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February 14, 2000

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Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 991854-TP

Dear Ms. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Alphonso J. Varner and K. Keith Milner, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

A Langley Kitchings

A. Langley Kitchings

(*ba*)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 991854-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 14th day of February, 2000 to the following:

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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 991854-TP
FEBRUARY 14, 2000

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present role since February 1996, and have been involved with the management of certain issues related to local interconnection, resale, and unbundling.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 29 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations (including research and development) in both the domestic and

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1 international arenas.

2

3 I graduated from Fayetteville Technical Institute in Fayetteville, North
4 Carolina, in 1970, with an Associate of Applied Science in Business
5 Administration degree. I later graduated from Georgia State University in
6 1992 with a Master of Business Administration degree.

7

8 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
9 SERVICE COMMISSION, AND IF SO, BRIEFLY DESCRIBE THE
10 SUBJECT OF YOUR TESTIMONY?

11

12 A. I have previously testified before the state public service commissions in
13 Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and South
14 Carolina, the Tennessee Regulatory Authority, and the Utilities
15 Commission in North Carolina on the issues of technical capabilities of the
16 switching and facilities network regarding the introduction of new service
17 offerings, expanded calling areas, unbundling, and network
18 interconnection.

19

20 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
21 TODAY?

22

23 A. In my testimony, I will address the technical aspects of certain network-
24 related issues raised in the Interconnection Agreement negotiations
25 between BellSouth and Intermedia Communications, Inc. Specifically, I

1 will address issues 10, 17, 27, 29, and 30.

2

3 **Issue 10: Are BellSouth's policies regarding conversion of virtual to**
4 **physical collocation reasonable?**

5

6 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

7

8 A. BellSouth believes its policies regarding conversion of virtual to physical
9 collocation are reasonable. The terms and conditions that should apply
10 for converting virtual to physical collocation should be consistent with the
11 terms and conditions of the assessment and provisioning of physical
12 collocation. These terms and conditions are negotiated between the
13 carriers and are found in the collocation agreement between the carriers.
14 An application for a conversion of virtual to physical collocation should be
15 evaluated just as an application for physical collocation would. Requests
16 for in place conversions will be evaluated on an individual case basis, and
17 a specific set of criteria will be used to ensure consistency in evaluation.

18

19 BellSouth will authorize the conversion of virtual collocation arrangements
20 to physical collocation arrangements "in place" without requiring the
21 relocation of the virtual arrangement where there are no extenuating
22 circumstances or technical reasons that would prevent the arrangement
23 from becoming a safety hazard within the premises or otherwise being in
24 conformance with the terms and conditions of the collocation agreement
25 and where (1) there is no change to the arrangement; (2) the conversion

1 of the virtual arrangement would not cause the arrangement to be located
2 in the area of the premises reserved for BellSouth's forecast of future
3 growth; and (3) due to the location of the virtual collocation arrangement,
4 the conversion of said arrangement to a physical arrangement would not
5 impact BellSouth's ability to secure its own facilities. Notwithstanding the
6 foregoing, if the BellSouth premises is at or nearing space exhaust,
7 BellSouth may authorize the conversion of the virtual arrangement to a
8 physical arrangement even though BellSouth could no longer secure its
9 own facilities.

10
11 A collocator always has the option to request to convert the services on an
12 existing virtual collocation arrangement to a new physical collocation
13 arrangement. If the collocator should desire such a request, the collocator
14 should be responsible for any costs incurred.

15
16 Q. WHY DOES BELLSOUTH TREAT A REQUEST FOR A CONVERSION IN
17 THE SAME MANNER IT TREATS A REQUEST FOR PHYSICAL
18 COLLOCATION?

19
20 A. **Virtual collocation and physical collocation are two different service**
21 **offerings. While a collocating carrier has direct access to its physical**
22 **collocation equipment on a twenty-four hour a day, seven-day a week**
23 **basis, access to virtual collocation is restricted to limited inspection visits**
24 **only. Since BellSouth leases virtual collocation equipment from the carrier**
25 **and assumes the maintenance and repair responsibility at the direction of**

1 the collocator, virtual collocation arrangements are most often placed
2 within the BellSouth equipment line-up. The conversion of an existing
3 virtual collocation arrangement to a physical collocation arrangement may
4 necessitate either the relocation of the virtual collocation equipment to the
5 space designated for the new physical collocation arrangement or the
6 placement of new equipment in the physical collocation space and the
7 decommissioning of the old virtual collocation arrangement.

8
9 This conversion process gives BellSouth the ability to manage its space in
10 the most efficient manner possible. BellSouth must separately review its
11 ability to provide physical collocation and assess the support components
12 necessary for the particular arrangement (e.g., space allocation based on
13 engineering drawings, HVAC, power feeder and distribution, grounding,
14 cable racking). In performing these activities, BellSouth incurs costs.
15 BellSouth recovers these costs through the assessment of a physical
16 collocation Application Fee. Furthermore, BellSouth is obligated by the
17 Telecommunications Act of 1996 to treat requesting collocators in a non-
18 discriminatory manner. Each request for a physical collocation
19 arrangement is handled in the same non-discriminatory manner, whether it
20 is a physical collocation request or a request for a conversion from virtual
21 to physical collocation. Therefore, a collocator who previously had virtual
22 collocated equipment within an office follows the same process to obtain
23 physical collocation as a collocator that did not previously have virtual
24 collocation within that office.

1 **Issue 17: Should BellSouth be required to offer subloop unbundling and**
2 **access to BellSouth-owned inside wiring in accordance with the UNE**
3 **Remand Order and the FCC Rule 319(a)?**

4
5 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

6
7 A. BellSouth offers access to all elements of its loop network through sub-
8 loop unbundling offerings that comply with the FCC's UNE Remand Order
9 and FCC Rule 319(a). BellSouth expects, and is entitled to, compensation
10 for the use of its sub-loop elements provided to ALECs. In keeping with
11 the full intent of the FCC's UNE Remand Order, BellSouth is, and has
12 been, providing sub-loop unbundling at technically feasible points of
13 access.

14
15 Q. PER THE FCC'S UNE REMAND ORDER, WHAT DOES TECHNICALLY
16 FEASIBLE POINTS OF ACCESS INCLUDE?

17
18 A. BellSouth will provide sub-loop unbundling at those technically feasible
19 points of access per the FCC's Remand Order. However, the Order
20 relating to access points is not entirely clear and BellSouth may seek
21 additional clarification from the FCC. For example, it is not exactly clear to
22 BellSouth what access to the Minimum Point of Entry (MPOE) means
23 since the term MPOE is generally used to define a location of the
24 demarcation point, not a cross-connect block or some other piece of
25 hardware. In this sense, BellSouth has no control over ALEC access to

1 the location on a property, which is designated as the MPOE, for access
2 to facilities that are on the customer side of the demarcation at the MPOE.

3
4 Q. IS BELLSOUTH OBLIGATED TO ESTABLISH THE DEMARCATION
5 POINT AT THE MPOE?

6
7 A. No. The FCC has not established any presumption that the demarcation
8 point should be at the MPOE. First of all, Part 68.3(b) deals separately
9 with buildings existing after August 13, 1990, and with buildings existing
10 on or before August 13, 1990. Following is the entire text of Part
11 68.3(b)(1) which deals with buildings existing as of August 13, 1990:

12 "In multiunit premises existing as of August 13, 1990, the
13 demarcation point shall be determined in accordance with the local
14 carrier's reasonable and non-discriminatory practices. Provided,
15 however, that where there are multiple demarcation points within
16 the multiunit premises, a demarcation point for a customer shall not
17 be further inside the customer's premises than a point twelve
18 inches from where the wiring enters the customer's premises, or as
19 close thereto as practicable."

20
21 Following is the complete text of paragraph 68.3(b)(2), which deals with
22 wiring installed after August 13, 1990:

23 "In multiunit premises in which wiring is installed after August 13,
24 1990, including major additions or rearrangements of wiring existing
25 prior to that date, the telephone company may [emphasis added]

1 establish a reasonable and nondiscriminatory practice of placing
2 the demarcation point at the minimum point of entry. If the
3 telephone company does not elect to establish a practice of placing
4 the demarcation point at the minimum point of entry, the multiunit
5 premises owner shall determine the location of the demarcation
6 point or points. The multiunit premises owner shall determine
7 whether there shall be a single demarcation point location for all
8 customers or separate such locations for each customer. Provided,
9 however, that where there are multiple demarcation points within
10 the multi-unit premises, a demarcation point for a customer shall
11 not be further inside the customer's premises than a point 30 cm
12 (12 in) from where the wiring enters the customer's premises, or as
13 close thereto as practicable.”

14
15 BellSouth has not elected to establish a practice of placing the
16 demarcation point at the MPOE. However, if the building owner wants
17 BellSouth to establish a single demarcation point to serve the entire
18 building, BellSouth will comply with such a request. If the building owner
19 does not want a single demarcation point, BellSouth provides demarcation
20 points in each tenant's office or suite.

21
22 Q. ARE THERE ANY OTHER AREAS OF CLARIFICATION THAT NEED TO
23 BE ADDRESSED RELATIVE TO “TECHNICALLY FEASIBLE POINTS OF
24 ACCESS”?

25

1 A. Yes. Access to sub-loop unbundling at the Main Distributing Frame (MDF)
2 is viable only for those network elements that normally terminate on the
3 MDF. One example of such a network element is loop feeder. Loop
4 feeder is sometimes referred to as the "first mile" of the loop in that it is
5 that part of the loop terminated at one end in the central office and at the
6 other end a cross-connection device such as the Feeder Distribution
7 Interface (FDI) often found in rights-of-way alongside highways, streets,
8 and roads.

9
10 Q. IN ISSUE 17, WHAT IS MEANT BY "ACCESS TO BELLSOUTH-OWNED
11 INSIDE WIRING", AND WHAT IS ITS IMPACT, IF ANY?

12
13 A. The FCC's Remand Order at ¶223 is as follows:

14 We clarify that "technically feasible points" would include a point
15 near the customer premises, such as the point of interconnection
16 between the drop and the distribution cable, the NID, or the MPOE.
17 Such access would give competitors unbundled access to the
18 inside wire subloop element, in cases where the incumbent owns
19 and controls wire inside the customer premises. It would also
20 include any FDI, whether the FDI is located at a cabinet, CEV,
21 remote terminal, utility room in a multi-dwelling unit, or any
22 other accessible terminal. (Emphasis added).

23
24 The FCC's Remand Order at ¶182 becomes more specific as to inside
25 wire control as follows:

1 Section 68.3 of our rules defines the demarcation point as that point
2 on the loop where the telephone company's control of the wire
3 ceases, and the subscriber's control (or, in the case of some
4 multiunit premises, the landlord's control) of the wire begins. Thus,
5 the demarcation point is defined by control; it is not a fixed location
6 on the network, but rather a point where an incumbent's and a
7 property owner's responsibilities meet. The demarcation point is
8 often, but not always, located at the minimum point of entry
9 (MPOE), which is the closest practicable point to where the
10 wire crosses a property line or enters a building. In multiunit
11 premises, there may be either a single demarcation point for the
12 entire building or separate demarcation points for each tenant,
13 located at any of several locations, depending on the date the
14 inside wire was installed, the local carrier's reasonable and
15 nondiscriminatory practices, and the property owner's preferences.
16 Thus, depending on the circumstances, the demarcation point may
17 be located either at the NID, outside the NID, or inside the NID.

18
19 The above paragraphs from the Order appear to indicate to me that the
20 FCC's intent is to include in the unbundling of inside wire those facilities
21 that exist today on the network side of the demarcation point, and which
22 are included in BellSouth's Accounts and Subsidiary Records Categories
23 as "Network Terminating Wire (NTW)", and that which are defined in Part
24 32 of the Uniform System Of Accounting (USOA) as "Intrabuilding Network
25 Cable (INC)". (Note: INC is sometimes referred to generically as "riser"

1 cable.) As defined in several previous FCC Orders, "inside wire" is
2 located on the customer's side of the demarcation point and is under
3 control of the end user or, in some cases, the landlord. In the situation of
4 NTW and INC, ALECs should obtain access to these sub-loop elements in
5 the same manner as it obtains access to any other network element -- by
6 placing an order with BellSouth and paying a just and reasonable price for
7 the element. As to access to the inside wire within the end user's
8 premises, this would be at the discretion of the end user, or building
9 owner, rather than at BellSouth's discretion.

10
11 Q. HAVE YOU PREPARED AN EXHIBIT WHICH ILLUSTRATES
12 BELL SOUTH'S PROPOSAL REGARDING SUB-LOOP UNBUNDLING?

13
14 A. Yes. Exhibit WKM-1, which is attached to this testimony, contains three
15 (3) pages that I hope aid in understanding this issue. Page 1, shows the
16 typical access to unbundled NTW in a "garden" apartment. The
17 apartments on page 1 could as easily be envisioned as separate floors in
18 a multi-story building. The point to be made here is that the access
19 terminal is cross-connected by tie cable pairs with the terminals of both
20 BellSouth and the ALEC thus allowing an ALEC access while preserving
21 network reliability and security. Page 2 shows a typical serving
22 arrangement in multi-story buildings for which BellSouth is, at present, the
23 sole provider of telephone service. Page 3 shows BellSouth's proposed
24 form of access for any ALEC. BellSouth proposes the use of an access
25 terminal that is cross-connected by tie cable with the terminals of both

1 BellSouth and the ALEC.

2

3 Q. WHAT ARE SUB-LOOP ELEMENTS?

4

5 A. Sub-loop elements are the individual elements that make up the entire
6 loop that extends from the BellSouth central office to the demarcation
7 point between BellSouth's network and the inside wire at the end user
8 customer's premises. No sub-loop elements, including those accounted
9 for as NTW and INC, can be classified as inside wire. Rather, since these
10 sub-loop elements are on the network side of the demarcation point, sub-
11 loop elements are all parts of BellSouth's loop facilities and, as such, are
12 subject to unbundling per the FCC's UNE Remand Order.

13

14 Q. PLEASE GIVE A BRIEF DESCRIPTION OF THE TECHNOLOGY
15 BELLSOUTH USES IN PROVIDING CUSTOMER LOOPS.

16

17 A. Today, BellSouth uses many types of facilities and technologies to
18 provision loops to its customers. In some cases, the facility may be a
19 basic architecture consisting of a pair of copper wires that extend from the
20 MDF of the central office (CO) to the Network Interface Device (NID) at
21 the end user's premises. In other cases, BellSouth may use a mixture of
22 fiber optic cables, pairs of copper wires and sophisticated electronics to
23 provision a circuit from the CO to the customer. As an example, Digital
24 Loop Carrier ("DLC") is one such technology that uses a mixture of
25 facilities and equipment to provide loops to end users. By offering these

1 different types of provisioning options, BellSouth is able to provide
2 optimum flexibility and cost-effectiveness during its service provisioning
3 and maintenance processes.
4

5 Q. PLEASE DISCUSS THE SUB-LOOP ELEMENT REFERRED TO AS
6 LOOP FEEDER.
7

8 A. In many cases BellSouth deploys a multiple circuit copper cable (for
9 example, a 1,200 pair cable) from its CO to a remote terminal (RT) or
10 cross-box located somewhere between the CO and the end user's
11 location. Each pair within this cable can be used to carry a single voice
12 conversion. This section of the loop is called the loop feeder. Sometimes,
13 loop feeder has been referred to as "the first mile" of the loop in that it is
14 the first section of cable leaving the BellSouth CO headed towards a
15 customer's premises. This loop feeder section may also be provisioned
16 using fiber optic cable.
17

18 The copper pairs of the loop feeder are then individually cross-connected
19 to pairs in smaller cables called loop distribution. The loop distribution
20 cables are attached to the feeder cables and serve all the houses or
21 businesses in a sub-section of one of the CO's serving areas.
22

23 Q. PLEASE DESCRIBE THE SUB-LOOP ELEMENT REFERRED TO AS
24 LOOP DISTRIBUTION.
25

1 A. Loop distribution facilities have been referred to as the “last mile” because
2 these are the facilities that go the “last mile” to the customer’s premises.
3 The loop distribution cables are used to, in effect, “fan out” the availability
4 of the cable pairs and/or transmission channels from the loop feeder
5 cables. In this regard, the cables one would see within a sub-division are
6 generally the loop distribution cables. Between the loop feeder cable and
7 the loop distribution cable is a cabinet, above ground “hut”, or below
8 ground “controlled environment vault” within which cross-connections
9 and/or electronics are located. These structures have been variously
10 described as the “Feeder/Distribution Interface”, the “Serving Area
11 Interface”, the “Remote Terminal” or, in its most simplistic configuration a
12 “cross-connect box” or simply “cross-box”. Any of these terms provides a
13 reasonable description of the function of connecting a copper cable pair or
14 fiber optic facility in the loop feeder cable to a copper cable pair in the
15 loop distribution cable. However, in certain Fiber In The Loop (FITL)
16 architectures, the loop distribution facility is fiber optic cable which may
17 extend all the way to a terminal within, or attached to, end users’ buildings.
18 In either case, the distribution facility eventually runs to the customer’s
19 building and is then connected to INC and/or NTW, or in single family
20 dwellings, a “drop wire”, which connects the entire loop to the device
21 called the NID. Note that the loops may be either attached to the
22 BellSouth switch within the BellSouth CO, or the loops may be extended
23 into the collocation space of an ALEC on an unbundled basis.
24
25

1 Q. PLEASE DESCRIBE THE NETWORK INTERFACE DEVICE (NID)

2

3 A. Simply stated, the NID provides a demarcation point between BellSouth's
4 facilities (that is, the loop) and the customer's facilities (that is, the inside
5 wire). Thus, the NID provides a way to connect the loop to the inside wire.
6 In some cases, the NID integrates other components; e.g., a lightning
7 protector, loopback test electronics, etc.

8

9 Q. WHAT IS INTRABUILDING NETWORK CABLE (INC)?

10

11 A. In multi-story buildings, and in some campus-type properties, INC is that
12 part of BellSouth's loop facilities extending from a cross-connect terminal
13 at, or close to, the entrance point of the distribution cable. INC is another
14 sub-loop element that is located on the network side of the demarcation
15 point between BellSouth's network and the inside wire at an end user
16 customer's premises. Although INC may in some cases connect directly
17 to the NID, typically it connects to NTW prior to final termination at the end
18 user's NID.

19

20 Q. WHAT IS NETWORK TERMINATING WIRE (NTW)?

21

22 A. NTW is another sub-loop element of the BellSouth loop. Depending on
23 the type of building served, NTW provides a copper wire transmission path
24 between distribution cable (copper or fiber), or INC, and "fans out" to
25 individual customer suites or rooms within that building. In this sense,

1 NTW is the “last” part of the loop on the network side of the demarcation
2 point.

3
4 To summarize, distribution cables are connected to INC and/or NTW,
5 depending on the situation, either of which then extends the loop to its
6 final termination at the customer’s NID. The NID establishes the
7 demarcation point between BellSouth’s network and the inside wire at the
8 end user customer’s premises with either or both NTW and INC being
9 located on BellSouth’s side of the demarcation point and, thus, comprising
10 sub-loop elements of BellSouth’s network.

11
12 Q. IS INTRABUILDING NETWORK CABLE (INC) AND NETWORK
13 TERMINATING WIRE (NTW) PART OF BELLSOUTH’S LOOP, OR ARE
14 THEY “INSIDE WIRE”?

15
16 A. INC and NTW are sub-elements of the loop. BellSouth expects to be, and
17 is entitled to be, compensated for the parts of BellSouth’s loop used by an
18 ALEC, including INC and NTW. The loop, including all sub-elements, is
19 on the network side of the demarcation point or NID. The inside wire is on
20 the customer’s side of that demarcation point. The demarcation point has
21 clearly been established by rules set forth in the FCC’s CC Docket 88-57
22 and codified in CFR Part 68. The FCC’s definition of the MPOE, which is
23 found on page 13 of its Order in Docket 88-57, reads “In particular, that
24 rule defines the minimum point of entry as ‘the closest practical point to
25 the point at which the wiring crosses a property line or . . . enters a

1 multiunit building'." On page 14 of that same order, the FCC clearly states
2 ". . .we expect that the 'closest practical point' could just as easily be
3 outside the customer's premises as deeper inside those premises." Most
4 importantly however, the FCC's Order in no way presumes that the
5 demarcation point is at the MPOE.

6
7 Q. WHAT IS BELLSOUTH'S BASIC POSITION REGARDING ALEC'S
8 ACCESS TO NETWORK TERMINATING WIRE AND INTRABUILDING
9 NETWORK CABLE LOCATED ON BELLSOUTH'S SIDE OF THE
10 DEMARCATION POINT?

11
12 A. Because BellSouth's NTW and INC constitute sub-loop elements, ALECs
13 should obtain access to NTW and INC in the same manner as it obtains
14 access to any other network element -- by placing an order with BellSouth
15 and paying a just and reasonable price for the element.

16
17 **Issue 27: Should Intermedia be permitted to establish Points of Presence**
18 **("POP") and Points of Interface ("POI") for delivery of its originated**
19 **interLATA toll traffic?**

20
21 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

22
23 A. All local service providers, including BellSouth and ALECs, should be
24 permitted to establish POIs as they choose so long as each local service
25 provider designates at least one POI within the LATA to which it will

1 deliver traffic originated by its end user customers bound for the end user
2 customers of another local service provider.

3
4 Q. DOES BELLSOUTH'S PROPOSED INTERCONNECTION AGREEMENT
5 LIMIT THE ESTABLISHMENT OF INTERMEDIA'S POINTS OF
6 PRESENCE AND POINTS OF INTERFACE TO INTERCONNECTION
7 FOR LOCAL AND INTRALATA TOLL TRAFFIC?

8
9 A. No. As indicated by the FCC's First Report and Order, Intermedia is free
10 to interconnect with the BellSouth network at any technically feasible point
11 for delivery of its traffic to BellSouth. Intermedia is free to establish one or
12 more Points of Interface with the BellSouth network. For example,
13 BellSouth offers interconnection at every BellSouth access tandem in a
14 LATA, offers multiple tandem access (where BellSouth will deliver
15 Intermedia transit traffic to access tandems in the LATA where Intermedia
16 does not have NXXs homed thus eliminating the need for Intermedia to
17 interconnect at those access tandems), local tandem interconnection, and
18 direct end office interconnection. This is the intent of Paragraph 6.9 on
19 Transit Traffic contained in BellSouth's standard interconnection
20 agreement. Accordingly, Intermedia's POI(s) with BellSouth allow(s) for
21 the routing of Intermedia's end user local, intraLATA and switched access
22 traffic.

1 **Issue 29: In the event Intermedia chooses multiple tandem access (“MTA”),**
2 **must Intermedia establish points of interconnection at all BellSouth access**
3 **tandems where Intermedia’s NXX’s are “homed”?**

4
5 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

6
7 A. If Intermedia elects BellSouth's MTA offer, Intermedia must designate for
8 each of Intermedia's switches the BellSouth tandem at which BellSouth
9 will receive traffic originated by Intermedia's end user customers. The
10 MTA option alleviates the need for the ALEC to establish interconnecting
11 trunking at access tandems where the ALEC has no NPA/NXX codes
12 homing. However, NPA/NXX code homing arrangements are published
13 in the Local Exchange Routing Guide (LERG) so that all
14 telecommunications companies in the industry will know where in the
15 network to send calls to the designated NPA/NXX code and where in the
16 network calls from the designated NPA/NXX code will originate. The
17 ALEC must interconnect where its NPA/NXX codes home. For example, if
18 Intermedia assigns its NPA/NXXs to a BellSouth Exchange Rate Center,
19 Intermedia must home such NPA/NXXs on the BellSouth access tandem
20 serving that BellSouth Exchange Rate Center. Correspondingly, in order
21 for BellSouth to deliver terminating IXC switched access traffic to the
22 Intermedia switch serving those Intermedia NPA/NXXs, Intermedia must
23 establish a trunk group to that BellSouth access tandem switch. This is
24 normal NPA/NXX homing and network traffic routing practice within the
25 industry.

1 BellSouth does not attempt to limit Intermedia's flexibility regarding the design or
2 operation of its network, but BellSouth and all other telecommunications service
3 providers must know where Intermedia's NPA/NXX codes are homed in order
4 that required translations and routing instruction be installed to ensure the correct
5 handling of calls to and from Intermedia's end user customers.

6

7 **Issue 30: Should Intermedia be required to: (a) designate a "home" local**
8 **tandem for each assigned NPA/NXX; and (b) establish points of**
9 **interconnection to BellSouth access tandems within the LATA on which**
10 **Intermedia has NPA/NXXs homed?**

11

12 Q. WHAT IS LOCAL TANDEM INTERCONNECTION?

13

14 A. Interconnection with a BellSouth local tandem allows an ALEC to
15 terminate its local traffic to end offices within a local calling area rather
16 than the ALEC interconnecting its switch(es) directly with each end office
17 within that local calling area. ALECs may also interconnect with BellSouth
18 and other service providers via BellSouth's access tandems to exchange
19 local traffic.

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21 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

22

23 A. Intermedia may interconnect its network to BellSouth's network at one or
24 more access tandems in the LATA for delivery and receipt of its access
25 traffic. However, Intermedia must interconnect at each access tandem

1 where its NPA/NXX codes are homed. Telecommunications service
2 providers inform all other telecommunications service providers where
3 traffic for a given NPA/NXX code should be delivered for completion of
4 calls. Telecommunications service providers then build translations and
5 routing instructions based on that information to ensure the proper
6 handling of calls.

7
8 BellSouth's local tandems were created for efficient tandem switching of
9 local traffic served by those local tandems. By interconnecting to a
10 BellSouth local tandem, Intermedia may deliver its originated local traffic
11 to BellSouth end offices (and third party end offices) subtending that
12 BellSouth local tandem. If more than one BellSouth local tandem serves a
13 particular BellSouth local calling area, and Intermedia elects to
14 interconnect at BellSouth's local tandem(s) for Intermedia's local traffic,
15 Intermedia must establish one or more of the BellSouth local tandems as
16 a home local tandem for its NPA/NXXs and establish interconnection to
17 the BellSouth local tandem(s) on which Intermedia homed its NPA/NXXs.
18 Once again, this is normal network homing and routing practice necessary
19 for BellSouth and third parties to know how to deliver traffic to Intermedia
20 in the most efficient means possible. Obviously, if telecommunications
21 service providers do not know where Intermedia's NPA/NXX codes are
22 homed, then it is impossible for proper translations and routing instructions
23 to be created and implemented. As a result, calls to and from Intermedia's
24 end user customers cannot be completed.

25

1 As I have previously stated, in order for all entities in the
2 telecommunications industry to be able to configure their own network for
3 delivery and receipt of calls, a "homing" arrangement for every NPA/NXX
4 code in the network is required. Further, requirements for the treatment of
5 exchange access traffic have already been developed and have long been
6 in place.

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8 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

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10 A. Yes.

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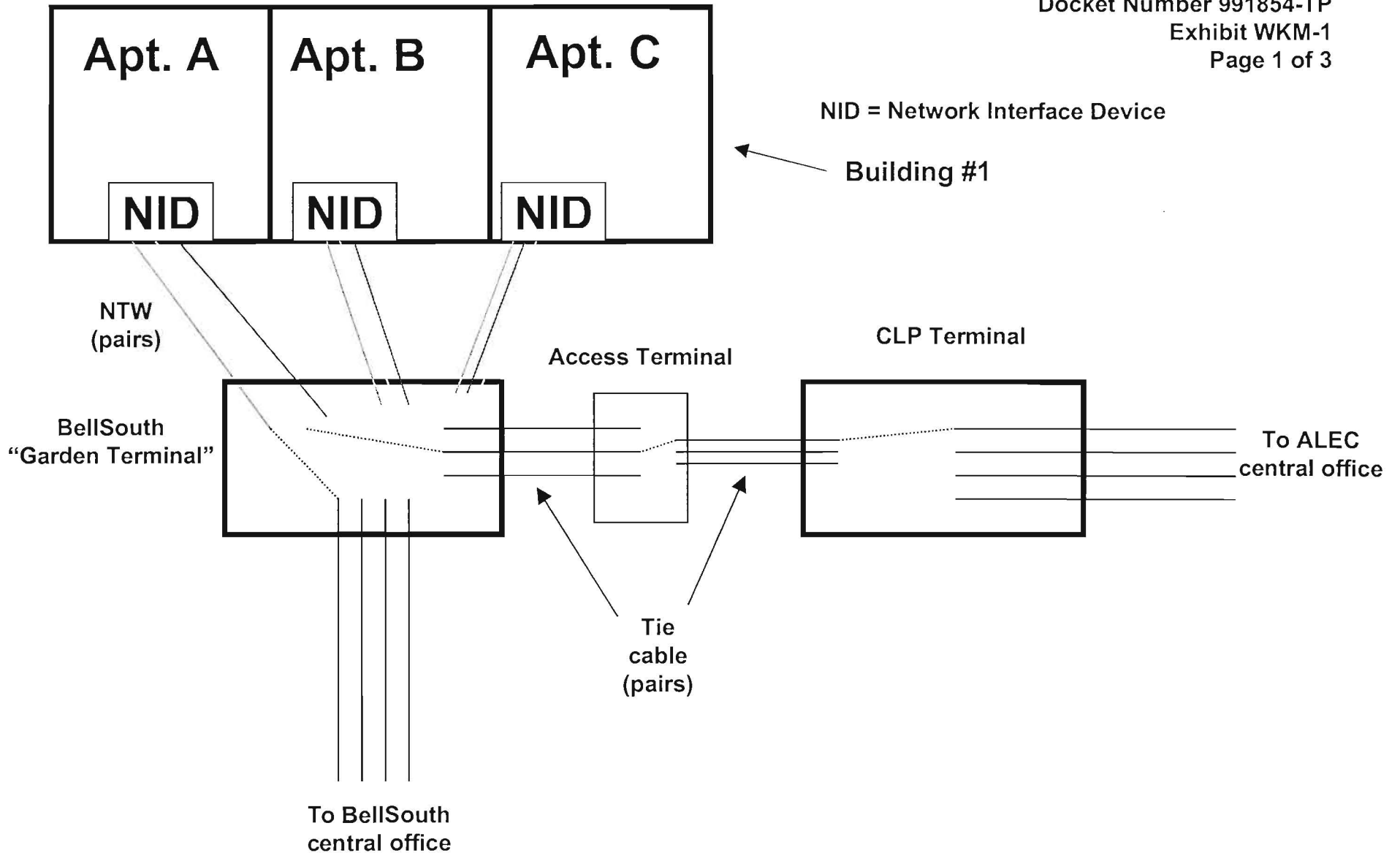
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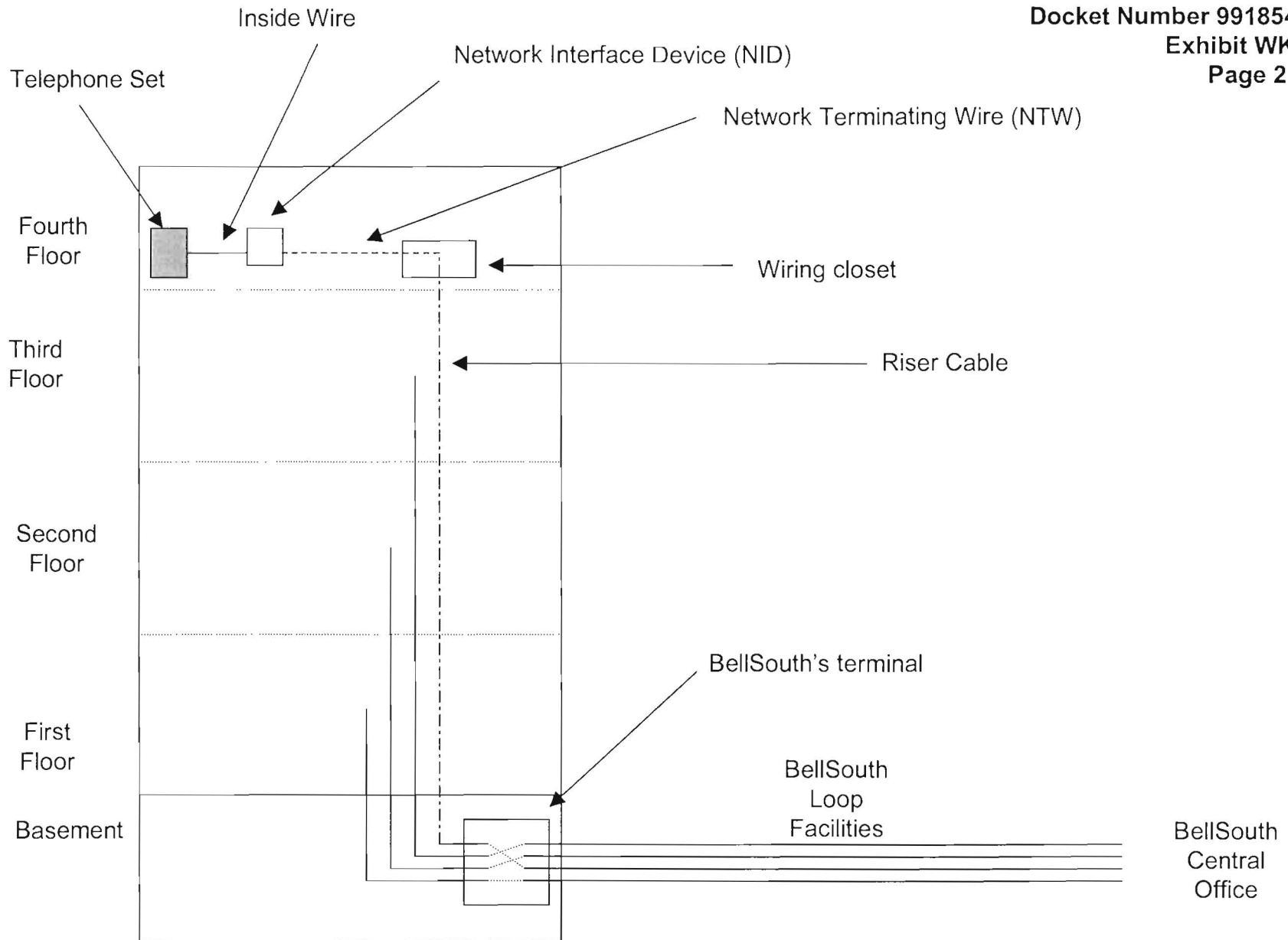
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Typical access to unbundled network terminating wire
in "garden" apartment



Typical existing serving arrangement

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BellSouth's proposed form of access

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