that the ALEC wishes
6 to proceed with the collocation arrangement.

7
8 **Q. SOME ALECS PROPOSE SHORTER COLLOCATION**
9 **IMPLEMENTATION INTERVALS FOR CAGELESS COLLOCATION**
10 **THAN CAGED COLLOCATION. ARE DIFFERENT**
11 **IMPLEMENTATION INTERVALS WARRANTED?**

12 **A.** No. The tasks required to prepare caged and cageless space are not
13 significantly different, so the implementation intervals should not be,
14 either. Each type of request centers around the need to place
15 telecommunications equipment into a central office, with the chief
16 potential difference being where the equipment is placed. The type
17 of equipment to be installed will not vary with the category of
18 collocation request. For each request, the ILEC must assess space
19 availability; power requirements; heating, ventilation and air
20 conditioning (HVAC) impacts; cable racking requirements; cable
21 termination requirements; available cable routes; and cable (fiber,
22 transmission, and power) length estimates, in accordance with the
23 ALEC's requirements reflected in the application. For each type of
24 collocation, the ILEC must then engineer and prepare the collocation
25 area prior to equipment installation.

1 GTE has proposed a 90-day implementation interval for physical
2 collocation (both caged and cageless), unless the arrangement
3 involves major upgrades for power or HVAC. Contrary to some
4 ALECs' beliefs, (e.g., Levy DT at 14; Falvey DT at 9; Closz DT at 15),
5 cage construction is not an intensive or time-consuming task, as the
6 cage provisioned in parallel with the other components. Thus, the
7 presence or absence of a cage does not justify different provisioning
8 intervals. Certainly, it does not warrant reducing the provisioning
9 interval by 30 days or more, as some have suggested. (See, e.g.,
10 Closz DT at 15; Strow DT at 8.)

11

12 **Q. THE ALECS WOULD ALSO DEFINE A SHORTER**
13 **IMPLEMENTATION TIME FOR VIRTUAL THAN CAGED**
14 **COLLOCATION. IS THIS JUSTIFIED?**

15 **A.** No. While virtual collocation can sometimes be provisioned faster than
16 the typical physical arrangement, it would be a mistake to set an
17 implementation timeframe on the assumption that this is always the
18 case. The ILEC will need to perform similar kinds of tasks whether the
19 request is for physical or virtual collocation. Moreover, as I stated in
20 my Direct Testimony, the key event driving the virtual collocation
21 implementation date is the delivery of the ALEC's equipment. Unlike
22 physical collocation arrangements, where the ALEC installs its own
23 equipment, the ILEC must install the equipment in case of virtual
24 collocation. Because equipment delivery is largely out of the ILEC's
25 control, the fairest and most practical approach for both the ALEC and

1 ILEC is to set an implementation deadline from the date of such
2 delivery. In this way, the ALEC has maximum control over its own
3 implementation date and GTE cannot be held responsible for events
4 beyond its control.

5
6 GTE endeavors to prepare virtual collocation space in a timely
7 manner; its standard practice is to install, test, and turn up the
8 arrangement within 30 days of receipt of all the ALEC's equipment.
9 GTE believes this is a more reasonable approach than the
10 Commission's proposal to require completion within 60 days of the
11 firm order.

12

13 **Q. MANY ALECS HAVE SUGGESTED THAT REQUESTS FOR**
14 **CHANGES TO EXISTING COLLOCATION SPACE SHOULD BE**
15 **PROCESSED DIFFERENTLY THAN INITIAL COLLOCATION**
16 **REQUESTS. WHAT IS GTE'S RESPONSE?**

17 A. In this regard, GTE distinguishes between major and minor augments.
18 At the time it originally submits its collocation application, the ALEC
19 indicates the amount of power it will need and the amount of heat (in
20 BTUs) that its equipment will generate. The ALEC may then place
21 equipment that does not exceed the capacity of the engineered
22 space. As long as any changes the ALEC wishes to make are within
23 the ALEC's original specifications, the change is considered to be a
24 minor augment. A fee will apply to minor augments that require GTE
25 to perform a service or function on behalf of the collocator (e.g.,

1 pulling cable for CLEC-to-CLEC interconnects, DS0, DS1, and DS3
2 facility terminations, and virtual circuit card installations). A fee will
3 not be required for augments performed solely by the collocator (e.g.,
4 installing additional equipment in its cage).

5
6 If the requested augment would exceed the power and BTUs
7 originally specified, or if it would require additional space, it is
8 considered a major augment. Major augments will be treated like new
9 collocation applications. In these cases, the ILEC will need to assess
10 potential impacts of requested changes on power, HVAC, cabling,
11 and space requirements. While it will not take 90 days to provision
12 every such change, it would be impossible to define some uniform,
13 shorter interval, because change requests can vary widely in the
14 amount of work they require. GTE will work with the ALEC to
15 complete the change in a timely manner; however, absent a clear
16 description of what a particular change will involve, one cannot
17 assume it will take less time than an original application.

18

19 **Q. WILL CONVERSION OF VIRTUAL TO PHYSICAL COLLOCATION**
20 **BE TREATED AS A NEW REQUEST AS TO BOTH CAGED AND**
21 **CAGELESS ARRANGEMENTS?**

22 **A.** Yes, physical collocation can be provisioned as either a caged or
23 cageless arrangement, so the policy I stated in my Direct Testimony
24 applies to both. As I stated before, the same site survey and
25 engineering analysis need to be done in either case, so there's no

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reason to treat them differently.

Q. THE ALECS SEEM TO BELIEVE THAT CONVERSION FROM VIRTUAL TO CAGELESS COLLOCATION CAN BE EFFECTED ALMOST IMMEDIATELY AND WITH LITTLE OR NO EXPENSE. IS THIS TRUE?

A. No. Again, the ALECs portray the collocation provisioning process as much easier than it is. It is not necessarily a simple matter of a "reversing the ownership of the virtually collocated equipment." (Falvey DT at 7; Gillan DT at 10.) For instance, since virtual collocations are maintained by the ILEC, the equipment and all circuit assignments are reflected in the ILEC systems. A conversion will thus require ordering and processing activities to update these systems accordingly. Furthermore, equipment relocation may be necessary for some conversions. Requests for in-place conversions will be reviewed on a case-by-case basis. In some instances, they can be granted. In others, such as where the virtually collocated equipment is commingled with the ILEC's equipment, it may be necessary to move the ALEC's equipment to properly separate it. In this regard, the FCC allows ILECs to take reasonable steps to protect their own equipment, such as enclosing the equipment in its own cage. (See Deployment of Wireline Services Offering Advanced Telecommunications Capability, First Report & Order, Mar. 31, 1999 (Advanced Services Order) at para. 42.)

1 **Q. INTERMEDIA’S WITNESS STROW CONTENDS THAT ILECS**
2 **CANNOT REQUIRE ALECS TO RECONFIGURE OR MOVE**
3 **EXISTING VIRTUAL EQUIPMENT TO A SEPARATE SPACE WHEN**
4 **CONVERTING FROM VIRTUAL TO CAGELESS PHYSICAL**
5 **COLOCATION. DO YOU AGREE?**

6 A. No, and neither does the FCC. As the FCC quote in Ms. Strow’s
7 testimony states, the ILECs “may not utilize unreasonable segregation
8 requirements to impose unnecessary additional costs on competitors.”
9 (Strow DT at 4-5, citing Advanced Services Order at para. 42.)
10 Plainly, this is not the absolute prohibition that Ms. Strow appears to
11 believe it is. GTE has a right, under the FCC’s rulings, to secure its
12 own equipment. To this end, it can impose reasonable segregation
13 requirements with a legitimate purpose.

14
15 **Q. SOME PARTIES ADVOCATE DEFINED TIME LIMITS FOR SPACE**
16 **RESERVATION. (HUNSUCKER DT AT 15; MARTINEZ DT AT 14;**
17 **STROW DT AT 10.) DOES GTE BELIEVE THIS APPROACH IS**
18 **FEASIBLE?**

19 A. No. As I stated in my Direct Testimony, ILECs and ALECs should be
20 able to reserve space in parity based on the type of equipment in
21 question and supportable documentation for future plans. An
22 inflexible timeframe for space reservation is not workable; for
23 instance, stand-alone switching and power plant equipment need to
24 grow into contiguous space and will have relatively longer engineering
25 and planning intervals than transmission, multiplexing and routing

1 equipment, which do not demand contiguous growth space.

2
3 **Q. E.SPIRE'S WITNESS FALVEY STATES THAT REQUIRING AN**
4 **ALEC TO HIRE AN ILEC-CERTIFIED VENDOR TO PERFORM**
5 **SPACE PREPARATION, RACKING AND CABLING, AND POWER**
6 **WORK IS MEANT TO OBSTRUCT ALECS' EFFORTS TO PROVIDE**
7 **SERVICE. IS THIS TRUE?**

8 **A.** No. GTE is the landlord of its central offices, which are some very
9 important real estate to telecommunications consumers in this state.
10 Maintaining the safety and reliability of GTE's network is critical to
11 GTE's end users, as well as the end users of carriers which
12 interconnect with GTE or resell its services. Requiring an ILEC-
13 certified vendor for work that affects more than just the individual
14 collocator space is not an attempt to drive up the ALEC's costs or
15 obstruct provisioning, but rather part of GTE's responsibility to
16 safeguard its facilities and those of its collocator-tenants. In any
17 event, this requirement should not be hard to comply with. There are
18 many ILEC-certified vendors which can perform provisioning.

19
20 **Q. SOME ALECS WOULD REQUIRE THE ILEC TO NOTIFY ALL**
21 **ENTITIES THAT WERE PREVIOUSLY DENIED SPACE IN A**
22 **CENTRAL OFFICE IN THE ORDER OF APPLICATION DATE**
23 **WHEN AVAILABLE SPACE IS CREATED THROUGH**
24 **MODIFICATIONS. DOES GTE SUPPORT THIS PROPOSAL?**

25 **A.** No. While this approach may appear to be the fairest one in concept,

1 it is not likely to be very effective or beneficial to the ALECs in
2 practice, thus placing unwarranted administrative burdens on the
3 ILEC. An office that is exempt from providing collocation space is
4 likely to remain so for a prolonged period of time--until, for example,
5 a building modification is implemented. The waiting list process
6 proposed in varying degrees of specificity by the ALECs, (Williams DT
7 at 17; Levy DT at 22; Martinez DT at 21-22; Hunsucker DT at 30-35;
8 Nilson DT at 21-22; Strow DT at 11-12), would encourage ALECs to
9 seek space even in offices where they have no foreseeable interest,
10 in order to be placed on the waiting list should space become
11 available in the future. They have nothing to lose in doing so. An
12 ALEC which receives space under this process, but which doesn't
13 really have much interest in collocating in the office, could use the
14 additional space primarily as a subleasing opportunity, which probably
15 isn't the kind of incentive this Commission wants to create. Also,
16 when space is created in a central office, ALECs which were at the
17 top of the list to receive notification may well have implemented other
18 alternatives to enter that market area. Finally, the time spent by each
19 ALEC, within the pecking order, to decide on space acquisition can
20 delay use of the space by an ALEC which stands ready to
21 immediately place a firm order and quickly enter the market.

22

23 **Q. WHAT IS GTE'S APPROACH TO THIS ISSUE?**

24 A. As stated in my Direct Testimony, GTE will publish a notice on its
25 website when new collocation space is created in a particular office

1 that was previously exempt from physical colocation. This is the
2 fairest and easiest way to notify all potentially interested parties of the
3 change in space availability. Once the notice is published, the first
4 firm order GTE receives will be given first priority. .

5 **Q. MCI'S MR. MARTINEZ SUGGESTS THAT THE ILEC SHOULD**
6 **PUBLISH FUTURE PLANS AND ESTIMATED DATES WHEN**
7 **SPACE WILL BE CREATED IN AN EXEMPTED CENTRAL OFFICE.**
8 **WHAT IS GTE'S RESPONSE?**

9 A. This suggestion is unworkable and would, in any event, have little
10 value for the ALEC's planning process. Plans for activities that may
11 create space in a central office often undergo major revisions due to
12 re-evaluation of technical alternatives, budget changes, and the like.
13 Thus, ALECs could not rely with any certainty on such plans (or
14 subsequent revisions), and GTE could not be held to them. If a
15 central office remains exempted for an extended period of time, then
16 GTE would propose allowing an ALEC or the Commission to ask GTE
17 for a walk-through or an analysis of planned alternatives to create
18 space.

19
20 **Q. MR. LEVY ARGUES THAT A COMMISSION FILING SHOULD BE**
21 **REQUIRED EVEN WHERE THE ALEC AND ILEC AGREE TO**
22 **EXTEND PROVISIONING INTERVALS. (LEVY DT AT 20.) DO YOU**
23 **AGREE?**

24 A. No. In situations where the parties agree on an implementation date,
25 it would serve no purpose to require the ILEC to seek a waiver, only

1 to have the ALEC file a response agreeing to the extension. This
2 approach would waste company and Commission resources and
3 undermine the Commission's policy favoring negotiated agreements.
4

5 It appears that other ALECs would not advocate Commission filings
6 where the parties agree to extend provisioning intervals. (See, e.g.,
7 Williams DT at 5.)
8

9 **Q. SOME ALECS HAVE PROPOSED THAT ONLY ESSENTIAL**
10 **PERSONNEL SHOULD BE RETAINED IN CENTRAL OFFICES**
11 **WHERE THERE IS OTHERWISE NO COLLOCATION SPACE.**
12 **(LEVY DT AT 16; MARTINEZ DT AT 15-16; HUNSUCKER DT AT**
13 **18-19.) WHAT IS GTE'S VIEW OF THIS PROPOSAL?**

14 **A.** As I stated in my Direct Testimony, it is infeasible to define rules for
15 administrative space in central offices because each office is unique.
16 In this regard, there should be no blanket requirement to move "non-
17 essential" personnel. For instance, in some cases, GTE's central
18 office facilities happen to be located in office buildings which house
19 several floors of employees supporting GTE's operations, but not
20 necessarily just the operations of the central office facilities in that
21 building. All of these personnel would be considered "non-essential"
22 and would have to be moved under the ALECs' proposals for a
23 uniform rule. This kind of extreme effect of a blanket rule is plainly
24 unreasonable.
25

1 Any evaluation of the ILEC's use of central office space, including the
2 type of personnel housed there, should be done on a case-by-case
3 basis, as it is today, with due consideration of the effect on GTE's
4 business and its employees' lives. If a move is determined to be
5 appropriate in a particular case, then the ALEC(s) causing the move
6 should pay the associated costs.

7
8 **Q. INTERMEDIA COMMUNICATIONS WITNESS STROW**
9 **RECOMMENDS THAT IF THE AMOUNT OF AVAILABLE SPACE**
10 **WITHIN A CENTRAL OFFICE FALLS BELOW A "THRESHOLD"**
11 **AMOUNT, THE ILEC SHOULD BE REQUIRED TO BEGIN TO**
12 **CREATE PLANS FOR EXPANSION OF THE CENTRAL OFFICE**
13 **SPACE. (STROW DT AT 10.) IS THIS CONSISTENT WITH FCC**
14 **REQUIREMENTS?**

15 **A.** No. In its First Report and Order on Implementation of the Local
16 Competition Provision in the Telecommunications Act of 1996, CC
17 Docket No. 96-98, (First Report and Order), the FCC concluded that
18 "incumbent LECs should be required to take collocator demand into
19 account *when* renovating existing facilities and constructing or leasing
20 new facilities, just as they consider demand for other services when
21 undertaking such projects." (First Report and Order at para. 585
22 [emphasis added].) This is not a requirement to keep vacant space
23 above a certain threshold level, but rather a requirement to take into
24 account the space requirements of others if GTE concludes it needs
25 to add space for itself.

1 Ms. Strow's proposal would, in any event, be bad policy. Collocation
2 demand varies widely with offices, so a uniform requirement for
3 expansion at a defined threshold would likely leave the ILEC with
4 substantial unused space and no means of recovering the cost of
5 creating the space.

6
7 **Q. WHAT IS GTE'S POSITION RELATIVE TO ALEC PROPOSALS TO**
8 **USE ALEC COLLOCATION FORECASTS AS A BASIS FOR**
9 **DETERMINING THE SIZE OF CENTRAL OFFICE EXPANSIONS?**
10 **(LEVY DT AT 22; HUNSUCKER DT AT 29-30.)**

11 **A.** GTE does not oppose consideration of ALEC collocation forecasts as
12 one element in GTE's space planning process, which factors in all
13 available market and historical information (including held
14 applications). But GTE would strongly oppose any requirement for
15 ILECs to expand or add space based on ALEC forecasts. ALECs
16 have no financial commitment to such forecasts and there is no way
17 of verifying their validity. Expanding central offices is a capital-
18 intensive and time consuming process requiring substantial lead-time.
19 Requiring the ILEC to add an additional 500 feet to a central office
20 because ALECs have submitted forecasts that say they'll need the
21 space in three years is not fair or reasonable. ALECs have nothing to
22 lose in submitting overblown space forecasts. In fact, they will have
23 the incentive to do so, either as a way of trying to assure there will be
24 plenty of space in the event they do need it, or as a means of driving
25 up the ILEC's costs. It is, moreover, inevitable that some ALECs'

1 business plans will change and that some will not be as successful as
2 they anticipated. The result in each case is that the ILEC will be left
3 with unused space and stranded investment.

4
5 Conversely, an approach that relies heavily on ALEC forecasts could
6 underestimate the need for additions. GTE believes ALECs would
7 consider collocation forecasts to be competitively sensitive
8 information. In GTE's experience, ALECs are reluctant to share this
9 kind of information. Also, this process will be meaningless absent
10 complete and accurate information about all potential collocations.
11 But there is no practical way to obtain forecasts from all ALECs which
12 may not have expressed interest in collocation yet. Mr. Levy, for
13 example, admits that "MCG has no opinion on how to forecast space
14 needs from new collocators that have not yet submitted applications
15 expressing interest in collocation in a particular central office." (Levy
16 DT at 23.)

17
18 **Q. DOES GTE BELIEVE THAT SPACE EXHAUSTION VERIFICATION**
19 **PROCEDURES SHOULD APPLY WHEN AN ILEC DENIES ANY**
20 **PORTION OF AN ALEC'S SPACE REQUEST, AS SOME ALECS**
21 **SEEM TO SUGGEST?**

22 **A.** No. If the Commission adopted this kind of expansive proposal, there
23 there would be no way to prevent ALEC abuse of their tour rights. If
24 the ILEC is compelled to conduct continuous tours, it will mean less
25 resources available for actually implementing collocation requests.

1 **Q. MR. MARTINEZ LISTS A NUMBER OF ITEMS HE BELIEVES THE**
2 **ILEC SHOULD PROVIDE IN ITS INITIAL RESPONSE TO THE**
3 **ILEC'S COLLOCATION REQUEST. (MARTINEZ DT AT 4- 5.) CAN**
4 **GTE COMPLY WITH THIS SUGGESTION?**

5 A. No. Many of the items on Mr. Martinez' list are pieces of information
6 that GTE would not have collected at this early stage in the
7 collocation process. Some of these details would require GTE to do
8 detailed engineering work and GTE could not know some of this
9 information until the ALEC's space in the central office is finalized.
10 Until the ALEC has placed a firm order, GTE cannot be expected to
11 begin preparing the space or performing detailed engineering work.
12 Otherwise, GTE will be forced to divert scarce resources away from
13 confirmed collocation projects to run "what-if" scenarios for ALECs
14 that may not be serious about a collocating in a particular office.

15
16 **Q. MR. MARTINEZ ALSO TAKES THE POSITION THAT THERE**
17 **SHOULD RARELY BE ANY SECURITY COSTS TO ALLOCATE**
18 **AMONG ALECS. (MARTINEZ DT AT 19.) DO YOU AGREE?**

19 A. No, and apparently the FCC does not, either. Paragraph 48 of the
20 First Report and Order and Further Notice of Proposed Rulemaking
21 in CC Docket No. 98-147 clearly states, "We permit incumbent LECs
22 to install, for example, security cameras or other monitoring systems,
23 or to require competitive LEC personnel to use badges with
24 computerized tracking systems." The agency goes on to say, "We
25 expect that state commissions will permit incumbent LECs to recover

1 the costs of implementing these security measures from collocating
2 carriers in a reasonable manner." It is the collocation of ALEC
3 equipment that is causing GTE to incur these additional security
4 costs; therefore, their recovery should come from the rates charged
5 to the ALECs.

6
7
8 **Q. DO YOU AGREE WITH MR. LEVY THAT A POTS BAY IS THE**
9 **"ONLY WAY TO ESTABLISH A DEMARCATION POINT"**
10 **BETWEEN THE ILEC AND ALEC? (LEVY DT AT 15.)**

11 A. No. In fact, the ALECs themselves appear divided on the use of
12 POTs bays. Mr. Williams, for example, contends that intermediate
13 arrangements such as POTs Bays drive up the ALEC's
14 interconnection costs. (Williams DT at 13.)

15
16 As I stated in my Direct Testimony, GTE considers the ALEC-
17 designated block on the main distribution frame (MDF) to be the most
18 appropriate demarcation point. In general, GTE does not favor POTs
19 Bays because its engineers believe they may introduce a potential
20 source of failure into the network. However, GTE will employ them
21 in particular circumstances when the configuration of the central office
22 leaves no other practical options.

23
24 GTE does not agree with some ALECs that they should be able to
25 connect to the network at any point they choose. (See, e.g., Williams

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DT at 14.) In particular, allowing ALECs to connect directly to the
MDF raises issues of network security and reliability.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Rebuttal Testimony of John W. Ries on behalf of GTE Florida Incorporated in Docket Nos. 981834-TP and 990321-TP were sent via U. S. mail on November 19, 1999 to the parties on the attached list.



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