BELLSOUTH TELECOMMUNICATIONS, INC.

TESTIMONY OF THOMAS G. WILLIAMS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 001797-TP

APRIL 23, 2001

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

A. My name is Thomas G. Williams. I am employed by BellSouth as Product Manager for Line Sharing for the nine-state BellSouth region. My business address is 3535 Colonnade Parkway, Suite E511, Birmingham, Alabama, 35242.

Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND?

A. My career at BellSouth spans over 14 years and includes positions in various product management positions. I also have seventeen years service with AT&T and Southern Bell, during which I held various positions in sales, marketing, and operations. I have a bachelor's degree in Marketing.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I previously testified before the Georgia Public Service Commission and the Public Service Commission of South Carolina, and filed testimony with the Alabama, and Florida Public Service Commissions and the Public Utility Commission of North Carolina.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is to present BellSouth's position on some of the unresolved line sharing issues in the negotiations between BellSouth and Covad. Specifically, my testimony addresses Issues 16, 18, 21, 22, and 23.

Issue 16: Where should the splitter be located in the central office?

Q. WHAT IS YOUR UNDERSTANDING OF COVAD'S POSITION ON THIS ISSUE?

A. Covad believes it is best place the line sharing splitter on BellSouth's frame or with 25 feet of the main distributing frame ("MDF").

Q. WHAT IS BELLSOUTH'S POSITION CONCERNING THE BEST LOCATION FOR A LINE SHARING SPLITTER?

A. The most efficient architecture to deploy line sharing when BellSouth owns the splitter is to place the splitter in a rack either in the common area close to the collocation area or in a rack in the BellSouth lineup. While BellSouth recognizes that locating splitters on a central office frame is technically feasible, BellSouth

feels that splitters are better located in a relay rack in the alternative local exchange carrier ("ALEC") common area or in the BellSouth line up of equipment.. A frame located splitter arrangement requires six frame-mountable splitter blocks, each of which is capable of serving sixteen end user line sharing lines. This is inefficient due to the frame space that approach requires. This architecture requires 6 blocks to serve 96 end user lines. BellSouth's preferred rack-mounted architecture requires four frame mounted blocks, or 89 type blocks, which can serve 96 end user lines. The rack-mounted architecture is one third more efficient than mounting the splitter on the frame. The frame-mounted architecture proposed by Covad would cause BellSouth to prematurely exhaust its frame and is, therefore, much less efficient than the rack-mounted approach.

Also, to use the frame-mountable splitter would ignore the experience gained in the Line Sharing trial pilot. BellSouth found during the Line Sharing pilot in Atlanta, Georgia that main distributing frame-mounted splitters could not accommodate the manual test access jacks (the so-called "bantam jacks") that BellSouth provides to each ALEC. These bantam jacks provide the ALEC with direct access to the outside plant cable pair for testing. In BellSouth's proposed architecture, the bantam jacks are located adjacent to the rack-mounted splitter shelves in the ALECs' common area. The consensus of ALECs who attended the Collaborative was that frame-mounted splitters and bantam jacks allowed more room for testing and eliminated the possibility of accidentally losing other cross-connections on the frame.

Covad should not be allowed to dictate to BellSouth where central office equipment should be placed. There are differences in central offices. BellSouth

should be allowed to make an engineering decision on a central office by central office basis where to place their equipment. Additionally, Covad has the option of owning the splitter and can place it in their collocation space.

Q. COVAD HAS EXPRESSED A CONCERN THAT BELLSOUTH'S PROPOSED PLACEMENT OF THE SPLITTER WILL INCREASE CABLING COSTS. PLEASE DISCUSS.

A. There is little cost difference incurred by varying the length of the hard-wired cabling between the splitters and the distributing frame. When compared to the material and installation costs of the splitter shelf, incremental changes in cable length are not significant. Moreover, the primary focus of BellSouth's splitter placement was to avoid unnecessarily using additional frame blocks while accommodating the need identified by the Collaborative for ALECs' test access to the cable pair.

What has to be considered when discussing tie cable lengths are the locations of the ALEC's collocation termination pairs. Because ALEC collocation pairs terminate on a conventional distribution frame, BellSouth chose to also terminate the splitter cross-connect appearances there. This minimizes the length of the cross-connect between the ALEC data signal and the splitter.

Issue 18: What should the provisioning interval be for the line sharing unbundled network element?

Q. WHAT IS YOUR UNDERSTANDING OF WHAT COVAD REGARDS AS REASONABLE INTERVAL?

A. Covad is proposing a phase-in approach to reduce intervals to 24 hours.

Q. WHAT MUST BELLSOUTH DO TO PROVISION A LINE SHARING LOOP?

A. When a BellSouth technician receives a line sharing installation work order, collocation cross-connections are used to connect the loop carrying the shared voice and data traffic to the splitter termination on the frame. A second cross-connection carries the voice traffic from the splitter termination to the BellSouth voice switch. The data traffic is then carried to the CLEC collocation space by a cross connection.

When the wiring is completed the technician tests to insure voice service is wired correctly. BellSouth also tests the cross-connections necessary to provide end user data service. In order to verify that the data cross-connections are correct, BellSouth recently completed work with a supplier who developed a Line-sharing Verification Transmitter test set. BellSouth technicians use this Test Set to ensure that the data portion of the circuit is wired correctly for the end user service. When the technician is satisfied that both portions of the circuit are correct, the work order is closed in COSMOS.

Q. WHAT IS THE APPROPRIATE INTERVAL FOR LINE SHARING END USER SERVICE?

A. The appropriate comparison for line sharing provisioning intervals is to BellSouth's ADSL service provided to its customers. This is the retail analog established in FPSC Docket No. 991834-TP as interim performance measures for 3-party testing. BellSouth's planned interval for ADSL service is four days. BellSouth's plan for line sharing is to return to the ALEC a firm order confirmation no later than the next day for an electronic order, and two days for manual orders. The planned provisioning interval is three days after the firm order confirmation.

It may be possible to provision line sharing loops is some cases in less than three days if all information flows correctly through all of BellSouth's provisioning systems. However, if orders fall out for manual handling, three days will be required. Therefore, to be sure all parties, including the end user, have appropriate expectations; three days after the return of the firm order confirmation is the appropriate interval. This interval places line sharing at parity with BellSouth's own ADSL offering.

Issue 21: Should BellSouth provide accurate service order competition notifications for line sharing orders?

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

A. BellSouth agrees that it must provide accurate information to the ALECs when line sharing orders have been completed. BellSouth's CLEC Service Order Tracking System (CSOTS) provides DLECs the status of its line sharing billing order. BellSouth is developing an enhancement to allow DLECs to view the status of its line sharing provisioning order. Completion of this enhancement is

anticipated prior to April 30, 2001. BellSouth currently provides ALECs with a "line sharing COSMOS report" that provides the status of the BellSouth line sharing work order. The ALEC simply has to check that report and it will be advised as to the current status of its order.

Issue 22: Should BellSouth test for data continuity as well as data continuity both when provisioning and repairing line shared loops?

Q. WHAT IS BELLSOUTH'S POSITION CONCERNING TESTING DATA CONTINUITY

A. BellSouth is willing to test continuity of the data circuit wiring. BellSouth has made it clear that it is also testing the wiring of the high frequency spectrum. In January 2001, BellSouth announced to the line sharing collaborative that it would begin using the new Line Sharing Verification Transmitter (LSVT), described above, to test the wiring of the loops for line sharing. The device is now being deployed and use of this device has been included in procedures for installation and maintenance of line sharing loops.

Issue 23: Should Covad have access to all points on the line shared loop?

Q. WHAT IS YOUR UNDERSTANDING OF COVAD'S POSITION ON ISSUE 23?

A. Covad believes it should be allowed to test the loop at any point of interconnection within BellSouth's central office, even in places that Covad

currently does not have access.

Q. DOES BELLSOUTH HAVE CONCERNS ABOUT COVAD'S PROPOSAL?

A. Yes. BellSouth is responsible for the quality of wiring at their frame. There is a process for CLECs to report troubles on UNE services and for BellSouth to respond to and repair the troubles. There is no question of the party responsible for the wiring of service on the BellSouth frame. BellSouth feels that to allow individuals not employed by BellSouth to perform work at its frame is a potential risk to service and potentially costly for BellSouth to remedy errors caused by CLEC technicians.

To insure quality service is delivered to its customers, BellSouth tracks all wiring changes performed on their central office frames. This tracking includes all wiring and diagnostic work performed, the date and time of the activity, and the technician performing the work. This information is used to locate wiring problems and to identify training needs. BellSouth technicians are held accountable for the quality of their work through this system.
BellSouth has no control over the training of CLEC technicians nor their experience levels. When work is performed at the frame, mishaps or accidents can occur that could be service effecting. Unauthorized wiring changes could be made without supporting systems to track the changes. If CLEC technicians perform work at the frame, BellSouth tracking information is incomplete or inaccurate. It may be impossible to re-create changes performed by a technician unfamiliar with BellSouth's equipment and procedures. BellSouth believes

allowing CLEC technicians to perform work at BellSouth's frame is extremely risky to service and potentially costly for rate payers.

Q. WHAT IS BELLSOUTH'S POSITION ON ISSUE 23?

A. BellSouth agrees that Covad should be allowed to test the loop it uses for line sharing. But, we see no need for Covad to have access to all points of interconnection with the central office. BellSouth believes that the use of the bantam-type test jack is a better solution to provide ALECs direct access to the loop for testing for line sharing. Current interconnection agreements preclude ALECs from direct testing from the frame but the bantam jack solution offers the same electrical equivalent. The bantam jack allows the ALEC to test the loop from the splitter to the NID. For each line sharing end user, BellSouth offers the ALECs a bantam-type test access jack located in the same rack as the splitter shelf. This bantam jack is made to accept a test cord. When the cord is inserted, the voice and data signals and associated central office wiring are isolated from the outside plant copper loop. This leaves the loop ready for unobstructed wideband testing by the ALEC technician, with no central office battery or DC blocking capacitors to interfere with the test results.

BellSouth also provide ALECs access to DLEC TAFI, an OSS that allows the ALEC to report troubles, check the status of trouble reports, and also, perform Mechanized Loops Tests (MLT).

If these testing methods are not adequate for the ALECs, they could choose to own the splitter. This would allow the ALEC to view the circuit from the loop side of the splitter.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.