

**REDACTED**

**ATTACHMENT B**

**AT&T Florida  
FPSC Dkt No. 070736-TP  
Staff's 3rd Set of Interrogatories  
Page 1 of 1  
07/03/08**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO STAFF'S THIRD REQUEST FOR INTERROGATORIES, ITEM NO.  
88, FILED JUNE 26, 2008 IN FLORIDA DOCKET NO. 070736-TP**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

COMP 1  
CCIA \_\_\_\_\_  
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DOCUMENT NUMBER-DATE  
**05818 JUL-7 8**  
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AT&T Florida  
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REQUEST: Please refer to Intrado witness Hicks' rebuttal testimony on page 18, lines 20-23 for the following questions.

- a. Is witness Hicks correct when he asserts that AT&T maintains ten selective routers in Florida? If so, please list by county and identify the street address(es). If not, please identify AT&T's selective routers in Florida and list by county and identify the street address(es).
- b. Is witness Hicks correct when he asserts that "only [the] Brevard County [selective router] is served by dual tandems"? Please explain why or why not.
- c. Please explain the benefits of dual tandems at a selective router and what conditions exist that would necessitate dual tandems at a selective router.
- d. Is witness Hicks correct when he asserts that because of the dual tandems in Brevard County, only Brevard County "would be conducive to establishing multiple POIs for the exchange of E911 services traffic"? Please explain why or why not.

RESPONSE:

- a. Yes. The specific location of AT&T's selective routers is confidential information. AT&T Florida is providing this information subject to a Notice of Intent filed with this response.

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County            Street Address

- b.    No, Brevard County is served by one selective router. Mr. Hicks' testimony is unclear, but it appears that he believes that Intrado would implement POIs on a county basis, rather than on a LATA basis. If Intrado were attempting to establish POIs at the selective router location, then the LATA is the correct reference point, and not county.
  
- a.    AT&T is unaware of the existence of dual tandems at a selective router. However, there are limited instances of PSAPS deploying dual selective routers (tandems) that utilize two synchronized switches performing identical selective router functions such that if one incurs an outage, the other automatically routes all 911 calls.

Such dual selective router arrangement is rare and is ordered by PSAPs that want the highest level of redundancy possible at the switching level. This is the most expensive 911 network configuration to build because not only the facilities redundant, but the selective router switch itself, is also redundant. Because of the expense and the fact that that the PSTN Class 5 switches are

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extremely reliable, there are not very many ordered throughout the nation. Most PSAPs consider this level of redundancy as cost prohibitive and rely on the fact that the Class 5 End Offices are designed with internal redundancy specifications that result in less than one hour of down-time over a 40 year period.

- d. No, Mr. Hicks is not correct. The network configuration used in Brevard County is not related to multiple POIs. Dual selective routers provide redundancy at a switching level, as opposed to facility (POI) redundancy and diversity. A POI is where AT&T Florida's and Intrado's networks come together at a facility level where the fiber cables meet up at a point of hand-off or demarcation, and each carrier is responsible for the facilities on their respective side of the POI. A POI can be at any of the AT&T Florida central office buildings, but since this is 911 emergency services traffic, AT&T Florida strongly opposes placing a POI at indiscriminate locations. Intrado may want to establish a POI at a place that is more economical for Intrado, but there are certain AT&T Florida central office buildings that are categorized as hubbing offices and are the major intersections for fiber facilities and provide a logical point for a POI. Other carriers typically also use these central offices for their POIs, which will be important if these carriers must interconnect with Intrado for 911 services.

RESPONSE PROVIDED BY: Mark Neinast

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