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June 27, 1994

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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. [redacted]-TP
Expanded Interconnection Phase II and Local Transport Restructure

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of the Rebuttal Testimony of R. Kirk Lee on behalf of GTE Florida Incorporated.

Service has been made on the parties of record as evidenced by the Certificate of Service.

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Very truly yours,

Kimberly Caswell

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Enclosures

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

| | | |
|---|---|---|
| In re: Expanded Interconnection Phase II and Local Transport Restructure | ) | Docket No. 921074-TP<br>Docket No. 930955-TL<br>Docket No. 940014-TL<br>Docket No. 940020-TL<br>Docket No. 931196-TL<br>Docket No. 940190-TL |

Filed: June 27, 1994

# REBUTTAL TESTIMONY

of

**R. KIRK LEE**

On Behalf of

**GTE FLORIDA INCORPORATED**

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is R. Kirk Lee. My business address is 600 Hidden Ridge, Irving, Texas 75038.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed direct testimony in this proceeding addressing issues related to pricing flexibility and the local transport restructure (LTR).

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to issues raised by several parties in this case, including AT&T witness Mike Guedel, IAC witness Joseph Gillan, Sprint witness Fred Rock, Teleport witness Steven Andreassi, and ICI witness Douglas Metcalf. These issues include (1) the appropriate policy basis for pricing switched transport services, (2) the use of reconfigured demand for the Company's LTR filing, and (3) the level of pricing flexibility needed by LECs.

Q. THE INTEREXCHANGE ACCESS COALITION (IAC) ADVOCATES THE ESTABLISHMENT OF COST-BASED RATE DIFFERENTIALS COMBINED WITH THE RECOVERY OF CONTRIBUTION IN A

COMPETITIVELY NEUTRAL MANNER. WHAT EXACTLY DOES THIS MEAN AND HOW WAS THIS ISSUE ADDRESSED BY THE FCC?

A. Essentially, the IAC proposal appears to be the same proposal that certain small IXCs advocated at the federal level. This proposal, basically a 28-to-1 DS1-to-DS3 crossover ratio, with some minor modifications, was considered and rejected by the FCC. It appears that the IAC has, in an attempt to make it more palatable, repackaged previous arguments without providing any additional evidence that they would be harmed by the LECs' LTR rates.

The FCC addressed these arguments in its Report and Order and Further Notice of Proposed Rulemaking in Docket No. 91-213 (Transport Order), released October 16, 1992, and found that the record did not support the arguments of the small and medium IXCs that DS1 rates should be based on a simplistic translation from DS3 rates. The FCC noted that:

> "The interoffice network does not consist entirely of facilities capable of providing DS3 service. [Footnote omitted.] The record indicates that the interoffice segment of the access network

is a mix of fiber, copper, and microwave facilities. [Footnote omitted.] Copper facilities in particular cannot be used to provide DS3 services in the interoffice network. In many instances, a given interoffice route may actually use a combination of facilities using different technologies. Thus, it would not be possible to set DS1 rates on the basis of DS3 rates without ignoring the higher costs associated with copper facilities, or attempting to allocate such costs on a route-by-route basis."

(Transport Order at para. 47.)

The FCC explained that even if it were to base DS1 rates on DS3 prices, the appropriate relationship would not be 28-to-1. The FCC gave three primary reasons why such a ratio was inappropriate:

"There are costs associated with providing DS1 circuits over a DS3 fiber facility that are not incurred when a full DS3 facility is provided to the customer. First, in order to carry an IXC's DS1 level traffic over a DS3 facility in the interoffice network, the

DS1 circuit must be multiplexed up to a DS3 at the (SWC) and back down to a DS1 at the end office. [Footnote omitted.] The additional multiplexing costs at the SWC are properly included in the nondistance-sensitive charge of the DS1 interoffice rate. Second, if DS1 direct-trunked traffic is routed through an intermediate office where some of the traffic being carried on the DS3 circuit is dropped off, LECs have to multiplex the circuits down to the DS1 level in order to strip off traffic, and then up again to the DS3 level to continue through the interoffice network. [Footnote omitted.] To accomplish this multiplexing, the LEC must convert an optical signal to an electrical signal and then back to an optical signal by using the appropriate optical line terminating circuit equipment. These multiplexing and optical circuit equipment costs are now recovered through the mileage component of DS1 special access interoffice rates. Third, DS1

circuits riding on a DS3 facility will generally not fill the DS3 facility. There will often be fewer than 28 DS1s in use on the DS3. While customers that purchase a DS3 facility pay for the full capacity of the DS3, DS1 rates are set to recover on average the full cost of the DS3 spread among all DS1s, even when it is not fully utilized by DS1 customers. [Footnote omitted.] For all of these reasons, we reject the argument that DS1 rates should be based on 1/28 of DS3 rates."

(Transport Order at para. 48)

Q. THE FCC ESTABLISHED A BENCHMARK CROSSOVER RATIO OF 9.6-TO-1 FOR DS1-TO-DS3 RATES. PLEASE EXPLAIN YOUR UNDERSTANDING OF THE FCC'S RATIONALE IN DETERMINING THIS WAS THE MOST APPROPRIATE RATIO FOR THE INITIAL LTR FILING.

A. The FCC found that there was no evidence on the record supporting the establishment of a specific rate relationship between DS1 and DS3 services. While the FCC could have undertaken a cost investigation to determine a DS3-to-DS1 rate

relationship, it found that a lengthy investigation with continuance of the equal charge rule would not be in the public interest. The FCC believed that because of cost differences between the LECs, any mandated fixed ratio would be inaccurate and would have to be adjusted over time. Instead, it concluded that:

> "a LEC's initial DS1 and DS3 transport rates, based on special access rates as of September 1, 1992, should be presumed reasonable if they satisfy a benchmark analysis. [Footnote omitted.]"

(Transport Order at para. 50.)

The FCC established its benchmark ratio by finding that most of the LECs offering DS3 service were clustered between 9.6-to-1 and 15-to-1 ratios. Because the FCC was concerned with unreasonably disadvantaging smaller IXCs, rates reflecting ratios below 9.6-to-1, in the absence of satisfactory justification, were to be suspended and investigated, while rate ratios above 9.6-to-1 were determined to be presumptively lawful and reasonable.

The FCC further found that special access rates

were a reasonable basis to use in setting LTR rates because the same underlying facilities are used to provide both special access and switched transport services. The FCC noted that:

> "[a]llowing the LECs to use a greater range of high capacity services in their direct-trunked transport rates recognizes that, as with special access, there are efficiencies to be gained through high volume usage. We note that today, small IXCs that would otherwise take DS1s can aggregate their traffic together on a DS3, and take advantage of DS3 rates, and this may be an alternative for the small IXCs."

(Transport Order at para. 50.)

GTEFL is already aware of some IXC customers in Florida who are selling excess capacity on their networks to smaller IXCs in order to aggregate traffic and reduce access costs.

Q. DO GTEFL'S COMPETITORS AND CUSTOMERS SUPPORT LTR PRICES BASED UPON EQUIVALENT SPECIAL ACCESS SERVICES?

A. Yes. Teleport witness Andreassi, representing a

competitor for GTEFL's transport services, provided testimony which supports using special access rates as a basis for setting switched dedicated rates. For example, at page 18 of his testimony, he states:

> "Different rate levels for interstate and intrastate transport are appropriate only to the extent that different interstate and intrastate tariff rates apply for equivalent DS1 and DS3 special access services."

Mr. Andreassi's testimony demonstrates the appeal of market-based pricing to diverse interests.

AT&T witness Guedel, representing GTEFL's largest customer, also supports the Company's LTR proposal at page 11 of his testimony:

> "the Commission should approve the proposed rate structure as filed. This structure will more accurately reflect the underlying costs associated with the provision of transport services."

Q. DOES GTEFL AGREE WITH THE FCC's BENCHMARK RATIO OF 9.6-TO-1?

A. Not entirely. Although the FCC's goal of preventing the small IXCs from being unreasonably disadvantaged is important, broader public interest factors should take precedence. As I stated in my direct testimony, GTEFL believes that crossover ratios should not be pre-set, but should be allowed to be driven by market factors which determine what prices are ultimately charged for a given service. The demand for a service and the number of available substitutes for that service are examples of such market factors. Use of market-based rates will create an environment where competition can flourish and the public will benefit more overall as rates are driven closer to true economic costs.

With expanded interconnection for switched access, the potential for a LEC competitor to provide alternative transport services will increase. A number of witnesses indicated in direct testimony that, even without expanded interconnection, special access and dedicated private line transport services are fully competitive today in Florida. If a LEC's prices for DS1 or DS3 transport services are not market-based, the LEC will be forced to correct them or risk losing customers to

alternative access providers. Allowing the market to set transport prices will help prevent potential uneconomic bypass and help keep traffic on the LECs' networks while allowing the public to benefit from the increased level of competition. To accomplish this, crossover ratios should be flexible and should be determined by market prices for existing special access services.

Given the increasingly competitive nature of local transport services, it is <u>not</u> appropriate to establish a pre-set level of contribution to be provided by each service as the IAC advocates. Rates for local transport services should be set above long run incremental cost, as a price floor, and at a level which will contribute to the recovery of the Company's common overhead expenses. The specific rates for each type of service should again, however, be based on market factors, including market demand and competitive pressures.

Q. DID THE FCC ALLOW THE SMALL IXCs AND OTHER PARTIES TO ITS TRANSPORT RESTRUCTURE DOCKET THE OPPORTUNITY TO CHALLENGE THE LECs' LTR RATES, EVEN THOUGH THE RATES WERE PRESUMED REASONABLE?

A. Yes. FCC policy states that parties seeking suspension of rates that are presumed reasonable must demonstrate: (1) a high probability that the tariff would be found unlawful after investigation; (2) that suspension would not substantially harm other interested parties; (3) that irreparable injury would result if suspension did not issue; and (4) that suspension would not otherwise be contrary to the public interest.

Any party opposing a LEC's LTR rates is required to submit evidence to the FCC on the four points above supporting their claim. To GTEFL's knowledge, none of the small IXCs or any other party was able to demonstrate to the FCC that GTEFL's tariff was unlawful or that any irreparable injury was incurred due to GTEFL's local transport rates. The Company's rates met all requirements to be presumed reasonable by the FCC and were allowed to go into effect on December 30, 1993.

Q. ARE GTEFL'S LTR RATES NON-DISCRIMINATORY?

A. Yes. As mentioned above, the Company met all of the FCC's criteria for lawful rates. Discrimination, in the common carrier context,

means that different rates are being charged to similarly situated customers for the same service. This is not the case with GTEFL's LTR rates. With the authorized exception of Contract Service Authority (CSA) and Individual Case Basis (ICB) applications, GTEFL charges each customer the same tariff rates for its DS1 service. The Company also charges each of its customers the same tariff rates for DS3 services. The Company does not have different sets of rates for different customers for the same service. Moreover, it is important to remember that DS1 and DS3 transport are different transport services with different markets for each. They are not the same service.

This does not mean that some IXCs will not experience increases and some will not experience decreases in their access costs as a result of LTR. However, these increases and decreases are not the result of discriminatory rates. The Company does not and cannot differentiate between its customers when selling a tariffed service. The cost differences to the IXCs are primarily due to the mix of transport services each IXC purchases. These cost differences are also due in part to

elimination of subsidies that were inherent in the previously used equal charge per-minute pricing scheme.

These impacts on the IXCs were fully anticipated by the FCC in its investigation of LTR. However, the FCC still found elimination of the equal charge rule to be in the public interest.

Q. WHAT OTHER FACTORS ARE IMPORTANT IN CONSIDERING THE IAC's PROPOSED DS1-TO-DS3 RATIOS?

A. The IAC's proposal isolates only the interoffice trunking rate elements and fails to take into account the rates for entrance facilities in calculating their crossover ratios. The FCC specified in its Transport Order that the rate relationship comparison between DS1 and DS3 services should include a channel termination rate element, which is the special access equivalent of an entrance facility. The rate relationships of the different services need to be examined in total, not on a rate element basis. To do otherwise ignores rate elements which are needed to fully provision the service.

In addition, the IAC's proposal takes away most of the incentive for an IXC to optimize its network and reduce costs because it makes the rates for DS3 transport, DS1 transport, and Tandem Switched transport essentially the same. This is contrary to the FCC's objectives in eliminating the equal charge rule. The FCC found that:

> "the equal charge rate structure cannot remain in place if customers are to receive the benefits of switched transport competition."

(Transport Order at para. 2.)

It further noted that:

> "The current rate structure, under the "equal charge" rule, has promoted significant inefficient use of the local exchange carrier (LEC) networks by interexchange carriers (IXCs) and other access customers. The uneconomic pricing signals created by the equal charge rule have caused wasteful use of LEC facilities and higher rates for ratepayers. For this reason, it is critical that we adopt a new rate structure that will better match LEC

transport rates and costs."

(Transport Order at para. 1.)

The IAC's proposal is simply another way to re-implement the effects of the equal charge rule. As such, the Commission should reject it.

The IAC proposal would also potentially shift more dollars to be recovered by the Residual Interconnection Charge (RIC). This further compounds the equal charge aspect of their proposal since all parties are required to pay the RIC, regardless of which transport option they buy from a LEC.

A 28-to-1 crossover ratio is essentially a rate relationship based solely on the equivalent capacity of each type of circuit, since there are 28 DS1 circuits available on a DS3 facility. This ratio has nothing to do with the underlying costs of providing those facilities, as the FCC correctly concluded.

Q. DO THE IXCs THEMSELVES ADHERE TO A 28-TO-1 RATE RELATIONSHIP IN PRICING THEIR OWN HIGH CAPACITY SERVICES?

A. No. As GTE pointed out before the FCC, the rates charged by both IXCs and Alternative Access Vendors (AAVs) exhibit crossovers consistent with those found in local exchange carrier rates, including those of GTEFL. As examples, rates quoted for Teleport and Jones Lightwave showed crossovers occurring in a range from 9.7-to-1 to 13.7-to-1. AT&T and MCI had crossovers ranging from 5.8-to-1 to 12.9-to-1.

The underlying cost relationship between DS1 and DS3 services is apparently not anywhere close to 28-to-1 since we have not observed any competitive carriers charging such rates in the non-regulated marketplace. The Commission should view such proposals (28-to-1 or cost-based differentials) with skepticism if parties which have no regulatory constraints on their rates are not pricing in this manner.

Q. WILL GTEFL's PROPOSED LTR RATES AFFECT COMPETITION IN LESS POPULATED MARKETS?

A. No. Mr. Gillan, on page 9 of his testimony, implies that GTEFL's LTR rates will ultimately lead to fewer customer choices in rural areas or

possibly lead to deaveraged retail rates. This implication is incorrect. Under today's equal charge rule, rural customers already have relatively fewer choices of toll carriers. An IXC's decision to provide toll service in an area is based on customer density and revenue potential more than any other factors. An urban customer today (pre-LTR) has more choices than a rural customer because smaller IXCs find it more profitable to operate where the majority of customers are clustered.

Also, it is unlikely that LTR interoffice transport rates will cause any retail toll rates to be deaveraged. In GTEFL's LTR proposal, less than 7% of the total transport revenues are generated by rates for these interoffice transport options. Other factors, such as widely varying access rates between LECs, put much more pressure on toll providers to deaverage their rates.

Q. THE SUGGESTION HAS BEEN MADE THAT ANY POTENTIAL DECREASE TO DS1 RATES THAT MIGHT RESULT FROM THIS PROCEEDING CAN SIMPLY BE RECOVERED BY INCREASING THE RESIDUAL INTERCONNECTION CHARGE (RIC) SO THAT

THE LEC REMAINS REVENUE NEUTRAL. PLEASE DISCUSS.

A. The RIC was designed to be a residual rate element which would keep the LECs revenue neutral to their current transport revenue levels. This rate element is not supported by any readily identifiable investment cost on a long run incremental cost basis and, as a result, may not be a viable element in the long run. It was intended only to ensure short-term transport revenue neutrality. The FCC recognized this fact and has indicated its intention to review this rate element, and there is the potential that it may be phased down or eliminated altogether. The FPSC may also take action on the intrastate RIC as a result of these proceedings. Given these circumstances, shifting more money to the RIC now may lead to a larger burden placed on local ratepayers once the RIC is phased down or eliminated and the LECs must look elsewhere to replace this revenue stream.

Q. AT&T AND THE IAC BOTH ARGUE AGAINST GTEFL'S USE OF RECONFIGURED DEMAND TO DEVELOP THE RIC. AT&T WITNESS GUEDEL, ON PAGE 9 OF HIS TESTIMONY, IMPLIES THAT LECS HAVE INCENTIVES TO INFLATE THE RIC AND THAT RECONFIGURED DEMAND IS TOO DIFFICULT TO

EVALUATE. PLEASE RESPOND.

A. These criticisms are unfounded and unsupported by any evidence in this proceeding. As mentioned above, the RIC is not a viable long-term rate element. As a result, it is unclear why GTE would have any incentive to artificially inflate a rate element that may ultimately be eliminated or phased down. To help guard against any perception of even unintentional inflation of the RIC, GTEFL used a reconfiguration methodology that resulted in a conservative 75% reconfigured demand estimate. The Company believes this partial reconfiguration estimate gives it a reasonable chance of ensuring revenue neutrality in the near term.

Regarding Mr. Guedel's second point, evaluation of reconfigured demand is not the complex process he would have us believe. As I mentioned in my direct testimony, GTEFL used a simple economic choice model to evaluate the most likely transport choices an IXC would make for a given route, based on its current traffic volumes and dedicated facilities. There is no growth factored into the model results. Given these choices in the real world, most rational companies would also make the demand

choices which yield the lowest cost to them. IXCs, being no different, actively seek cheaper forms of access in the marketplace based upon LECs' access rates. Reconfiguration is one way an IXC can purchase cheaper access.

As I previously indicated in my direct testimony, the use of historical demand will cause the Company to under-recover its transport revenues if any reconfiguration does occur. Therefore, the Company has used a conservative estimate of reconfigured demand to give it a better chance of remaining revenue neutral. There is no doubt that IXCs will actually reconfigure. The Company began receiving LTR-related orders from the IXCs well prior to the effective date of interstate LTR. The Company expects reconfiguration activity to increase over time, especially since AT&T has asked GTE to extend its nonrecurring charge (NRC) waiver through the end of 1994. It is GTEFL's understanding that AT&T's resources to optimize its network are tied up with the RBOCs' territories and that GTE is prioritized after the RBOCs. It is also our understanding that AT&T plans to use hubbing and shared use arrangements in the future, which will

also require reconfiguration.

Q. TELEPORT WITNESS ANDREASSI ARGUES THAT THE LECs SHOULD NOT BE GIVEN PRICING FLEXIBILITY, OTHER THAN WHAT THE FCC HAS GRANTED. DO YOU AGREE?

A. No. First, it should be noted that the switched access pricing flexibility granted by the FCC for volume/term discounts puts significant restrictions and a burden of proof on the LECs which rendered this type of pricing flexibility unworkable for the most part. The FCC required LECs to demonstrate that 100 DS1 equivalent crossconnects had been purchased by interconnectors before volume/term discounts could be implemented. In addition, the tariff review period for a volume/term discount filing was extended from 45 to 120 days. In short, the FCC pricing flexibility that Mr. Andreassi says is adequate is really not available.

Mr. Andreassi further claims that "an order in this docket will only open up a fraction of the intrastate switched access market [transport] to competition. Because of this, the LECs will not lose significant revenues and should not receive excessive pricing flexibility." This statement

ignores the existing competition LECs face today, as well as the loss of switched usage from the LECs' network due to the use of cheaper special access alternatives. As I have previously noted in my direct testimony, and as ICI witness Metcalf agrees, there is already a substantial amount of competition allowed in the Florida intrastate access market in the form of dedicated or special access.

Further, special access is a substitute service for switched access for certain customers. When an end user generates a large volume of traffic from a single location, it is often more cost-effective for an IXC to carry the traffic from the customer's location the IXC's POP over special access, as opposed to switched access. These cheaper special access circuits can be provided by the LEC or by an AAV, such as Teleport or ICI. The result is that switched usage, which provides a higher contribution than special access, is removed from the LEC's network. If an AAV provides the special access, all contribution is lost.

Large blocks of switched usage can be removed from

the network by converting relatively few large business customers to special access or private network alternatives. Removing this usage from the network affects more than just transport revenues since other switched access rate elements such as end office switching are also bypassed. This leaves the average ratepayer, who generates little usage, left to pay the fixed costs of the network, which have now increased on a per-unit basis due to the lower overall usage remaining.

For these reasons, it is critical to allow the LECs additional switched access pricing flexibility so they can compete with alternative sources of access. Sprint witness Rock, for example, recognizes the need for a zone pricing scheme for switched access. The additional pricing flexibility is needed today, however, not some time in the future as Mr. Metcalf suggests. By delaying implementation of flexible pricing options, erosion of LEC revenues will continue and LECs will not be able to recoup these losses once they occur. This, in turn, will place upward pressure on the rates of other services, including local rates, to make up the difference.

Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.

A. As I have indicated above, the FCC has conducted a thorough investigation of LTR issues and found GTEFL's LTR rates to be just, reasonable, and lawful. These are the same rates that the Company has mirrored for its intrastate access tariff, with the exception of the RIC. Further, as the FCC concluded, there is no support for use of DS1-to-DS3 ratio of 28-to-1. The FCC has recognized that some carriers will experience changes in their access costs resulting from LTR. Nevertheless, it found that eliminating the equal charge rule and implementing the LECs' LTR rates was in the public interest.

The Commission should approve GTEFL's proposed LTR rates and its proposed enhancements to LTR, including the use of pricing flexibility and reconfigured demand. The Commission should allow the Company to implement these enhancements in conjunction with its LTR filing.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the Rebuttal Testimony of R. Kirk Lee on behalf of GTE Florida Incorporated in Docket No. 921074-TP were sent by U.S. mail on June 27, 1994, to the parties on the attached list.

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