

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY**

3 **OF**

4 **ANGELA OLIVER**

ORIGINAL

5 **I. INTRODUCTION**

6
7 **Q. Please state your name, occupation and business address.**

8
9 **A.** My name is Angela Oliver. I am employed on behalf of Sprint Communications
10 Company Limited Partnership ("Sprint") as Regulatory Manager – Access
11 Planning. My business address is 7171 West 95th Street, Overland Park, Kansas,
12 66212.

13
14 **Q. Please summarize your professional background.**

15
16 **A.** I have been employed with Sprint's Long Distance Division since July 1999. My
17 responsibilities as Regulatory Manager in the Regulatory Access Planning
18 Department require me to represent Sprint's interests before state and federal
19 regulatory commissions regarding access and interconnection issues and to
20 negotiate access pricing and rate structures with Local Exchange Carriers (LECs).
21 Prior to joining the Sprint Long Distance Division, I was employed from 1996
22 through 1999 by McLeod USA, where I held positions of increasing responsibility
23 in both the Law and Regulatory departments. During my tenure with McLeod, I

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18 Department require me to represent Sprint's interests before state and federal
19 regulatory commissions regarding access and interconnection issues and to
20 negotiate access pricing and rate structures with Local Exchange Carriers (LECs).
21 Prior to joining the Sprint Long Distance Division, I was employed from 1996
22 through 1999 by McLeod USA, where I held positions of increasing responsibility
23 in both the Law and Regulatory departments. During my tenure with McLeod, I

1 was responsible for the company's regulatory compliance in Illinois, Wisconsin,
2 and Indiana. Prior to my employment with McLeod, I was employed as an
3 economic analyst with the Public Utilities Division of the Illinois Commerce
4 Commission from 1994 to 1996. I received a Bachelors Degree in Economics
5 from Sangamon State University in 1994 and a Masters Degree in Economics
6 from the University of Illinois in 1996.

7
8 **Q. Have you previously testified before any state regulatory commission?**

9
10 **A.** I have testified on behalf of the Illinois Commerce Commission on wholesale and
11 resale issues. I also testified on behalf of McLeod USA in Illinois on certificate
12 issues. In addition, I have testified on behalf of Sprint before the Public Service
13 Commission of Wisconsin in docket 6720-T1-156/6720-T1-157 (AT&T
14 Complaint against Ameritech Wisconsin's PICC), the Michigan Public Service
15 Commission in Case No. U-12287 (AT&T Complaint against Ameritech
16 Michigan's intrastate access rates) and Case No. U-12321 (AT&T Complaint
17 against GTE). In addition, I have prepared and submitted direct testimony in
18 D.T.E. 00-54 in the matter of Sprint's Petition for an Arbitration Award of
19 Interconnection Rates, Terms and Conditions Pursuant to 47 U.S.C. §252(b) with
20 Bell Atlantic-Massachusetts, Inc., which will be ruled upon without an
21 evidentiary hearing as agreed to by all parties.

22
23 **II. OVERVIEW**

1 **Q. What is the purpose of your testimony?**

2

3 A. The purpose of my testimony is to provide an explanation for an arbitration issue
4 that affects Sprint's interconnection with BellSouth. The issue pertains to the
5 feasibility of combining traffic of multiple jurisdictions on the same trunks.
6 Sprint has requested that BellSouth allow the routing of certain local calls over
7 existing access trunk facilities. I will point out the differences between Sprint's
8 proposal versus BellSouth's proposal and explain why Sprint's proposal is more
9 efficient and therefore, more beneficial to Florida consumers. In addition, I will
10 explain how BellSouth is currently routing jurisdictionally combined traffic over
11 existing access facilities for valid network and efficiency reasons. Sprint's
12 proposal merely extends a routing arrangement that exists today.

13

14 **III. LOCAL CALLS OVER ACCESS TRUNKS**

15

16 **ISSUE 9: Should the parties' Agreement contain language providing Sprint with the**
17 **ability to transport multi-jurisdictional traffic over a single trunk group,**
18 **including an access trunk group? (Attachment 3, Sections 2.8.7, 2.8.8, and**
19 **2.8.9)**

20

21 **Q. What is the main finding of your testimony on this issue?**

22

1 A. Alternative Local Exchange Companies (ALECs) such as Sprint, require
2 flexibility in interconnecting their networks with the incumbent local exchange
3 carrier (ILEC) networks in methods that best suit the demands and economics of
4 the traffic. BellSouth, during the negotiation process, has proposed restrictions on
5 the method of interconnection available to Sprint as well as restrictions on the
6 type of traffic that can be placed on specific trunk groups. These arbitrary
7 restrictions jeopardize the ability of both BellSouth and Sprint to design their
8 networks in the most efficient manner in order to ensure that consumers receive
9 the benefits of the lowest cost, most robust network available. Moreover, such
10 arbitrary restrictions make entry into competitive markets more difficult, and thus
11 are anti-competitive. My testimony explains BellSouth's proposals in more detail
12 and explains how BellSouth's proposed interconnection methods will hinder
13 Sprint's ability to compete effectively as a new competitor in the local market.

14

15 **Q. Please describe the issue related to combining multi-jurisdictional traffic on**
16 **the same trunk group.**

17

18 A. Sprint has requested from BellSouth, the ability to combine multi-jurisdictional
19 traffic on the same trunk group. This would include interLATA, intraLATA and
20 local traffic between the Sprint network switches and the BellSouth network
21 switches. The primary focus of this issue is between the Sprint end office and
22 BellSouth offices, but the issue also pertains to the issue on local calls over access
23 trunks.

1 The language specifically addressing this issue can be found in Section 2.8.7
2 through 2.8.9 of Attachment 3 to the Interconnection Agreement.

3

4

5 **Q. BellSouth requires segregation between interLATA and intraLATA traffic.**
6 **Is it technically feasible to combine interLATA and intraLATA traffic on**
7 **trunk groups between Sprint's ALEC end office and BellSouth's tandems?**

8

9 A. Yes, it is technically feasible and in fact, it is an industry-wide practice to
10 combine interLATA and intraLATA traffic on the same trunk groups. According
11 to SR-2275 Bellcore Notes on the Networks, Issue 3, December 1997 Network
12 Design and Configuration, Section 4.5.4 Combined Configurations,

13 In LATAs with a single access tandem, that tandem can
14 also serve as a local (intraLATA) tandem as shown in
15 Figure 4-16. *IntraLATA and interLATA traffic are*
16 *combined on the tandem connecting trunk groups*, while
17 the end office-to-end office high-usage groups carry only
18 intraLATA traffic, and the end office-IXC POP groups
19 carry only interLATA traffic. IntraLATA routing is the
20 same as with a segregated single-tandem network.
21 (emphasis added)

22

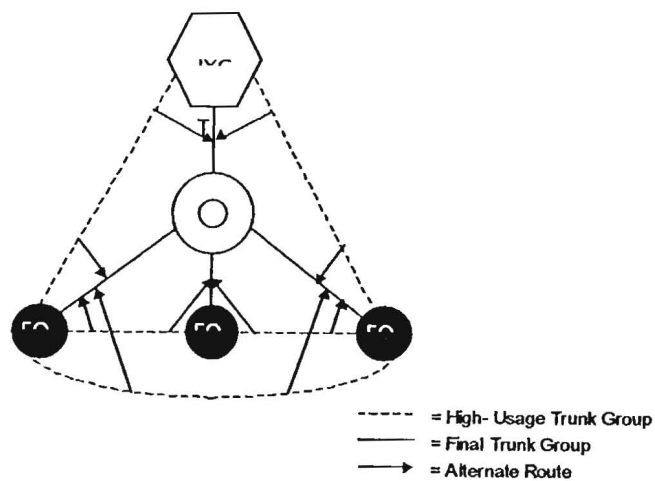


Figure 4-16. Single Tandem/Access tandem

1 Where two or more access tandems are required, the tandems can
 2 also serve as local tandems in a combined sector-tandem
 3 configuration as shown in Figure 4-17. *As with the single tandem*
 4 *case described above, the tandem connecting final groups carry*
 5 *both intraLATA and interLATA traffic.* The end office-to-end
 6 office and end office-distant tandem high-usage groups, and the
 7 intertandem final group carry only intraLATA traffic routed as
 8 with a segregated, combined sector-tandem configuration.
 9 (emphasis added)

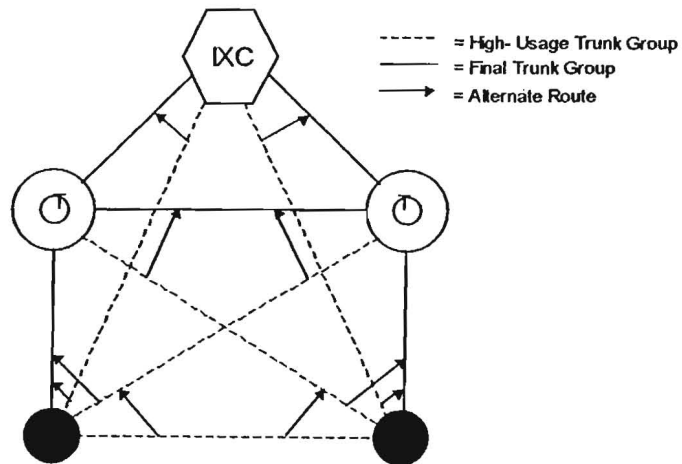


Figure 4-17. Combined Sector Tandem/Access tandem

12

13 **Q. Does the 1997 Interconnection Agreement between BellSouth and Sprint in**
 14 **Florida allow for the combining of multi-jurisdictional traffic on the same**
 15 **trunk groups?**

1 A. Yes. Attachment 2, page 102 of the July, 17, 1997, Agreement allows for the
2 combining of multi-jurisdictional traffic on the same trunk group:

3

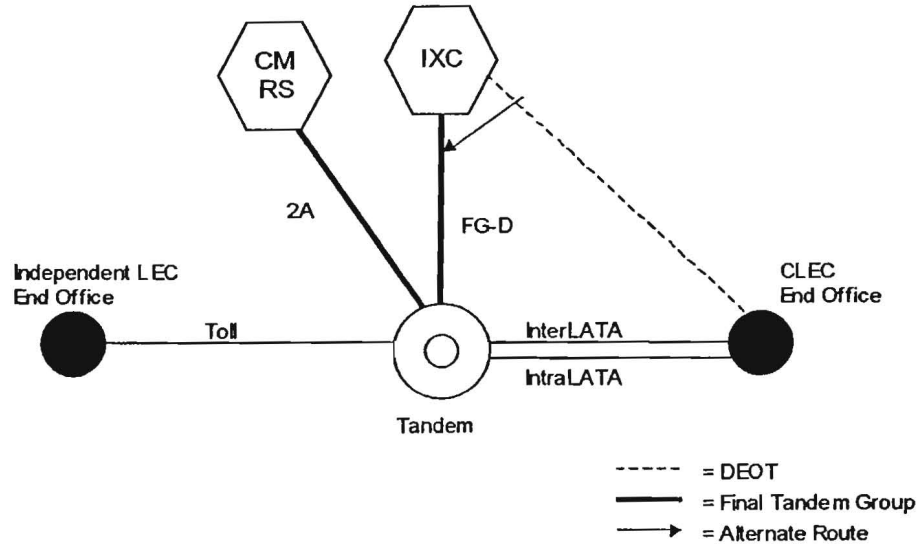
4 Sprint shall be allowed to mix local, intraLATA and InterLATA
5 toll and wireless traffic over the same trunks. Sprint shall report
6 traffic to BellSouth using percentage use factors and shall grant
7 BellSouth reasonable audit rights to ensure the accuracy of the
8 factors. Sprint shall be required to share the necessary call detail
9 records with BellSouth. Sprint and BellSouth shall work together
10 to develop a mutually agreed upon solution for billing mixed
11 traffic.

12

13 **Q. Are there instances in today's network design where InterLATA and**
14 **IntraLATA traffic is routed over the same trunk groups?**

15

16 A. Yes, there are examples where ILECs, including BellSouth, have combined multi-
17 jurisdictional traffic on the same trunk groups. BellSouth may very well route
18 jurisdictionally mixed traffic over the same trunk groups for valid network
19 engineering reasons. The following diagram is an example where Inter-exchange
20 Carriers (IXCs) are not exposed to the discriminatory practice of traffic
21 segregation that is being forced on ALECs. The diagram below depicts the
22 inefficient topology of segregated jurisdictional trunk groups with ALECs where
23 the same demands are not expected from non-competing wireline networks.



1 When Sprint as an IXC deploys a 2-way Direct End Office Trunk (DEOT) group
 2 to BellSouth end offices, and the end-user dials a 1+ intraLATA equal access call,
 3 the call is routed to the same trunk group that carries a 1+ interLATA call. In the
 4 same vein, a call terminating to the end-user may be carried on the same DEOT
 5 group regardless of the distance it traveled on Sprint's any-distance network or it
 6 may overflow to a combined tandem group. When a carrier hands off a
 7 terminating call to a BellSouth tandem, I do not believe that the tandem can
 8 accurately determine which call would be routed to a jurisdictionally segregated
 9 trunk group to each end office or IXC.

10 A call from an IXC or wireless carrier may in fact be local or intraLATA, but
 11 based on the determination that it is transit traffic with a competing
 12 interconnecting network, the traffic is routed on the same interLATA trunks as
 13 access traffic and not to the local/intraLATA group. Routing multi-jurisdictional
 14 calls across the same network of trunks does not indicate that billing

1 characteristics of the calls would be obscured. In fact an intraLATA call is still an
2 intraLATA call. This demonstrates that combining multi-jurisdictional traffic is a
3 common practice between BellSouth and IXCs and that combining traffic is
4 technically feasible between BellSouth and ALECs.

5 The cost of underutilized switch trunk ports and transmission media can be
6 burdensome even to incumbent carriers. Requirements by BellSouth that a
7 developing ALEC spend capital to establish multiple trunk groups and squander
8 precious resources to maintain a less efficient network where BellSouth does not
9 hold itself to the same standard are discriminatory and will raise the cost of
10 services for all ALECs and eventually for all consumers. Therefore, BellSouth
11 should be required to provide Sprint the functionality of multi-jurisdictional
12 trunking.

13
14
15 **Q. What is BellSouth's position on routing multi-jurisdictional traffic over the**
16 **same trunk group?**

17
18 **A.** BellSouth has not objected to the routing of multi-jurisdictional traffic over the
19 same trunk group. BellSouth objects to Sprint's proposed language to route
20 multi-jurisdictional traffic, where technically feasible, over any trunk group that
21 Sprint chooses, including the trunks Sprint purchases from the BellSouth access
22 tariff.

23

1 **Q. Should BellSouth be required to provide Sprint the functionality of multi-**
2 **jurisdictional trunking on Sprint’s existing access trunks?**

3

4 **A. As demonstrated above, BellSouth has the technical ability to combine multiple**
5 **jurisdictions of traffic on the same trunk circuits over the same transport facilities.**

6 **Sprint has in place an efficient trunking network interconnected to BellSouth’s**
7 **end offices and tandems. Sprint should have the opportunity to operate a network**
8 **architecture similar to BellSouth and not be forced into deploying a dedicated**
9 **overlay network for local traffic. Sprint should be able to use its trunk capacity**
10 **where incremental traffic could be economically added to existing trunks and use**
11 **its DMS-250s or other switches as tandems.**

12 **Sprint is requesting the flexibility to use either one way or two-way trunking or a**
13 **combination, for certain traffic types as specified by Sprint. Sprint is willing to**
14 **work with the BellSouth network planners and engineers to deploy trunking that**
15 **utilizes the most efficient network for the individual market to the benefit of all**
16 **users and stakeholders.**

17

18 **Q. Since it is technically feasible and, in fact, normal engineering practice to**
19 **combine multi-jurisdictional traffic on the same trunk group, BellSouth may**
20 **have concerns other than maintaining the most robust, efficient trunking**
21 **network. What reason could explain BellSouth’s resistance to allowing**
22 **multiple traffic jurisdictions on a combined trunk group or transported on**
23 **existing facilities?**

1 A. BellSouth apparently is concerned with the bypass of the access charge
2 compensation scheme through the "masking" of access traffic as local traffic
3 subject to reciprocal compensation. The FCC's rules however specifically
4 prohibit a claim of technical infeasibility based upon a claim of billing or
5 accounting concerns. It is crucial to point out that Sprint is not attempting to
6 circumvent the appropriate compensation for various traffic types and
7 jurisdictions. In fact, Sprint has explicitly represented to BellSouth that it would
8 maintain the required compensation arrangements and agrees that attempting to
9 bypass such arrangements would constitute a violation of the interconnection
10 agreement. It is important to note that BellSouth agreed to this arrangement in the
11 1997 Interconnection Agreement and Sprint has not changed its position
12 regarding the compensation of various traffic types and jurisdictions.

13 Moreover, Sprint has committed to BellSouth that Sprint will implement the
14 necessary processes to measure and accurately report the various types of
15 jurisdictional traffic on the combined trunk group. Any reporting system
16 implemented by Sprint will be made available to BellSouth to audit to their
17 satisfaction and to ensure that BellSouth is accurately compensated for the various
18 types of traffic on the combined trunk group.

19
20 **IV 00-TRAFFIC OVER ACCESS TRUNKS**

21
22
23 **Q. Please describe the issue related to routing local 00- traffic over access trunks**
24 **used for interLATA traffic.**

25

1 A. Sprint requests the flexibility to use its existing or new access trunks between the
2 Sprint network and the BellSouth network for local traffic. Sprint is also asking
3 BellSouth to recognize operator traffic as traffic that cannot be segregated by
4 predetermining jurisdiction before handing off the call to Sprint. Sprint asks that
5 BellSouth route all 00- calls destined to Sprint over existing or new operator
6 access trunks and recognize that some 00- traffic over those access trunks is
7 actually local traffic. The alternate solution would be routing all 00- traffic over
8 local interconnection trunks, some of which may be determined to be access
9 traffic and billed accordingly. Sprint has proposed the following language to be
10 added to the Interconnection Agreement:

11 In instances where Sprint combines traffic as set forth in this
12 Section, Sprint shall not be precluded by BellSouth in any way
13 from using existing facilities procured in its capacity as an
14 interexchange carrier. In this circumstance, Sprint will preserve
15 the compensation scheme for each jurisdiction of traffic that is
16 combined. Sprint's failure to preserve this scheme and compensate
17 BellSouth accordingly would constitute a violation of this
18 Agreement.

19
20 **Q. Are there other reasons why Sprint is requesting the provision of**
21 **Local/IntraLATA and InterLATA traffic over existing access trunk**
22 **facilities?**

23

1 A. Yes. Sprint already has in place an efficient all distance network. Accordingly,
2 Sprint would like to preserve the efficiencies of this network by routing local,
3 intraLATA, and interLATA over its existing Feature Group D trunk groups.
4 Sprint is also asking BellSouth to recognize traffic as traffic which cannot be
5 segregated by predetermining jurisdiction before handing off a 00- call to Sprint.
6 Sprint asks that BellSouth route all 00- calls destined to Sprint over existing or
7 new operator access trunks, and recognize that some 00- traffic over these access
8 trunks is actually local traffic. The alternative is routing all 00- traffic over local
9 interconnection trunks, some of which may be determined to be access traffic and
10 billed accordingly. It would be inefficient for Sprint to be required to establish
11 trunk groups for local/intraLATA traffic when there is capacity available on the
12 existing access network. There are tremendous network efficiencies to be gained
13 by combining these traffic types, from a facilities, trunking, and switch port
14 perspective. It has taken BellSouth many years to build its interoffice network,
15 and basically, BellSouth wants Sprint to build a new separate network in a much
16 shorter period of time in order for Sprint's customers to make and receive local
17 calls. The restrictions BellSouth is placing on Sprint would impose precisely the
18 type of economic barrier to entry the FCC's rules were designed to prevent.

19

20 **Q. BellSouth has an integrated network for local and intraLATA, with operator**
21 **services serving both. Does Sprint also have an integrated network to**
22 **provide services?**

1 A. Yes it does. Sprint integrates the IXC and ALEC network backbone facilities,
2 and therefore, Sprint also integrates operation, administration, maintenance and
3 provisioning using the same corporate identity for lines using resale UNE's or
4 facility based switches and the same corporate identity for trunks for access or
5 interconnection. Sprint also manages a common integrated operator services
6 platform providing enhanced operator services for both IXC and ALEC
7 operations. Sprint is an integrated service provider with an integrated network.
8 BellSouth's attempt to treat Sprint as separate carrier networks is discriminatory
9 and would create a less efficient, higher cost interconnection for both network
10 owners and all consumers.

11

12 **Q: Sprint currently routes operator service traffic (00-) over existing access**
13 **trunks. Should 00- traffic, be classified only as access?**

14

15 A. No. As an efficient network owner, Sprint manages a common operator services
16 platform to provide enhanced operator services to a number of Sprint service
17 platforms, including the IXC and the ALEC operations. When Sprint was
18 interconnected to BellSouth solely as an IXC, it may have been correct to assume
19 that the digit sequence 00 (zero zero) was for interexchange traffic only. Today,
20 however, Sprint is certified as an alternative local exchange company as well as
21 an IXC and plans to offer to Sprint customers enhanced 00- operator services via
22 its own facilities based network in competition with the LEC 0- operator services.

1 In addition, Sprint intends on providing local services through 00- access, just as
2 BellSouth provides local service via 0- access.

3 The 00- service access codes exist today and do not require routing modification.
4 When an end user presubscribed to Sprint dials 00, the call will be naturally be
5 routed to Sprint's Feature Group D or operator access trunks regardless of the
6 jurisdictional nature of the call and whether the destination of the call is
7 ultimately determined to be local / intraLATA, or interLATA. The 00- call is
8 non-jurisdictional as the call is passed from the originating network to the
9 operator platform to receive additional voice or tone commands from the end
10 user. Only after the call is routed for completion by the Sprint integrated
11 enhanced services platform can the jurisdiction of the call be determined and
12 reported. Sprint's proposal to route local calls over access facilities recognizes
13 the reality of combining traffic regardless of jurisdiction. BellSouth, however,
14 has refused to acknowledge that the nature of 00- calls is non-jurisdictional until
15 after the BellSouth network hands off the call to Sprint. BellSouth's position
16 creates a barrier to parity and the provision of enhanced services to Florida's
17 consumers.

18
19 **V. TWO-WAY TRUNKS**

1 **Issue 28 (a): Should Bellsouth be required to provide Sprint with two-way trunks?**

2

3 **Q. Please describe the issue for which Sprint seeks arbitration by**
4 **this Commission.**

5

6 A. The issue at hand is whether BellSouth is obligated to provide two-way
7 interconnection trunking to Sprint upon request, or whether the provision of such
8 Trunking is predicated on the parties mutually agreeing to the use of such
9 trunking arrangements.

10

11 **Q. What is Sprint's position on this issue?**

12

13 A. BellSouth should provide two-way interconnection trunking upon Sprint's request,
14 subject only to technical feasibility. The provision of two-way trunking should
15 not be subject to whether or not BellSouth agrees to provide such trunking. Two-
16 way trunking in the context of the parties' interconnection agreement includes
17 "two-way" trunking and "SuperGroup" interconnection trunking.

18

19 **Q. What is BellSouth's position on this issue?**

20

21 A. BellSouth has agreed to provide two-way trunking to Sprint, but only when the
22 parties mutually agree that two-way trunking shall be used. The requirement for

1 mutual agreement includes both two-way trunking and SuperGroup
2 interconnection trunking as described above.

3
4 **Q. Why does Sprint believe that BellSouth is obligated to provide two-way**
5 **trunking upon Sprint's request?**

6
7 A. FCC Rule 51.305 (f) states, "If technically feasible, an incumbent LEC shall
8 provide two-way trunking upon request." There is nothing in this Rule to suggest
9 that the ILEC and the ALEC must mutually agree to the use of two-way trunking
10 as a condition of BellSouth making such trunking available to Sprint.

11
12 **Q. Are there any other FCC references which support Sprint's contention that**
13 **BellSouth should be required to provide two-way trunking to Sprint upon**
14 **request?**

15
16 A. Yes. Paragraph 219 of the Local Competition Order states:

17 where a carrier requesting interconnection pursuant to section 251 (c) (2)
18 does not carry a sufficient amount of traffic to justify separate one-way
19 trunks, an incumbent LEC must accommodate two-way trunking upon
20 request where technically feasible. Refusing to provide two-way trunking
21 would raise costs for new entrants and create a barrier to entry. Thus, we
22 conclude that if two-way trunking is technically feasible, it would not be

1 just, reasonable, and nondiscriminatory for the incumbent LEC to refuse to
2 provide it.

3

4 **Q. Why is this issue important to Sprint?**

5

6 A. Sprint views two-way trunks as the preferred trunking arrangement, in many cases,
7 because of efficiencies gained in switching ports and interconnecting facilities,
8 particularly in the early stages of market entry. There simply may not be enough
9 traffic, especially early on, to justify setting up multiple one-way trunk groups for
10 the exchange of traffic with BellSouth. BellSouth's proposed language suggests
11 that BellSouth has the right to refuse to provide two-way trunking if such trunking
12 is requested by Sprint. Sprint believes that this violates both the spirit and the
13 letter of FCC Rule 51.305 (f).

14

15 **Q. What action does Sprint request that the Commission take on this issue?**

16

17 A. Sprint requests that the Commission order BellSouth to provide two-way trunking
18 to Sprint upon request. The provision of two-way trunking should incorporate
19 both "two-way" trunking and "SuperGroup" interconnection trunking as defined
20 in the draft interconnection agreement.

21

22 **Issue 28 (b): Should BellSouth be required to use two-way trunks for BellSouth-**
23 **originated traffic?**

1 **Q. Please describe the issue for which Sprint seeks arbitration by this Commission.**

2

3 A. The issue before this Commission is this: When two-way interconnection trunks are
4 provided, should BellSouth be required to use those trunks for its originated
5 traffic?

6

7 **Q. What is Sprint's position on this issue?**

8

9 A. BellSouth should be required to use two-way trunks, when provided, for
10 BellSouth's originated traffic.

11

12 **Q. What is BellSouth's position on this issue?**

13

14 A. BellSouth's position is that it is not obligated to use the two-way trunks, but instead,
15 entirely at its option, can use one-way trunks to deliver its originated traffic to
16 Sprint.

17 **Q. Why is BellSouth's proposal problematic?**

18

19 A. If BellSouth refuses to use two-way trunks, the trunks effectively cease to be two-
20 way trunks. This effectively denies Sprint the opportunity to use two-way trunks
21 and eliminates the efficiencies that were intended and are inherent in two-way
22 trunking arrangements.

1 **Q. Is BellSouth obligated to provide two-way trunking?**

2

3 A. Yes. As stated in Issue 28 (a), BellSouth is obligated to provide two-way trunking to
4 Sprint upon request consistent with FCC Rule 51.305 (f) and paragraph 219 of the
5 Local Competition Order. If BellSouth refuses to use the two-way trunks, they
6 will no longer be functioning as two-way trunks. Practically speaking,
7 BellSouth's refusal to use these two-way trunks will require Sprint to operate one-
8 way trunks, which is precisely what the FCC was trying to avoid in the sections
9 referenced above.

10

11 Paragraph 219 of the Local Competition Order does not refer to BellSouth as the
12 carrier that may lack sufficient traffic volumes to justify one-way trunks. The
13 relevant phrase from paragraph 219 references, "...where a carrier requesting
14 interconnection pursuant to section 251 (c) (2)" (i.e., the ALEC, Sprint) does
15 not have sufficient traffic volumes to warrant separate one-way trunks. To state it
16 another way, paragraph 219 permits the ALEC, not BellSouth, to use one-way
17 trunks if so warranted by the ALEC's traffic.

18

19 **Q. What action does Sprint request that the Commission take regarding this**
20 **issue?**

21

22 A. When Sprint request two-way trunking, Sprint requests that the Commission require
23 BellSouth to use two-way trunks for BellSouth-originated traffic.

1 . **SUMMARY**

2

3 **Q. Would you please summarize your testimony?**

4

5 A. My testimony provides support for the arbitration issues that affect Sprint's
6 interconnection with Bell South. In order to be successful, as a competitor in the
7 local market, Sprint requires flexibility to combine local and intraLATA and
8 interLATA traffic on the same trunk group without the restriction proposed by
9 BellSouth. BellSouth has proposed arbitrary restrictions on the type of traffic that
10 can be placed on specific trunk groups. Sprint has demonstrated that BellSouth is
11 currently routing jurisdictional combined traffic and it is technically feasible;
12 therefore, BellSouth should be required to allow Sprint the opportunity to design
13 its network using this method.

14

15 **Q. What action does Sprint request this Commission take?**

16

17

18 A. Sprint requests this Commission grant Sprint the flexibility to interconnect its
19 network with BellSouth's network in order to preserve the efficiencies Sprint
20 has built into its all distance network. Specifically, Sprint would like the
21 Commission to grant the following:

22

23

24

25

- 1) flexibility to route multi-jurisdictional traffic between Sprint's ALEC end office and BellSouth's tandem over any type of any interconnection trunk;
- 2) flexibility to route multi-jurisdictional traffic over new and existing access and interconnection trunk

1 groups; 3) the flexibility to route local 00- traffic over new and
2 existing trunk group; and 4) the requirement that BellSouth
3 provide two-way trunks to Sprint, upon request, and to use two-
4 way trunks for BellSouth originated traffic. The language
5 specifically addressing these issues can be found in Attachment 3
6 of the interconnection Agreement; see the proposed language
7 included on page 9.

8

9 **Q. Does this conclude your Direct Testimony?**

10

11 **A.** Yes, it does.

12