

1 **BELLSOUTH TELECOMMUNICATIONS, INC.**
2 **TESTIMONY OF WILEY G. (JERRY) LATHAM**
3 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
4 **DOCKET NO. 001797-TP**
5 **APRIL 23, 2001**
6

7 **Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.**

8
9 A. My name is Wiley G. (Jerry) Latham. My business address is 3535 Colonnade
10 Parkway, Birmingham, Alabama. I am BellSouth's Product Manager for
11 Unbundled Loops within Interconnection Services – Marketing and have been
12 employed by BellSouth for fifteen years.

13

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 A. The purpose of my testimony is to address Issues 5(a), 5(b), and 5(c). Issue 5(a)
16 raises the question of the time within which BellSouth should provision voice-grade,
17 ADSL, HDSL and UCL loops to Covad. Issue 5(b) raises the question of the time
18 within which BellSouth must provision IDSL-compatible loops to Covad. Issue
19 5(c) raises the question of the time within which BellSouth should “condition” and
20 unbundled loop for Covad. I will address each of these issues in turn.

21

22 **ISSUE 5(a): What is the appropriate interval for BellSouth to provision an**
23 **unbundled voice-grade loop, ADSL, HDSL or UCL for Covad?**

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1 **Q. PLEASE BRIEFLY DESCRIBE THE LOOPS FOR WHICH COVAD**
2 **SEEKS TO ESTABLISH PROVISIONING INTERVALS IN ISSUE 5(a).**

3

4 A. An unbundled voice-grade loop is a circuit that will support those services known
5 as Plain Old Telephone Service (POTS). They may be provisioned using any
6 technology that can support voice grade services. This includes loaded-copper,
7 non-loaded copper, Digital Loop Carrier (“DLC”), fiber, or any combination of
8 these. Within BellSouth, voice grade loops come in two versions – Service Level 1
9 (SL1) and Service Level 2 (SL2). An SL1 loop is a 2-wire voice grade loop that is
10 non-designed, is not provisioned with test points and does not include a Design
11 Layout Record (DLR) or any type of coordinated conversion activity. An SL2
12 loop can be a designed 2-wire or 4-wire circuit, is provisioned with a test point
13 and comes standard with a DLR and Order Coordination.

14

15 An ADSL loop will meet Revised Resistance Design (RRD) standards. RRD
16 standards require a non-loaded copper loop, up to 18,000 feet in length, with up to
17 6,000 ft of BT inclusive of loop length, and 1300 ohms or resistance. “Inclusive of
18 loop length” means that for every foot of BT, the loop length is reduced by an equal
19 amount. Therefore, a RRD loop that has 4,000 ft of BT could be no longer than
20 14,000 ft.

21

22 An HDSL loop is a circuit that meets stringent industry standards for Carrier
23 Serving Area (CSA) transmission specifications that better support DSL services.
24 Under these strict technical standards, the end user must be served by non-loaded
25 copper and the loop typically cannot be more than 12,000 feet long. If 26-gauge

1 copper is used, the limit is 9,000 feet or less. HDSL-Capable loops may have up to
2 2,500 ft of BT, and 850 ohms or less of resistance.

3

4 Unbundled Copper Loops can be ordered in three different ways.

5 1) The UCL-Short is a 2-wire or 4-wire loop that provides a non-loaded or
6 "clean" copper pair to an end user using the Resistance Design (RD) industry
7 standard. Under the RD standard, these loops may be up to 18,000 feet long
8 and may have up to 6,000 feet of bridged tap ("BT") exclusive of the loop
9 length. In other words, a UCL-Short loop can be 18,000 feet long and have
10 up to 6,000 feet of BT. These loops will have no more than 1300 ohms of
11 resistance.

12

13 2) The UCL-Long is a 2-wire or 4-wire copper loop that is longer than 18,000
14 feet and may have up to 2800 ohms of resistance. Normal telephony standards
15 dictate that all copper loops exceeding 18,000 feet in length must be loaded to
16 properly service dial-tone or POTS type customers. Therefore, in almost all
17 cases, a CLEC seeking to provide functioning DSL service will need, to place
18 an order for "loop conditioning" - BellSouth's Unbundled Loop Modifications
19 (ULM) product - to remove the load coils and/or BT from these loops in order
20 to transform them into "dry" or "clean" copper loops. The CLEC would pay
21 the ULM costs separate from the cost of the loop itself.

22

23 3) The Unbundled Copper Loop – Non Designed (UCL-ND). It will be a non-
24 loaded copper loop that will have 1300 ohms or less of resistance and will not
25 have a specific length limitation. The length will be driven by many factors and

1 will generally be less than 18,000 feet long. This loop will not go through the
2 “design” process. Therefore, it will not have a remote access test point and will
3 not come standard with a Design Layout Record (DLR).

4

5 **Q. WHAT INTERVALS DOES BELL SOUTH BELIEVE ARE**
6 **APPROPRIATE FOR THE PROVISIONING OF THESE LOOPS?**

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8 A. The interval for installing voice-grade, ADSL, HDSL and UCL unbundled loops
9 should be six business days. This includes one business day for the Firm Order
10 Confirmation (FOC), on accurate orders received before 10am, plus five business
11 days to complete the loop provisioning. Service Level 1 (SL1) voice grade loops
12 should have an interval of five business days (1 for the FOC plus 4 for the loop)
13 due to the fact that these loops are non-designed and are intended for POTS-type
14 services. When the LSR is received after 10am, the FOC interval would increase
15 by one day.

16

17 These intervals are needed to efficiently and accurately install the volume of loops
18 being demanded by our CLEC customers. In fact, the monthly volume for these
19 loop types has grown significantly over the past 12 months. In April of 2000,
20 BellSouth installed 5,969 of these loop types in Florida, and in March of 2001, the
21 monthly figure had almost doubled to 12,203. It is also important to remember that
22 provisioning unbundled loops is not the same as turning up retail circuits that may
23 already be connected to BellSouth’s switch. In these cases, relatively simple
24 software translations may be all that is needed to activate a circuit. By comparison,
25 an unbundled loop involves cross-connects elements that must be provided to

1 connect the loop facility to the CLEC's collocation space. Also, in most cases,
2 BellSouth and the CLEC will be working together to ensure the circuit is properly
3 tested and connected through to the CLEC's equipment so that the CLEC's service
4 can be provided to the end user at the predetermined cut-over time. Many of the
5 above activities must be done in sequence and involve multiple work groups within
6 BellSouth. This is why the intervals listed above are needed.

7

8 **Issue 5(b): What is the appropriate interval for BellSouth to provision an IDSL-**
9 **compatible loop for Covad?**

10

11 **Q. PLEASE BRIEFLY DESCRIBE AN IDSL-COMPATIBLE LOOP.**

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13 A. An IDSL-compatible loop is also known as an Unbundled Digital Channel (UDC)
14 Loop. As recognized by the FCC, not all ISDN loops are completely compatible
15 with IDSL service. Because of this, BellSouth developed the UDC loop, which
16 was introduced on May 31, 2000. This loop is identical to the ISDN loop, but is
17 provisioned in a manner that supports "data-only" ISDN, which will better meet the
18 needs of CLECs who want to deploy IDSL.

19

20 **Q. WHAT INTERVAL DOES BELLSOUTH BELIEVE IS THE**
21 **APPROPRIATE INTERVAL FOR THE PROVISIONING OF IDSL-**
22 **COMPATIBLE LOOPS?**

23

24 A. The interval needed to provision the IDSL-compatible loop (also known as the
25 Universal Digital Channel (UDC)) should be longer than the loops listed in 5(a)

1 above. This is due to the fact that these circuits are more complex in how they can
2 be provisioned. When these circuits are provided through a Digital Loop Carrier
3 (DLC) system, they require a specialized line card in order to function properly. In
4 addition, they also must be provided on certain slots within the DLC in order to be
5 compatible with IDSL service. the appropriate provisioning interval for these loops
6 is 10 business days plus the FOC interval described in my discussion of Issue 5(a).

7

8 **Issue 5(c): What should be the appropriate interval for BellSouth to “de-**
9 **condition” (i.e., remove load coils or bridged tap) loops requested by Covad?**

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11 **Q. PLEASE BRIEFLY DESCRIBE LOOP CONDITIONING.**

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13 A. Loop conditioning is the removal of equipment or devices that diminish a loop’s
14 ability to provide advanced data services such as DSL.

15

16 **Q. WHAT DOES BELL SOUTH BELIEVE IS THE APPROPRIATE**
17 **INTERVAL FOR PERFORMING THE WORK NECESSARY TO**
18 **CONDITION A LOOP?**

19

20 A. The appropriate interval to condition a loop (by removing equipment such as load
21 coils, repeaters, filters, etc., or to remove bridged tap) should be as follows for the
22 removal of 1 – 3 intervening devices:

23

Aerial Plant = 10 days

24

Buried Plant = 15 days

25

Underground Plant = 30 days

1 These intervals take into consideration the difficulties involved with the placement
2 of different types of facilities; the expected volumes of conditioning orders; and the
3 scheduling and dispatching of technicians.

4

5 Loop facilities placed in aerial sections are most accessible and typically present
6 fewer problems to the technicians. Buried loop plant is more difficult to access
7 due to the fact that equipment may be needed to dig up the facilities prior to
8 conditioning. Underground loop plant is generally most difficult to access and can
9 present many problems to the technicians who are attempting to condition these
10 facilities. These problems may include: gaining municipal authority to close a street;
11 pumping water and/or hazardous gas from a manhole; un-racking and re-racking
12 large splice cases; and dealing with older pulp-type cables, to name a few.

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14 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

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16 **A. Yes.**

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