

MCWHIRTER REEVES
ATTORNEYS AT LAW

ORIGINAL

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

May 23, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
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RECORDS AND
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Re: Docket No.: 001797-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Rebuttal Testimony of William Seeger on Behalf of Covad Communications Company; *06502-01*
- ▶ Rebuttal Testimony and Exhibit of Jason D. Oxman on Behalf of Covad Communications Company; *06503-01*
- ▶ Rebuttal Testimony and Exhibits of Thomas E. Allen on Behalf of Covad Communications Company; *06504-01*
- ▶ Public version of the Rebuttal Testimony of Joseph P. Riolo on Behalf of Covad Communications Company, and *06508-01*
- ▶ Public version of the Joint Rebuttal Testimony and Exhibits of Elizabeth R. Y. Kientzle and Joseph P. Riolo on Behalf of Covad Communications Company. *06509-01*

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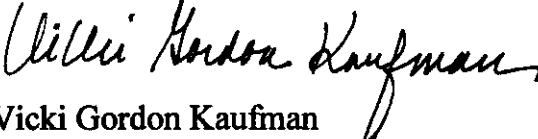
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Blanca S. Bayo, Director
May 23, 2001
Page 2

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Sincerely,


Vicki Gordon Kaufman

VGK/bae
Enclosures
cc: Catherine F. Boone

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by DIECA Communications,
Inc., d/b/a Covad Communications Company
for Arbitration of Unresolved Issues in
Interconnection Agreement with BellSouth
Telecommunications, Inc.

Docket No. 001797-TP

Filed: May 23, 2001

REBUTTAL TESTIMONY OF WILLIAM SEEGER

ON BEHALF OF COVAD COMMUNICATIONS COMPANY

DOCUMENT NUMBER-DATE

06502 MAY 23 2001

FPSC-RECORDS/REPORTING

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**REBUTTAL TESTIMONY OF WILLIAM SEEGER
ON BEHALF OF COVAD COMMUNICATIONS COMPANY**

1 **Q. What is your name and by whom are you employed?**

2 A. My name is William Seeger and I am employed as a Program Manager in the
3 Network Deployment group at Covad Communications Company ("Covad"). My
4 business address is 2650 Military Trail, Suite 200, Boca Raton, Florida 33431.

5 **Q. Please describe your responsibilities as a Program Manager in the Network
6 Deployment Group at Covad.**

7 A. I am responsible for Central Office space acceptance, ordering, and applications
8 from ILECs (BellSouth, GTE/Verizon, and Sprint) in the Southern region: Georgia,
9 Florida, North Carolina, South Carolina, Tennessee, Kentucky and Louisiana.

10 **Q. What is the purpose of your rebuttal testimony?**

11 A. The purpose of this testimony is to respond to issues raised by BellSouth witnesses
12 Jerry Kephart, Jerry Latham, and Tommy Williams in their direct testimony.

13 **Issue 5(a): WHAT IS THE APPROPRIATE INTERVAL FOR BELL SOUTH TO**
14 **PROVISION AN UNBUNDLED VOICE-GRADE LOOP, ADSL, HDSL, OR UCL**
15 **FOR COVAD?**

16 **Q. Do you agree with Mr. Latham that extra time is required for physical cross-
17 connections rather than software translations?**

18 A. No. I worked in the central office environment for many years. The physical cross-
19 connection takes a few minutes, 10 minutes at the very most. A cross-connection
20 consists of running a wire from the Covad OVC/DS0 block on the mainframe to the
21 associated pair and cable. The longest connection in BellSouth territory is
22 approximately 100 feet. On the average, the longest connection is approximately

1 30 feet. The physical act of wiring is not a time consuming process. A BellSouth
2 technician would then have to update COSMOS. That would take another few
3 minutes, at the most. A BellSouth central office technician making a cross-
4 connection to Covad's equipment should not add days to the loop delivery interval.

5 **ISSUE 5(b): WHAT IS THE APPROPRIATE INTERVAL FOR BELLSOUTH TO**
6 **PROVISION AN IDSL-COMPATIBLE LOOP FOR COVAD?**

7 **Q. Do you agree that provisioning an IDSL-compatible loop should take 10**
8 **business days?**

9 A. No. BellSouth wants an extra four days because these loops require a specialized
10 line card and must be provided on certain slots in the DLC. I have personally
11 installed cards in Covad DSLAMs in Florida. This process requires no more than
12 10 minutes in the central office and one hour maximum in the remote terminal.
13 When I worked as a NYNEX technician, I installed SLC 96 (a type of digital loop
14 carrier system) cards in both central offices and remote terminals and this is not a
15 time consuming process. It entails simply putting a line card in a specific slot on
16 the DLC unit. The necessary work does not justify adding four business days to the
17 interval.

18 **Issue 5(c): WHAT SHOULD BE THE APPROPRIATE INTERVAL FOR**
19 **BELLSOUTH TO "DECONDITION" (I.E., REMOVE LOAD COILS OR**
20 **BRIDGED TAP) LOOPS REQUESTED BY COVAD?**

21 **Q. Do you agree with Mr. Latham's assessment regarding the number of days it**
22 **takes to decondition a loop?**

1 A. No. The first thing a BellSouth technician should do when it is determined that the
2 requested loop needs conditioning is to look for a clean loop. While working for
3 NYNEX, when I installed ISDN lines (which also required clean loops), and no
4 clean facilities were available, I would make an attempt to find clean facilities by
5 going into the closest terminal, identifying other working numbers in those
6 terminals, checking to see if any were clean, and then attempting to do a line station
7 transfer, thus freeing up a clean pair.

8 If conditioning is required, that work is routine and can easily be
9 accomplished in five days. Mr. Latham states that BellSouth needs 10 days to
10 decondition aerial facilities. I disagree. When I was a repair technician at NYNEX,
11 I removed multiple cross-connections and multiple drop wires (i.e., bridged tap).
12 The process took approximately 2 hours from start to finish. The physical act of
13 deconditioning is performed during the technician's daily workload. If you add a
14 day for plant engineering to determine how many load coils are involved and where
15 they are (although the task would never take even close to 8 hours), and another day
16 to schedule it into the technician's work load, it would still take only 3 days to
17 condition a loop. Therefore, Covad's proposed 5-day interval is more than
18 adequate time. I do not see why BellSouth needs 10 days and BellSouth does not
19 explain the rationale of the time they propose. As for buried plant and underground
20 plant, BellSouth suggests 15 and 30 days, respectively. Again, I disagree. The
21 actual point of where the bridged tap or load coil would be "buried" would not be
22 placed where they need fifteen days to access it. In Florida, when loops are buried,

1 they typically are only 3 inches underground. As for underground plant, the 30
2 days proposed by BellSouth is totally unreasonable. I cannot imagine the work
3 would ever take more than part of a single day. Even with engineering and
4 scheduling, 30 days to accomplish this is excessive.

5 **Issue 7(a): WHEN BELLSOUTH PROVISIONS A NON DESIGNED xDSL LOOP,**
6 **UNDER WHAT TERMS, CONDITIONS AND COSTS, IF ANY, SHOULD**
7 **BELLSOUTH BE OBLIGATED TO PARTICIPATE IN JOINT ACCEPTANCE**
8 **TESTING TO ENSURE THE LOOP IS PROPERLY PROVISIONED?**

9 **Q. Do you agree with Mr. Kephart that BellSouth should charge Covad for time**
10 **and materials to do Joint Acceptance Testing?**

11 A. No. When I managed field service technicians for Covad in Florida, many times
12 my technicians were forced to call BellSouth to open a trouble ticket because the
13 loop was not tagged, was defective, had excessive metallic noise (meaning there
14 was a short or ground on line) and lack of connectivity. Nonetheless, BellSouth
15 dropped those loops as "good." Therefore, Joint Acceptance Testing of all loops
16 is crucial. Joint Acceptance Testing ensures that loops that are not functioning
17 properly get fixed during the provisioning process, rather than requiring resolution
18 of the problem problems in the repair and maintenance process, which could add
19 many more days to provision a working loop to the customer. In theory, BellSouth
20 tests their own loops with a CAT access terminal which gives them a read out on
21 the line. Therefore, if BellSouth does it for their own customers, they should also
22 do the same for Covad. Joint Acceptance Testing should not cost additional time

1 and materials as it's a simple task which consists of the BellSouth technician
2 calling Covad and Covad running the loop test while the BellSouth technician is
3 still at the network interface device ("NID").

4 The bottom line is that my experience with BellSouth has shown that we
5 need a joint process to deliver loops on the BellSouth side and to accept them on
6 the Covad side to ensure they are working when delivered.

7 **Issue 23: SHOULD COVAD HAVE ACCESS TO ALL POINTS ON THE LINE**
8 **SHARED LOOP?**

9 **Q. Do you agree with Mr. Williams' statement that to allow individuals not**
10 **employed by BellSouth to perform work at its frame is a potential risk?**

11 A. No. Covad does not want to do wiring on the MDF, we only want to be able to test.
12 Therefore, Mr. Williams' statement regarding Covad technicians causing a potential
13 risk is not relevant. Covad technicians are held accountable by Covad just as
14 BellSouth technicians are held accountable to BellSouth. Covad technicians are
15 instructed not to tamper with any BellSouth owned or maintained equipment and
16 they would not alter or remove any BellSouth connections without BellSouth's
17 approval. Furthermore, my technicians have as much interest in maintaining
18 BellSouth's network as BellSouth does. After all, Covad's service depends on a
19 functional BellSouth network. If the BellSouth network is disrupted, Covad's
20 service will not work either. Thus, we share BellSouth's need to maintain network
21 security.

22 **Issue 30: SHOULD BELL SOUTH RESOLVE ALL LOOP "FACILITIES" ISSUES**

1 **WITHIN THIRTY DAYS OF RECEIVING A COMPLETE AND CORRECT LSR?**

2 **Q. Do you agree with Mr. Kephart's statement that it is not reasonable to place**
3 **an arbitrary, artificial time limit on when facilities issues can be resolved?**

4 A. Covad is not requesting an arbitrary time limit to resolve facilities issues. We
5 believe that 30 days is more than reasonable.

6 We need to set a specific interval so BellSouth will resolve the problem. If
7 there is not a fixed date, the problem will drop off into the "black hole known as
8 pending facilities," as I stated in my direct testimony. BellSouth states that facility
9 problems are handled for ALECs using the same procedure BellSouth uses. The
10 problem with that is that we do not know how long BellSouth takes to resolve their
11 own facility issues.

12 Covad has placed hundreds of orders with BellSouth that were held
13 "pending facilities." Because there is no deadline to fill these orders, many linger
14 for days or even months before either Covad or the customer cancels them. All we
15 are trying to do is to get BellSouth to focus on resolving these issues in a timely
16 way. Without a clean cut interval, BellSouth will never resolve the problems in a
17 way that enables Covad to deliver customer satisfaction.

18 The first thing a BellSouth technician should do when encountering a
19 facilities issue is to check the local terminal for spare facilities. For an underground
20 facility, the technician should check 10 pairs in each direction from the facility in
21 question. As a NYNEX technician, I usually worked in the same area and over
22 time became quite familiar with facilities in the cross box and the BellSouth

1 technicians should be the same. Therefore, it is not unreasonable to test multiple
2 pairs to see if anything looks good. The second step, if there are no pairs available,
3 would be to attempt to perform a line station transfer. Even if the BellSouth
4 technician were to go that route, it certainly would not take 30 days. In other cases,
5 there may be no clean facilities in the terminal or no facilities at all. In any of these
6 situations, BellSouth should be able to resolve the problem in 30 days. Covad has
7 discussed with BellSouth setting specific intervals based on the specific type of
8 facility problem, but the parties have not yet reached agreement on this issue.

9 **Q. Does this conclude your rebuttal testimony?**

10 A. Yes.

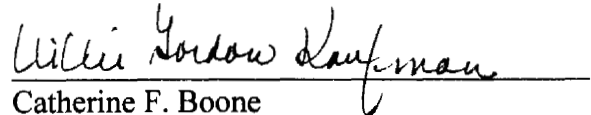
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Rebuttal Testimony of William Seeger on Behalf of Covad Communications Company has been furnished by (*) hand delivery this 23rd day of May, 2001, to the following:

(*)Felicia Banks
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(*)Michael Twomey
c/o Nancy Sims
150 S. Monroe Street
Suite 400
Tallahassee, Florida 32301


Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, Georgia 30328
(678) 579-8388 Telephone
(678) 320-9433 Facsimile

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
(850) 222-2525 Telephone
(850) 222-5605 Facsimile

Attorneys for Covad Communications
Company