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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF BARBARA CRUIT
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKETS Nos. 980946-TL, 980947-TL, 980948-TL,
981011-TL, 981012-TL and 981250-TL

MAY 7, 1999

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELCOMMUNICATIONS.

A. My name is Barbara Cruit. My business address is 18560 North West
27th Avenue, Miami, Florida 33056. I am the Director – South Florida
Capacity Management for BellSouth Telecommunications, Inc. I have
served in my present position since 1995. I am responsible for
planning and engineering of the South Florida switching and interoffice
network.

Q. ARE YOU THE SAME BARBARA CRUIT WHO FILED DIRECT
TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

1 A. I will provide rebuttal testimony to the direct testimony of Sprint
2 Communications Company Limited Partnership ("Sprint") witness
3 Michael D. West, Teleport Communications Group Inc. ("TCG") witness
4 Scott Stinson, WorldCom Technologies, Inc. ("WorldCom") witness Ron
5 Martinez, Intermedia Communications Inc. ("Intermedia") witness
6 Ronald W. Beasley, Sprint Communications Company Limited
7 Partnership ("Sprint") witness Melissa L. Closz, and Supra
8 Telecommunications and Information Systems, Inc. ("Supra") witness
9 David Nilson regarding forecasting and space reservations in the
10 central offices being discussed in these proceedings.

11

12 Q. MR. WEST (SPRINT), ON SEVERAL OCCASIONS, ASSERTS THAT
13 BELL SOUTH HAS NOT PROVIDED DETAILED FLOOR PLANS,
14 HISTORICAL DATA, NOR PROJECTED GROWTH REQUIREMENTS
15 FOR THE SIX CENTRAL OFFICES UNDER DISCUSSION IN THESE
16 PROCEEDINGS AND THAT THE COMPANY SHOULD BE
17 REQUIRED TO PROVIDE THIS INFORMATION. DO YOU AGREE
18 WITH THIS ASSERTION?

19

20 A. No. BellSouth has provided office layouts and detailed floor plans for
21 all six of the offices, and has conducted numerous tours of these
22 central offices as well. The Company has also provided historical
23 growth of access lines and trunks served by these wire centers (from
24 as far back as January 1, 1992), as well as historical demand for the
25 associated switching, transport, and supporting power equipment. The

1 Company has provided copies of equipment orders placed on the
2 vendors. Further, projected growth of access lines and trunks to be
3 served and the associated equipment requirements have also been
4 provided. Testimony submitted by the Switch Capacity Management
5 (SCM) and Circuit Capacity Management (CCM) Panels, on behalf of
6 BellSouth, included equipment forecasts, while testimony filed by the
7 Common Systems Capacity Management (CSCM) Panel and BellSouth
8 Witness Jim Bloomer included detailed floor plans for all of the offices.

9

10 Q. MR. STINSON (TCG) STATES THAT THE COMMISSION SHOULD
11 CONSIDER THE HISTORY OF GROWTH/REDUCTION BY
12 EQUIPMENT CATEGORIES TO ENSURE THAT BELL SOUTH'S
13 PROJECTED SPACE NEEDS ARE REASONABLE. DO YOU
14 AGREE?

15

16 A. Yes. BellSouth agrees that the history of equipment growth and
17 removals should be considered when projecting space requirements,
18 and that is precisely what BellSouth does. The historical equipment
19 additions are identified, along with the forecasted projection of
20 equipment requirements, to project the space requirements. When a
21 removal project is identified, the vacated space is included in the
22 calculation of overall space requirements or space available. For
23 example, in the North Dade Golden Glades central office, the space
24 vacated by the STP (Signal Transfer Point) removal and the LM (Line

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1 Module) to LCM (Line Controller Module) conversions was incorporated
2 into the overall space requirements.

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4 Q. IN TESTIMONY FILED BY MR. WEST (SPRINT), MR. MARTINEZ
5 (WORLDCOM), MR. BEASLEY (INTERMEDIA), AND MS. CLOSZ
6 (SPRINT), THEY ASSERT THAT BELL SOUTH SHOULD ONLY BE
7 ALLOWED TO RESERVE SPACE FOR ONE YEAR OF GROWTH. IS
8 THIS REASONABLE?

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10 A. No. It is critical that BellSouth be allowed to reserve space to support
11 two to three years of growth. It is BellSouth's responsibility to serve the
12 customers in these wire centers and have space available to install
13 equipment to meet these customer requirements. Also, it is critical that
14 BellSouth have space available to install equipment to interconnect with
15 all the carriers' (ALECs, wireless, interexchange carriers') networks to
16 allow traffic to traverse from one network to the other. One year of
17 reserved space is not sufficient. Space must be reserved for
18 equipment growth to allow sufficient time to expand a central office
19 when space is exhausted. The planning, design, permitting, and
20 construction activities associated with a building addition take
21 approximately two to three years.

22

23 This projection was reviewed by the Florida Public Service Commission
24 Staff Auditors in their audit report on West Palm Beach Gardens, Audit
25 Disclosure Number 3 on Page 10.

1 Q. IN TESTIMONY FILED BY MR. NILSON (SUPRA) ON PAGE 9, HE
2 INDICATES THAT BELL SOUTH'S ESTIMATES FOR SPACE ARE
3 INCORRECT BECAUSE THEY DO NOT TAKE INTO ACCOUNT THE
4 PROJECTED LOSS OF CUSTOMERS DUE TO INCREASED
5 COMPETITION FROM ALEC COMPANIES. IS HE CORRECT?

6

7 A. No. BellSouth's projection of lines does include a projected loss of
8 lines to ALEC companies. Forecasters take into account the entire
9 market and then subtract projected losses to facility bypass.
10 Forecasters also add projected sales of unbundled facilities to
11 projected retail customers to make a complete forecast.

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13 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

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15 A. Yes.

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