

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Petition by DIECA Communications, Inc. d/b/a)
Covad Communications Company for)
Arbitration of Interconnection Rates, Terms,)
and Conditions and Related Arrangements)
with Verizon Florida Inc. Pursuant to)
Section 252(b) of the Telecommunications)
Act of 1996)

Docket No. 020960-TP

DIRECT TESTIMONY OF

JOHN WHITE

ON BEHALF OF

VERIZON FLORIDA INC.

SUBJECT: ISSUE NOS. 12, 30-33

JANUARY 17, 2003

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1 **DIRECT TESTIMONY OF JOHN WHITE**

2

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is John White. My business address is 1095 Avenue of the
5 Americas, New York, NY 10036.

6

7 **Q. BY WHOM ARE YOU CURRENTLY EMPLOYED?**

8 A. I am currently employed by Verizon Communications Inc. I am testifying in
9 this arbitration on behalf of Verizon Florida Inc. ("Verizon").

10

11 **Q. WHAT ARE YOUR CURRENT DUTIES AND RESPONSIBILITIES?**

12 A. I am an Executive Director within the Verizon Wholesale Services
13 organization. In this position, I am responsible for the introduction of
14 wholesale digital services, with a focus on the technical support required for
15 xDSL-capable loops.

16

17 **Q. PLEASE SUMMARIZE YOUR WORK EXPERIENCE.**

18 A. I have been employed by Verizon or by its affiliates and predecessor
19 companies since 1966. Before joining Verizon, I worked for a number of
20 engineering and construction firms. During my first 12 years at Verizon, I was
21 involved in every aspect of Outside Plant telephone engineering. From 1979
22 to 1994, I held managerial positions in Construction, Installation and
23 Maintenance, and Engineering, in both line and staff capacities. Before
24 joining the Wholesale Services organization in June 2000, I worked in the Bell

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1 Atlantic Technology organization as the Executive Director, Transport
2 Technology Planning.

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

5 A. The purpose of my testimony is to provide Verizon's positions relative to Issue
6 Nos. 12 and 30 through 33, which pertain to the xDSL-capable loops that
7 Covad orders from Verizon.

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9 **ISSUE NO. 30 — COOPERATIVE TESTING**

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11 **Q. WHAT IS THE DISPUTE REGARDING ISSUE NO. 30?**

12 A. This issue pertains to the procedures that Verizon should be required to
13 follow with respect to the testing of xDSL-capable loops that Covad orders.
14 Covad proposes to add language to the agreement that specifies, in great
15 detail, a manual cooperative testing process that Verizon's technicians must
16 follow when they provision an xDSL-capable loop. Verizon's position is that,
17 because the cooperative testing of loops is an operational matter that is
18 subject to change over time, detailed processes for such testing should not be
19 specified in interconnection agreements. In addition, Verizon opposes
20 Covad's position because it would require Verizon to conduct inefficient and
21 burdensome manual testing, even when mechanized testing of the loop is
22 available.

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1 Q. PLEASE DESCRIBE THE DEVELOPMENT OF THE MANUAL
2 COOPERATIVE TESTING PROCESS.

3 A. Whenever a loop is provisioned or repaired, the loop is tested to verify
4 continuity and to ensure that the loop meets Verizon's technical
5 specifications. Loop testing is accomplished either through a manual
6 process, involving a Verizon and an ALEC technician, or through a more
7 efficient, automated process.

8

9 In the former Bell Atlantic region of Verizon's territory, procedures for the
10 manual testing of xDSL-capable loops were developed in a DSL collaborative
11 proceeding, which commenced in New York in August 1999. Changes to that
12 process would be extremely difficult to implement if the testing process was
13 specified in great detail in interconnection agreements. Although this
14 procedure is employed in Verizon's former Bell Atlantic jurisdictions, it is not
15 employed in Verizon's former GTE jurisdictions, such as Florida. Bell Atlantic
16 and GTE were separate companies at the time these procedures were
17 established.

18

19 The manual process of loop testing is commonly referred to as cooperative
20 loop testing, because it requires that both a Verizon technician and an ALEC
21 technician jointly verify that the loop is properly installed and operational.
22 Cooperative testing requires that, upon completion of the loop installation, a
23 Verizon technician and an ALEC technician run a series of manual tests on
24 the loop together. The Verizon technician must call the ALEC to get an ALEC
25 technician to initiate the test query into the ALEC test equipment. Both

1 technicians must remain on the call until the completion of the tests. Once
2 both the Verizon technician and the ALEC technician agree that the loop tests
3 show that the loop is operational, the ALEC accepts the loop and the
4 provisioning order or maintenance activity is completed. In those cases
5 where the loop is not acceptable, additional testing calls — from the field, the
6 central office, and/or the Verizon dispatch center — may need to occur fo
7 complete the provisioning or maintenance activity.

8

9 **Q. HOW DOES THE MANUAL PROCESS COMPARE TO THE AUTOMATED**
10 **PROCESS?**

11 A. An ALEC can install gateways that enable the provisioning of xDSL-capable
12 loops or digital designed loops through an automated testing process,
13 allowing Verizon to access the ALEC's testing process remotely and making
14 the labor intensive cooperative testing process unnecessary. This testing is
15 similar to the Mechanized Loop Testing ("MLT") process that Verizon uses for
16 the provisioning of plain old telephone service ("POTS"), whereby central
17 office switching equipment enables any technician — whether that technician
18 is in a dispatch center, a central office, or the field — to do a full test of a loop,
19 independent of all other activities and personnel.

20

21 Covad has recently implemented an Interactive Voice Response ("IVR") Unit,
22 which allows Verizon to perform remote testing of xDSL-capable loops that
23 Verizon provisions for Covad. When a Verizon technician can successfully
24 test an xDSL loop provisioned to a Covad end user through this system, it

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1 would be wasteful and duplicative also to engage in a manual cooperative
2 testing process.

3

4 **Q. DOES COVAD'S PROPOSED LANGUAGE ADDRESS THE AUTOMATED**
5 **TESTING PROCESS?**

6 A. No. Covad's proposed language contains no mention of the IVR process for
7 the remote testing of xDSL-capable loops. Indeed, Covad's proposed
8 language would apparently require Verizon to perform a manual cooperative
9 test of a loop even when the test conducted using the IVR indicated that the
10 loop "passed." Manual testing in those circumstances would be redundant.
11 In addition, although Covad's proposed language sets forth substantial and
12 detailed actions that Verizon's technician must perform, it does not obligate
13 Covad to ensure that its IVR is available when Verizon provisions an xDSL-
14 capable loop.

15

16 **ISSUE NO. 31 — LOOP DEMARCATION INFORMATION**

17

18 **Q. WHAT IS THE DISPUTE REGARDING THIS ISSUE?**

19 A. This issue pertains to the information that Verizon must provide Covad
20 regarding the location — or demarcation point — for loops that Covad orders
21 from Verizon. Covad has proposed to require Verizon to "tag" loops when it
22 dispatches a technician to provision a loop and, when a loop is provisioned
23 without dispatching a technician, to provide Covad with "sufficient information"
24 to enable Covad to find the demarcation point. Verizon's position is that it
25 should not be forced to tag loops when it can provide specific demarcation

1 point information. For loops provisioned without a dispatch, Verizon's position
2 is that, under federal law, it is required to provide Covad only that same
3 information about the demarcation point that is available to it.

4
5 **Q. PLEASE DESCRIBE WHAT IT MEANS TO “TAG” A LOOP.**

6 A. A Verizon technician would affix a small piece of paper or plastic to the
7 demarcation point. That paper would contain information such as the ALEC's
8 order number, the number of the circuit to be connected, and the order due
9 date.

10
11 **Q. WHAT IS THE PURPOSE OF TAGGING A LOOP?**

12 A. Tagging a loop is one way to identify the particular loop that Verizon
13 provisioned from among the many possible loops at a location.

14
15 **Q. IS TAGGING ALWAYS NECESSARY?**

16 A. No. Tagging, far from being necessary, is sometimes counterproductive or
17 physically impossible. In a location where there are thousands of loops in
18 one telephone closet, tagging individual demarcation points can yield a
19 plethora of tags through which to be sifted, rather than easily finding the loop
20 through particular terminal, frame, and pair numbers. In single dwelling units,
21 where there are usually only a few loops terminated at the Network Interface
22 Device (“NID”), descriptive information is more than sufficient to give an ALEC
23 the location of the loop. In some instances, when loops are terminated into
24 push-on blocks, for example, tagging the loop is an impossibility, due to the
25 physical make-up of the demarcation point. In all of these cases, a tag is not

1 necessary to ensure that the ALEC can identify the loop that Verizon has
2 provisioned. Furthermore, when tags are used, the tags themselves may
3 become dislodged or confused with other tags. Verizon's normal practice is
4 to tag loops only when it is necessary; that is, when specific demarcation
5 point information cannot be provided in any other manner.

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7 **Q. WHAT DEMARCATION POINT INFORMATION DOES VERIZON PROVIDE**
8 **TO ALECS IF IT DOES NOT DISPATCH A TECHNICIAN?**

9 A. Verizon will provide the ALEC with all of the information regarding the
10 demarcation point that Verizon has available in its database. Usually, this
11 information will include the address, terminal, terminal name, cable and pair,
12 and binding post. However, even on loops that can be provisioned without a
13 dispatch, an ALEC can still request that a Verizon technician be dispatched
14 (at the ALEC's expense). In this case, Verizon will provide the ALEC with
15 specific demarcation point information or, where necessary, tag the loop.

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17 **ISSUE NOS. 12 AND 32 — LOOP QUALIFICATION**

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19 **Q. WHAT IS THE DISPUTE REGARDING THESE ISSUES?**

20 A. Both of these issues involve the loop qualification information that Verizon
21 makes available to Covad. With respect to Issue No. 12, the parties agree
22 that Verizon is obligated to provide Covad with nondiscriminatory access to
23 loop qualification information; they disagree whether the agreed-upon
24 language in the agreement is sufficient. Below, I discuss the means through
25 which Verizon provides Covad with loop qualification information in Florida.

1 With respect to Issue No. 32, the parties disagree about whether the
2 agreement should contain language setting forth terms, conditions, and
3 intervals that would apply to Covad's manual loop qualification requests.
4 Covad has proposed such language. However, that language pertains to the
5 loop qualification process used in Verizon's former Bell Atlantic jurisdictions.
6 Verizon uses a different loop qualification process in Florida and in Verizon's
7 other former GTE jurisdictions. Covad's language is therefore generally
8 inapplicable to Verizon's systems and processes in Florida.

9
10 **Q. PLEASE DESCRIBE THE LOOP QUALIFICATION PROCESS THAT**
11 **VERIZON USES IN ITS FORMER BELL ATLANTIC JURISDICTIONS.**

12 A. In those jurisdictions, Verizon offers ALECs access to loop qualification
13 information in four ways. First, ALECs can submit an electronic loop
14 prequalification request to Verizon's LiveWire database, which contains loop
15 qualification (and other) information. LiveWire is the same mechanized
16 database that Verizon's retail representatives use. If, for some reason, a
17 ALEC is unable to prequalify a loop through LiveWire, that ALEC can request
18 an on-demand, or manual, loop qualification, either by submitting a pre-order
19 transaction known as an xDSL Loop Qualification – Extended Inquiry
20 (“Extended Query”), or by indicating that a manual loop qualification is
21 needed on its order for an xDSL loop. Verizon also offers ALECs a Loop
22 Make Up Inquiry, which provides ALECs with access to the limited loop make-
23 up information contained in a back office inventory systems known as Loop
24 Facilities Assignment and Control System (“LFACS”). Finally, ALECs can

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1 also submit an Engineering Query (or Engineering Record Request), which is
2 a request for full loop make-up.

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4 **Q. HOW IS THE LOOP QUALIFICATION PROCESS USED IN FLORIDA**
5 **DIFFERENT?**

6 A. In Florida, as in Verizon's other former GTE jurisdictions, Verizon offers
7 ALECs a single, mechanized loop qualification inquiry. This transaction
8 provides ALECs with information contained in Verizon's Wholesale Internet
9 Service Engine ("WISE") database. This database, which is the same
10 database accessed by Verizon's retail representatives in Florida, contains all
11 the loop qualification information available in the LiveWire database used in
12 the former Bell Atlantic footprint, as well as information normally available
13 only through one or more of the other loop qualification transactions offered in
14 those areas.

15

16 In spite of providing this wealth of information via an automated process,
17 Verizon — on an exceptions basis, when an ALEC makes a specific request
18 to its account manager — will manually investigate loop qualification
19 information on particular loops. Verizon provides this information in the same
20 time and manner as it would provide this information to itself.

21

22 **Q. HOW IS COVAD'S PROPOSED LANGUAGE INAPPLICABLE TO**
23 **VERIZON'S PROCESS IN FLORIDA?**

24 A. For example, Covad has proposed that it should be able to submit an
25 Extended Query in certain instances. But this is not a transaction used in

1 Florida or Verizon's other former GTE jurisdictions. In addition, Covad has
2 proposed that Verizon should respond to its manual loop qualification
3 requests in one business day. As noted above, Verizon does not have a
4 manual loop qualification process. And, even when Verizon manually
5 investigates loop information for a particular loop on an exceptions basis, the
6 appropriate standard is that Verizon provide Covad with that information in
7 the same time and manner that it provides the information to itself.

8
9 **ISSUE NO. 33 — PREQUALIFICATION OF XDSL-CAPABLE LOOP ORDERS**

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11 **Q. WHAT IS THE DISPUTE REGARDING THIS ISSUE?**

12 A. This issue pertains to Covad's obligation to prequalify its xDSL-capable loop
13 orders. Verizon has agreed that Covad may challenge Verizon's
14 determination that a particular loop, or set of loops, is not qualified for the
15 xDSL type that Covad seeks to deploy on that loop. Covad, however, has
16 proposed changing this language to allow it to contest the very requirement
17 that it prequalify its xDSL-capable loop orders.

18
19 **Q. WHY DOES VERIZON REQUIRE ALECS TO PREQUALIFY THEIR XDSL-
20 CAPABLE LOOP ORDERS?**

21 A. In order for an ALEC to provide xDSL service over a loop, it is essential that
22 the loops possess the appropriate technical capabilities. The prequalification
23 process, described above in my discussion of Issue No. 32, provides ALECs
24 with information on the technical capabilities of those loops, including all the
25 information necessary for the ALEC to determine whether the loop can

1 support the particular xDSL type that it seeks to deploy. Therefore, Verizon
2 expects that ALECs have prequalified their xDSL orders before submitting
3 them.

4

5 **Q. WHY DOES VERIZON OBJECT TO COVAD'S PROPOSAL?**

6 A. As explained above, Verizon agrees that Covad may seek to dispute
7 Verizon's determination that a particular loop or set of loops does not meet
8 the necessary technical specifications to handle the advanced services that
9 Covad seeks to provide. In the event that Covad does dispute Verizon's
10 determination, Verizon has further agreed that, at Covad's option and where
11 available facilities exist, Verizon will provision any such contested order or set
12 of orders, except where it will impair voice service to the end user, pending
13 resolution of the parties' dispute.

14

15 Although Covad has proposed to change only one word in the provision at
16 issue, its proposal would dramatically change the purpose of this provision, by
17 allowing Covad to argue that the prequalification requirement for a particular
18 class of xDSL loops — or for all xDSL loops — should be eliminated.
19 Covad's claimed justification for this change is that "Verizon's prequalification
20 tool has proven to be unreliable on certain orders types." Covad Petition
21 Attach. B at 13. Even if Covad were correct — and it is not (nor is it clear
22 whether Covad is referring to WISE or to the LiveWire database used in the
23 former Bell Atlantic jurisdictions) — that would not change the fact that a
24 substantial percentage of the loops in Verizon's network cannot support any
25 xDSL type. If Covad were not required to prequalify its xDSL-capable loop

1 orders, then Verizon would routinely be required to attempt to provision
2 Covad's xDSL-capable loop orders where no xDSL-capable loop is available
3 and, in some cases, perform work that would degrade voice service.

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

6 A. Yes.

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