

030852-TP

1 the significant fiber construction cost is incurred, the record  
 2 reflects that it is relatively easy and inexpensive to install  
 3 fiber strands in excess of current demand at that time to  
 4 maximize the use of conduit and avoid the need to incur  
 5 duplicate costs to retrench the same location in the future if  
 6 demand for additional fiber facilities occurs.

7 *Id.*

8  
 9 Thus, fiber facilities are always installed with extra fiber to meet projected demand  
 10 growth. Furthermore, fiber cables are commonly manufactured and deployed in  
 11 increments of 12 fiber strands (i.e., 12, 24, 48, etc., fibers per cable), which means that  
 12 there are likely to be additional unused fibers available to fill up the standard cable  
 13 size the carrier deployed. Verizon therefore assumed (and the Commission should  
 14 find) that CLECs who have deployed fiber optic loop facilities also have dark fiber  
 15 deployed at that location— unless a carrier shows, for a particular customer location,  
 16 that it does not have any dark fiber.

17  
 18 **Q. HOW DID VERIZON IDENTIFY CARRIERS OFFERING LOOP**  
 19 **FACILITIES ON A WHOLESALE BASIS, AND THE CAPACITIES AT**  
 20 **WHICH THOSE FACILITIES ARE OFFERED?**

21 A. Verizon primarily relied on carriers to self-identify themselves as wholesale providers  
 22 in response to the Commission Staff's TRO loop discovery requests. \*\* \*\* and  
 23 \*\* \*\* identified themselves as wholesale providers.  
 24 Verizon also found evidence of CLEC wholesale providers from public sources. As  
 25 with its transport evidence, Verizon identified carriers that hold themselves out as

AUS  
 CAF  
 CMP  
 COM  
 CTR  
 ECR  
 GCL  
 OPC  
 MMS  
 SEC  
 JTH

1           Therefore, unless there is specific evidence that a carrier refuses to sell other carriers  
2           specific capacities and dark fiber on a particular transport route, the Commission  
3           should find that a wholesale provider will sell DS1 and DS3 transport over its fiber  
4           facilities, as well as dark fiber.

5  
6           Based on the discovery responses and carrier websites, Verizon has identified \*\*  
7           \*\* and \*\* \*\* as counting towards the competitive wholesale trigger in at least one  
8           building. If these carriers wish to attempt to show that a specific location is not  
9           available at wholesale, the burden is now properly put on them to make such a  
10          demonstration. Absent such particularized, location-specific evidence, however, the  
11          Commission should rely on Verizon's evidence of a carrier's general willingness to  
12          offer its loop facilities on a wholesale basis and treat all such carriers' loop facilities as  
13          available for leasing at wholesale.

14  
15   **Q.   HOW DID VERIZON IDENTIFY WHETHER CLECS HAVE ACCESS TO**  
16   **AN ENTIRE CUSTOMER LOCATION?**

17   A.   The Commission's hi-cap loop discovery requests include a column entitled  
18   "Accessible Y/N". Verizon assumes that this column is asking CLECs whether they  
19   have access to the entire customer location. Moreover, in its responses to the  
20   Commission's discovery requests, \*\* \*\* included a column entitled "Can Serve  
21   All At Location." Where CLECs did not provide such information, Verizon  
22   assumed that they do have access to the entire location. It is reasonable to assume that  
23   a carrier with fiber optic facilities into a large commercial building has access to the  
24   entire building.

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