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December 19, 2002

BY HAND DELIVERY
Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc. are an original and fifteen copies of the Direct Testimony of Steven E. Turner in the above referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

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GCL B Keating
OPC
MMS
SEC 1
OTH

Sincerely yours,

Tracy W. Hatch

TWH/amb
Enclosure
cc: Virginia Tate, Esq.
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

JEFFREY A. KING

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC
AND TCG SOUTH FLORIDA, INC.

DOCKET NO. 981834-TP

DOCKET NO. 990321-TP

DECEMBER 19, 2002

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF JEFFREY A. KING

ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC
AND TCG SOUTH FLORIDA, INC.

DOCKET NO. 981834-TP/DOCKET NO. 990321-TP

DECEMBER 19, 2002

Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

A. My name is Jeffrey A. King. I am a District Manager in the Local Services & Access Management organization of AT&T Corp. ("AT&T"). My business address is 1200 Peachtree Street, N.E., Atlanta, Georgia 30309.

Q. FOR WHICH COMPANY ARE YOU FILING TESTIMONY IN THIS PROCEEDING?

A. I am testifying on behalf of AT&T Communications of the Southern States, LLC, and TCG South Florida, Inc. (collectively referred to as "AT&T").

Q. HAVE YOU TESTIFIED IN OTHER REGULATORY PROCEEDINGS?

A. Yes. I previously filed testimony on behalf of AT&T regarding various cost and pricing issues with public service or utility commissions in Georgia, Florida, Tennessee, North Carolina, Louisiana, Alabama, Puerto Rico and before the Federal Communications Commission ("FCC").

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR EDUCATION AND EXPERIENCE.

A. I received a Bachelor of Arts degree in Business Administration with a concentration in Industrial Administration from the University of Kentucky in

1983. I joined AT&T's Access Information Management organization in April 1986 and worked developing and testing the ordering and inventory Access Capacity Management System for electronically interfacing "High Capacity" access orders with incumbent local exchange carriers ("ILECs"). In December 1992, I joined the Access Management organization and managed customer/supplier relations on interstate access price issues, including access charge impacts and tariff terms and conditions analysis, with BellSouth Telecommunications, Inc. ("BellSouth") and Sprint LTD. In addition, my responsibilities included ILEC cost study analysis. I began supporting AT&T's efforts to enter the local services market with the implementation of the Telecommunications Act of 1996. Since July 1998, my responsibilities have included analyzing ILEC costs and recommending all cost-based prices charged by ILECs. My responsibilities also include managing the rates, terms and conditions of local interconnection agreement charges and access tariff charges that AT&T pays to ILECs in the nine-state BellSouth region.

Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

A. The purpose of my testimony is to the address the technical issues (Issues 1A-8) associated with the provisioning of collocation space, as listed in the Order Establishing Procedure in this proceeding. These issues include billing and payment of non-recurring and recurring charges, cancellation charges, justification of space reservation needs, reclaimed unused space, contractual obligations for ALECs, transfer of space from one ALEC to another, ILEC

requirement to provide copper entrance facilities, standardization of power, and space exhaustion.

Q. ISSUE 1A. WHEN SHOULD AN ALEC BE REQUIRED TO REMIT PAYMENT FOR NON-RECURRING CHARGES FOR COLLOCATION SPACE?

A. There are generally 3 categories of non-recurring charges associated with collocation space: (1) Application Fee, (2) Space Preparation – Firm Order Processing and (3) Other.

(1) The applicable non-recurring Application Fee should be billed within a 30-day billing cycle of the date which the ILEC notifies the ALEC of space availability. Space availability notification occurs within 20 days of the date which the ALEC submits the collocation application.

(2) The non-recurring charge for processing the firm order for collocation space preparation is billed within a 30-day billing cycle of the date which the ILEC confirms the ALEC's Firm Order for collocation.

(3) The non-recurring charges for Other (e.g., Cable Installation, Cross-Connects, etc) are billed within a 30-day billing cycle of the date that the ALEC has accepted the requested collocation UNE (i.e., the date the ALEC has tested and interconnected its facilities to the ILEC).

Q. ISSUE 1B. WHEN SHOULD BILLING OF MONTHLY RECURRING CHARGES BEGIN?

A. Once the ALEC accepts the collocation space (i.e., cage acceptance) from the ILEC, the ILEC should bill the ALEC within a thirty (30) day billing cycle for the

floor space. Because the ALEC is generally not permitted to begin its installation process of installing equipment, power cables, and cross-connection of facilities, until the space has been accepted by the ILEC, the remaining monthly recurring charges should be deferred until the completed phase of collocation deployment by both companies. After the ALEC installs its equipment, tests and interconnects its equipment to the ILEC interoffice facilities and is provided power, the remaining applicable monthly recurring charges should be billed within a thirty (30)- day billing cycle.

Q. ISSUE 1C. WHAT CANCELLATION CHARGES SHOULD APPLY IF AN ALEC CANCELS ITS REQUEST FOR COLLOCATION SPACE?

A. There should not be a cancellation charge (i.e., a separate fee for cancellation) imposed on the ALEC when collocation space is cancelled. If a collocation request is cancelled before the preparation of the space is complete, the ALEC should be entitled to a return of the portion of the amounts already paid attributable to the work that will not be done as a result of the cancellation. Further, if the ALEC cancels its request for collocation space within 20 days after the application has been submitted to the ILEC, the application fees should be fully refundable to the ALEC. Moreover, the ILEC receives the benefit of the investment the ALEC has already made in the preparation of the space. For example, if an ALEC has a completed collocation space and then cancels, the ILEC will inherit a ready made collocation space that it can use to supply the next ALEC that orders space. In addition, to the extent that the collocation is not

complete, the ILEC still will recoup its costs for the work performed as well as the benefit of the preparation of the space already accomplished.

Q. ISSUE 2A. SHOULD AN ALEC BE REQUIRED TO JUSTIFY ITS SPACE RESERVATION NEEDS TO THE ILEC WHEN AN ILEC IS FORCED TO CONSIDER A BUILDING ADDITION TO ACCOMMODATE FUTURE SPACE REQUIREMENTS?

A. If an ILEC desires to reclaim unused space from an ALEC, the ILEC should be required to notify the ALEC in possession of the space in writing, sufficient to enable the ALEC to make a reasonable judgment as to the necessity for the reclamation. The ALEC should be allowed the opportunity to verify the ILEC's need through a site survey or other reasonable means. The ILEC must justify that any building addition is a necessity of meeting demand and not of convenience. Should the ALEC be affected by a building addition, the ILEC and CLECs should work cooperatively to limit the expense and burden, including the option that the ILEC pay its fair share of the expense to move ALECs from their space. After the ILEC has demonstrated an immediate need for space reclamation, an ALEC should then be required to show that it has need of the space within a reasonable amount of time.

Q. ISSUE 2B. UNDER WHAT CONDITIONS SHOULD AN ILEC BE ALLOWED TO RECLAIM UNUSED COLLOCATION SPACE?

A. The condition that would allow an ILEC to reclaim unused collocation space is when the ILEC has determined that their central office floor space is completely exhausted, has demonstrated an immediate need for the deployment of equipment

necessary to provide service for its local customers, and the ALEC has no demonstrated need for the space.

Q. ISSUE 2C. WHAT OBLIGATIONS, IF ANY, SHOULD BE PLACED ON THE ALEC THAT CONTRACTED FOR THE SPACE?

A. 1) If the ALEC has future plans for their collocation space and provides written notification as such to the ILEC, then the ILEC has no authority to reclaim their collocation space.

2) If the ALEC has no future plans for the designated collocation space and provides written documentation to the ILEC as such, then the ILEC should be allowed to reclaim the unused collocation space.

Q. ISSUE 2D. WHAT OBLIGATIONS, IF ANY, SHOULD BE PLACED ON THE ILEC?

A. The ILEC must send formal written notification to the ALEC requesting reclamation of space. If the ALEC has no future plans for the collocation space, the ILEC can reclaim the space. Once the collocation space has been reclaimed, the ILEC must stop all monthly recurring billing charges to the ALEC and send formal notification to the ALEC of the stopped bill date.

Q. ISSUE 3. SHOULD AN ALEC HAVE THE OPTION TO TRANSFER ACCEPTED COLLOCATION SPACE TO ANOTHER ALEC? IF SO, WHAT ARE THE RESPONSIBILITIES OF THE ILEC AND ALEC?

A. Yes. If an ALEC has accepted collocation space from an ILEC and at that time, its requirements for collocation have changed, the ALEC should be allowed to transfer over this space to another ALEC that has expressed an interest. The

contracted ALEC should submit an application for a collocation records change to the ILEC for said collocation space. The collocation provisioning intervals should not apply as the space has already been completed. Therefore, the ALEC should be granted immediate access to the designated collocation space.

Q. ISSUE 4. SHOULD THE ILEC BE REQUIRED TO PROVIDE COPPER ENTRANCE FACILITIES WITHIN THE CONTEXT OF A COLLOCATION INSIDE THE CENTRAL OFFICE?

A. Yes. Copper technology, including copper entrance facilities, is still an integral part of the telecommunications industry. The ILECs still use copper technology within their networks to provide both basic and advanced services such as the ongoing deployment of DSL technology. An ALEC should be allowed the same opportunity to use copper plant within the context of a collocation inside the central office.

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Q. ISSUE 5: SHOULD AN ILEC BE REQUIRED TO OFFER, AT A MINIMUM, POWER IN STANDARDIZED INCREMENTS? IF SO, WHAT SHOULD THE STANDARDIZED POWER INCREMENTS BE?

A. Power, as defined for purpose of charges "per amp", should be offered in one (1) amp increments. ILECs should be required to provision power in fuse size increments of 5, 10, 15, 20, 25, 30, 40, 50, 60, 70, 80, 90, 100, 120, 150, 180, 200, 225 amps, and above as available from the market. Fuse sizes of 70 amps or greater should be provisioned from the ILEC power distribution board if requested by the ALEC.

Q. ISSUE 6A: SHOULD AN ILEC'S PER AMPERE (AMP) RATE FOR THE PROVISIONING OF DC POWER TO AN ALEC'S COLLOCATION SPACE APPLY TO AMPS USED OR FUSED CAPACITY?

A. The ILEC's "per ampere" power rate should be based on the ALEC's actual usage such as the specified load or amps used.

ISSUE 6B: IF POWER IS CHARGED ON A PER-AMP-USED BASIS OR ON A FUSED CAPACITY BASIS, HOW SHOULD THE CHARGE BE CALCULATED AND APPLIED?

Q. PLEASE EXPLAIN WHY POWER CHARGES SHOULD BE BASED ON ACTUAL USAGE.

A. Following cost-causation pricing principles, since the ILEC incurs its expense from its power supplier based on actual usage then the ILEC (as a secondary supplier of power) should charge its customers (i.e., ALECs) based on the actual amperage used by the ALEC's installed equipment. Any deviation, or attempt to charge on a "per fused" basis, introduces opportunities for significant over recovery of the ILEC's true cost.

Q. WHAT METHODOLOGY DOES AT&T PROPOSE TO BASE POWER CHARGES ON USAGE?

A. There are two ways recommended, in priority order, to capture actual ALEC power usage: (1) metering and (2) using the List 1 Drain of installed equipment as provided by the equipment vendors.

Metering entails the actual placement of meters, or utilization of existing measurement facilities, at the power distribution board (PDB) or the battery distribution fuse bay

(BDFB) to measure actual amperage drained by the collocation equipment for which the ILEC is providing the power.

Using List 1 Drain entails using the power requirements that the collocation equipment vendor has specified as the maximum steady state drain for the equipment. The Collocation Application process requires the ALEC to provide to the ILEC the List 1 Drain of installed equipment.

AT&T believes the Commission should order the use of List 1 Drain specifications as a suitable proxy for actual usage when determining collocation power charges if meters or measuring facilities are unavailable or not economically feasible at the PDB or BDFB.

Q. HAVE ANY OTHER STATES ORDERED THE USE OF ACTUAL USAGE FOR DETERMINING COLLOCATION POWER CHARGES?

A. Yes. In its Order in ICC Docket Nos. 96-0486 and 96-0569 (Consol.), the Illinois Commerce Commission ordered the use of power meters for determining the number of amps for calculating collocation power charges. The installation of the power meters was completed in the first quarter of 2001 and the actual amperage readings from those meters are now being used as the basis for determining DC power charges.

The Tennessee Regulatory Authority ("TRA") ordered BellSouth to work out a method of usage based charges as a result of a complaint filed by MCI/Worldcom. Based on the TRA's order, the AT&T/BellSouth ICA was revised May 22, 2002, to incorporate usage based power charges and BellSouth will be reading the AT&T owned BDFB meters as the basis for usage charges where the collocation site is equipped with a BDFB. Further, Verizon (in its local service territories, including North Carolina in Docket No. P-100, Sub 133j) advocates actual "load" as the correct method of charging for power.

Q. ISSUE 6C: WHEN SHOULD AN ILEC BE ALLOWED TO BEGIN BILLING AN ALEC FOR POWER?

A. As also discussed in Issue 1B, an ALEC should be billed for power once power is being provided and used by the ALEC. Once equipment has been installed and activated by the ALEC the ILEC (or certified 3rd party representative) will perform a collocation site survey and record the metered power. Unless future augments occur to a collocation site metering surveys could occur quarterly. This is due to the fact that telecommunications equipment maintains a steady state power drain.

Q. ISSUE 7: SHOULD AN ALEC HAVE THE OPTION OF AN AC POWER FEED TO ITS COLLOCATION SPACE?

A. Yes, an ALEC should have the option of an AC power feed to its collocation space. This is essential to enable ALECs to place AC powered equipment in their collocation space. In addition, ALECs can also convert AC power to DC power if needed. Such conversion may also be more economical for an ALEC than purchasing DC power from the ILEC.

Q. ISSUE 8. WHAT ARE THE RESPONSIBILITIES OF THE ILEC, IF ANY, WHEN AN ALEC REQUESTS COLLOCATION SPACE AT A REMOTE TERMINAL WHERE SPACE IS NOT AVAILABLE OR SPACE IS NEAR EXHAUSTION?

A. The ILEC should be responsible for notifying the ALEC community via its form of communications such as website postings or Carrier Notification Letters, of the remote terminal sites that are exhausted. For these sites pre-determined to be

exhausted, the ILEC owes to the ALEC community, a plan of action as to when new construction of a remote terminal will be completed. If the ILEC has other plans in which to relieve the exhausted conditions of the remote terminal, again, the ILEC needs to provide notification to the ALEC's of those plans with time lines and dates of anticipated completion.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 19th day of December, 2002.

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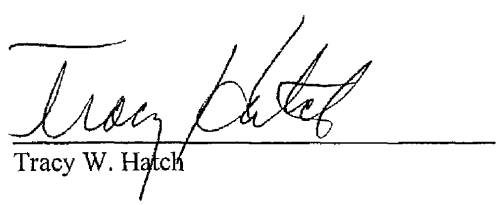

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