

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Mad Hatter Utility, Inc.)
and Paradise Lakes Utility, LLC Against)
Verizon Florida LLC)
_____)

Docket No. 090313-PU

REBUTTAL TESTIMONY OF DONALD W. COWART

ON BEHALF OF

VERIZON FLORIDA LLC

DECEMBER 15, 2009

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FPSC-COMMISSION CLERK

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Donald W. Cowart. My business address is 5110 S.
3 Manhattan, Tampa, Florida 33611.

4

5 Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND
6 EDUCATIONAL BACKGROUND?

7 A. I have been employed with Verizon (and its predecessor, GTE) for 39
8 years. Since 1982 I have been the local area manager for Pressurized
9 Cable Outside Plant Construction in Tampa, Florida. In 1999, the area
10 for which I was responsible was expanded so that it included the Mad
11 Hatter Utility, Inc. ("Mad Hatter") properties at issue in this case. I also
12 assumed additional responsibilities in 1999, providing technical
13 assistance to other local area managers in the Southeast concerning air
14 pressure issues and reporting on these issues and their resolution to
15 their senior area manager. I have taken courses at Hillsborough
16 Community College, but have not completed the coursework for a
17 degree.

18

19 Q. WHAT IS PRESSURIZED CABLE?

20 A. Pressurized cable has dry, compressed air between the paper-insulated
21 copper wires and the outer cable sheathing. Verizon uses air dryers
22 (compressors) at its central offices and remote locations to pressurize
23 cable with dry air to protect the cable from water intrusion. When the
24 sheathing of pressurized cable is punctured, the air pressure prevents
25 water from intruding into the cable, making the paper insulation wet and

1 short circuiting the copper wire. When a puncture or cut causes the air
2 pressure to decrease below a certain level, an alarm is triggered at the
3 central office so a technician can be dispatched to fix the cable. An
4 alarm also can be triggered if a central office or remote air dryer is not
5 functioning properly.

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7 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

8 A. The purpose of my Rebuttal Testimony is to respond to certain points
9 concerning Issue 3B raised in the Direct Testimony of Larry Delucenay
10 that was filed on behalf of Mad Hatter and Paradise Lakes Utility, LLC.

11

12 **ISSUE 3B: SINCE JANUARY 1, 1994, WHAT PRODUCTS OR SERVICES**
13 **THAT WERE BILLED BY VERIZON TO MAD HATTER AND/OR**
14 **PARADISE LAKES LIFT STATION LOCATIONS REMAIN IN**
15 **DISPUTE?**

16

17 **Q. AT PAGE 4 OF HIS DIRECT TESTIMONY, MR. DELUCENAY**
18 **DESCRIBES A SERVICE THAT VERIZON'S PREDECESSOR, GTE,**
19 **PROVIDED TO MAD HATTER THAT MONITORED LIFT STATION**
20 **LINES. ARE YOU FAMILIAR WITH THAT SERVICE?**

21 A. Yes. In 1999, not long after the time my local area was expanded to
22 include the area encompassing Mad Hatter's property, an air pressure
23 alarm went off at a GTE central office that appeared to indicate a
24 problem with a remote air dryer on Mad Hatter's property. Upon
25 investigation, we determined that there was no air dryer on the property

1 and no pressurized cable in the vicinity. I then discussed the situation
2 with my supervisor. Because there was no pressurized cable in this
3 area, he directed that computer entries be made at the central office
4 disabling the alarms associated with Mad Hatter's property.

5

6 **Q. WHAT HAPPENED NEXT?**

7 A. Before I disabled the alarms, an executive complaint was forwarded to
8 me concerning Mad Hatter's alarm monitoring service, which I was not
9 aware GTE was providing. I then called Mr. DeLucenay and arranged a
10 meeting at his office. After we met, Mr. DeLucenay drove me around
11 the area, discussed his business, described the alarm monitoring
12 service GTE was providing to Mad Hatter, and expressed concerns
13 about the quality of the service Mad Hatter had received.

14

15 **Q. WHAT IS YOUR UNDERSTANDING OF THE ALARM MONITORING
16 SERVICE THAT HAD BEEN INSTALLED?**

17 A. My understanding is that the alarm monitoring service was designed to
18 trigger an alarm if a certain water level was reached where transducers
19 had been attached to Mad Hatter's facilities. I also understand that the
20 system worked by connecting the transducers to GTE's air pressure
21 alarm monitoring system.

22

23 **Q. DID MR. DELUCENAY STATE WHETHER MAD HATTER WISHED TO
24 KEEP THE SERVICE THAT GTE HAD BEEN PROVIDING?**

25 A. Yes, Mr. Delucenay said he wanted to continue receiving the service.

1 Q. HOW DID YOU RESPOND?

2 A. I explained that I was going to have to check with my management to
3 determine whether GTE would continue to provide it.

4

5 Q. MR. DELUCENAY STATES AT PAGES 4 AND 5 THAT MAD HATTER
6 WAS NOT CHARGED FOR THE ALARM MONITORING SERVICE. IS
7 THAT CONSISTENT WITH WHAT HE TOLD YOU DURING YOUR
8 MEETING?

9 A. No. In fact, Mr. Delucenay pulled out bills in GTE envelopes that Mad
10 Hatter had received and he identified them as bills for the alarm
11 monitoring service we were discussing. Mr. Delucenay's complaints
12 about the bills related to his concerns about the quality of service he had
13 received, not the fact that GTE was billing for the service.

14

15 Q. DID YOU HAVE ANY FURTHER DISCUSSIONS WITH MR.
16 DELUCENAY?

17 A. Yes. After checking with GTE's management, I called Mr. DeLucenay to
18 tell him that GTE was not going to continue providing the alarm
19 monitoring service.

20

21 Q. DID MR. DELUCENAY EXPRESS ANY CONCERNS WHEN YOU
22 INFORMED HIM OF THIS DECISION?

23 A. Yes. Mr. DeLucenay expressed concern about demonstrating that Mad
24 Hatter was meeting certain regulatory requirements. Based on our
25 conversation, I understood that he planned to call GTE's business office

1 to discuss the matter further. I did not speak with Mr. DeLucenay after
2 that, nor did I learn about any discussion he may have had with GTE's
3 business office.

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5 **Q. DID YOU TAKE ANY FURTHER ACTION?**

6 A. Yes. I made computer entries at the central office disabling the alarms
7 associated with Mad Hatter's property and disconnected the drops for
8 the four lines in question.

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10 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

11 A. Yes.

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