BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF ALFRED A. HEARTLEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 030851-TP

JANUARY 7, 2003

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is Alfred A. Heartley. My business address is 754 Peachtree Street, Atlanta, Georgia 30308. My title is General Manager – Wholesale Performance and Regional Centers for BellSouth.

Q. ARE YOU THE SAME ALFRED HEARTLEY WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I will respond to portions of the direct testimonies of Mr. James D. Webber on behalf of MCI and Mr. Mark David Van de Water on behalf of AT&T regarding the batch hot cut process.

Q. PRIOR TO REBUTTING THE CLEC WITNESSES, HAS BELLSOUTH MADE ANY CHANGES TO ITS LOAD AND FORCE PROJECTIONS SINCE IT FILED DIRECT TESTIMONY ON DECEMBER 4, 2003 ABOUT WHICH YOU WOULD LIKE TO INFORM THE COMMISSION?

A. Yes, BellSouth recently discovered that the model was incorrectly adding the annual assumed rate of churn of UNEP and UNEL facilities (48%) to each month's activity. The annual rate is based on a monthly churn rate of 4%. Corrections to the model have been made and a revised version of Exhibit AH-1 is attached. The overall force required in Florida is 759 compared to 1080 in the forecast in my direct testimony.

Q. ON PAGE 22, MR. WEBBER ALLUDES (WITHOUT SUPPORT) TO "REAL-WORLD CONSTRAINTS ON THE NUMBER OF TECHNICIANS THAT CAN WORK ON A GIVEN FRAME AT A GIVEN TIME." IS THIS A PROBLEM?

A. No. As explained in my direct testimony, certainly there are limitations on the number of technicians that can work on a frame at one time. BellSouth, however, can manage around limitations on the number of technicians who can work on the frame to address even "worst-case" anticipated volumes. For example, on conventional frames, two (2) technicians may work for every 50 verticals in length with a maximum of ten (10). These technicians would work together in tandem with one technician laying in the wires on the horizontal side of the frame and the other technician terminating the wires on the vertical side of the frame. The maximum number of jumpers being laid in the frame

simultaneously would be five (5). This is known as the pre-wire step in the hot cut process. On modular type frames (sometimes referred to as "COSMIC" frames), a single technician may prewire circuits for every ten (10) modules in length. The hot cut prewiring steps are the most restrictive steps of the conversion process. However, prewiring may be conducted 24 hours per day utilizing three (3), eight-hour shifts. Therefore BellSouth will be able to handle the prewiring for all its central offices without a problem. For example, BellSouth's force model indicates that even in a worst-case scenario BellSouth would have to prewire 4,493 circuits per day in Florida. BellSouth's model indicates that 452 central office technicians would be required for these conversions. These technicians can easily wire an average of 10 circuits in an eight-hour shift.

The actual individual loop cutovers will then take place at a single location on the frame (that is, at the location on the distributing frame where the loop cable pair appears) for each circuit. However, it is possible to cut more circuits in a single eight-hour shift (8 AM to 5 PM) than can be wired in two (2), eight-hour shifts because the hot-cut conversion steps take less time per circuit that the pre-wire steps per circuit.

Q. ON PAGE 23, MR. WEBBER DESCRIBES WHAT HE CALLS "THE POTENTIALLY CHAOTIC SITUATION" THAT COULD RESULT WHEN MULTIPLE TECHNICIANS WORK ON THE MAIN DISTRIBUTING FRAME ("MDF"). IS HIS SPECULATION CREDIBLE?

A. No. Mr. Webber's baseless speculation of a potentially chaotic situation is not credible because BellSouth will properly and efficiently manage the conversions. That is the reason BellSouth determined the number of technicians that can work simultaneously on a given distributing frame. While BellSouth's technicians are trained to work safely together, too many working in a tight location could become cumbersome. BellSouth routinely prevents such a situation by working the appropriate number of technicians on different shifts. This may require 24-hour scheduling but BellSouth is willing to do such scheduling. BellSouth will not permit a chaotic situation to occur. I would also point out that BellSouth has successfully replaced entire switching systems and has done so with minimal customer disruption.

Q. DO YOU AGREE WITH THE EXTRAPOLATION OF WORK TIMES MR. VAN DE WATER DOES ON PAGE 37-38, LINES 17-14 OF HIS TESTIMONY?

A. No. Mr. Van de Water's analysis of the time required to cutover a UNEP to a UNEL does not differ substantially from BellSouth's own analysis; however, his conclusion that such work times will preclude BellSouth from handling anticipated volumes is incorrect.

Beginning on page 37, at line 17, Mr. Van de Water uses BellSouth data to argue that any given technician could complete 12-13 UNE-P conversions per day (using a seven-hour day). BellSouth's force model is more conservative, yielding an average of 9.93 conversions per shift (using a 7.5-hour day). Even taking BellSouth's more conservative view, BellSouth will still complete all of the

required conversions within 21 months. BellSouth's analysis takes into consideration the different times required to complete a conversion depending on the type of unbundled loop requested (for example, SL1 or SL2) and the type conversion requested for SL1 orders (for example, Coordinated or Non-Coordinated).

Beginning on page 38 at line 3, Mr. Van de Water uses BellSouth data in an attempt to prove that there is insufficient space on the MDF in the West Hollywood, FL central office for enough technicians to work simultaneously to complete enough conversions to create "meaningful" UNE competition. Again, while BellSouth's own analysis does not differ substantially, the conclusion that Mr. Van de Water draws is incorrect. Mr. Van de Water alleges that completing 104 hot cuts per day cannot support competition. Notably, he does not put forth a number of cuts that would, in his view, support competition. Moreover, BellSouth's worst-case force model assumes that only 126 cuts per day are required in West Hollywood to handle the UNEP to UNEL migration as well as normal growth within the 21-month timeframe. Based on the information provided above, 126 cuts per day would require approximately 12 technicians to complete. As noted in interrogatory item 45, 8 technicians can work on the West Hollywood frame simultaneously without impacting productivity. Assuming this work is done during the other two (2) available shifts (that is evening and night) to avoid interfering with any other activities, West Hollywood can accommodate up to 16 technicians per day. Therefore, BellSouth can readily handle the required load in its West Hollywood central office as well as in all other BellSouth wire centers.

Q. HOW DO UNMANNED CENTRAL OFFICES AFFECT BELLSOUTH'S ABILITY TO HANDLE ANTICIPATED VOLUMES OF UNE-L ORDERS? (SEE MR. VAN DE WATER'S TESTIMONY AT PAGE 40)?

A. Mr. Van de Water's statements beginning on page 40, line 12, that unmanned Central Offices coupled with the use of Integrated Digital Loop Carrier ("IDLC") will limit BellSouth's capacity to work hot cuts in Florida are incorrect. It is true that Bellsouth does not have employees report to work daily at each and every central office simply for the reason that there are some central offices in which there would be no work required to be performed even if BellSouth were to assign its employees daily to those central offices. Instead, for those offices with a low volume of work, technicians are dispatched as needed to work the pending load, daily if required. However, while not all offices are manned daily at the beginning of the workday, all BellSouth central offices are manned if work is required therein. BellSouth's force model includes hours for working hot cuts at all BellSouth wirecenters. Thus, BellSouth already has taken into account any so-called "unmanned" offices.

Q. MR. VAN DE WATER DISCUSSES THE IMPACT OF IDLC DISPATCHES ON HIS LOAD PRODUCTIONS AT PAGES 40-41 OF HIS TESTIMONY. DID BELLSOUTH FACTOR THOSE DISPATCHES INTO ITS LOAD PROJECTION?

A. Yes. BellSouth's worst-case force model accounts conservatively for dispatching outside technicians to handle conversions involving IDLC. Unlike Mr. Van de Water's analysis, the force model bases the number of field dispatches required

on the %IDLC in each wire center. The force model assumes that every hot cut involving IDLC will require a separate dispatch. In reality, however, a technician would be dispatched to work all of the conversions at a single interface (sometimes referred to as the "remote terminal") at one time. BellSouth's assumption is therefore conservative as it is unknown how many hot cuts will be required at each field interface each day. Based on regional estimates of 4,827 daily outside dispatches, well over 2.2 million dispatches could be required to complete the conversions and handle growth. BellSouth took those dispatches into account in its force model and is confident of its ability to perform those dispatches effectively and efficiently.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

Top 20 Regional Wire Centers List

Worst Case Force Projection

ercentage of UNEPs that will convert to UNEL	100%
Business days per month	22.3
Regional growth UNEPs per month	116,295
Regional IM UNELs per month	19,029
Churn percentage per month	4%
ance and Repair Report Rate increase per mo	5%

Daily Conversion % to SL1 Non-Coordinated	50.00%
Daily Conversion % to SL1 Coordinated	25.00%
Daily Conversion % to SL2 (Coordinated)	25.00%

CO Cutover Times (Hours)	First Line (Worst Case)	Additional Line
CO Time SL1 Non Coordinated	0.43333	0.30000
CO Time SL1 Coordinated	0.60000	0.33333
CO Time SL2 (Coordinated)	1.05000	0.63333
Outside Tech Cutover Hours per Dispatch	1.0000	

No new UNEP.
Only new UNE-L.

STATE	W/C	I&M Work Center	% of Total UNE-Ps	% IDLC	UNE-P Growth per Month	UNE-L Growth per Month	Total UNE-P Dec. 2004	Monthly UNE-P to UNE-L Conversions plus Normal UNE-P and UNE-L Growth	Daily UNE-P to UNE-L Conversions	Daily Conversions Requiring Outside Dispatch	Daily Conversions to SL1 Non-Coordinated	Daily Conversions to SL1 Coordinated	Daily Conversions to SL2 (Coordinated)	CO Transfer Man-Hours	Outside Transfer Man-Hours
FL	hlwdflpe	61 NW 98 AVE./ 1390	1.25174%	82%	1,456	238	48,042	3,979	195	161	97	49	49	122.60	160.57
FL	miamflhl	13305 NW 45 AVENU	0.81674%	51%	950	155	31,347	2,596	127	64	64	32	32	80.00	64.44
FL	hlwdflwh	250 SW 62 AVE.	0.81249%	21%	945	155	31,183	2,583	126	27	63	32	32	79.58	26.96
GA	mrttgama	185 Old Hamilton Rd ,	0.70588%	52%	821	134	27,092	2,244	110	57	55	27	27	69.14	57.02
FL	prmflma	10330 SW 184 St , F	0.68049%	47%	791	129	26,117	2,163	106	50	53	26	26	66.65	49.83
GA	lrvlgaos	330 Oak Street,	0.59361%	73%	690	113	22,783	1,887	92	68	46	23	23	58.14	67.91
FL	pmbhflcs	9500 Royal Palm Blvd	0.54365%	56%	632	103	20,865	1,728	85	47	42	21	21	53.25	47.15
FL	wpbhflga	1201 Barnett Dr, Lake	0.53062%	51%	617	101	20,365	1,687	83	42	41	21	21	51.97	42.45
FL	miamflca	12800 SW 56 St Miar	0.52962%	46%	616	101	20,327	1,684	82	38	41	21	21	51.87	38.07
FL	ftldflca	4200 W Oakland Pk.	0.50691%	14%	590	96	19,455	1,611	79	11	39	20	20	49.65	11.26
FL	pmbhflma	1180 Banks Rd., Marg	0.48107%	37%	559	92	18,463	1,529	75	28	37	19	19	47.12	28.04
FL	ndadflbr	19051 N E 3RD CT.	0.46745%	42%	544	89	17,941	1,486	73	31	36	18	18	45.78	30.64
GA	jnbogama	107 Smith Street, Jon	0.43383%	63%	505	83	16,650	1,379	68	43	34	17	17	42.49	42.55
GA	smyrgama	1359 Springs St., Smy	0.43315%	33%	504	82	16,624	1,377	67	23	34	17	17	42.42	22.52
GA	wdstgacr	1200 JVL Industrial Ci	0.43220%	68%	503	82	16,588	1,374	67	46	34	17	17	42.33	45.93
FL	orldflph	5120 SilverStar Road	0.42568%	63%	495	81	16,338	1,353	66	42	33	17	17	41.69	41.78
FL	ftldflpl	4401 DAVIE BLVD.-F	0.42563%	27%	495	81	16,336	1,353	66	18	33	17	17	41.69	18.03
GA	rswlgama	850 Holcomb Bridge F	0.42048%	46%	489	80	16,138	1,337	65	30	33	16	16	41.18	30.10
GA	alprgama	1525 Hembree Rd & 2	0.41699%	75%	485	79	16,004	1,326	65	48	32	16	16	40.84	48.37
FL	miamflwd	12800 SW 56 St. Miar	0.40957%	55%	476	78	15,719	1,302	64	35	32	16	16	40.12	35.05
FL	ftldflja	10141 W. BROWARD	0.40898%	54%	476	78	15,697	1,300	64	34	32	16	16	40.06	34.26
Regional Total			**100.00000%**	**31%**	**116,295**	**19,029**	**3,838,007**	**317,903**	**15,567**	**4,827**	**7,784**	**3,892**	**3,892**	**9,794**	**4,827**

Headcount	1306	644
Add Undistributed	1567	772
Supervisors 15/1	104	51
Total Force	2495	

Top 20 Florida Wire Centers List

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FL	ndadflac	19051 N.E 3RD CT	0.40441%	8%	470	77	15,521	1,286	63	5	31	16	16	39.61	5.02
FL	bybhflma	321 SE 2nd St, Delray	0 40333%	56%	469	77	15,480	1,282	63	35	31	16	16	39.50	34 85
FL	pmbhflfe	1117 NE 3rd Ave., Po	0.37418%	21%	435	71	14,361	1,190	58	12	29	15	15	36.65	12 26
FL	hlwdflma	715 N FEDERAL HW	0 37360%	17%	434	71	14,339	1,188	58	10	29	15	15	36.59	9.88
FL	ftldflmr	201 S.W. 14 STREET	0 36581%	17%	425	70	14,040	1,163	57	10	28	14	14	35 83	9.93
FL	ndadflgg	19051 N.E 3RD CT.	0.35925%	13%	418	68	13,788	1,142	56	7	28	14	14	35.19	7.21
FL	miamflpl	9090 NW 41 Street	0.35251%	62%	410	67	13,529	1,121	55	34	27	14	14	34.53	33.93
FL	miamflsh	8451 NE AVE	0.35043%	0%	408	67	13,449	1,114	55	0	27	14	14	34.32	0.04
FL	bcrtflma	6037 W. Atlantic Ave,	0.34848%	39%	405	66	13,375	1,108	54	21	27	14	14	34 13	21.34
Florida Total			**28.86247%**	**36%**	**33,566**	**5,492**	**1,107,743**	**91,755**	**4,493**	**1,620**	**2,247**	**1,123**	**1,123**	**2,827**	**1,620**

Headcount	377	216
Add Undistributed	452	259
Supervisors 15/1	30	17
Total Force	759	