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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF WILEY G. (JERRY) LATHAM
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 000121-TP
MARCH 16, 2001

Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

A. My name is Wiley G. (Jerry) Latham. My business address is 3535 Colonnade Parkway, Birmingham, Alabama. I am BellSouth's Product Manager for Unbundled Loops within Interconnection Services – Marketing and have been employed by BellSouth for fifteen years.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to certain statements in the direct testimony of Thomas E. Allen of Covad Communications Company. These issues include the intervals for loops and loop conditioning; the types of facilities that constitute voice grade loops versus xDSL loops; and whether or not there can be a "one size and rate fits all" approach to these loops.

Q. ON PAGE 12 (LINES 19 – 20) OF HIS TESTIMONY, MR. ALLEN CLAIMS THAT BELLSOUTH BELIEVES THAT "IT SHOULD ACTUALLY BE ALLOWED UP TO 14 BUSINESS DAYS TO

1 **PROVISION AN xDSL LOOP". IS THIS AN ACCURATE**
2 **STATEMENT?**

3 A No, it is not. Mr. Allen is confusing the provisioning process for two different
4 UNEs – Loop Make Up (LMU) and Unbundled Loops. It is true that before
5 the availability of the mechanized loop make up gateway, BellSouth did
6 require a Service Inquiry (SI) process in order to qualify loops as being xDSL-
7 capable. This was needed because BellSouth did not have a way to
8 mechanically qualify and assign loops that met the criteria for xDSL. The SI
9 process is very labor intensive and requires a technician to perform a manual
10 loop make up which uses a combination of electronic and manual
11 verifications. The interval for this process is typically 5-7 business days but is
12 not part of the provisioning process for the loop. This interval is to qualify the
13 loop – not to provision it. The provisioning of the loop cannot begin until a
14 loop is selected and qualified.

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16 Now that BellSouth has an electronic LMU gateway, the CLEC can select,
17 qualify, and reserve the loop in a matter of minutes. Once this is done, the
18 actual provisioning of the loop can begin. This interval is 7 days, as stated by
19 Mr. Allen. Therefore, it is not true that BellSouth believes it should be
20 allowed up to 14 business days to provision xDSL loops. This would only be
21 the case if the CLEC has requested that BellSouth perform a manual LMU or
22 utilize the manual SI process to qualify the loop prior to beginning the
23 provisioning cycle.

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1 **Q. ALSO ON PAGE 12 (LINES 20 –21) OF HIS TESTIMONY, MR.**
2 **ALLEN STATES THAT BELLSOUTH BELIEVES THAT IT SHOULD**
3 **BE ALLOWED UP TO 21 BUSINESS DAYS TO PROVISION AN xDSL**
4 **LOOP THAT REQUIRES CONDITIONING. IS MR. ALLEN**
5 **INCORRECT ON THIS POINT AS WELL?**

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8 A. Yes. Here Mr. Allen combines the interval for three different UNEs – LMU,
9 UNE Loops, and Loop Conditioning. Once again he erroneously includes the
10 qualification of the loop as a part of the provisioning process and compounds
11 the problem by also including the conditioning interval. These are all serial
12 processes that are all labor intensive. Before a loop can be conditioned it must
13 first be pre-qualified, before it can be provisioned it must be conditioned.

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15 The conditioning interval is dependent upon many factors. Load coils,
16 bridged-tap, repeaters, etc., can be located in underground or buried locations.
17 This requires extensive work and planning to be performed properly.

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19 As previously stated, the provisioning interval for an xDSL loop is 7 business
20 days. If the CLEC qualifies the loop using the LMU gateway, the intervals
21 mentioned by Mr. Allen can be reduced by 7 business days.

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24 **Q. ON PAGE 13 (LINES 3 –4), MR. ALLEN STATES THAT “xDSL**
25 **LOOPS ARE NOTHING MORE THAN PLAIN COPPER VOICE**

1 **LOOPS". HE ALSO IMPLIES THAT BECAUSE BELLSOUTH HAS**
2 **PROVISIONED SERVICE TO OVER 51,000 DSL CUSTOMERS IN**
3 **GEORGIA ("THROUGH LINE SHARING" PAGE 3, LINE 6) THIS**
4 **MEANS THAT LOOPS ARE SIMPLE TO PROVISION, AND**
5 **THEREFORE, SHOULD HAVE REDUCED INTERVALS. IS THIS A**
6 **FAIR CHARACTERIZATION?**

7

8 A. Absolutely not. Mr. Allen seems to imply that all voice loops are qualified for
9 xDSL service. This is not true. First, as Mr. Allen acknowledges, only those
10 voice grade loops that are provisioned on copper can even begin to be
11 qualified as xDSL loops. However, not every copper voice grade loop can be
12 an xDSL loop. Copper voice grade loops that are longer than 18kft require
13 load coils to work properly. These voice grade loops can also work properly
14 with significant amounts of bridged-tap. Therefore, these loops would not
15 qualify as xDSL loops unless they first are conditioned by removing the load
16 coils and/or bridged-tap.

17

18 Further, Mr. Allen acknowledges that the 51,000 DSL customers in Georgia
19 he refers to are line sharing customers. Yet, he still tries to compare line
20 sharing to the provisioning of an unbundled loop. His testimony recognizes
21 that line sharing involves the use of a loop that is already provisioned and is
22 working properly. The provisioning of an xDSL loop is different. These
23 loops are generally additional circuits to an end user's location and are not
24 currently working. Even if they are currently providing voice grade service,
25 they would have to be qualified as being xDSL-capable and would have to be

1 tested and provisioned as such. Therefore, it is not appropriate to assume that
2 line sharing provisioning and UNE loop provisioning are the same.

3

4 **Q. ON PAGE 18 (LINES 18 – 21), MR. ALLEN STATES THAT COVAD**
5 **BELIEVES THAT ALL OF BELL SOUTH'S xDSL LOOP PRODUCTS**
6 **ARE EXACTLY THE SAME EXCEPT FOR THE "ARTIFICIAL"**
7 **LENGTH RESTRICTIONS PLACED ON THE LOOPS BY**
8 **BELL SOUTH. IS THIS ACCURATE?**

9

10 A. No. BellSouth offers many different xDSL loops in response to Regulatory
11 mandates (FCC 319 rules, etc.) as well as direct requests from CLECs during
12 negotiations. Each of these loop types are developed using industry standards
13 to the extent possible. This includes length limitations. It is these standards,
14 not BellSouth, that dictate the length limitations. In fact, Covad has
15 demanded that BellSouth change its ADSL-capable loop to comply with
16 newly established standards for ADSL service, which called for the use of
17 Revised Resistance Design (RRD) standards for the loop portion of the
18 service. The RRD standards limit non-loaded copper facilities to 18kft. This
19 is just one example. Different xDSL services have different loop
20 requirements. These include:

21

22 (a) ADSL-compatible loops – 2-wire loop that is provisioned only on
23 copper facilities and meets industry specifications for Revised
24 Resistance Design (RRD). This means non-loaded copper, less
25

1 than 18 kft, no more than 6 kft of inclusive bridged tap and 1300
2 ohms or less of resistance.

3 (b) HDSL-compatible loops – 2-wire or 4-wire circuits that are only
4 provisioned on copper and meet industry specifications for Carrier
5 Serving Area (CSA) loops. This means non-loaded copper, less
6 than 12 kft, no more than 2.5 kft of bridged tap and 850 ohms or
7 less of resistance.

8 (c) Unbundled Copper Loops (UCL) - Short – 2-wire or 4-wire
9 circuits that are provisioned using industry standard specifications
10 for Resistance Design (RD) loops. This means non-loaded copper,
11 less than 18 kft, no more than 6 kft of exclusive bridged tap and
12 1300 ohms or less of resistance.

13 (d) Unbundled Copper Loops (UCL) - Long – 2-wire or 4-wire
14 circuits that are provisioned using non-loaded copper. They are
15 longer than 18 kft, may have up to 12 kft of exclusive bridged tap
16 and may have up to 2800 ohms of resistance.

17 (e) Unbundled Digital Channel – This loop is the same as a 2-wire
18 ISDN loop, except it is provisioned uniquely to support IDSL
19 service.

20
21 Currently, BellSouth is developing another xDSL copper loop at the request
22 of at least one Data Coalition member. This will be a non-designed copper
23 loop with no specific length limitation.

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1 Each of these product offerings is different, and Mr. Allen's attempt to have
2 a "one size and rate fits all" approach ignores these differences.

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4 It is also interesting to note that Mr. Allen admits (on page 19, lines 2 – 4) that
5 "over the course of its business relationship with BellSouth, Covad has
6 ordered and provided service using the HDSL, ADSL, UCL, and UDC/IDSL
7 loops". If these loops are truly the same, why would they want to monitor the
8 performance of all these loop types and continue to have the option of
9 ordering any and all of them? It seems that Covad does recognize these loops
10 are different and they want the ability to order the loop that best meets their
11 needs at the time of the order.

12

13 **Q. IS THERE ONE xDSL LOOP TYPE OFFERED BY BELLSOUTH**
14 **THAT WILL BEST SUPPORT ALL xDSL OFFERINGS?**

15

16 A. Not necessarily, which is one reason BellSouth offers a number of different
17 loop types so that each carrier can decide for itself which particular loop type
18 will support its particular xDSL service. XDSL services are highly dependent
19 upon the equipment used to provide that service. For example, one vendor's
20 DSLAM may operate fine on an 18 kft loop with minimal bridged tap, while
21 another's may not. Therefore, BellSouth cannot guarantee that an xDSL
22 service will work at any particular bit-rate or function at all on every
23 unbundled loop provided by BellSouth. However, BellSouth does guarantee
24 that the xDSL loop described above will meet a pre-defined set of
25 transmission characteristics, which are usually dictated by industry standards.

1 BellSouth publishes a technical reference document (TR73600) that contains
2 a very detailed listing of the loops' characteristics, which allows the
3 requesting carrier to determine for itself how its equipment will operate on
4 any given loop type.

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6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

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8 A. Yes.

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