JAMES S. ALVES BRIAN H. BIBEAU RICHARD S. BRIGHTMAN KEVIN B. COVINGTON PETER C. CUNNINGHAM RALPH A. DEMEO RANDOLPH M. GIDDINGS WILLIAM H. GREEN WADE L. HOPPING GARY K. HUNTER, JR. JONATHAN T. JOHNSON ROBERT A. MANNING FRANK E. MATTHEWS RICHARD D. MELSON ANGELA R. MORRISON GABRIEL E. NIETO ERIC T. OLSEN

HOPPING GREEN SAMS & SMITH PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS 123 SOUTH CALHOUN STREET POST OFFICE BOX 6526 NOV -5 PM 2: 46 TALLAHASSEE, FLORIDA 32314 (850) 222-7500 RECORDS AND FAX (850) 224-8551 REPORTING FAX (850) 425-3415

Writer's Direct Dial No. (904) 425-2313

November 5, 1999

ORIGINAL

GARY V. PERKO MICHAEL P. PETROVICH DAVID L. POWELL WILLIAM D. PRESTON CAROLYN S. RAEPPLE DOUGLAS S. ROBERTS GARY P. SAMS TIMOTHY G. SCHOENWALDER ROBERT P. SMITH DAN R. STENGLE CHERYL G. STUART W. STEVE SYKES T. KENT WETHERELL, II

OF COUNSEL ELIZABETH C. BOWMAN

Ms. Blanca S. Bayó Director, Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: UNE Docket No. 990649

Dear Ms. Bayó:

Enclosed for filing on behalf of Rhythms Links Inc. (f/k/a)ACI Corp.) are the original and fifteen copies of the Adoption by Robert Williams of the Rebuttal Testimony of Eric Geis.

By copy of this letter, this document has been furnished to the parties on the attached service list.

Very truly yours,

rel)1

Richard D. Melson

RDM/kcg Enclosures cc: Parties of Record

AFA APP CAF D00,0CMU CTR EAG LEG MAS OPC PAI SEC 130987.1 RECEIVED WAW TH RECORDS

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail this 5th day of November, 1999.

Beth Keating Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard oak Blvd. Tallahassee, FL 32399-0850 BellSouth Telecommunications, Inc. Nancy B. White c/o Nancy H. Sims 150 S. Monroe Street, Suite 400Tallahassee, FL 32301-1556 Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold, & Steen, P.A. 117 South Gadsden Street Tallahassee, FL 32301 Andrew O. Isar Telecommunications Resellers Association 4312 92nd Avenue, N.W. Gig Harbor, WA 98335 Floyd Self/Norman H. Horton, Jr. Messer, Caparello & Self P.O. Drawer 1876 215 S. Monroie Street Suite 701 Tallahassee, FL 32302-1876 Florida Public Telecom Assoc. Angela Green, General Counsel 125 S. Gadsden Street # 200

Tallahassee, FL 32301-1525

...

Tracy Hatch AT&T Communications 101 N. Monroe Street Suite 700 Tallahassee, FL 32301 Susan Huther Rick Heapter MGC Communications, Inc. 3301 Worth Buffalo Drive Las Vegas, Nevada 89129 James C. Falvey, Esq. e.spire Communications, Inc 133 National Business Parkway Suite 200 Annapolis Junction, Maryland 20701 Jeremy Marcus Kristen Smith Blumenfeld & Cohen 1625 Massachusetts Ave. NW Suite 300 Washington, D.C. 20036

Terry Monroe Vice President, State Affairs Competitive Telecomm. Assoc. 1900 M. Street, N.W. Suite 800 Washington, DC 20036

Kimberly Caswell GTE Service Corporation One Tampa City Center 201 North Franklin Street Tampa, FL 33601-0110 Carolyn Marek Vice President of Regulatory Affairs Southeast Region Time Warner Communications 233 Bramerton Court Franklin, TN 37069

David Dimlich, Legal Counsel Supra Telecommunications & Information System, Inc. 2620 SW 27th Avenue Miami, FL 33133

Donna Canzano McNulty, Esq. MCI WorldCom 325 John Knox Road Suite 105 Tallahassee, Fl 32303

Michael A. Gross VP Reg. Affairs & Reg. Counsel Florida Cable Telecomm. Assoc. 310 North Monroe Street Tallahassee, FL 32301

TCG South Florida c/o Rutledge Law Firm Kenneth Hoffman P.O. Box 551 Tallahassee, FL 32302-0551

Peter M. Dunbar, Esq. Marc W. Dunbar Esq. Pennington, Moore, Wilkinson & Dunbar P.O. Box 10095 Tallahassee, FL 32302

Scott A. Sapperstein Sr. Policy Counsel Intermedia Communications 3625 Queen Palm Dr. Tampa, FL 33619

Eric J. Branfman Morton J. Posner Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, D.C. 20007-5116

Christopher V. Goodpastor, Esq. Covad Communications, Co. 9600 Great Hills Trail Suite 150W Austin TX, 78759 Laura Gallagher, P.A. 101 E. College Ave. Suite 302 Tallahassee, Fl 32301 Charles J. Rehwinkel Sprint P.O. Box 2214 Tallahassee, FL 32316 Bettye Willis ALLTEL Communications Services, Inc. One Allied Drive Little Rock, AR 72203-2177 J. Jeffry Wahlen Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 Florida Competitive Carriers Association P.O. Box 10967 Tallahassee, FL 32302 Florida Digital Network, Inc. 390 N. Orange Ave., Suite 2000 Orlando, FL 32801 KMC Telecom, Inc. John McLaughlin Suite 170 3025 Breckinridge Blvd. Duluth, Ga 30096 MCI WorldCom, Inc. Mr. Brian Sulmonetti Concourse Corporate Center Six Six Concourse Parkway, Suite 3200 Atlanta, GA 30328

NorthPoint Communications, Inc. Glenn Harris, Esq. 22 Sutter Street, 7th Floor San Francisco, CA 94108

Office of Public Counsel Stephen C. Reilly c/o The Florida LegisLature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

Holland Law Firm Bruce May P.O. Drawer 810 Tallahassee, FL 32302

LeD.

. . .

Attorney

1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION	
2	ADOPTION BY ROBERT WILLIAMS		
3		OF REBUTTAL TESTIMONY OF ERIC GEIS	
4		ON BEHALF OF RHYTHMS LINKS INC.	
5		DOCKET NO. 990649-TP	
6	November 5, 1999		
7			
8	Q.	PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.	
9	Α.	My name is Robert Williams. My title is National Deployment Director, East	
10		Region for Rhythms Links Inc., a wholly owned subsidiary of Rhythms	
11		NetConnections Inc. (collectively "Rhythms"). My business address is 8605	
12		Westwood Center Drive, Suite 300, Vienna, VA 22182.	
13	Q.	PLEASE STATE YOUR QUALIFICATIONS AND EXPERIENCE.	
14	Α.	I am responsible for negotiation, management, and execution of interconnection	
15		agreements and associated issues between Rhythms and ILEC phone companies	
16		in the eastern third of the United States. I am also responsible for methods and	
1 7		procedures for ordering, provisioning, delivery, and maintenance of unbundled	
18		network element loops between Rhythms and ILECs. Further, I am responsible	
19		for all physical collocation issues between Rhythms and ILECs, including filing	
20		collocation applications, scheduling collocation, exchanges of information,	
21		billing and turn-over of collocation from ILECs to Rhythms. Specifically, I	
22		handle all of these matters for Rhythms in dealing with BellSouth, Bell Atlantic,	
23		and Sprint.	

DOCUMENT NUMBER-DATE 13661 NOV-58 FPSC-RECORDS/REPORTING

1		I have seventeen years of business and operations experience, mostly		
2		telecommunications, working as an Officer in the United States Navy, as well as		
3		for regulated telephone companies.	On August 23, 1999, I began working for	
4		Rhythms. My qualifications and prior business experiences include:		
5		• Jan. 1999 – Aug. 1999:	Senior Manager, Data Network	
6			Implementation, Global One, Reston, VA	
7		• Dec. 1996 – Dec. 1998;	Senior Manager, Local Network	
8			Implementation, MCI, Reston, VA	
9		• Dec. 1995 – Dec. 1996:	Manager, Global Project Implementation,	
10			MCI, Reston, VA	
11		• Feb. 1994 – Dec. 1995;	Project Manager, Global Project	
12			Implementation, MCI, Reston, VA	
13		• June 1991 – Feb. 1994:	Project Manager, Pfizer Inc., Parsippany,	
14			NJ	
15		• Dec. 1983 – June 1991:	Officer, United States Navy	
16				
17	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?		
18	A .	I am adopting the rebuttal testimony filed by Eric Geis in this docket on behalf		
19		of Rhythms on September 10, 1999, except for page 1, lines 7 to 19, which		
20		contain personal information about Mr. Geis. I will also sponsor Exhibits		
21		(EHG-2) and (EHG-3) attached to that testimony.		
22	Q.	DOES THAT CONCLUDE YOUR TESTIMONY?		
23	А.	Yes, it does.		
24				