BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of	DOCKET NO. 990649-TP
INVESTIGATION INTO PRICING OF UNBUNDLED NETWORK ELEMENTS.	

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VOLUME 12

Pages 1743 through 1835

PROCEEDINGS:	HEARING
BEFORE:	CHAIRMAN J. TERRY DEASON COMMISSIONER E. LEON JACOBS, JR. COMMISSIONER LILA A. JABER
DATE:	Wednesday, September 20, 2000
TIME:	Commenced at 9:15 a.m.
PLACE:	Betty Easley Conference Center Room 148 4075 Esplanade Way Tallahassee, Florida
REPORTED BY:	TRICIA DeMARTE Official FPSC Reporter
APPEARANCES:	
	(As heretofore noted.)

I N D E X

E X H I B T S

PROCEEDINGS

(Transcript continues in sequence from Volume 11.)

MR. EDENFIELD: Just to be clear, may I ask Ms. Boone whether this is from his first or second testimony?

MS. BOONE: This is from his original first direct. I just need a blowup of this, and I'd like to ask you some questions about this. Page -- I need to write, and so I promise you'll be able to here me.

MR. RUMSEY: We've got to get it on the --

MS. BOONE: Oh, okay. Okay. I'll try.

CHAIRMAN DEASON: You want to sing a song while you're up there?

MS. BOONE: Well, I'm scared. I may break out in karaoke. Let me know if that happens.

WILLIAM H. R. GREER

continues his testimony under oath from Volume 10:

CONTINUED CROSS EXAMINATION

BY MS. BOONE:

Q Okay. I'd like to ask you some of the things about Mr. Riolo's time chart here as compared to what we saw on the videotape. Now, you would agree with me that this page of Mr. Riolo's testimony sets forth underground cable load coil removal in a manhole; right?

A Yes, I do.

Q And that's what we saw in the videotape; right?

A Yes, it is.

Q Okay. Now, I'd like to take you through the steps one about by one, if you would agree to do that with me. The first one is the time to travel to the underground splice location. Now, that was not shown on your video; right?

A No, it was not.

Q Okay. So I'm just going to write up here "tape time," and that's an N/A. Now, the next step is to set up the work area protection and underground work site. Now, you would agree with me that some of that had been done at the beginning of the tape and was being done as the tape started? Would you agree with me?

A Yes, I will agree.

Q Mr. Riolo estimates it would take about five minutes to do that work; is that correct?

A That is what he shows.

Q And would you agree with me, subject to check, that your tape starts at 8:16 and the same work tasks are completed by 8:20 on your tape? Would you agree with that, subject to check?

A Subject to check, yes.

Q Okay. So you took actually four minutes there,

so Mr. Riolo had five minutes. Would you agree that you two are very close in the amount of time, your tape and Mr. Riolo's estimate?

A I do not understand how you came up with the four minutes. Would you go through that again, please.

Q Certainly. The tape started at 8:16.

A Yes.

Q Okay. And these work times concluded at -- these tasks associated with setting up work area protection concluded at 8:20.

A Subject to check, okay.

Q Okay. Thank you. Now, the next step is 3. Now, that's pump and ventilate the manhole. Now, would you agree with me, subject to check, that that work was done by your technicians on the tape? You don't have to check that, we just saw it, sorry.

Would you agree with me, subject to check, that that work started at about 8:20?

A Yes.

Q And it concluded at 10:03?

A That sounds reasonable.

Q Okay. So that's a total of 103 minutes. Okay. Would you agree with that, subject to check?

A Yes, I would.

Q That's quite different than what Mr. Riolo said,

15 minutes; right?

A Indeed.

Q Okay. Now, the next step is called buffer cable, rerack cable, and set up splice; right? That's Step Number 4?

A Yes.

Q And that task was done on the tape; right?

A The reracking was not necessary in this case.

Q Okay. But, okay, these group of tasks, whatever would be associated with that, in this particular manhole was done on the tape?

A Yes, it was.

Q Would you agree with me, subject to check, that that work began about 10:03 on the tape and concluded at about 10:10 for a total of seven minutes?

A Yes, I will agree, subject to check.

Q So if we compare this, you will see that Mr. Riolo in his testimony thought that -- he estimated in his expert opinion it would take about five minutes to do that work; right?

A Yes.

Q But your tape showed it took seven minutes.

A Yes.

Q Would you agree that those are pretty close?

A Yes, I will agree.

Q Okay. Now, on the tape between 8:10 and 8:57, the BellSouth technicians are plugging a leak in the manhole. Does that sound about right?

A Yes.

Q Okay. So that's not a task that Mr. Riolo has on his chart; correct?

A That is correct.

Q And that's the task that took the technicians 47 minutes to complete, subject to check?

A No, it did not take that long.

Q Okay. But you agreed with me it was between -- it started at 10:10 and it concluded at 10:57?

A Excuse me. I specifically watched that task, and that task took about ten minutes for him to do that, to plug the hole.

Q Okay. Well, we have the tape, so everyone can make their determination themselves, but that's fine. We think it took from 10:10 to 10:57. But what times do you have?

MR. EDENFIELD: Commissioner Deason, I object to Ms. Boone's constant editorializing. If she has questions, certainly she's entitled to ask them, but her testifying and making editorial comments I think is inappropriate, and I would object to that and ask her to stop.

CHAIRMAN DEASON: Ms. Boone, you've been asked not to editorialize.

MS. BOONE: I will try, Commissioner. Thank you.

CHAIRMAN DEASON: Thank you.

BY MS. BOONE:

Q What times do you have recorded for that task?

A I do not have the times recorded for the each individual time and task listed here.

Q Okay. I see in front of you a list of what looks to be times.

A Yes, they are. They were the times in which things were going to be changing during that presentation. I do not have listed here what indeed the events were that occurred with them.

Q Okay. Thank you. Now, if you look next at Step 5, which is opening the splice case, would you agree with me, subject to check, that the tape shows this work occurring between 10:57 and 11:04? So it's roughly four minutes long.

A Yes, I do recall that those tasks started at 10:57.

CHAIRMAN DEASON: Did you stay 10:57 to 11:04?

MS. BOONE: I'm sorry, 10:57 to 11:01. And that's a total of four minutes.

BY MS. BOONE:

Q Now, if we look on this chart, you will note that Mr. Riolo in his expert opinion estimated it would take five minutes for that task; correct?

A That is correct.

Q So you would agree with me that he was pretty close? In fact, he gave you all a little bit more time for that task?

A Actually, he has been very close in all of these. As you look at these, you will see that his total time is close to what BellSouth has. So, yes, he has done a very good job here of enumerating the steps and giving some times.

Q Great. Step 6, identifying pairs to be deloaded. Would you agree with me, subject to check, that the BellSouth technicians on the tape began to do this at about 11:01?

A No, that I do not recall. And I'm not sure what you would have called when they began to try to identify the pairs on this tape.

Q Well, as I recall from the tape, they had the splice case open, the plastic was open, and we began -- we said that at 11:01, we think they began to look through and find the proper binder.

A Okay. I will accept that as they beginning to

look for the first pair.

Q Okay. Great. In this case, your technicians were actually deloading all 25 pairs of a binder group; correct?

A Yes, that is our understanding.

Q Okay. Would you agree with me that there's a blank on the tape between 11:04 and 11:36?

A Yes, I will agree to that.

Q And that was after the technicians had identified the proper binder group; correct?

A No. We do not have on the tape where he actually picked up and said, yes, I have the right binder group. What the tape shows is that he's beginning to dig through it, and then they cut from that point. They do not actually show him, because had they shown him identifying the right binder group, if they would have shown him with a tone detector, the same one that he used to pick out each little pair, he would have used it without the headset and been going through all of those groups in order to find the first one.

So the tape itself did not capture the moment at which he identified the group that he had to have.

Q So is it your testimony that the tape showed him putting tone on a variety of different binder groups?

A No. It is my testimony that, to my recall, it

does not show him doing that. He was digging for a number, but in order to be sure, he would have had to have a tone put on there.

Q And as Commissioner Jaber mentioned, the number was around the binder group of 25 pairs, right, that was the tag number?

A And as my comment said, the plastic connectors are definitely 25 pairs. I could not tell for sure whether or not the number was around a 25-pair or a 100-pair group.

Q Okay. Fair enough. So did you talk to the technicians about what they were doing in that time period where there's a blank on the record?

A No, I have not.

Q Okay. Then how do you know that's what they were doing?

A I do not. I'm just simply stating that we do not have on tape the time in which they actually identified the connector that they needed.

Q Would you agree with me that --

COMMISSIONER JABER: Excuse me. Is what you're testifying in that regard that the tape doesn't reflect the technician searching for the appropriate group?

THE WITNESS: It shows him beginning to search through there, but it doesn't show the final decision

point.

COMMISSIONER JABER: But it's also your testimony that you don't know if that's what the absence in the tape was either.

THE WITNESS: No, I do not know.

COMMISSIONER JACOBS: When we talked earlier about his instructions from the engineer, would that point him to a binder group? Does he have to still search through all the binders to find the one -- I'm sorry, put tone on all the binders to figure out which one he needs to go to?

THE WITNESS: It is my understanding that the outside plant engineer really doesn't necessarily have -- he does not instruct through his work order a number, one of those numbers to be identified.

COMMISSIONER JACOBS: Okay. So he still has to put tone on all of them?

THE WITNESS: Yes.

COMMISSIONER JACOBS: Okay.

BY MS. BOONE:

Q If we could just finish up with Step 6 here. This is the part where he's identifying -- would you agree with me that started at about 11:01 and concluded at 11:04, they had identified the proper binder group?

A Subject to check, in that time frame he did

find -- he was sure that he was working with the right binder group.

Q Okay. So that's three minutes that it took on the tape to conduct the tasks associated with Step 6; correct?

A Would you rephrase that question again?

Q Right. The work identifying the binder group began at 11:01 and concluded by 11:04, they had identified the proper binder group to work on?

A No, I have to disagree with that because what is shown on the tape is when he began searching through the 25-pair connector to find the first pair. So to show three minutes on this display here, I believe, does not do justice to the time that it took him to search through and find that initial 25 pairs.

CHAIRMAN DEASON: How many sets of 25-pair were in this cable? About 30 something, 32?

THE WITNESS: Twenty-seven times four.

CHAIRMAN DEASON: Twenty-seven times four.

THE WITNESS: A 2,700-pair cable, 4 bindery groups.

CHAIRMAN DEASON: So it's 27 times 4. That's 108?

MS. BOONE: There's a calculator right there.

THE WITNESS: Yes, sir.

CHAIRMAN DEASON: So what that -- but if -- does he just randomly go through and just starts checking, putting the -- checking the tone on each one until he finds one?

THE WITNESS: These probes, as they get closer to the pair that has the tone on it, will get louder and louder, so he's just simply moving through and making sure he hears a tone, and then he keeps searching until he says, yes, this one is the loudest one. And then he pulls it out to get that.

So the time it took him to find the first pair is, in fact, from the time that he laid back that black cover and began pulling it out and finding it. So even though there's a blank in the tape at that point, it was more than the three minutes that's shown here from where he actually had a connector in his hand and started going down the pairs.

BY MS. BOONE:

Q Okay. But do you know how long exactly it took him?

A No, I do not.

Q Okay. If an entire binder group is being deconditioned, being unloaded, as we saw here, you're saying it's still necessary to test each and every pair even once you identify that binder group?

A Yes, indeed, because this is a pulp cable. And, therefore, you would be betting on somebody else, you know, never making a mistake in this place and making another mistake someplace else. We don't know who's been in and made a cut. So in order to be sure you are getting the 25 pairs that the engineer calls for, you want to test each and every one of those 25 pairs.

CHAIRMAN DEASON: Each one of those will have a tone?

THE WITNESS: They will test one pair at a time. As a matter of fact, he does several things in this case. Not only does he pick up and make sure he's on the pair by the way of a tone, then he takes and he puts a connector to ground. We call it grounding the pair. And he asks the technician in the central office, do you see my ground? And he does that to both the tip and the ring so he can be sure that in fact the two leads he has are the two leads that he needs to be an end-to-end circuit.

There are things that are called splints predominately in pulp cable where a person could have picked up the tip of one pair and the ring of another, and they go ahead and splice them. And at some point, somebody else finds it, and they repair it wherever. So these things occur as you're in your plant. And, therefore, it just says that to be sure you do the job

right, test each pair and be sure you have the tip and the ring.

BY MS. BOONE:

Q Okay. If it weren't PIC cable, you would be required to put tone on every one of the 25 pairs in the binder group?

A Yes. I am told that still you want to be sure you're on the cable pair that you're supposed to be on. There's just things that can happen in your outside plant, so to do the job right, test each pair, and you will know what you have when you get through.

Q Okay. You're BellSouth's task time expert on conditioning; correct?

A No.

Q You're not?

A No, I am not.

Q Can you give me an estimate based on your experience of how long you think it would take? Because essentially you're putting tone, ziz, ziz (verbal indicator), you're checking, it takes until you find 25; right?

A Yes, I am checking them until I find the right 25, but then that's going to depend upon the size of the cable. In this case, it's 2,700. Had this been a simple 100-pair cable, 50-pair cable, he would have found it much

quicker.

Q Okay. Well, the tape shows it's taking about three minutes. You think it actually took longer?

A Again, I object to the fact that the tape does not show it, but if you wish to show three minutes at that point --

Q Okay, yeah. Let's just move along here. If you look at Step 7, now, this is going to be a particular interest to Chairman Deason and Jaber who asked earlier about discontinuity of service. Now, on this, Mr. Riolo says bridge 25-pair binder group for service continuity, if necessary, and he includes a task time of five. Do you know what that's for?

A Yes. What he's assuming is that he's going to go through an operation and be able to connect onto the top of that connector another connector which makes continuity with the existing pairs.

Q And isn't this a way to ensure that there is never a loss of continuity during the load coil removal process?

A Yes. In theory that works out well, but you notice that the guy never wanted to break apart these connectors. These are plastic. They have metal in them. The simple connection is actually nothing more than the cable pair being pushed down into this metal connector.

It is not a rigid connection. It can be fragile. So you don't want to be messing around with these things. You want to handle them deliberately to be sure.

If you notice on the tape -- I did not point it out, but the guy carefully -- when he places it in a new connector, he trims it off. He wants to be sure that it's a clean connection.

Q Okay. But Mr. Riolo has assumed time, five minutes of time that -- for a task that was not conducted on the tape; correct?

A No, he has given a time for one type of task, and a similar task was done on the tape. This whole process here has to be considered as a block event, not a step by step for a couple of reasons: One is that we're dealing with pulp cable and, second, that he makes no allowance for being sure that those 25 pairs are there.

So the tasks on the tape that correlate to this are the fact that he went through and identified each pair, and then he made a connection one at a time to be sure that he got it. So the total tasks should include the three steps, at least three steps.

COMMISSIONER JABER: So the task on the tape that correlates to Number 7, just to try to move this along, how long would you say that took?

THE WITNESS: On the tape, it was done on a

pair-by-pair basis. Seven, 8, and 9, 10 are the tasks here that were necessary for the men there to identify each pair, remove it and move to a next connector.

CHAIRMAN DEASON: Well, excuse me. Now, I thought that in response to a question, you indicated that Step 7 was not done, because you indicated that there's residential service, and it's a risk that you take that you're going to be interrupting a telephone call.

THE WITNESS: What I'm saying is 7, 8, and 9 on his -- now, he's doing 7 for the intention of not interrupting it, but that's part of the splicing. In other words, he uses 7 in a way to begin -- no, he doesn't either. He does not. So, true, in this case, 7 is not done in any way at all.

BY MS. BOONE:

Q Okay. Moving along. Steps 8 and 9, you will see that in Mr. Riolo's chart that's actually severing the connection from the main cable and then rejoining and splicing it. Would you agree with me, subject to check, that those tasks began about 11:48 when the crew started removing the connections and snipping these parts to the loop, and then finished rejoining the parts at apparently 12 even, noon? So together 8 and 9 took about 12 minutes?

A Subject to check, the tape did not show them actually moving all 25 pairs over.

Q And would you agree with me also that since you didn't do Number 7, removing the bridging would not be a necessary step in what we saw in the tape?

A Yes, I would agree with that.

Q Okay. Now, would you agree with me that Steps 11, 12, 13, 14, and 15 all have to do with Mr. Riolo's idea that you should actually be unloading 50 at a time? This is the time for identifying the second pair. Would you agree with that?

A Yes, that time is for doing another 25 pair.

Q Okay. And those steps were not included and were not done on the tape?

A Yes, that is correct.

Q All right. Now, on Step 16, cleaning, resealing, and closing the splice case. Would you agree with me that the work for that started at about 12 noon and concluded about 11 minutes later at 12:11, subject to check?

A Yes.

Q Okay. And I'm going to write that up here. If you'll note as well, Mr. Riolo in his expert opinion had said it was going to take about ten minutes; right?

A Yes.

Q So he's pretty close on the mark there?

A Yes, he is.

Q Okay. Number 17 is rack cables, pressure test cables in manhole. Now, that occurs after you close the splice case and you're reracking and pressurizing the cable; is that correct?

A Yes, that's correct.

Q Would you agree, subject to check, that that started at about 12:11 on the tape and went to 12:20 for approximately nine minutes of crew time?

A Subject to check.

Q And that compares to Mr. Riolo's estimate of ten minutes?

A Yes.

Q Okay. And the last one here, closing down the manhole, stowing away the tools, breaking down the work area. Would you agree with me that that began on the tape at about 12:23 and ran until the end of the tape at 12:42 for a total of 19 minutes?

A That was the total on the tape. It did not show the final, but, subject to check, that is very close.

Q Okay. And Mr. Riolo had said that was going to take ten minutes; right?

A Yes.

Q But you actually closed two manholes on the tape; right?

A That cannot be considered closing two manholes

as far as this time is concerned. Yes, there were two openings to these manholes, but the few minutes extra that it actually takes to put that other lid back on I would not classify as closing a second manhole. So, therefore, I would not divide that by two.

Q Fair enough. Would you agree with me that most manholes are only going to have one opening?

A I do not have that knowledge.

Q A simple 51 percent?

A I don't have that knowledge at all.

Q Okay. We're almost done here with this chart. I'd just like to run through a couple of things from here. There are a number of tasks that were both on the tape and on Mr. Riolo's chart, and those are tasks 2, 3, 4, 5, 6, 8, 9, and 16 to 18. So would you agree with me that those are both, subject to check, on the tape and on Mr. Riolo's chart?

A Would you rephrase that question, please.

Q Sure. I've written down here the times from the tape, and these are the times from Mr. Riolo's testimony. Would you agree with me that both the tape and the testimony have times for Steps 2, 3, 4, 5, 6, 8, 9, and 16, 17, and 18?

A No, I disagree. I still have to refrain from saying that Item 6 that the tape shows the full time that

that was necessary.

Q Okay. We already went over that. And for purposes of this discussion --

A Yes, we have.

Q -- that's what's on the tape, three minutes; correct?

A Yes, for this discussion.

Q Okay. Now, let's just write "similar activities." Mr. Riolo -- would you accept, subject to check, that the total amount of all those times is 73 minutes? Would you accept that, subject to check? I have a calculator if you'd like --

A Yes, subject to check, I will accept that.

Q Okay. And the tape time also, subject to check, was 172 minutes. Does that sound about right for those activities?

A May I ask that you mark them again in the left column so we can be sure of which ones each time?

Q This one over here? Sure. So we're talking 4 plus 103, plus 7, plus 4, plus 3, plus 12, plus 11, plus 9, plus 19 for a total of 172.

A Subject to check, I accept that, yes.

Q Okay. Now, if you pull out the time for Number 3, right here, pumping and ventilating the manhole, that's going to make some pretty dramatic changes,

wouldn't you agree?

A Yes, I have to agree that that is a huge factor of time. But then again, this is Florida, and although I cannot tell you how often that water is in there, you have to expect that pumping even the least bit of water takes longer than 15 minutes to be able to get out your pumps, put them down in there, power them up, get them out of the way.

Q Okay. We're going to talk about that a little bit more in just a second, but I just want to get these numbers up here. So you would take 15 minutes off Mr. Riolo's time for a total of 58 minutes, correct, subject to check?

A Yes.

Q And you'd take 103 minutes off the BellSouth time, right, for a total of 69 minutes?

A Yes.

Q So, now, there are only 11 minutes' difference between what the BellSouth folks did on the same tasks as what Mr. Riolo came up with.

A With these exceptions, yes.

Q And you'd agree with me that if we had included Mr. Riolo's time identified in Steps 11, 12, 13, 14, and 15 for doing additional binder groups, Mr. Riolo would have had more time than the BellSouth tape?

A Yes, it would have taken him more time.

Q So this is pretty accurate, his times? You've already agreed; right?

A I do not understand what you mean by pretty accurate.

Q Well, I believe you testified somewhere here in the middle that Mr. Riolo did a pretty accurate job of estimating task times.

A I said he did an excellent job of listing out the tasks, and his assumptions on times were reasonable, yes.

Q Great. Now, I'd like to talk a little bit about -- in particular, the manhole that we saw on the tape, if you would. Would that be called what is called in the telephony parlance a four-head manhole?

A My understanding is that there were four chambers to this one.

Q Okay. And is that typical in BellSouth?

A I do not know.

Q Did you do any studies, any research to determine if it was in fact typical what you showed on the tape?

A No, I did not.

Q Would you agree with me that there's more work involved on a four-head manhole than there is on a smaller

one?

A No, I would not. As a matter of fact, some people call this the Cadillac of manholes. You notice they had plenty of room to move around and do things to get past each other. A much smaller manhole where that may have had less water in it would have been more confining, would have been more -- even more difficult to do any of these tasks at all. So to say that that is a bad situation here doesn't fit the mold.

This is actually a pleasant environment. As a matter of fact, you notice that there weren't that many cables that were around each other. A much smaller manhole would have had the cables closer together, and the phrase that was used up here as far as racking and reracking would have come into play to be able to move the cases out to be able to get to the splice case and then to put them back in again. So the size of the manhole has advantages and disadvantages.

Q Fair enough. You did state that was a large manhole; right?

A Yes, I did.

Q So they're not all going to be that large?

A It depends. Now, this is a load manhole. This manhole was designed this big because this is 3,000 feet from the central office, and when they designed this

underground structure, they were anticipating what would happen at this location.

Ironically, back in this time frame, T1 was coming out at the same time. T1 was the interoffice facilities, of course, during the '70s using cable, and at the same point, because of these large manholes that were developed for load points, the technology was designed that a T1 repeater case would also be at this same point.

So these manholes at 3,000 feet from the central office from predominately a downtown central office that would have a lot of trunking facilities and a lot of these distribution cables would have been built as large manholes.

Q Was there a T1 box in that manhole?

A No. In this particular section, I did not see any T1 repeater cases. As a matter of fact, most of the T1 has been taken out of our interoffice facilities. There was one point in the tape that you wouldn't have known to be looking for, but there were three plastic pipes. They were only about -- each one was only about an inch and a half, 2 inches in diameter together. That would have been the fiberoptics interoffice ducts.

So the trunking route that was along this distribution route -- I mean, along these underground facilities has probably been changed out to fiberoptics.

Q Would you agree with me that that on the tape was a larger than average splice case?

A No, I cannot agree or disagree with you.

Q You just don't know how big splice cases are at all?

A No. It's that, again, it depends on where you are in our outside plant. Now, for a metropolitan office that is that far from the central office, a 2,700-pair cable might be reasonable --

Q Okay.

A -- but it would depend.

Q It might be reasonable. Excuse me, sorry. Did you finish your statement? I'm sorry.

A Yes, I have.

Q So I'm sorry, I didn't get the answer. Is that an average-sized splice case in the BellSouth outside plant in Florida?

A I do not have that knowledge.

Q What size splice case would be used 9,000 feet from the central office?

A That would have to depend, but again, I do not have that knowledge.

Q Would you agree with me it's more likely to be smaller?

A Again, I do not have that knowledge.

Q How about 15,000 feet from the central office, what size splice case would be used there?

A I do not have any knowledge of what's typical of what splice cases are.

Q All right. If we talk about the comparison between the work steps that Mr. Riolo's outlined in his testimony and what we saw on the tape, would you agree with me that the real differences came in two places: One was the time for pumping and ventilating, and the second was the time for plugging the leak?

A No. Again, I have to say that we do not have an accurate record with this tape, the amount of time that it took to find those pairs. Yes, I understand that there is about a 15-minute gap there, and what portion of it was used in finding the pairs, we have no record.

COMMISSIONER JABER: Do you know why that part was not videotaped?

THE WITNESS: No, I have no idea.

BY MS. BOONE:

Q Okay. Let's talk about that leak for just a second, if you will. Would you agree with me that at about 10:10 until about 10:57, technicians were doing work, plugging that leak that was coming in off the side?

A Would you restate the times again, please.

Q Sure. 10:10 to 10:57.

A Again, no. As I stated earlier, I cannot accept that time because I did look and watch that to see how much time was spent plugging that leak, and it was, as I remember it, about ten minutes.

MS. BOONE: I wonder, Mr. Edenfield, if I could ask the witness to review that portion of the tape and report back to us as a data request after lunch? The time that he believes it took exactly to plug the leak.

MR. EDENFIELD: Let me reiterate, when I moved this into evidence, that BellSouth at no time has indicated that this is to be used as a time and motion study. In fact, I specifically said it was not being entered into evidence as a time and motion study but only to demonstrate the task.

So to the extent -- first of all, you know, the request is not appropriate because we're not introducing this for that purpose. Second of all, I'm not sure that I understand what counsel is exactly directing me to do here, not that she has that authority or --

CHAIRMAN DEASON: She wants the witness to review the amount of time -- she claims it's 47 minutes; he claims it's more like 10 minutes to plug the leak. I don't think it's an unreasonable request.

MR. EDENFIELD: That's fine. I'll do that.

CHAIRMAN DEASON: Okay.

MS. BOONE: Thank you.

BY MS. BOONE:

Q I'd like to talk about repairing the leak in general. Would you agree that fixing the leak has nothing to do with removing the load coil?

A No, I do not agree.

Q Would you agree that the leak wasn't caused by the request to remove the load coil from the ALEC?

A No, I do not agree. The task calls for entering a manhole and being able to perform an operation there. Had this been at the request of a CLEC to unload a pair, this is what is necessary to do it. You have to dam the water before you can proceed with the operation at hand.

That's just like time that is here shown on Mr. Riolo's thing of racking the cable. If the splice had happened to be underneath another splice and we had to lift one out of the way, that's time that it takes to get to it. So these operations are necessary in order to unload the pairs. So I cannot agree that it had nothing to do with it.

CHAIRMAN DEASON: Let me ask you this. How much time, and you may not be familiar with the cost study, but how much time in determining the cost is allocated to plugging leaks?

THE WITNESS: To my knowledge, there is no time,

but I do not have that detailed knowledge of what's in the cost study.

CHAIRMAN DEASON: Okay.

BY MS. BOONE:

Q Would you agree with me that there is time included for all of the tasks that you say are necessary to condition a load coil -- condition a loop? Excuse me.

A Will you rephrase the question?

Q Well, I think Chairman Deason just asked you if there was a specific time for plugging the leak, and you said you didn't think there was; is that correct?

A To my knowledge, there is not. That's what I said.

Q But it's BellSouth's position that this work is included in the work that needs to be done to condition a loop; is that correct?

A No. It's BellSouth's position that there are things out there that are just a natural environment of telephony, and when you take all those into consideration, these are the tasks and the times that are necessary.

Q All right. My question was really getting at what caused the leak, not -- the order from the ALEC did not cause the leak. We can agree to that?

A Yes, we can agree to that.

Q Okay. Now, would you agree that having a leaky

duct is bad for plant maintenance?

A Yes, by virtue of the fact that they saw that as one of the first tasks that needed to be done, you repair your duct leaks. Yes.

Q Okay. And if somebody was down there doing something on a T1 line, if there were a T1 box down there, they do the same work; right?

A Yes. Had they been down there and they had to pump the manhole because there was water pouring in, they would have done the same task. This task was generated by the fact that they needed to be in the manhole.

Q Does BellSouth have a habit of keeping its manholes full of water?

A No. BellSouth let's nature take its natural course.

Q Okay. So there's no routine maintenance involved in making sure that these cables stay dry?

A Yes, there is. As a matter of fact, there is a whole section of -- in BellSouth that's responsible for those air pipes and that air pressure. And the construction guys will tell you, if they let the air pressure drop on that manifold, it rings an alarm. They will have some people out there at that manhole very, very quickly. So there's a very conscious effort to keep its cables dry. That's why this leak in the duct had not

caused any damage to our outside plant. It was an inconvenience to being able to get into the manhole and do the work. So this is not a maintenance on the cable itself. This is a task that needed to be done to do the other task.

Q Okay. But while BellSouth is down there, you're going to fix the leak; right?

A Yes. It's necessary to fix it to do the job.

Q Okay. Yeah, you said that earlier. It was necessary to fix the leak in order to open the splice case. Is that your testimony?

A Yes. You don't want to be standing there with the water slowing coming back up to your knees as you're trying to unload these pairs.

Q Okay. Well, you could keep the pump in there and keep pumping it out, though; right?

A I do not know if that's an option or not.

Q Okay. But would you agree it's possible?

A I do not know if that's an option.

COMMISSIONER JABER: Mr. Greer, let me ask the question this way. This leak had to be fixed, period; correct?

THE WITNESS: Until the -- I do not know whether or not construction would have -- there is no way of knowing that there is a leak until you enter a manhole.

When you're entering a manhole, you're entering it to do a task. And the task -- you don't enter it to do a routine task like this. You enter it to touch your plant.

COMMISSIONER JABER: But it is inefficient to enter a manhole, discover a leak, and not fix the leak right away. You would agree with that; correct?

THE WITNESS: Yes. I mean, the manhole leak had to fixed while they're down -- to be down there, yes.

COMMISSIONER JABER: All right. Fixing that leak or anything else that you discover when you're there in a manhole on the task of -- based on an ALEC order, it is not your testimony or your position today that those unexpected tasks should be paid for by the ALEC or recovered through the service you're performing for the ALEC, is it?

THE WITNESS: No, it is not. As a matter of fact, one of the tasks he performed was repairing a ground strap. And, no, you cannot say that that was a task that should be charged to the time required to unload the pairs.

BY MS. BOONE:

Q So whatever time we agree on was used for plugging the leak would be deleted from your total four and a half hours that you show on this tape for the task, and it would not be charged to Covad for the load coil

removal?

A No. I have shown a difference in that one task here was necessary to be in the manhole. The other task was a failure of the plant itself. So there's a difference in failure of the plant and failure of the structure there.

COMMISSIONER JABER: Mr. Greer, if you thought you were showing me the difference, I didn't get it. If you are entering a manhole and you discover a leak while you're there, that's a leak in the manhole, and you're going to fix it while you're there; correct?

THE WITNESS: Yes, correct.

COMMISSIONER JABER: All right. That cost does not get recovered -- it is not your testimony that that cost should get recovered from the ALEC; correct?

THE WITNESS: No. What I'm saying is that the difference here is that if you had entered that manhole on a totally dry day and you did not know there was a leak, then that task would not have been done and may not have been detectible at all, but the task this time was needed to be there.

Now, there is this other assumption that has to be made as to whether or not did damming that whole -- damming that leak keep you from having to pump the manhole the next time, that I cannot address. I do not know.

COMMISSIONER JABER: So should ALECs receive credit for your killing two birds with one stone? You completed the task of the ALEC, and you got to fix the leak that was discovered in the manhole. I guess I don't understand your testimony.

THE WITNESS: My testimony is that we've looked at the cost of going into manholes and unloading it, and it includes a variety of things, and though this occurs in this tape, something else could occur in another that has to do with just the actual work activities that are necessary to unload the pairs.

BY MS. BOONE:

Q Would you agree with me, there are two main ways to get water in a manhole, surface water through the opening of the manhole and then ground water through an opening around the cables?

A Yes, that is two ways. Yes.

Q And surface water -- now, there's this thing called a pan right at the top of the manhole opening; right?

A Yes, there is a pan.

Q I think we saw him putting it back on it. It just catches the rain water; right?

A It deflects major flows is my understanding.

Q And the other way would be ground water seeping

in and around the cables; right?

A Yes, ground water and water that just leaks to the side of the walls of the manhole.

Q And the tape showed that all the other conduit areas around those cables were plugged up; right?

A Yes, they were not leaking.

Q And that's standard procedure for BellSouth; right?

A Yes, they do plug those ducts.

Q Because that avoids leaks; right?

A Yes, it does.

Q Would you agree with me that the technician on the tape even commented that there was something wrong with the job that had been done before because it wasn't properly plugged?

A No, I do not recall that.

Q Okay. Now, I'd like to talk a little bit about the time your crew spent pumping and ventilating the manhole. Would you agree with me, there's a big time difference between what the tape shows and what Mr. Riolo's chart estimates it will take to pump and ventilate?

A Yes, I agree.

Q In fact, the difference is 88 minutes or about an hour and a half?

A Yes, I agree, subject to check, of these times. Yes.

Q First, does every manhole in Florida require pumping?

A I do not have that knowledge.

Q Even if we assume that every pumping job took the amount of time that we showed, would you agree with me that not every single manhole would require pumping?

A I do not have any knowledge on the number --

Q But, I mean, logically, you could agree with me that not every single one?

A I do not know as to how many do and don't.

Q Now, you understand that Mr. Riolo's chart shows an average of 15 minutes, and that's for all manholes; right?

A Yes, I assume he's doing an average for all manholes.

Q So he's saying in some of them I know there won't be pumping, but I'm still going to give you the 15-minute credit, and others there may be more pumping, and they give you credit there; right? That's what an average does.

A Yes, that's what an average does.

Q Now, the time on the tape was obviously specific to the job that required pumping; right?

A Yes, a large portion of the time was --

Q And I think you mentioned that there was a lot of water in that manhole; right?

A Yes, that manhole was full.

Q And because of -- the manhole was particularly large; right?

A That would correlate, yes.

Q And so it was a big pumping job?

A Yes, it was.

Q Not an average pumping job?

A I do not know what average means.

Q So the real issue here on these times that we've seen between the tape and Mr. Riolo's testimony is whether routine maintenance activities, like plugging a leak, should be included in the cost of conditioning a loop for an ALEC? Would you agree with me that's one of the things we've isolated here?

A No. That would be based upon the assumption that this manhole did get full because of that one leak.

Q Okay. And I think we've talked about the other way could have been is through ground -- through water coming in off the street; right?

A That was another way we mentioned, yes.

Q And there was a cap in there to prevent that from happening?

A There was a lid on one manhole that was to divert major flow, yes.

Q Okay. But would you say there's about eight feet of water in there?

A I do not know how deep the manhole was, nor how much water was up to the rim. I could not tell from the video, I could not.

Q Okay. And would you agree with me that one of the issues is whether the cost of conditioning a loop in every underground situation must account for 88 minutes of pumping and ventilating like we saw here today?

A Would you rephrase that question again?

Q Do you believe that when this Commission sets the price for conditioning, it should conclude 88 minutes for pumping and ventilating for all manholes?

A No. Again, BellSouth has not said that this was a typical situation. BellSouth is not even establishing this that -- it could be averaged -- yes, it could be averaged in but would just presenting this as tasks that happened. And if you consider this time that did take place to what is in BellSouth's cost study, then you will see that BellSouth by no means has put into it's cost study this exaggerated amount of time.

MS. BOONE: Chairman, I only have about five minutes more on this line of cross, I just wanted to let

you know.

CHAIRMAN DEASON: Okay.

BY MS. BOONE:

Q Okay. I'd like to talk about the difference between PIC cable and pulp cable. Now, you'd agree with pulp cable is what you talked about. It's a wood base. It has, like, some sort of wood product on the outside of the copper pairs?

A Yes, a pulp cable is insulated with a wood-based insulation.

Q And PIC cable -- that's PIC, sorry -- it has color-coded plastic covering; right?

A Yes, it is plastic covered.

Q Do you remember -- do you have your deposition up there, by any chance?

A No, I do not.

Q Okay. Let's get you a copy real quick. I'd like you to turn to Page 126 of your deposition, and I just want to get you to refresh your recollection about when Ms. Keating was asking you about some of Mr. Riolo's assumptions. Okay?

A Yes.

Q She asked you which of Mr. Riolo's assumptions you disagreed with; right?

A Yes. Excuse me, may I ask the page again?

Q Pardon me?
A May I ask what page it was again?
Q Oh, sure. I'm sorry. 126.
A I'm there, yes.
Q All right. Now, she asked you which of Mr. Riolo's assumptions you disagreed with; right?
A Let me read her question, if I may.
Q Sure. I think it's at the very top of 126.
A Yes.
Q And do you see your response about pulp cable?
A Yes, I do.
Q Can you explain what your concern is about Mr. Riolo's assumption and pulp cable? You don't have to read it. I just was refreshing your --
A Well, my point was that a pulp cable is not as easy to identify the pairs, the same issue I've brought out now, that there is this missing time, but it was one of the points that it takes time to locate each and every pair. Mr. Riolo does not allow for that process. He is making the assumption that you can simply based upon the color-coded identify the pair and know that you are there.
Q So this tape showed working with pulp cable; correct?
A Yes, it did.
Q And would you agree with me that you would

expect the times for working with PIC cable to be less?

A No, not necessarily.

Q Okay. I think -- I thought you just explained that it was harder to identify pulp cable. Can you tell me why you don't think it's going to be easier to do it and quicker on PIC?

A As I stated earlier, you still have to identify the pairs to go through it. Now, PIC is less fragile, and you can handle it easier, but you haven't -- and identifying it does have color-coded, but you still have to spend the time to go through pair by pair, so depending upon how much less, whatever less means.

Q The videotape shows unloading 25 pairs; correct?

A Yes, that is our understanding. This was a job to unload 25 pairs.

Q How much additional time would it take to do 50 pairs in the exact same splice that we just saw?

A It would have been the same amount of time that we're discussing about how far long it would have taken him to find the other count and go about performing the same operation.

Q Okay. And you realize that Mr. Riolo's chart does include times for a second binder group. Mr. Riolo right here at 11, 12, 13, 14, 15, all of those times, 10, 15, 20 minutes he includes for the second binder group;

right?

A Yes, he includes time for a second binder group.

Q Now, let's look at the list here. Would you agree that most of the tasks listed here are not affected at all by the number of pairs that you unload?

A Yes, I agree. That is true.

Q Okay. Things like travel time, setting up, pumping has nothing to do with it?

A Yes, that is true.

Q Even all the way up here to opening the splice case really doesn't matter how many you're doing?

A Yes, that's true.

Q And then when you go to closing it, resealing it, you're putting the cables back, you're closing down the manhole, again, totally unaffected by doing 10, 25, or 50?

A I agree, yes.

MS. BOONE: That's all I have on the videotape. I have some other questions on other matters.

CHAIRMAN DEASON: We're going to recess for lunch at this time. We will reconvene at 2:00.

MR. EDENFIELD: Commissioner Deason, could I get Ms. Boone to repeat one more time the question? Plus I'm going to need the Commission's video person to operate the tape so that we can review it. I'm not sure if that

person is --

CHAIRMAN DEASON: I don't know how much she will charge you, but that's between you and her.

MR. EDENFIELD: I'm racking up quite a tab.

CHAIRMAN DEASON: What is the question again?

MS. BOONE: The times on the tape that Mr. Greer believes were spent plugging the leak, start time and finish time.

CHAIRMAN DEASON: Okay.

MS. BOONE: Thank you, Mr. Edenfield. Thank you, Mr. Greer.

MR. EDENFIELD: Thank you.

(Lunch recess was taken at 1:00 p.m.)

CHAIRMAN DEASON: Call the hearing back to order.

MR. EDENFIELD: Commissioner Deason, during the break, we actually did take a look at the video, and I think if Ms. Boone would like to pursue that question, we have an answer for her.

CHAIRMAN DEASON: Very good. Ms. Boone.

MS. BOONE: Yes.

BY MS. BOONE:

Q Could you please tell me the times for plugging the leak.

A Yes. We still contend that there was about

ten minutes, maybe another minute or so.

Q And from what times to what times?

A From approximately 10:32 to 10:42.

Q Thank you. Fair enough.

MS. BOONE: May I continue, Chairman?

CHAIRMAN DEASON: Yes, you may.

BY MS. BOONE:

Q Mr. Greer, I'd like to talk to you a little bit about BellSouth's contention that load coil removal should be costed removing ten load coils at a time. Do you believe that when the opportunity exists, BellSouth should unload as many load coils as possible?

A Yes. In order to be efficient, BellSouth did not deny that unloading this whole operation this morning that it's most efficient to unload a whole complement if it's available. As the questions were pointed out earlier this morning, were there working circuits in it, those are things to be taken into consideration.

What are those circuits? As I pointed out, we would hope that the engineer recognized that these were POTS circuits and that he could handle them in a different manner than if there were circuits in there that were critical. The engineer has that capability. He can look into LFACS, and he can see circuit IDs that are across his count. So he knows whether or not he is potentially

ordering to have these cable pairs touch that are carrying critical circuits.

So that may be a consideration that he takes in to determine if he wants to unload the whole count, to touch it at all. Because some of these circuits, design circuits we call them, that have actually had equipment put on them and adjusted for these very load coils, for example, an analog data circuit that might be used for the lottery or might serve an ATM machine, some of those circuits have specifically had the load coils taken into account for the design of them. So before he can just remove the load coils, he has to make contact with the circuit provisioning group to have these circuits redesigned.

A project group might handle them. They would go to the BRC. The BRC would contact the customer, the end user, and get a release of the circuit and move them out. So there are many things to be taken into consideration before you simply say, unload all the pairs.

But BellSouth agrees that efficiency dictates that you do what is right for the particular situation. And it is the outside plant engineer who works up the order and knows the most about what should be done in that situation.

Q Excluding special design circuits, some of which

you've just named, would you agree with me that you can remove all load coils from all copper loops below 18,000 feet without any damage to the voice service at all?

A No, I do not agree. In fact, one of the very reasons that we started loading all these loops back in the late -- the '70s and so forth, a predominate service that we were offering were CENTREX lines. And CENTREX lines is a replacement -- is our version of having a PBX in the central office.

So you might have an office that -- or people who would be calling one another, and so if you had people that were both on the same identical loop calling each other all the time, their calling pattern would dictate this same repetitive this much loss to this much loss type loop. And they could be dissatisfied with it.

The nature of good voice grade service through the whole network is based on a probability of how many times you call somebody and what that end-to-end connection is like. I can have a loop to my house that may not be the best. It may have quite a bit of loss compared to the norm, that some people say, and because I only make a certain pattern of calls, then I don't notice it. I'm always calling a business. But if I'm always calling my neighbor who has the same type of loop, then I

perceive that I have a worse grade of service.

So calling patterns in a CENTREX line was one of those very reasons that we loaded all of these loops. CENTREX were, at first, intended to only go out to a certain -- we offered them in the tariff based upon how far you are away from the central office. And in order to get more of them, we said, okay, we need to decrease the loss in them and include those a little bit farther away from the CO. So we could get more CENTREX customers by loading them.

Also, PBX trunks, first off, understand that a POTS telephone is a dynamic device. It was a genius creation by Bell labs that with the POTS telephone it would compensate so that somebody -- let's say you are at your office, you're in downtown, you have a short loop, all day long you're on the phone, and you only experience a short loop type of grade of service. If the phone wasn't dynamic, when you went home and you were on one of these long loops, you would have the perception that I got good service at the office, lousy at home.

Well, the forefathers in their infinite wisdom said, you know, we need to reduce this disparity. We need to minimize it. So the phone was designed to average out these types of loops, and so the people would generally have a single perception of the type of grade of service

that was given. That's a requirement for a POTS phone.

But on the other hand, PBX trunks, they are not -- PBX is not required to be a dynamic device. So when you have people on stations behind a PBX, you need to minimize the loss from the PBX to the central office. So those type of trunks for years and years we have said need to be a certain amount of loss. The number for years have been 40. That allowed everybody to have a good type of end-to-end connection.

Now, what's happening in the industry today that is interesting is that more and more key systems are becoming common. They may not be actually PBXs. They may not even order up PBX trunks. They are using 1FBs for it. And if a telephone set was on it, then there would be one perception of service, but because these key systems are not required by any standard to compensate for the loss, then you have people today who will perceive more loss in it.

So in order to answer the question, transmission is a wonderful study. I love it. And although our forefathers when they said, unload everything, they were basing it upon POTS service. They did not necessarily say that it would be excellent voice grade services for all types of connections.

Q Okay. I thought I had asked you to exclude

special design services, but that's fine because I wanted to get into these things that you talked about. Now, the CENTREX line -- well, let's talk first about PBX trunks. Your testimony is that you can't unload PBX trunks that are designed with load coils; is that correct?

A No, I'm not saying that you can't unload them. I am saying that there are situations where the load coils have enhanced the voice grade quality of that service. And, therefore, that's a consideration to be taken into account before you just arbitrarily say, I can unload them.

Q Okay. So sometimes you can; sometimes you can't. Would you agree with that?

A Yes.

Q Okay. And digital PBX trunks are not provisioned with load coils. Would you agree with that statement?

A Yes, I agree. In fact, a digital PBX trunk is using a T1 line to have connectivity from my central office, and that T1 line may be provisioned over many types of facilities. It could be over a T1 that provisioned with HDSL or a conventional T1, and that would have to be provisioned over a nonloaded loop. And then, again, these T1 lines may be over a fiberoptic mux of some sort.

Q Okay. But you don't put load coils on PBX digital loops; right?

A No, you do not.

Q Okay. And so we're just talking about PBX analog loops here. Now, what percentage of BellSouth's loops in Florida are analog PBX loops?

A I do not have any knowledge of that.

Q You also said that you need to sometimes load loops for CENTREX lines; is that correct?

A Yes.

Q And not all CENTREX lines, just analog CENTREX lines; correct?

A Yes, that's true, analog CENTREX lines.

Q And not all of the analog CENTREX lines, just certain ones that you have designed in the load coil on; correct?

A No. Now, we did not design in the load coil specifically for CENTREX lines. We loaded much of our cable in anticipation of it, and then when CENTREX service is offered, they end up on loaded pairs. So just to clear up that, it isn't an intention that you go load pairs to provide a CENTREX line. It's that you've loaded pairs in the design of your outside plant in anticipation of CENTREX lines being ordered and that they can be provisioned over those.

Q Okay. And what percentage of analog CENTREX lines are there in Florida?

A I do not have that information.

Q You also mentioned that certain circuits like lottery circuits and ATM machines might need load coils on them; is that correct?

A Yes. There is still a tendancy by some to believe in analog data circuits. They are going away more and more, but analog data circuits by some people's interpretation have quicker response time. So for ATM machines, it isn't unusual to have an analog data circuit out there. And these analog data circuits are the ones that I've mentioned that they can work, they can work very well over loaded facilities, and they have been designed. They have equipment on there to make a good data circuit along with the load coils.

And if you remove the load coils, then you've changed the settings of your equipment, and it has to be reengineered, redesigned, dispatched, moved, work has to be done.

Q Okay. And what percentage of lines in Florida are these lottery lines?

A I don't have that information.

Q What percentage of the lines in Florida are ATM machine lines?

A I don't have that information.

Q Is there any way for us to know or ascertain from anyone testifying here for BellSouth how often these special circumstances are going to come up?

A No, to my knowledge, there isn't anyone.

Q Do you think Mr. Latham might know, product manager? Does he do those kinds of products?

A To my knowledge, Mr. Latham has no involvement with those products at all.

Q Let me ask you one thing. You mentioned that back in the '70s you started proactively loading the plant; is that correct?

A Yes, that is correct.

Q And can you give me a time frame, late '70s?

A Actually, I would say about the mid '70s.

Q Okay. Mid '70s. So 1975 until about when?

A Well, as I stated earlier, this is a phenomena when you are terminating cable on the main frame. In the early '80s when digital carrier came out, we began and eventually ceased to terminate any cable in the main frame at all. So since there was no more cable being terminated on the main frame going out this initial 3, 6, 9,000 feet where the load coils are, then in that time frame there was no more cable installed with loading.

Q Okay. So that would be about 1975 to about

1982, would you say? 1980 did you -- what did you say?

A Sometime in the early '80s.

Q Okay. And BellSouth wasn't -- that was just for new plant being placed, right, this loading, this proactive loading that you engaged in?

A As I stated, that was for plant that was being terminated on the MDF.

Q Okay. New plant that was being put out there and terminated on the MDF?

A Yes.

Q So BellSouth didn't go into the ground into existing plant and proactively load?

A No, not to my knowledge.

Q So we're talking about just plant placed from roughly 1970 to 1982?

A Excuse me, they did what?

Q That you did this proactive loading on, 1975 to 1982.

A Yes.

Q Would you agree with me that BellSouth has been conditioning lines, that means removing bridge tap and placing or removing load coils for more than ten years?

A Yes. Conditioning loops, removing load coils is necessary whenever you want more bandwidth on your circuit, a better frequency response may be a good way of

describing it. A load coil gives you a tradeoff between frequency response and volume. You may think of it like a stereo system. You can by a stereo system that can go up to 20 kilohertz, and it may have a 50-watt output. Or you can buy a stereo system that only goes up to 10 kilohertz, and it may have 100-watt output. So that's kind of the similar thing that we have here. It is a bandwidth versus a level of signal or a volume of signal.

So when we needed more bandwidth, you have to remove the load coils, because load coils limit your bandwidth to what is determined to be acceptable for voice band services, which is only about four kilohertz. That's enough for you to be able to hear somebody and hear all of their speech and understand it.

So the Bell labs, when they came up with the novel idea of loading pairs to compensate for the finer-gauged cable that was being used, had to determine what was good voice grade transmission and how often did they have to put these load coils on it. So services have existed for years that needed wider bandwidth.

For example, program circuits. The weekend football games, the church revivals, even the things happening down at the local, those programs circuits back in the '70s, they were more common than before wireless means came into place. Those loops had to be unloaded.

Also, in the '70s, digital data in the form of DDS came out, and for those circuits, you had to go looking for specifically nonloaded plant. And then again in the T1 was -- came first to us on an interoffice facility. So you didn't even ever load those in the first place. You typically would place new cable that you put T1s on, but in the early '80s, T1 became the first high bandwidth that we put into the distribution, and we began unloading pairs for those services also.

COMMISSIONER JABER: When BellSouth rolls out its HDSL service, do you just put new fiber in, or do you have to go through any sort of loop conditioning when you roll out your own service?

THE WITNESS: May I ask you to repeat, did you -- which DSL did you state?

COMMISSIONER JABER: Does it matter?

THE WITNESS: Service is an interesting word. We have used HDSL as a technology to provide, for example, the T1 service, the 1.544 megabits for -- well, HDSL came out in the early '90s, so for that, you unloaded pairs to use HDSL to provide the T1 service.

If you're talking about the ADSL service that we're presently rolling out, we're doing it on a line-sharing basis where we apply it to lines that we had determined that are nonloaded. As far as whether or not

we are actually unloading pairs, I'm not familiar with what the policy is at that time.

COMMISSIONER JABER: Okay. And this is hypothetical. I'm not even sure that you have a situation like this, but if an ALEC contacted you and they want to provide ADSL service then via what you do with line-sharing, then that's possible? There would be no loop conditioning with that type of request?

THE WITNESS: I'm not familiar with all that's being developed now in the line-sharing effort that's going on. I know that we are working with ALECs in order to give them the option to do the same thing we do where they put their data over a nonloaded POTS line that BellSouth presently has to its switch.

COMMISSIONER JABER: When a load coil is removed, it's removed once and for all, so that if BellSouth rolls out its service and has to do some sort of loop conditioning on its own and an ALEC comes along and is going to compete for the same service in same area, there wouldn't be another charge to the ALEC, would there?

THE WITNESS: Once that pair is unloaded and is in the record as being available as nonloaded, no, there would be no further use charge.

BY MS. BOONE:

Q Are you familiar with the additive that

BellSouth is attempting to impose on CLECs on every DSL loop for conditioning?

A I am aware of it, yes.

Q You know it's $57 on each loop?

A I do not know what the actual money cost is.

Q Yes. You were talking about the fact that conditioning is routine. So you would agree with me, it's a routine thing that BellSouth does -- has done?

A Yes, routine in that it is done, not routine as in something that we are going about doing every day.

Q And BellSouth has methods and procedures in place about how to do this, conditioning loops?

A Whereas where we saw in the video this morning, it's simply an engineer making a decision to issue a work order to a construction site to perform a certain operation.

Q How did you become familiar with how many load coils BellSouth removes at one time so that you could support their proposal of ten at one time?

A The actual number came from SMEs who are more familiar with outside plant engineering, but my own experience -- and I have 20 years with the phone company, 19 of it in network, and you don't spend that many years in transmission engineering working with special surface circuits and with POTS circuits and analog circuits and

also with the digital data circuits not to know that we are not always able to unload a single pair.

You can look through databases and you can look in LFACS, and you can see small accounts that have been unloaded in specific areas. One of the things that has been my job responsibility in the last year as we've rolled out ADSL is, how do you more accurately make sure -- determine from the central office whether the pair is nonloaded or not or loaded, whichever way you want to look at it. And in so doing, I discovered that one of our switches has to be able to make a measurement on the line quickly in order to provide good voice grade service. And the switch records in it which way it's decided that the loop is loaded or nonloaded, but I have looked through this data to try to determine how accurate is the switch, and you can see repeatedly across cable counts that suddenly the switch said, oh, there's a couple of nonloaded lines scattered across that loaded loop.

So there are many indications; as one who is familiar with the network and is in touch with the network that single pairs are unloaded. So as the cost study was developed, my understanding is that when a number was determined, it was from experience that says, we don't always do 25 pairs, we often do one.

CHAIRMAN DEASON: Experience over what period of

time?

THE WITNESS: My first job in transmission was actually designing interoffice facilities --

CHAIRMAN DEASON: No, I'm talking about experience over what period of time do you say that BellSouth has determined that ten is a good average?

THE WITNESS: Well, the fact that outside planting engineering today, as well as the SMEs who are familiar with outside plant in their career, in other words, the past 15, 20 years.

CHAIRMAN DEASON: Fifteen, twenty years. Is it your opinion that the demand for having these circuits unloaded is increasing?

THE WITNESS: Yes, I know that there is a belief that it will be the service. I believe there are still a lot of technical answers to be resolved, and therefore, I, as a techno person, am not sure that this is going to be the answer for data. A provider of DSL service in South Carolina, I went up and was looking at some loops, and he commented that he didn't see this.

So, yes, I will agree most wholeheartedly that the needs for high-speed data are coming. I am not yet convinced that ADSL or SDSL will be the right answer.

CHAIRMAN DEASON: But I guess my question is: If ten is a good average based upon 15 to 20 years of

engineering experience, given the rapid deployment of data services and needs at this time, would you anticipate that that is going to be cost effective and efficient to be unloading more than a ten average on a going-forward basis?

THE WITNESS: Yes, I will; that when an engineer can see the way to unload is unload 25 pairs, he needs to move in that direction.

CHAIRMAN DEASON: Okay.

BY MS. BOONE:

Q Mr. Greer, you've never actually conditioned a loop, have you?

A No. As a matter of fact, I have not either supervised nor done any physical task in my career in BellSouth. I was one of those people who, as they express, came off the street into a staff position. Ironically, in my first four or five years designing interoffice facilities, it was quite a challenge to be able to understand cable and what a cable pair did in its characteristic for T1 and the idiosyncrasies that were necessary to provision it, but since then in going into special services, I've been in touch with many organizations in BellSouth.

I've been on the phone many, many hours in technical support roles with the technician outside, with

technicians in the center. I've supported the design groups that actually design the circuits, the circuit provisioning group. So although I am not a hands-on person, I have a very large familiarity with those who do tasks in BellSouth.

Q Okay. But the answer is no?

A The answer is no.

Q Okay. Do you remember during your deposition, Mr. Greer, I asked you about the differences between SL1 loops and ADSL loops or any type of DSL loops?

A Yes, I remember a question of that nature.

Q Okay. Do you remember you told me that there were three major differences, design layout record, order coordination, and -- I can't remember the third one -- oh, the test points. Do you remember that statement?

A Yes, I remember stating that some of the differences were the test points and the DLR report document.

Q Okay. You'll agree with me that what's produced in the DLR is the same information as what is in loop qualification inquiry, wouldn't you?

A For design circuits, yes. The DLR is basically a stripped down version of what we call the word doc. The word document is what we internally get that shows all the equipment, the loop, and the makeup of the loop. And the

DLR is a stripped down version, so in that the loop makeup is given on the word document, it is also applied -- is given through the DLR.

Q So yes is the answer?

A Yes.

Q Okay. And we talked about test points, and I asked you if you knew if any of the data ALECs had requested BellSouth to place test points on DSL loops. Do you remember your answer to that?

A No, I do not remember the question nor my answer.

Q Okay. What is the answer? Do you know if we have asked you to put test points on these loops?

A No, I do not know if they have asked for it, but these test points are our survival. Firsthand knowledge, without those, we cannot decide when we have agreed that the loop is good. Presently, part of my job function is to decide better how to test from this point to resolve disagreements in the quality of that loop.

The ALECs have their test points, and they make their measurements with their test head; we have ours. We will work together to make sure they agree. These test points, without them, the task of being able to get ahold of a person in a central office to go over to the main frame to pick up a test set, to make the measurements, to

get the report back to you to be able to do it in any real time whatsoever, it just couldn't work.

These test points are necessary so that when the ALEC says, it doesn't work, you know, it's broke, we have to have them to be able to go in and take a look at the cable pair and decide that, yes, obviously that's a bad pair now, and we need to get about repairing it, or, no, we don't see any faults on the line from this point. What is your -- you know, what type of failure are experiencing? Do we need to dispatch out?

So they may not have asked specifically for test points, but we know that without those test points, toning of these circuits would be a nightmare.

Q Okay. I appreciate your explanation, Mr. Greer, but let's just try to keep moving along here. You just stated, if there is no trouble found, you have to work with the ALEC. Isn't it true that if no trouble is found, BellSouth charges the ALEC for any dispatch?

A I do not have firsthand knowledge of that.

Q And if there is trouble found, there's a problem with the BellSouth line; right?

A Yes.

Q And if there is trouble found, this is on the repair side, and so this test point helps BellSouth do what it should do; right?

A The same applies to turning up the circuit. I mean, we have our parameters by which we have stated these loops should be, and they are necessary to be able to make measurements on the installation of it to agree with what the AC voltage is on the line, if there is DC voltage on the line. When we dispatch somebody out there, we can measure the resistance. We'll measure the length of it to know capacitively how long it is. So these are necessary not only from the installation standpoint but also from the maintenance standpoint.

Q Okay. And you would agree with me, the length is in LFACS; right?

A I would agree that there is a record in LFACS that states what the limit should be.

Q And you can calculate resistance based on the gauge of the wire and the length of the loop; right?

A Yes, I can, but in order to be sure you know what you have, you want to make a measurement so that that becomes your benchmark as you move forward after having provisioned the circuit.

Q But if I, as the ALEC, wanted to make sure for myself and didn't want to ask BellSouth to do that, that would be okay, wouldn't it?

A Yes, he can, but much of the argument that's going on today and much of the contention about the

measurement we make is based upon that dispatch issue. Dispatches are expensive, we all know that. And the point is, is that we do send somebody out upon installation to make these measurements, and we even make him available for a short period of time for the CLEC to make tests with him also.

Q The last thing you mentioned that was different between an SL1 and a DSL loop is order coordination, and that enables you to take a live cut and coordinate a bunch of people in BellSouth to make sure that that cutover happens at the right time. Am I correct in summarizing it that way?

A I do not remember saying that SL1s had coordinated cutovers.

Q Sorry. The difference between SL1s, SL1s do not have coordinated cutovers; right?

A Right.

Q And DSL, that is an option; correct?

A I'm not familiar with exactly what that means.

Q Coordinated cutover?

A Yes.

Q Order coordination, does that sound more like it? I'd like you to turn to Page 97 of your deposition, please. We talked a little bit about this on that page, and I asked you -- we are talking on this page about the

order coordination process. Are you -- look at 96 as well and just read down a little bit, if you would --

A Yes.

Q -- to refresh your memory.

Would you look on Line 19 of Page 57, your response, "The biggest benefit of the design circuit is getting it done when you want it done."

A Yes.

Q And you're not aware of any DSL providers asking for that order coordination, are you?

A No, I'm not.

MS. BOONE: That's all I have. Thank you.

MR. MARCUS: I'm Jeremy Marcus for Rhythms. I have a very small number of questions.

CROSS EXAMINATION

BY MR. MARCUS:

Q Mr. Greer, you mentioned that the splicing in the videotape demonstration had pulp insulation, I believe?

A Yes, I did.

Q And you also mentioned, I believe, that pulp insulation is fairly fragile; is that correct?

A Yes, I did.

Q So, therefore, wouldn't each time that you open up the splice case, you increase the potential for damage

to that insulation?

A Yes. Any type of handling of your plant runs that risk. Now, the question is, how much is done on each individual task? And the point is that as you go handling the pairs, each time you handle a pair, you run a risk of creating a defective -- you touch it, it can break. Therefore -- there's one risk at opening the case, but there's another risk that I'm touching this pair, this pair, I touched 25, and when I get done, what's the probability that out of those 25, I've created a defect?

Q But if you're going into a cable the size, for example, of the one we saw in your demonstration, which was, I believe, 2,700-pair, you would want to minimize the number of times you have to open the splice case to avoid potentially damaging the insulation on those 2,700-pair; is that correct?

A Again, as you saw this morning, the cover protects it, so that the fact that you open it up is not the damaging instant itself. It's the fact that you picked it up and you started handling them. And right now, there are pairs in there that are working. They are providing excellent service. They are doing everything that the end user needs to be done. And if I don't touch this pair, then I lower the probability that I will cause a problem on his pair. And, therefore, if I only unload

the one that I have to, I only touch that one, the other 24, if I haven't had any other trouble reports on them, they go untouched, and I lower the probability of creating a defect.

Q But you're also increasing the probability that if additional loops in that case were to require conditioning, then you would have to go back in and open that case up again and again and again because you did not condition as many loops as you could the first time you opened that case?

A Yes, and there again, that is another probability.

MR. MARCUS: Thank you. That's all I have.

MS. McNULTY: WorldCom has no questions.

MR. SLOAN: I just have one question.

CROSS EXAMINATION

BY MR. SLOAN:

Q Mr. Greer, I'm Mike Sloan representing Broadslate, Cleartel, and Florida Digital Network.

You've stated today and at your deposition that going forward, it would be a good idea for BellSouth technicians to unload as many pairs as possible; is that correct?

A Yes, when it's economically feasible. Yes.

Q And my question is: What criteria do you

provide technicians to make that determination?

A Well, as I said earlier, it's not down to the technician level that makes that decision at all. It's the outside plant engineer who made the decision as to -- he's got the big picture. He knows what's going on. He's got planters who know who's moving where, knows the characteristics of those neighborhoods. You know, are they the elderly that may not be buying it? Is it the up-and-coming? Is it an apartment complex going in there? He's got the big picture of knowing what's happening with his plant. It should be left to him to make the decision as to what he asked for on a work order to unload pairs.

Q So there is no policy governing the plant engineers? The plant engineers are not instructed to remove as many coils as possible?

A To my knowledge, there is no BellSouth policy that instructs them to unload as many pairs as possible.

MR. SLOAN: Thank you.

MR. FONS: Sprint has no questions.

CHAIRMAN DEASON: Staff.

MS. KEATING: Staff has no questions.

CHAIRMAN DEASON: Commissioners.

MR. BRESSMAN: Mr. Chairman, actually BlueStar had a few questions.

CHAIRMAN DEASON: Oh, okay. I'm sorry.

CROSS EXAMINATION

BY MR. BRESSMAN:

Q Mr. Greer, I'm Michael Bressman with Bluestar. BellSouth inventories its loops; correct?

A Yes, it does.

Q So does BellSouth list which loops are POTS loops in its inventories?

A Yes, there is a portion of LFACS by which you can determine that.

Q And which are special services?

A Yes.

Q And which are DSL?

A May I ask you to say, whose DSL?

Q Your DSL.

A Yes, they can be identified.

Q And would you know whether certain loops were being used by ALECs for DSL?

A The ALEC circuits have a unique circuit identity that we have identified some of those as being copper only, yes.

Q So the answer is, yes, you would know if a CLEC circuit was DSL?

A Yes.

Q And I believe you've testified that an SL1 loop can be used for DSL service?

A Yes. The same physical copper loop that may be -- that we may choose to provision an SL1 may be the same identical copper loop that is used to provide an xDSL loop.

Q And DSL providers are free to use it for DSL service?

A Yes, if they wish.

Q Because it's the same loop?

A They can order up an SL1 and use it on whatever they wish.

Q Now, is one of the downsides of putting DSL service on a SL1 loop that it can be rolled -- the loop could be rolled over to fiber at sometime in the future?

A By the way in which we have defined the SL1, meaning that it is a simple POTS-like service, and therefore, when one is ordered, the probability of us having a facility out there is very high, because it can be served on digital loop carrier; therefore, it has a circuit ID that implies that it's intention is for the purpose of providing POTS service.

Q So the answer is, yes, a loop could be rolled to fiber in the future?

A Yes, it can.

Q And does that mean that a BellSouth voice customer's loop could be rolled to fiber in the future?

A Restate that, please.

Q If a BellSouth customer were having its service, it's SL1 service provided on a cooper loop, could that service be rolled to a fiber loop in the future?

A Now, I'll restate the question as I heard it. If a BellSouth --

Q A BellSouth voice customer is getting service today on an SL1 loop and that SL1 loop happens to be a copper loop, could that loop be rolled in the future to a fiber loop?

A I'm not sure I understand what you mean by a BellSouth customer getting the POTS service on a SL1 loop. SL1 is what we offer to the CLECs as a loop that can be ordered. BellSouth customers do not have their POTS service provision over a -- what we call an SL1 loop. Now, if you mean can today's POTS customer be simply rolled over from a copper loop to a digital carrier, yes, it happens.

Q So taking out the SL1 designation, which, I guess, is a UNE designation, a BellSouth POTS customer who is currently be served on a BellSouth copper loop could be rolled to a BellSouth fiber loop?

A Yes, it can.

Q Okay. And there's nothing in BellSouth's system to prevent that?

A No, and there's reason not to.

Q So when BellSouth places DSL on top of an existing BellSouth voice customer's loop, line sharing, that customer's loop can be rolled to any fiber loop in the future?

A I do not know the policy for what we have offered in our DSL and our ADSL as far as an assurance of continued service if it becomes necessary to replace that cable with fiberoptics.

Q Would you know if there's anything in BellSouth's system to prevent a BellSouth customer who's also getting data service on the same loop from being rolled?

A Again, keeping it from being rolled would be dependent upon having a policy that says if you're presently on a copper loop in BellSouth and you have BellSouth ADSL service. I do not know the policy as to if it becomes necessary to cut those facilities over to digital loop carrier, what the policy is.

Q Surely BellSouth wouldn't provide service to one of its customers via line sharing one day, and then cut off their service the next day, their DSL service?

A No, it wouldn't be our intention, but our tariff offering to ADSL did not offer any guarantees as far as data speed, and I'm not sure about continuous service.

Q I'm not talking about data speed. When you sell DSL service to a BellSouth customer, a line-shared service, are you saying that that customer has no guarantee they might lose their DSL service?

A To my knowledge -- and I don't keep up with the policy on it. I'm on the technical side, and I try to find out why they don't work, but along that same line, we had to make -- there was a case where -- a situation where if the service is provisioned and that loop is marginal, and this goes back to why you want to know what the loop is, because BellSouth does not measure the loops for its own DSL, but the fact is that characteristics change on a cable pair.

He can make it have more resistance and DSL can fail. And DSL is a unique technology that has put us in a situation we haven't been in in many years. All of our services in all of our other platforms have means to compensate for the cable pair, ISDN, DDS, four circuits. If the cable pair isn't exactly what we thought it was, if it changes, there are means to mitigate that. That is not so in DSL technology.

If the DSL technology turns up today and the characteristics of that cable pair, for whatever reason, weather, aging, temperature, goes beyond a point at which the technology that's deployed on it can operate, there is

nothing that can be done for it. That is one of the reasons that we try to set criteria for these loops to ensure that what turns up today, won't end up in that situation tomorrow.

Q Let me try it again. What I'm asking is: If you have a BellSouth voice customer who is getting BellSouth DSL service over the same line, is it BellSouth's policy that that customer could lose their DSL service the next day? Yes or no?

A No, I do not know that policy.

MR. BRESSMAN: Okay. Thank you.

CHAIRMAN DEASON: Redirect.

MR. EDENFIELD: Just a few, Commissioner Deason.

REDIRECT EXAMINATION

BY MR. EDENFIELD:

Q Let's talk about the videotape for just a minute, Mr. Greer, if you can remember back to some of the questions from earlier today.

A Yes, I do.

Q Was BellSouth representing that videotape to be indicative of some type of time studies?

A No, not at all. It really -- if you compare it to our cost study, it's reflective of the fact that it would have to be at one extreme in order to be averaged out and come into what our cost study shows.

Q What was the purpose of us demonstrating that videotape this morning?

A Primarily, we had the concern that this whole process of unloading pairs was a very simple, easy, noninterrupting type activity. And we just wanted to be sure that people understood that it takes a very conscious effort, and you want to be sure how you go about doing it.

Q Would you consider this to be a typical load coil removal job, from a time perspective?

A I do not have firsthand knowledge of a large number of them, but again, there were -- times have been pointed out that show that this did not appear to be typical.

Q Okay. Consistent with our cost studies, how many load coils is BellSouth considering need to be removed on a line when it needs to be conditioned?

A Well, from a cost study standpoint, we're saying that to consider all that we take into account when that engineer makes that decision that ten is a good number.

Q I'm sorry, not the number of pairs, but the number of actual load coil removals per conditioning. I may be asking the question poorly.

A Typically, we're talking about a loop less than 18 kilofeet, because the technology really isn't there yet to go much beyond that. There may even be loops less than

18 kilofeet that it may not work over, but in 18 kilofeet, your design guide -- your outside plant design guideline says you can have two load coils or you may have three load coils. So assuming some probabilities that 90 percent of the loops will have the required minimum of two load coils and that 10 percent of the loops will have the third load coil, it comes out that in the cost study a 2.1 load coil factor is there.

Q How many load coils were removed in the video demonstration?

A This simply represents -- and we're not sure, but we believe this was the first load point. As I stated earlier that this manhole was huge because it's the first load point, so there should have been at least another job like this that had to be done before that loop was unloaded.

Q So the time that was demonstrated in the movie that everybody seems to have such a problem with, would that have had to have been doubled plus 10 percent there again to account for the amount of time that would have been considered for BellSouth's cost study?

A The numbers that I have given for -- that are in the BellSouth cost study is four and a half hours, and that's the amount of time, total amount of work time, that is allowed for unloading a single load point.

COMMISSIONER JABER: Mr. Greer, I didn't understand your response to the question, how many load coils were removed in the videotape.

THE WITNESS: Yes. I'm not sure the question -- I was not clear on the question.

MR. EDENFIELD: Thank you.

COMMISSIONER JABER: That was your question; right?

MR. EDENFIELD: Mr. Lackey (phonetic) always says redirect is the worst part of it.

THE WITNESS: There are two different issues with unloading loops. One is, how many pairs are you going to unload at a given load point? And then the other portion of the question is, how many load points do you assume there to be? So the load point was this manhole, and we did 25 pairs. I was saying that there was at least a second load point 6,000 feet down the road in which those 25 pairs need to be unloaded again, or at that point.

CHAIRMAN DEASON: So is the four and a half hours per load point or per pair?

THE WITNESS: No, it's four and a half hours per load point.

BY MR. EDENFIELD:

Q Okay. Earlier today, Commissioner Deason -- I'm

not sure you were on the same page with him -- was asking about the number of people that were involved in this particular video. How many people were actually involved in this video?

A It is my understanding that there were three technicians.

Q Okay. And I think Commissioner Deason was trying to get the point of the two -- there were two facility technicians that were down in the manhole?

A Yes, that's correct.

Q And there was a third person back at the central office presumably on the other end of the tone testing?

A Yes, that's correct.

Q And I think what Commissioner Deason was trying to get at was, is the person who's back at the central office doing the tone testing, are they basically locked up doing just that for four and a half hours, or was this something that they come on and do just when they are needed?

A The intention is that he goes back to the central office just to help out the toning of the pairs. So from the time that the -- he has to travel back to the CO, but he is only needed in the central office for the time from which they started trying to find that pair, that whole complement that we've had a lot of discussion

about, until the final pair was identified, and then he is free to leave the CO and come back to the job site.

Q That's in a typical arrangement where you just have two people; correct?

A The typical, to my understanding, is that you just have two.

Q The third person that was involved in this video, did that person sit around for four and a half hours doing nothing all day, or did that person get involved only for the toning?

A From the video, you could tell he was active doing other tasks that needed to be done.

Q We will fix this on the errata sheet, but it's something Ms. Boone asked you earlier today. In your deposition, you had indicated that our cost study had nine manhours per load coil removal?

A Yes.

Q Was that an error?

A Yes, that was an error.

Q What is the appropriate number of manhours for a load coil removal?

A The cost study, as I've stated, is four and a half hours, manhours, per load point.

Q And the first thing this morning Commissioner Jaber asked you, at least it appeared to me

she was asking, was this a real job, or was this something that was just kind of used for demonstrative purposes? I mean, was this a live actual job?

A It is my understanding that it was a quick, find a job that can be filmed. There was no time to even think about picking a specific job. It's just they needed a job that could be filmed. So this is a live job.

COMMISSIONER JABER: No. For the record, my question was, I wanted to know if you were videotaping that event for the hearing.

MR. EDENFIELD: Oh, I'm sorry. I was under the impression we were trying to find out were their real people on the ends of those lines, or was it something we had just --

BY MR. EDENFIELD:

Q How do we ensure when a load coil is removed that we are not putting people out of service?

A The best way to be able to do it is to go to the cross box. It's one more task that when you're through unloading all the pairs, all the pairs and all the load points, then you need to test again in the end.

Q And the final point I want to discuss with you is this going forward, the number of pairs to be unloaded going forward. Is BellSouth adding plant to its network basically every day?

A Yes, it adds plant to its network every day.

Q And as I understand it, the plant we're adding today does not have load coils on it. Is that a fair assumption?

A Yes, very much so.

Q The new plant that we're putting in the ground, is that compatible with DSL technologies?

A Yes, indeed, because as I stated earlier in my testimony, the advance forward-looking network was determined in the '80s to be fiber out to the remote sites. The forward-looking network won't even have an 18 kilofoot loop. It will have only at most a 12 kilofoot loop, because the concept of CSA, carrier serving area, whose original intention was to describe how you would develop your plant beyond a remote RT or DLC, but the ideal forward-looking network would say that the central office itself functions as a remote site and, therefore, the longest loop from the main frame would conform to this 12 kilofeet.

As a matter of fact, from a technical standpoint, the wonder of CSA is that the people who studied it recognized that in that length of cable, all services appear to be compatible. Now, we're beginning to approach and find a few that do not operate nicely with each other within 12 kilofeet, but that forward-looking

network, there will be no question about 18 kilofoot loops. It will strictly be from the central office standpoint a 9 to 12 kilofoot loop.

Q Okay. So the different digital subscriber line technologies will run over the plant we're putting in the ground today and tomorrow without having to remove any load coils?

A Yes.

Q Given that, is there any reason to increase the number of pairs that we are conditioning from 10 to 25 as we go forward?

A If you look at the deployment of a forward-looking network, the copper feeder goes away. You would put your fiber or T site near that cross box, and this feeder where the load coils are isn't there anymore. So only in that first nine kilofeet would there be an issue at all.

And today, BellSouth has -- I do not know exactly, but within nine kilofeet there are not supposed to be any load coils on a nine kilofoot loop. So if you look in the great scheme of a forward-looking network where your feeder is all replaced with fiber, then all your cross boxes that have your distribution behind it, there's no loading at all, and there's no feeder pairs that need to be unloaded. And your loops would strictly

be the -- what we call the F2 side of the distribution of a cross box, and there is very little in a metropolitan area of your F2 facilities to have any load coils.

CHAIRMAN DEASON: Explain something to me then. If what we're doing is trying to determine cost of a going-forward network and given the way you've just described that going-forward network, why are we even concerned with the cost of performing this conditioning or unloading?

THE WITNESS: Today, there is still a large number of customers who reside between the 9 and 18 kilofeet. And the forward-looking network says to deploy DLC in that area, but that's where we're growing with the forward-looking network. We began in the '80s deploying digital loop carrier as relief and as growth beyond the 18 kilofeet, and it has been slowly moving back closer and closer to the CO; that, in fact, in Florida, you do have those cross boxes at 10 and 12 kilofeet that are fed both by digital loop carrier and copper pairs.

CHAIRMAN DEASON: I understand that, and I don't question that. The question that I have is that if the whole purpose of this exercise that we've been doing for yesterday, today, and for the next two days is to determine the cost of a going-forward network and a going-forward network does not have load coils, why are we

even concerned with the cost of taking a load coil out of the network?

THE WITNESS: I'm not a cost person.

CHAIRMAN DEASON: Okay. Fair enough.

COMMISSIONER JACOBS: Would it be fair to say that on a going-forward basis, there is some likelihood that you -- you're going to encounter a -- I'm trying to place this back now to the conversation we had yesterday with Ms. Caldwell.

If I recall, there is a presumption that not only are you going to do ten, but when you do those ten, some of those aren't going to be used. Okay. And so there's an effort to recover the cost of, I guess, unloading that ten even though you may not be using all of them.

But what I'm hearing you say is, on a going-forward basis, you probably wouldn't have the coils, so in the likelihood of you having to incur some costs for having done ten goes down. Do you understand my question?

There was a concern in cost recovery that you would go out, you would unload these ten, and then there will be some likelihood that you would never ever provision four of them. Okay. I shouldn't say never ever, but the recovery of those would be of some sort that you would not recover those from a customer that was

sitting there at the time you did the unloading, and so that was in an effort to recover the cost of those through those people who now come to you to provision them. So for those lines, you would recover from six people, from six customers that would come to you.

Now, what I'm hearing you say is that in a going-forward basis, the likelihood of there being ten that you would need to remove load coils from would go down, because the likelihood is going to be that you are going to have more and more instances of there being no coils in the field. Is that a correct statement?

THE WITNESS: Yes. I believe the example I just gave addressed that. Now, if you're asking the issue about the additive, I'll defer that to Jerry Latham.

COMMISSIONER JACOBS: Okay.

THE WITNESS: But the example that I just gave where a cross box will have -- at ten kilofeet will have both fiber fed facilities and copper fed facilities. You can see that on a going-forward basis when -- my fiber fed are going to be my F1 facilities, then I have less need to be concerned about the loaded pairs that feed that cross box.

COMMISSIONER JACOBS: Thank you.

MR. EDENFIELD: I have nothing further.

MS. BOONE: Mr. Edenfield, could I just ask:

Was that errata on the testimony or in the depo?

MR. EDENFIELD: The errata that I referenced was for the deposition, which is supposed to be attached to the deposition, but since we didn't get it until late Monday night, Mr. Greer has not had a chance to get that typed up yet.

MS. BOONE: Okay. Because I noticed that there is a similar representation on Page 20 of his testimony.

MR. EDENFIELD: I mean, you can certainly ask Mr. Greer about that, but I'm telling you, wherever he referenced that the cost study said nine manhours, it should have been 4.5 manhours, and it was a mistake. I think that's what he just said. So if there is more than one place, it needs to be corrected.

MS. BOONE: Okay. I was just trying to point that out. Thanks.

CHAIRMAN DEASON: Okay. Exhibits.

MR. EDENFIELD: The videotape was the only exhibit we had. We would move that into evidence.

CHAIRMAN DEASON: Exhibit 117. Any objection? Hearing no objection, Exhibit 117 is admitted.

(Exhibit 117 admitted into the record.)

CHAIRMAN DEASON: We had one other exhibit identified, Exhibit 118.

MS. BOONE: Yeah, that's mine. That's the

Page 92 of Mr. Riolo's testimony. I'd like to move that into the testimony, please.

CHAIRMAN DEASON: Well, are you going to be moving this as part of that testimony?

MS. BOONE: Yes. I just wanted to go ahead and separately identify it just for the record.

CHAIRMAN DEASON: Well --

MS. BOONE: It doesn't matter, whatever you prefer.

CHAIRMAN DEASON: Let me ask you this. Are you moving it as it exists in the testimony, or are you moving it with all of the writing that you put on your display?

MS. BOONE: No, I'm not moving it with the writing, just as it exists in the testimony.

CHAIRMAN DEASON: Okay. I don't think there's a need to put this in the record if it's going to go in --

MS. BOONE: Okay, fine. Thanks.

CHAIRMAN DEASON: Very well.

MR. EDENFIELD: That is all we have for Mr. Greer.

CHAIRMAN DEASON: Thank you, Mr. Greer.

MR. EDENFIELD: Can Mr. Greer be excused?

CHAIRMAN DEASON: Yes, he may.

(Witness excused.)

CHAIRMAN DEASON: We'll take a ten-minute recess

at this time.

(Brief recess.)

(Transcript continues in sequence in Volume 13.)

STATE OF FLORIDA)

: CERTIFICATE OF REPORTER

COUNTY OF LEON)

I, TRICIA DeMARTE, Official FPSC Commission Reporter, do hereby certify that the Hearing in Docket No. 990649-TP was heard by the Florida Public Service Commission at the time and place herein stated.

It is further certified that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript, consisting of 93 pages, Volume 12 constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 22nd day of September, 2000.

Tricia DeMarte

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FPSC Official Commission Reporter
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