

1 **BEFORE THE PUBLIC UTILITIES COMMISSION OF FLORIDA**

2 **DIRECT TESTIMONY**

3 **OF**

4 **TERRY L. ALLEMAN**

5
6 **Q. Please state your name, title, and business address.**

7 A. My name is Terry L. Alleman. I am employed by Sprint Corporation as a Senior
8 Analyst in Regulatory Policy. My business address is 6450 Sprint Parkway, Overland
9 Park, Kansas 66251.

10
11 **Q. Please briefly summarize your educational background and professional**
12 **experience.**

13 A. I received a B.A. in Psychology and Philosophy from Rockhurst University in Kansas
14 City, Missouri, in 1992. I earned an M.S. and Ph.D. in Experimental Psychology from
15 Ohio University in 1995 and 1997, respectively.

16
17 I have been employed by Sprint since 1998. In my current position, I am involved
18 with the development of state and federal regulatory and legislative policy for all
19 divisions of Sprint Corporation. I am involved with the coordination of policy across
20 Sprint's business units. I also perform regulatory research and quantitative data
21 analyses as needed. The specific policy issues I address are Voice over Internet
22 Protocol, Performance Measures, Abbreviated Dialing Codes, and the issue we are
23 discussing today.

24 **Q. What is the purpose of your testimony?**

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1 A. The purpose of my testimony is to demonstrate why it is unnecessary for the
2 Commission to establish a batch hot cut process in the operating territory of Sprint-
3 Florida.

4

5 **Q. Is Sprint-Florida challenging the FCC's national finding of impairment for**
6 **unbundled local circuit switching in its markets?**

7 A. No. Sprint-Florida does not intend to challenge the FCC's findings regarding
8 impairment without access to unbundled local circuit switching for any market in its
9 Florida serving territory during this initial nine-month proceeding.

10

11 **Q. What impact does this decision have on the availability of unbundled local**
12 **switching in Sprint-Florida territory?**

13 A. Given Sprint-Florida's decision not to challenge the national findings in this
14 proceeding, under the FCC rules, Sprint-Florida is required to continue to offer mass
15 market unbundled local circuit switching until there is an affirmative finding of non-
16 impairment in a geographic market composed of or including Sprint-Florida
17 exchanges. Should Sprint-Florida challenge the FCC's national impairment findings
18 in the future, Sprint-Florida would be required to petition the Commission and initiate
19 a docket consistent with the FCC rules. As such, Sprint-Florida will continue to
20 provide CLECs serving the mass market access to unbundled switching in its Florida
21 territory until such time as the Commission rules otherwise.

22

23 **Q. Does Sprint-Florida's continued unbundling of local switching to the mass**
24 **market obviate the need for the Commission to review Sprint-Florida's hot-cut**
25 **process?**

1 A. Yes. The FCC rules (47 C.F.R. 51.319 (d)(2)(ii)(B)) contemplate that state
2 commissions will evaluate whether a hot cut process is:

3 “not impairing requesting telecommunications carriers’ ability to serve
4 end users using DS0 loops in the mass market *without access to local*
5 *circuit switching on an unbundled basis...*” (Emphasis Added).

6 Because CLECs in Sprint-Florida’s territories will continue to have access to
7 local switching on an unbundled basis, a review of Sprint-Florida’s hot cut
8 process is not necessary.

9

10 **Q. Issue 3(a) of the Commission’s issues list asks, “Does a batch cut process exist**
11 **that satisfies the FCC’s requirements in the Triennial Review Order? If not, in**
12 **which markets should the Commission establish a batch cut process?” Can you**
13 **address this issue?**

14 A. In the Triennial Review Order, the FCC defines a batch cut process as “a process by
15 which the incumbent LEC *simultaneously* migrates two or more loops from one
16 carrier’s local circuit switch to another carrier’s local circuit switch, giving rise to
17 operational and economic efficiencies not available when migrating loops from one
18 carrier’s local circuit switch to another carrier’s local circuit switch on a line-by-line
19 basis.”¹ (Emphasis Added.) Sprint is not aware of a batch cut process that can
20 “simultaneously” migrate two or more loops from one switch to another. A loop
21 migration is a manual process that requires the physical disconnection of the end
22 user’s copper pair from the ILEC’s block and pin and the reconnection of the copper
23 pair to the CLEC’s block and pin. Each copper pair must be cut over line by line.

¹ §51.319.(d)(2)(ii)

1 There are no Sprint-Florida markets in which the Commission should establish a batch
2 cut process.

3

4 **Q. Could you address the items raised in Issue 3(g) of the Commission's**
5 **issues list?**

6 A. Yes. The items included in the Commission's Issue 3(g) are taken from the
7 FCC Rules established in the TRO (47 C.F.R 51.319 (d)(2)(ii)(B)). The FCC
8 rules establish a state commission's requirements for supporting a finding that
9 the absence of a batch cut process is not impairing CLECs' ability to serve end
10 users without access to unbundled local switching. As I previously described,
11 CLECs will continue to have access to unbundled switching in Sprint-Florida
12 territory.

13

14 Nevertheless, Sprint-Florida's current hot cut process does not present
15 impairment and there is no need for the Commission to require Sprint-Florida
16 to establish a batch hot cut process. Under the FCC rules, state commissions
17 should evaluate several factors in reaching a decision as to whether a hot cut
18 process presents impairment. These items are included in the Commission's
19 Issue 3(g) as follows:

20 (i) what volume of unbundled loop migrations can be anticipated if
21 CLECs no longer have access to unbundled local circuit
22 switching.

23 (ii) how able is the ILEC to meet loop migration demand with its
24 existing processes in a timely and efficient manner; and

25 (iii) what are the nonrecurring costs associated with the ILEC's

1 existing hot cut process?

2 In my testimony below, I will address each of these issues while providing a
3 review of Sprint's current hot cut process.

4

5 **Q. How does the FCC define a "hot cut" in the Triennial Review Order?**

6 A. The FCC defines a "hot cut" as the physical transfer of a customer's line from the
7 incumbent LEC switch to the competitive LEC switch. (§ 465)

8

9 **Q. What is Sprint-Florida's current hot cut process?**

10 A. Sprint-Florida offers Timed Coordinated Hot Cuts and Non-timed Coordinated Hot
11 Cuts. Both types of hot cuts begin when the CLEC submits a local service request
12 (LSR) via Sprint-Florida's Integrated Request Entry System (IRES). IRES is a web-
13 based order entry system. Through IRES, the CLEC requests either the Timed
14 Coordinated or the Non-timed Coordinated Hot Cut, the due date is set, and the firm
15 order confirmation (FOC) is sent to the CLEC.

16

17 For the Timed Coordinated Hot Cut, more than 48 hours prior to the due date, the
18 Sprint National CLEC Provisioning Center (NCPC) Associate contacts the Sprint-
19 Florida central office personnel (and the outside technician if a dispatch is required) to
20 review and assign the conversion order and to establish contact names and numbers.
21 Forty-eight hours prior to the due date, the CLEC contacts the NCPC to confirm the
22 conversion. One day prior to the conversion, the CLEC provisions their switch and
23 the Sprint-Florida central office technician pre-runs the jumpers from the Sprint main
24 distribution frame to the CLEC block and pin, verifies correct assignment, and tests
25 for dial tone on the CLEC's block and pin. On the conversion date, at the specified

1 time, the NCPC associate initiates a conference call to all involved Sprint-Florida
2 personnel and the CLEC to begin the conversion process. The Sprint-Florida
3 technician terminates the jumpers to the appropriate block and pin and the conversion
4 is complete. The CLEC notifies NPAC to activate local number portability and
5 Sprint-Florida removes the ported number from its switch.

6
7 For the Non-timed Coordinated Hot Cut, 24 hours prior to the conversion, the CLEC
8 activates the 10-digit trigger in their switch. Prior to the conversion date, the Sprint-
9 Florida technician pre-runs the jumpers from the Sprint-Florida main distribution
10 frame to the CLEC block and pin, verifies correct assignment, and tests for dial tone
11 on the CLEC's block and pin. On the conversion date, the Sprint-Florida NCPC
12 associate contacts the Sprint-Florida central office technician when the conversion
13 process is ready to begin. The Sprint-Florida CO technician ties down the jumpers to
14 the appropriate block and pin. The NCPC associate notifies the CLEC that the
15 conversion is complete and removes the ported number from the switch. The CLEC
16 notifies NPAC to activate LNP and removes the 10-digit trigger from their switch.

17
18 **Q. How many mass market UNE-P lines does Sprint-Florida currently provide?**

19 **A.** Because the crossover is yet to be determined by the Commission, I used 12 or fewer
20 lines as a definition for mass market. As of August 2003, Sprint-Florida has provided
21 7,492 mass market UNE-P lines.

22
23 **Q. According to the TRO, if there is a finding of "no impairment" in a market,**
24 **CLECs will no longer be allowed to add UNE-P customers after December 2,**
25 **2004. (§ 532) Using that date as a point in time to discuss anticipated volumes,**

1 **how much growth does Sprint-Florida expect in mass market UNE-P lines from**
2 **now until December 2004?**

3 A. If additional CLECs enter Sprint-Florida's markets, the anticipated growth in mass
4 market UNE-P lines from now until December 2004 would be expected to be
5 approximately 17,000 access lines. If new CLECs do not enter Sprint-Florida's
6 territory, Sprint-Florida expects the growth for this period to be approximately 3,000
7 new UNE-P access lines.

8
9 **Q. Considering Sprint-Florida's current UNE-P base and an aggressive anticipated**
10 **growth of approximately 17,000 UNE-P lines, if UNE-P were no longer available**
11 **and the embedded base of UNE-P lines had to be transitioned to UNE loops, on**
12 **average, approximately how many hot cuts would Sprint-Florida need to**
13 **perform per month and per day?**

14 A. According to the FCC's Triennial Review Order, the transition will be one-third of the
15 UNE-P base over a seven-month period, then one-half of the remaining base over the
16 next seven months, and then the remainder over the next seven months. (§ 532) To
17 transition one-third of Sprint-Florida's UNE-P lines to UNE-L, Sprint-Florida will
18 need to perform, on average, 1,165 hot cuts per month or 55 hot cuts per day (based on
19 21 workdays per month). $(17,000 \text{ growth} + 7,492 \text{ current} = 24,492; 24,492 * 0.333 =$
20 $8,156; 8,156 / 7 \text{ months} = 1,165; 1,165 / 21 \text{ days} = 55)$

21
22 **Q. How many hot cuts per day does Sprint-Florida currently perform?**

23 A. Sprint-Florida keeps records showing the number of UNE loops provisioned, but the
24 records do not identify which loops required a hot cut. However, Sprint-Florida

1 currently provisions an average of 185 UNE loops per month or approximately nine
2 UNE loops per day.

3

4 **Q. If UNE-P is no longer available and UNE-P orders become UNE-L orders, how**
5 **many hot cuts per month and per day does Sprint-Florida expect to need to**
6 **perform?**

7 A. Assuming an average yearly growth at the same level as the projected UNE-P growth
8 previously discussed, Sprint-Florida would expect an average of 1,417 mass market
9 UNE-L orders per month or 67 per day. ($17,000/12$ months = 1,417; $1,417/21$ days =
10 67) If that number is added to Sprint-Florida's current UNE-L orders of nine per day,
11 Sprint-Florida would be provisioning, on average, 76 UNE-L orders per day for the
12 entire state of Florida.

13

14 **Q. During the 21-month period to transition the embedded base, how many hot cuts**
15 **per day would be required of Sprint-Florida?**

16 A. On average, Sprint-Florida would need to perform 132 hot cuts per day for the entire
17 state of Florida, or 123 hot cuts in addition to our current workload.

18

19 **Q. If you consider Sprint-Florida's ten largest wire centers based on the number of**
20 **UNE-P lines currently provisioned out of those offices, and assume the**
21 **percentage of UNE-P lines in those offices now will equate to the same percentage**
22 **of UNE-L lines in an environment without unbundled local switching,**
23 **approximately how many hot cuts per wire center will Sprint-Florida need to**
24 **perform each day?**

25 A. Sprint-Florida's largest wire center would need to perform an average of 13 hot cuts

1 per day. The second largest through the tenth largest wire centers would require daily
2 hot cut volumes of 8, 8, 5, 5, 5, 4, 4, 4 and 4 respectively.

3

4 **Q. How long does it take to pre-run the jumpers from the Sprint-Florida main**
5 **distribution frame to the CLEC block and pin?**

6 A. It takes approximately seven to nine minutes per line to pre-run the jumpers.

7

8 **Q. When it is time to perform the hot cut, how long does the central office work take**
9 **to complete the conversion?**

10 A. It takes approximately one to three minutes per line to complete the conversion.

11

12 **Q. What are Sprint-Florida's hours of operation for its central offices?**

13 A. Sprint-Florida's central offices hours of operation are Monday through Friday, 8 a.m.
14 to 5 p.m.

15 **Q. Does Sprint-Florida have any evidence that its current hot cut process can handle**
16 **the volumes you have discussed?**

17 A. Sprint uses the same hot cut process in all of its markets. Currently Sprint is
18 converting a CLEC in another state from UNE-P to UNE-L and is performing 50 hot
19 cuts per day in one wire center in addition to its current workload. This is evidence
20 that Sprint's process can easily handle any anticipated volumes in Florida.

21

22 **Q. Does Sprint-Florida consider these volumes to be "best case" or "worst case"?**

23 A. Sprint-Florida considers these volumes to be "worst case." The projected growth is
24 almost four times the current number of UNE-P lines, so growth is not likely to be
25 greater than projected. Also, it is unlikely that all of Sprint-Florida's markets will

1 transition to UNE-L at the same time, which will reduce the state-wide volume
2 numbers while the embedded base is being transitioned.

3

4 **Q. What are the nonrecurring costs associated with Sprint-Florida's existing hot cut
5 process?**

6 A. Sprint-Florida's nonrecurring costs are reflected in its Commission-approved
7 nonrecurring charges in Docket 990649-TP.

8

9 **Q. Based on your description of Sprint-Florida's hot cut process, its ability to handle
10 existing and projected volumes and the non-recurring costs associated with hot
11 cuts, does the Commission need to pursue development of a batch hot cut process
12 for Sprint-Florida?**

13 A. No. Given the above facts with respect to the FCC's three threshold criteria, Sprint-
14 Florida submits that its current hot cut process does not give rise to impairment in its
15 operating territory. Further, as Sprint-Florida is not challenging the national finding of
16 impairment, unbundled access to mass market switching will remain available in
17 Sprint-Florida's territory. For these reasons, there is no need for the Commission to
18 establish a batch hot cut process.

19

20 **Q. Does that conclude your testimony?**

21 A. Yes.

22

23

24

25