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June 1, 2001

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Florida Public Service Commission
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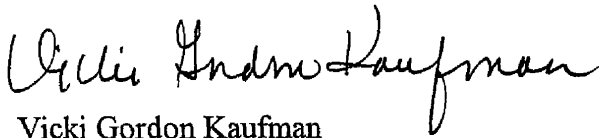
Re: Docket No. 001797-TP

Dear Ms. Bayo:

On May 23, 2001, DIECA Communications, Inc., d/b/a Covad Communications Company filed the Joint Rebuttal Testimony of Elizabeth R.Y. Keintzle and Joseph P. Riolo. It has come to our attention that pages 42 and 44 were inadvertently omitted from that testimony. I enclose the original and 15 copies of the omitted pages and would ask that you insert them into the testimony.

I apologize for any inconvenience this may have caused. Thank you for your assistance.

Sincerely,


Vicki Gordon Kaufman

cc: Catherine F. Boone (w/encls.)
Felicia Banks (by hand delivery w/ encls.)
Michael Twomey (by hand delivery c/o Nancy Sims w/ encls.)

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER-DATE

06910 JUN-15

TTD: RECORDS/REPORTING

1 **Q. Mr. Williams also notes on page 3 of his direct testimony that “frame-**
2 **mounted splitters could not accommodate the manual test jacks.” Does**
3 **this render frame-mounted splitters infeasible?**

4 A. No. As we noted in our direct testimony, the manual test jacks to which he
5 refers, the so-called “bantam jacks,” were not requested by Covad or other
6 competitors and are not necessary for line sharing. As we discussed in
7 Section II.A.1, BellSouth’s chosen approach to providing test access is
8 unnecessarily costly and inefficient. Use of bantam jacks increases costs in
9 numerous ways, by increasing material and installation costs (because they are
10 wired on site), using more space in the central office and introducing an
11 additional potential source of trouble on the line. We do not believe that
12 BellSouth will incur comparable costs for its own line-sharing offering.

13 **Issue 18: What Should the Provisioning Interval Be for the Line Sharing**
14 **Unbundled Network Element?**

15 **Q. What interval has BellSouth proposed for provisioning a line-sharing**
16 **line?**

17 A. BellSouth has proposed an interval for line-sharing provisioning of three days
18 after the return of the firm order confirmation, with the firm order
19 confirmation being returned no later than the next day for electronic orders
20 and two days for manual orders. [Williams Direct at 6.]

1 **Issue 23: Should Covad Have Access to All Points on the Line-Shared Loop?**

2 **Q. Are BellSouth's fears that allowing Covad access to its frame for testing**
3 **purposes would be a potential risk to service [Williams Direct at 8]**
4 **founded?**

5 A. No. BellSouth must realize that it is not only sharing a line with Covad, but
6 also sharing a customer. Covad has an interest in retaining and maintaining
7 the quality of its data service that is equal to BellSouth's interest in
8 maintaining the quality of its voice services. Covad also has a strong interest
9 in maintaining the quality of the voice service. A customer whose voice
10 service becomes degraded or otherwise impaired will soon be looking for
11 another data provider.

12 **Q. Should BellSouth be required to provide competitors access to the shared**
13 **physical loop for testing purposes?**

14 A. Yes. As we discussed in direct testimony, Covad must have direct physical
15 access to the loop at each point of connection so that Covad can properly and
16 expeditiously isolate problems on the loop. Covad seeks to have access to the
17 loop in the central office only where that loop carries both voice and data
18 services. Covad seeks the same access BellSouth has to isolate and resolve
19 troubles on its customer's loop. Without such test access, Covad's ability to
20 maintain customer satisfaction lies completely within BellSouth's hands.

21 If the Commission nonetheless allows BellSouth to deny Covad such
22 access, then the Commission should require BellSouth to respond to trouble