

*Redacted
Law*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief) Docket No.
of Supra Telecommunications and) 980800-TP
Information Systems, Inc., Against)
BellSouth Telecommunications, Inc.) Filed: 10-2-98
))
))

COPY

DEPOSITION OF: BARBARA CRUIT
TAKEN AT THE INSTANCE OF: Supra Telecommunications
DATE: Monday, October 19, 1998
TIME: Commenced at 9:45 a.m.
Concluded at 2:00 p.m.
LOCATION: 2540 Shumard Oak Blvd.
Tallahassee, Florida
REPORTED BY: ANITA M. PEKEROL, RPR,
CP, CM. Notary Public in
and for the State of
Florida at Large.

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Accurate Stenotype Reporters, Inc. DOCUMENT NUMBER-DATE

12620 NOV 10 98

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I N D E X

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The following deposition of BARBARA CRUIT was taken on oral examination, pursuant to notice, for purposes of discovery, for use as evidence, and for such other uses and purposes as may be permitted by the applicable and governing rules. Reading and signing is not waived.

- - -

Thereupon,

BARBARA CRUIT

was called as a witness, having been first duly sworn, was examined and testified as follows:

MS. SUMMERLIN: Suzanne Summerlin, representing Supra Telecommunications and Information Systems.

MS. WHITE: Nancy White, representing BellSouth Telecommunications.

MS. KEATING: Beth Keating, appearing for the Commission staff.

MS. SUMMERLIN: The usual stipulations, Nancy?

MS. WHITE: Yes.

DIRECT EXAMINATION

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BY MS. SUMMERLIN:

Q Would you please give your name and address, for the record, business address?

A My name is Barbara Cruit.

My business address is Miami, but if you need specifics, I'm going to have to pull it out. Do you want specifics? Do you want my specific business address?

Q This is not a test.

MS. WHITE: This is really pathetic.

THE WITNESS: My office is in Miami. One is in Ft. Lauderdale.

MS. SUMMERLIN: My company is in Miami, and for a while there I would have had to struggle to give the address.

BY MS. SUMMERLIN:

Q What is your title?

A Director, South Florida Capacity Management, for BellSouth.

Q Florida Capacity Management?

A Yes.

Q Now, how long have you been in that position?

A Since 1995.

1 Q And when did you start with BellSouth?

2 A 1979.

3 Q And what is your history with BellSouth,
4 generally? You know, not every little detail.

5 A Mostly, in network. Mostly, in the
6 planning and engineering organization. A brief period
7 in comptroller's.

8 Q What kind of educational background do
9 you possess?

10 A I have a Bachelor of Science Degree in
11 Business from Troy State University, in Alabama.

12 Q So, a BS in Business?

13 A Yes.

14 Q So, you have worked there a little while,
15 it looks like.

16 A Yes.

17 Q Who do you report to in that position?

18 A Scott Mulcahey.

19 Q Mulcahey?

20 A Yes,

21 Q What is his title?

22 A He's the Vice President of Network
23 Operations in South Florida.

24 Q For South Florida?

25 A Yes.

1 Q Now, do you supervise people?

2 A Yes, I do.

3 Q Who are your subordinates, in general?

4 Not every last person.

5 A There are 76 of them.

6 Q And what are their categories, generally?

7 A They're all capacity managers. There is
8 Switch Capacity Managers, Circuit Capacity Managers,
9 Common Systems Capacity Managers, Power Capacity
10 Managers, Transmission Engineers.

11 Q Power Systems Capacity Managers; is that
12 right?

13 A Just Power Capacity Managers. It is
14 common systems.

15 Q Transmission Engineers?

16 A Yes.

17 Q Are they all located in Miami, also?

18 A Miami and Ft. Lauderdale.

19 Q Do you have any direct knowledge of the
20 North Dade Golden Glades Central Office? Have you
21 ever been to it?

22 A I have been there.

23 Q Have you ever been to the West Palm Beach
24 Gardens?

25 A I have.

1 Q How often?

2 A Once for both.

3 Q When were you there?

4 A Golden Glades, I was there Wednesday.

5 Gardens, I was there probably two months
6 ago, three months ago.

7 Q In your position as Director of the South
8 Florida Capacity Management, what, exactly, do you do,
9 in general terms?

10 A We are responsible for short-term
11 capacity management of the offices in South Florida.
12 So, managing the equipment requirements for those
13 offices. It is close to a hundred offices.

14 And by short-term, I mean, current year,
15 plus one. So, 12 to 24 months.

16 We implement plans in those offices,
17 infrastructure plans for those offices, monitoring the
18 capacity, relieving when necessary. When major
19 infrastructure relief is required, I get a plan from
20 the infrastructure planners, who are responsible for
21 fundamental planning, and then we implement that plan.

22 Q So, I'm just trying to make sure that I
23 understand. You have people under you that look at
24 what equipment is already in a Central Office, and
25 look at what kind of experience? How far back do they

1 normally go?

2 A Well, it depends on the equipment and on
3 the system availability. If you are talking about
4 switching equipment, you have got some information
5 that goes back as far as 1992.

6 However, the history in those offices is
7 not relevant in today's environment. That's because
8 of the demand of the Internet access. It has changed
9 all of the characteristics of the office. The demand
10 from collocators and CLECs has, again, changed the
11 characteristics of the office.

12 So, we go back as far as we can using the
13 relevant data. And I'll say, just in general, that in
14 today's environment we go back approximately 18
15 months, and we use the most recent trends of current
16 demand. We project that 12 to 18 months.

17 And that's the relief that we plan on a
18 current basis.

19 Q So, you take the most recent trends over
20 the last 18 months and project it 12 to 18 months?

21 A For current equipment relief.

22 Now, in order for us to respond quickly
23 and responsively to customer requirements, that's both
24 BellSouth and user customer requirements, as well as
25 CLECs or collocators, we have been putting hard wire

1 frames in the office that would handle demand for
2 about a 24-month period.

3 We've got pricing information or prices
4 from our vendors where we can install the hard wire on
5 an economic basis for a 24-month period. And then, as
6 the demand occurs, we install the plug-ins, the
7 electronics, if you will, for that hard wire. That
8 allows us to quickly respond to customer demand.

9 Q When you say plug-ins, does this relate
10 to both transmission and switching, or is it just
11 switching, or just transmission, or what?

12 A It relates to both transmission and
13 switching.

14 Q You presented, or somebody from your shop
15 presented, this exhibit to address the projections
16 that have been made for these two Central Offices.

17 And what I would like to do with you, for
18 a lack of me having any better knowledge myself to be
19 able to point to specific spots, which we may do in a
20 little bit, but to start out, can you just sort of
21 walk me through what you have got in this package
22 here?

23 A We'll try to walk through it.

24 Q Just in general. Not every last detail.

25 A This first couple of sheets, pages 1 and

1 two, are a summary of the process, or really the
2 inputs that the Common System Capacity Manager
3 receives.

4 From those capacity managers that I
5 identified earlier, and they're underlined from the
6 Switch Capacity Manager, that person is responsible
7 for planning the switching systems; whether that be a
8 local switch or an access tandem.

9 The Circuit Capacity Manager is
10 responsible for planning the transport equipment, with
11 input from -- you see the second from the bottom
12 bullet under Circuit Capacity Manager, and it says
13 that he's, also, an interface to the Outside Plant
14 Loop Capacity Manager. So, getting input from that
15 individual.

16 The Power Capacity Manager is responsible
17 for planning the power.

18 The Infrastructure Planner is the
19 organization that I discussed a few minutes ago, that
20 gives me the infrastructure plans for relieving major
21 infrastructure in the office; whether that be a
22 switch, a new switch, whether it be a wide band DCS,
23 whether it be customer-driven SmartRings. The
24 infrastructure planner.

25 And the reason why I make a note of that

1 is that you have a lot of hand-off documents that have
2 come from that organization that I will reference as
3 we go through this planning organization.

4 Q From the infrastructure planner?

5 A Yes.

6 We call them hand-off documents. And we
7 use them as input into our plans. And we implement
8 those plans in securing the equipment from the vendors
9 and getting it installed.

10 Q Let me ask you one more time: A hand-off
11 document, what do you mean when you say that?

12 A It is a plan that has been documented by
13 the infrastructure planner. And it is a hand-off from
14 their organization to my organization to implement
15 that plan.

16 Q So, the people that you supervise get
17 hand-off documents from other sources, and this is one
18 of them?

19 A Right.

20 Q And this is one of them?

21 A This is one of them, yes.

22 Q And it is a hand-off because it is coming
23 from another group?

24 A Right.

25 Q Okay.

1 A And it is handing off a plan for
2 implementation.

3 Q It is something that you, actually, have
4 to figure into your hopper?

5 A Yes.

6 The RPEC, the Regional Planning and
7 Engineering Center, is an organization that does the
8 planning and the engineering for STP/SCP and voice
9 mail installations.

10 Voice mail is not applicable in this
11 case, because neither Gardens nor Golden Glades have
12 voice mailboxes in them. It is not a hub. But the
13 STP/SCP is..

14 So, that's what the first two pages is.
15 It is really just a guideline of what organizations do
16 what in the planning of these offices.

17 All of that information is provided to
18 the Common Systems Capacity Manager, who then
19 determines the space requirements for these entities.

20 Q There are voice mail installations in
21 some of the other hundred that you supervise?

22 A Oh, yes.

23 But we hub them, and so they're not in
24 Golden Glades or Gardens, so it is not really
25 applicable here.

1 From page 3 through 89 is titled Switch
2 Capacity. And it is the LSD&F Charts -- that stands
3 for Local Switch Demand and Facility Charts -- for all
4 of the various entities, switching entities, in Golden
5 Glades and Gardens.

6 You can identify these in the bottom
7 right-hand corner of the chart, and by that I mean the
8 bar graph, that looks like this. It has the entity
9 name.

10 For example, 34.2 says NDADFLGG 04T. That
11 is North Dade Florida Golden Glades 04T. That's one
12 of the tandems in Golden Glades.

13 The information behind it is all of the
14 project details in regards to dates that those
15 projects were implemented.

16 This is a pictorial representation of the
17 capacity for that switch in terms of DS1s, trunks.
18 The back-up is all of the various projects and the
19 capacity that is added. And we won't need to go
20 through all of that. I don't think we will.

21 Beginning on page 10 is the pictorial and
22 the back-up for GG01T, Golden Glades 01T tandem.

23 On page 16, is the GG01T.

24 Q Golden Glades 01T?

25 A Yes.

1 Which is not even in service. That is
2 not in service at this time.

3 Oh, I'm sorry, this is for the ISDN and
4 PRI.

5 Q On page 16?

6 A Yes, on pages 16 and 17. We have
7 installed PRI. That's associated with GG01T.

8 Q Where do you see what you just said it
9 was, PRI?

10 A On the left, I'm sorry. See, it says,
11 and I should not have mentioned this, ISDN PRI. It is
12 sideways.

13 Q Oh, right here.

14 A It is not even a different entity, and it
15 is part of GG01T. We have installed PRI capacity, but
16 that's how you read it.

17 Q Tell me, I know what PRI is, but I can't
18 remember.

19 A Primary rate interface.

20 Q Primary rate interface.

21 A It is an ISDN. It is a big pipe of ISDN.

22 Page 18 is GG03T. That's the TOPS remote
23 in Golden Glades.

24 Q The TOPS?

25 A The operator services TOPS remote in

1 Golden Glades. That's page 18 through 25.

2 Q Okay.

3 A Page 26 begins Golden Glades DSO, which
4 is the local switch for Golden Glades. And that's on
5 pages 26 through 56.

6 Q Twenty-six through 56?

7 A Yes.

8 Q Why are there all of these charts for
9 this one?

10 A If you want me to go through them, I'll
11 be glad to.

12 Q Well, analog network, digital network.

13 A It is different piece parts of the
14 switch; whether it is analog lines, digital lines,
15 digital systems.

16 Q Twenty-six through what?

17 A Fifty-six.

18 Q All right.

19 A Now, we start in West Palm Beach Gardens.
20 Pages 57 through 63 is West Palm Beach Gardens O2T,
21 and that's the tandem there.

22 Q All right.

23 A Pages 64 through 85 is the local switch
24 for Gardens, GR DSO.

25 Q Okay.

1 A Page 86 through the end of the package is
2 West Palm Beach Gardens. I'm sorry, not through the
3 end of the package. Through the end of that section
4 is GR O3T, which is the TOPS operator services host.
5 It is 86 through 89.

6 Q All right.

7 A Now, the next section is circuit
8 capacity, so this is going to be the section dealing
9 with the transport equipment.

10 Pages 90, 91 and 92 are the equipment
11 additions in Golden Glades; 97, 98 and 99.

12 Q Equipment additions?

13 A Yes.

14 Page 93 is a letter from my organization,
15 as an example, to the infrastructure planning
16 organization advising them of an exhaust condition.

17 Q This is just an example?

18 A This is an example. And it is,
19 specifically, about Golden Glades. That's why it is
20 in here, to advise them that we have an exhaust
21 condition and that we then need an infrastructure plan
22 to implement it. That's page 93.

23 Pages 94 through 103 are the Golden
24 Glades equipment charts for circuit equipment.

25 Q All right.

1 A Page 104 is the list of projects for West
2 Palm Beach Gardens, circuit equipment for 1997, '98
3 and '99.

4 Q For Palm Beach Gardens?

5 A For Gardens, yes. And the equipment
6 charts for that equipment are on pages 105 through
7 111.

8 Q All right.

9 A The next section is power capacity. Page
10 111 is the list of power projects for '98 and '99 in
11 Gardens. And following that are the TEOs or the
12 telephone equipment orders, for those projects that
13 have been submitted. Again, for Gardens.

14 Page 115 is for Golden Glades power
15 projects. Behind that are the TEOs for projects that
16 have been submitted.

17 Q All right.

18 A Next is a section from the RPEC talking
19 about this STP/SCP. That's the plans. There is a
20 letter, page 118, from an RPEC manager to my
21 organization advising what the plans are for the
22 STPs/SCPs in West Palm Beach, and Gardens and Golden
23 Glades.

24 Q That's 118?

25 A Yes.

1 Q Where is the infrastructure thing? Is
2 that after that?

3 A That's coming. They are part of a
4 infrastructure organization, infrastructure planning
5 organization.

6 Do you see where it says regional
7 planning and engineering on there?

8 Q Yes.

9 A So, this is coming from the RPEC, and it
10 is talking about this paragraph on the summary.

11 Q Is this page supposed to be in front of
12 118?

13 A Yes. It should be right there, because
14 that's the RPEC.

15 Q So, 115 and 117 was Golden Glades power
16 projects?

17 A Yes.

18 One hundred and eighteen is RPEC.

19 Q Okay.

20 A One hundred and nineteen, 120, these are
21 TEOs for the STPs, through 133.

22 Q One hundred and nineteen through 133?

23 A Yes.

24 Q All right.

25 A Now, the hand-off documents that I talked

1 about, I think that's toward the very end of the
2 stack.

3 Q It is.

4 A It is on page 134 to page 180, on
5 hand-off documents.

6 Q All right.
7 All different types of things?

8 A All different kinds of things. But all
9 relating to either equipment required in either Golden
10 Glades or Gardens.

11 Q All right.

12 MS. WHITE: And for the record, pages 134
13 to 180, the pieces of these documents that are
14 blacked out had customer names.

15 MS. SUMMERLIN: Fine. Actual companies?

16 MS. WHITE: Yes, actual companies.

17 MS. SUMMERLIN: All right.

18 BY MS. SUMMERLIN:

19 Q What is the instigating thing behind
20 these?

21 A A customer sale. Let's see. It is
22 either a customer sale or it is the need for
23 additional interoffice ring capacity, and it just
24 depends on which one you are looking at.

25 For example, it tells you in the purpose.

1 In Section A, the first one on page 134,
2 says that it:

3

4 and provide additional
5 capacity for forecasted growth and remaining circuits
6 that will be rolled."

7 That's an example of an interoffice ring
8 addition.

9 If you will look at page 137, which is
10 the next hand-off document, that is a SmartRing. And
11 on page 137 it says the name of a company has signed a
12 contract with BellSouth to build an for,
13 you know, the name of a company. And that
14 interconnects that particular site from West Palm
15 Beach Gardens with, et cetera, et cetera.

16 So, it that is a customer sale.

17 Another type of hand-off document would
18 be the relief of a wide band DCS. I will see if I
19 have an example of that, and if I can find it quickly.

20 Q Rick Weeks, here on page 136, you have
21 him as the person that wrote this memo. He's an
22 infrastructure planner?

23 A Yes.

24 Q What makes him know about this problem?
25 How does he become aware of this particular situation?

1 A Of the customer sale?

2 Q Yes.

3 A Marketing notifies him.

4 Q Of every sale?

5 A Of every sale requiring a SmartRing.

6 Not, specifically, him but the organization,
7 infrastructure planning. He's just one of several in
8 that organization, but marketing notifies them of the
9 sale. They develop the infrastructure plan. They
10 document it in this hand-off, and they turn it over to
11 my organization to implement.

12 Q So, Rick Weeks, he would be told about
13 every, not just SmartRings, or any kind of sale?

14 A No.

15 SmartRings. Because they require
16 infrastructure.

17 Q Is that the only kind of thing that
18 requires infrastructure?

19 A For fiber-optic terminals, it is, yes.
20 And so, not just Rick, but all of the infrastructure
21 planners are notified. Depending on the geography of
22 the sale, they're notified by marketing of the sale.
23 They develop the plan.

24 Now, I mentioned to you that, as an
25 example of another situation, my organization notifies

1 infrastructure planning of an exhaust of a switch, of
2 a switching entity. And when we do that, then they
3 develop a plan for us to relieve that.

4 Q Rick weeks, is he specializing in a
5 particular geographical area?

6 A Well, he's not even in this job any more.
7 But when he was, he was responsible for the Southeast
8 Florida area. He and another individual in that
9 organization were responsible for the West Palm Beach
10 Gardens area. So, when there was a sale in Southeast
11 Florida, they would develop the plan and then document
12 it here.

13 There are another few people who are
14 responsible for the South Florida area, the Dade
15 County area. So, when there is a sale there, they
16 develop the plan, document it and hand it off for us.

17 Q So, you have got, basically, the
18 southeast area and the south area, is that what it is,
19 your group?

20 A Yes.

21 But it is demand-driven, I guess, is the
22 point. It is customer sale-driven.

23 What we do in projecting the future, we
24 have looked at how many of these have we done over the
25 past couple of years. And we project that there are

1 six of them, approximately, per year.

2 So, we will need six fiber-optic
3 terminals for the next two years to satisfy this
4 demand. We don't know who the customer is, but from a
5 space perspective, we project that there will be a
6 similar number for the future.

7 Q Did we make it through the whole thing
8 already?

9 A I think so.

10 Q It goes all the way to 189; is that
11 right?

12 A One hundred and eighty.

13 Q You were in this position as of '95; is
14 that right?

15 A Right.

16 Q What were you in immediately prior to
17 that?

18 A Let me think. I was on maternity leave
19 for six months. And I headed the Summit of Americas
20 project, in Miami. And then I was in an outside plant
21 organization, planning engineering for an outside
22 plant for about six months before that.

23 So, that's about a year and a half
24 before.

25 Q Where were you, specifically, in, like

1 '93?

2 A In '93, that was right before the baby
3 was born, I was in operations. I had a couple of the
4 centers, the business repair center and the switching
5 centers.

6 Q When you talk about a switching center;
7 that's not like a NOC or something, is it?

8 A Yes.

9 Q Is that what it is?

10 A It is, like, a NOC.

11 MS. SUMMERLIN: But you all have changed
12 it because that was too easy.

13 THE WITNESS: Right.

14 In fact, most of everything has been
15 changed, because we have down-sized, we have
16 re-engineered processes. So, the way things
17 were in '93 are not anything like the way they
18 are today, organizationally or process-related.

19 BY MS. SUMMERLIN:

20 Q What is it called, now, the NOC thing?

21 A We broke that up into all kinds of
22 centers. I don't know.

23 Q Let me ask you something: To your
24 knowledge, since you have been in this job that you
25 are in right now, has there been a different approach

1 taken --

2 A Absolutely.

3 Q -- to projections?

4 A Absolutely.

5 Q By the company?

6 A Yes.

7 And that's because of the environment
8 changes that I noted when I first talked. That being
9 the explosion of Internet access and the
10 interconnection of CLECs. The demand being driven by
11 not only CLECs, but our exchange carriers and wireless
12 carriers.

13 Q Exactly, how was this stuff done in '95
14 that is different from the way it is done now?

15 A Well, I'm not going to say '95, as
16 opposed to '93, because it has been a gradual trend.
17 I would say at least the last 18 months it has been
18 done the way we're doing it now.

19 Q The last 18 months?

20 A Yes.

21 Because that's really when all of these
22 things started happening. Interconnection of CLECs
23 and the Internet really exploded in late '96.

24 Prior to that we could rely on a very
25 strong forecasting organization, who had very concrete

1 actual forecasts. That materialized. The forecast
2 was very steady. It was very predictable. The
3 environment was very predictable.

4 The forecasting organization could give
5 us a forecast of lines, access lines, that could be
6 turned into a forecast of trunks required?

7 The interoffice network was very stable,
8 and we could project that very easily. All of that is
9 totally different today. Totally different.

10 We do not have a good forecast of demands
11 being driven by the environment, so we're more in a
12 reactionary mode than we used to be in the earlier
13 years.

14 We have to be prepared to respond to
15 customer demands, whether those customers are BST end
16 user customers, or whether they're CLEC customers,
17 whether they're interexchange carrier customers, or
18 whether they're wireless customers.

19 In the past, we would be given a forecast
20 from the interexchange carriers and told that over the
21 next year, to two years, to three years they were
22 expecting a certain amount of growth.

23 And in today's environment, they don't
24 know. So, in today's environment I get an order from
25 them from 20, 30, 40 T-1's, where that would have

1 never happened in the past.

2 In the past, if we got some sort of order
3 like that, they knew that there would be a six-month
4 interval.

5 Today, the expectation is that we will
6 turn that demand up or that service up within --
7 really, we call it C Triple D, which is customer
8 desired due date -- whenever they want it; whether it
9 is tomorrow, next week or whenever.

10 When it is a big order, we try to
11 negotiate three weeks. But that means that we have to
12 be positioned, from a hard wire perspective, to have
13 the capacity and hard wire frames in the office, and
14 all we need is a quick turn-around of plug-ins,
15 electronics, to turn up the service.

16 So, all of the intervals have been
17 shortened significantly.

18 In the past, the forecast that we would
19 get would be very reliable. We get no forecasts any
20 more, and so we're driven by trends.

21 Q You get no forecasts any more?

22 A And I guess what I'm really talking about
23 here is that what impacts these offices the most is
24 trunks. Line forecasts impact the local switches.
25 But of the five or six switching entities that we

1 talked about, that's only two of them.

2 And the line forecast is very
3 conservative, and is not driving the office space
4 requirements nearly to the degree of trunk
5 requirements.

6 So, when I say I get no forecasts, thank
7 you for clarifying that, I'm really talking trunks. I
8 get no forecast of trunking requirements.

9 I get no forecast of the SmartRings that
10 we talked about on the hand-off documents.

11 I don't get a forecast of interconnect,
12 CLEC trunk requirements, wireless trunk requirements,
13 interexchange trunk requirements, ISP requirements.
14 ISP is Internet Service Providers.

15 So, the drivers of these two offices is,
16 primarily, access. That's why they are called access
17 tandems. Those are the drivers that are driven by
18 trunks and we don't get a forecast.

19 That's why we reverted to trending. And
20 what we do, and I can show you some the charts, is we
21 look at the most current history, 12 to 18 months. We
22 see what it has done, and we assume that it is going
23 to be the same in the future, the near term future.
24 And we project that trend 18 to 24 months.

25 Q So, you said that there has been a big

1 change since late '96?

2 A Yes. That is right.

3 Q Is that right?

4 A Yes. That is right.

5 In late '96, due to the explosion of the
6 Internet access, and due to the introduction of CLECs
7 and Internet Service Providers.

8 Q In what part of '95 did you start in this
9 job?

10 A January.

11 Q So, you have been there since the opening
12 bell of '95?

13 A Yes.

14 Q So, how late in '96 would this change
15 have started?

16 A When did Internet access take off?

17 Q The fall?

18 A Late '96.

19 Q Okay.

20 A We saw it very, very clearly in December,
21 when AOL offered their 1995 rate. So, then, it was
22 very obvious, but even prior to that, that Internet
23 access had started to really take off.

24 Q If we're talking, basically, fall of '96,
25 and we're now in fall of '98, we've had two years

1 since.

2 What, exactly, happened in the fall of
3 '96? Did you just start getting a lot of requests?

4 A No, no.

5 We saw the traffic on the network
6 encourage significantly. End users sitting at their
7 PCs would dial up to their Internet Service Provider,
8 and all of a sudden we would see an additional hour's
9 worth of usage on our interoffice network.

10 That ties up a link from the person's PC
11 to their office to whatever ISP they're served by.
12 And that could change, depending on how many Internet
13 Service Providers they have. But whoever is serving
14 that ISP, that would tie up interoffice capacity. And
15 so, we began to see that increased and that has just
16 continued to grow.

17 At the same time, the Internet Service
18 Providers, that's when it really got big, and so their
19 demands for interconnection increased. I mean, it
20 wouldn't do us any good for us to be able to deliver
21 the call to their serving end office if they weren't
22 able to receive the call.

23 So, on that end, their demands started
24 increasing, as well.

25 Q Give me one of these charts so that I can

1 understand what you are talking about, exactly, when
2 you talk about this trending. Which section of this
3 would be the most logical to look at?

4 A Let me find one. I think we can look at
5 the first one, but let me make sure.

6 Look at page 4.

7 Q This is switching?

8 A This is the switch.

9 Q So, does this to go trunks?

10 A Yes.

11 The switch does, yes.

12 Q It does?

13 A Yes.

14 Q Okay.

15 A This is O4T, Golden glades O4T. This
16 office serves the North Dade-Broward County areas.
17 You can see that back in the 94-'95 time frame, the
18 demand was relatively flat. And by demand, I mean --
19 and I will highlight it on mine so can you see what
20 I'm talking about -- it is the line on the bottom.
21 That's the demand. The line on the top that
22 stair-steps, is the capacity.

23 So, you can see that that demand is
24 relatively flat. I mean, it is growing a little bit,
25 but it is relatively flat.

1 You can see in late '95, that it starts
2 to increase somewhat. In '96, it curves up even more,
3 in late '96. And then in '97, it is even up, the
4 slope is even higher.

5 So, we're up to, like, October of '98.
6 Then the dotted line begins our projection.

7 So, all we have done is project our
8 actuals, based on the last 18 months. So, if I was to
9 plan, as we were planning in the '94-'95 time frame,
10 the slope is flat. So, that's saying that the demand
11 is not increasing.

12 So, you can see that the slope is now
13 much higher, and the demand is increasing and at an
14 increasing rate. So,

15
16

17 Q Where is the dotted line starting on
18 yours, exactly?

19 A Let's see.

20 I'll show it to you on here, so you can
21 see it better. The dotted line is in '98. '98 was
22 the forecast. The heavy line is the actuals.

23 So, actuals go through an October time
24 frame, but you can see what the forecast was for all
25 of '98. And you can see that the heavy line is very

1 similar to the forecast that we projected for '98.

2 Q So, right about here?

3 A No.

4 The dotted line begins in '98, January of
5 '98.

6 Q January of '98, okay.

7 A That's where you can see the forecast,
8 versus the demand; the dotted line being the forecast
9 and the heavy line being the actual demand.

10 Q Is that about right, where I have my
11 little blue arrow?

12 A Yes.

13 This is January.

14 Q All right. Thank you.

15 A So, that's just so you can compare how
16 the actuals are trending, versus the forecast. And it
17 is right on it.

18 Q Let me ask you something about when
19 things were being forecasted prior to this new
20 situation.

21 Like, when you first started in '95, what
22 was being looked at then? How far back did you go
23 when you would be trying to forecast?

24 A You can see on these charts. In '98,
25 we've got four years' worth of history. So, in '95,

1 we would have had '94, '93, '92 and '91, because it
2 just continues to roll. Each year that we add a new
3 year, we just lop off the last year.

4 Q So, back in '93-'94, you would have
5 looked four years back?

6 A We would have had that history, yes.

7 Q Now, when you talk about the Internet
8 issue, are you just talking about a situation where
9 the company is getting more demand in terms of the
10 access lines that need to be available and the trunks
11 that need to be available?

12 Is that the bottom line thing?

13 A Well, when you are looking at an axis
14 tandem, O4T, that is providing access, so this does
15 not really have anything to do with lines, because an
16 access tandem does not terminate lines. But the local
17 switch does.

18 So, we're really talking about trunking
19 demands, trunking for end users to be able to access
20 their carriers, their Internet Service Providers,
21 their CLEC, their serving customer. You know, it is
22 an access tandem.

23 So, the line side of the demand for this
24 particular office is shown on the local side, so
25 that's DSO.

1 So, that would be the subscribers within
2 either Golden Glades proper, or the Golden Glades
3 serving office, or the Gardens serving office. That
4 would show the line demand.

5 If there were subscribers within that
6 office who wanted Internet access and wanted a
7 separate line for that, that would be shown on a local
8 office.

9 But when we are talking about tandems,
10 that is really access. And it is access for
11 interexchange carriers, wireless, CLECs, all from
12 their networks into the BST network.

13 Q Okay.

14 MS. SUMMERLIN: Let me look at this for a
15 second.

16 THE WITNESS: Can I just tell you
17 something about the space, so we can handle
18 both at the same time? Do you mind?

19 MS. SUMMERLIN: I like this witness.
20 This is a good witness here.

21 THE WITNESS: Do you mind doing that, so
22 we don't have to rehash all of this, again?

23 MS. SUMMERLIN: If you will just give me
24 one second. I am curious as to where my expert
25 is.

1 MS. WHITE: Do you need to take a break?

2 MS. SUMMERLIN: Yes.

3 Can we go off the record for a second?

4 MS. WHITE: Sure.

5 (Brief recess.)

6 MS. SUMMERLIN: Let's go back on the
7 record.

8 BY MS. SUMMERLIN:

9 Q We are back on the record, Ms. Cruit. I
10 have a couple of things to ask you about.

11 I'll just start with this: In your
12 materials that you produced, this exhibit, whatever
13 we're calling it, WKM-1, is that Milner late filed?

14 I'm looking at pages 111 and 115.

15 A All right.

16 Q So, I will give you a chance to get to
17 them.

18 A I have 114 and 115.

19 Q Well, mine says 111.

20 MS. WHITE: What does your 111 look like?

21 MS. SUMMERLIN: There may be two
22 different places.

23 THE WITNESS: All right.

24 BY MS. SUMMERLIN:

25 Q On page 111, which deals with the West

1 Palm Beach Gardens power projects, it says completing
2 1998 through 2000.

3 At the bottom of this list, you have an
4 item PEB 3712, the very last one.

5 A Yes.

6 Q

7 And then it says
8 telephone equipment orders have not been placed yet.

9 A Right.

10 Q Estimated ship date July 1, 2000?

11 A Yes.

12 Q Estimated complete October 1, 2000?

13 A Yes.

14 Q And it was planned May 22, '98?

15 A Yes.

16 Q By way of comparison, on page 115, is
17 there any kind of project listed on that list
18 of projects for Golden Glades?

19 A I do not see it listed, but I do note
20 that there is

21 Q Again, do you think that it would have
22 been reasonable for it to be on this list?

23 A If it had been planned. But probably at
24 this point, it hasn't been identified yet. I mean,
25 that's the 2000 year.

Shipping in '98 and '99.

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Q

A Yes.

Q So, I guess I don't understand. It seems
kind of inconsistent to me.

A Well, two different people did it.

Q Okay.

A He didn't identify it on this one sheet
of paper.

Q Do you believe that the power problem in
West Palm Beach Gardens is as severe as it is in
Golden Glades, or is it, or do you know?

A I think that engines will be required in
both offices to support the building addition.

Q So, you don't know which is more
critical?

A I think they're both critical.

And I, also, know that two different
people are responsible for planning these offices, and
one interpreted the request differently than the
other.

Q You assume?

1 A Well, I'm sure, because I know that in
2 2000 we're planning an engine.

3 Q Let's see here. On POD 27, that was
4 produced by your company, I don't know if you would
5 have had a chance to look at this.

6 MS. SUMMERLIN: And I'm not sure, Nancy.
7 I don't see anything that says proprietary on
8 it, but I need you to make sure for me because
9 I don't have the whole packet.

10 MS. WHITE: I'm not sure whether it is.
11 Let's just say that it is for purposes of this.

12 MS. SUMMERLIN: And we'll figure it out
13 in time for the hearing, I guess.

14 BY MS. SUMMERLIN:

15 Q Ms. Cruik, you were just saying that you
16 recognized that there is a requirement for an engine
17 to support the building addition.

18 Is that what you just said?

19 A Well, as I think about Golden Glades, I
20 know that we are getting close to a critical exhaust
21 of that engine. And that we're going to have to
22 upgrade it from, I believe, , and
23 stair-step it, initially throttling it back until the
24 house service panel is in that can handle the

25 So, I think what is going to happen is

1 that we're going from a , throttling
2 it, and keeping it at until we can take the entire
3

4 Now, the exact time frame of that
5 exhaust, I know that there is a critical exhaust in
6 Golden Glades, but I am not briefed on all of the
7 specifics of that engine exhaust.

8 Q So, you said that it was connected with
9 the addition, but you are not really sure, exactly?

10 A Definitely, we'll need the additional
11 engine capacity for the additional switch capacity
12 with the equipment. We may need it prior to that just
13 to be able to fill up the equipment in the existing
14 building space.

15 Q So, what you are saying is that it is
16 not --

17 A I think the timing is all about the same.
18 The building exhaust in mid-2001, I just said the
19 engine is required in mid-2000, did I not? So,
20 obviously, we need the engine in order to use the
21 additional space for that year. And then we're sizing
22 it big enough for the building addition, as well, the
23 Second Floor expansion of Golden Glades.

24 Q You need the engine for the additional
25 space. What do you mean? Additional space for that

1 year? I don't understand.

2 A We need the engine in mid-2000 to support
3 the equipment additions going in, beginning in
4 mid-2000.

5 Q The equipment additions?

6 A Yes.

7 And then, additionally, we will size it
8 for the additional equipment that will go in the
9 building expansion in Golden Glades.

10 Q Okay.

11 A That's not required until mid-2001 at
12 this point.

13 Q I got you.

14 POD 27 here says, and I'm not supposed to
15 show it to them if it is confidential, so I'm saying
16 that it is Golden Glades Building Space Plan. It says
17 Issue 4. And it says May 18, '98.

18 Let me just let you look at that and see
19 if you have seen that before.

20 A This is out of an office profile, and we
21 have a plan for each office. I have not seen this or
22 reviewed it, but I am supposing that this is from the
23 office profile, because of the signatures.

24 Q What I want to do is to mention a couple
25 of things.

1 MS. SUMMERLIN: I know, Nancy, that you
2 don't want us to mention names of companies, so
3 I'll be real careful about that.

4 I guess what I want to look at, first,
5 and there are several places that I want to
6 look, I want to look at this power equipment
7 space paragraph.

8 Let me have you look at that and make
9 sure that there isn't anything that I should
10 not read aloud.

11 MS. WHITE: No.

12 That paragraph is fine, if you want her
13 to read it.

14 MS. SUMMERLIN: I don't mind reading it.
15 If you want to read it aloud, that's fine.
16 I'll read it aloud and you can answer
17 questions. I don't like the idea of making
18 witnesses read it aloud, even though I guess
19 some people do that commonly.

20 This says Power Equipment Space. "We
21 will continue to grow power equipment in the
22 First Floor power room. There is ample room
23 for growth. Stan Flanders agreed that the
24 southwest corner of this room could be used for
25 a storage room. This will be accomplished by

1 moving the existing air handler vents up,
2 thereby making room for storage shelves along
3 the walls."

4 Let me go ahead and read the rest of
5 that: "The existing 750 kilowatt engine is
6 operating at close to capacity.
7 Plans were to add a within
8 the next two years. However, a larger engine
9 would require the house service panel to be
10 changed from The
11 existing panel will not
12 support a

13 "This office is very space limited, and
14 the space required for a house service panel
15 turn-around is not available. The costs
16 associated with a new engine house service
17 panel and change out of electrical equipment
18 that is not rated for the new 480 volts is
19 excessive.

20 "For the reasons stated, growth of
21 equipment and power demand, will have to be
22 closely watched by the SCM and PCM. There is
23 no more space to add batteries in the Second
24 Floor power room. Based upon Second Floor
25 equipment growth projections, the existing

1 batteries will be adequate for at least another
2 four years. At that time, it will be
3 reevaluated and it may become necessary to
4 extend the Second Floor to enlarge the power
5 room."

6 BY MS. SUMMERLIN:

7 Q The question that I wanted to ask is:
8 Are you familiar with the current diagram of the
9 office?

10 A I don't have it memorized.

11 MS. WHITE: I've got it here.

12 MS. SUMMERLIN: You have another copy of
13 it?

14 MS. WHITE: Golden Glades?

15 MS. SUMMERLIN: Golden Glades.

16 BY MS. SUMMERLIN:

17 Q You are familiar with this room right
18 here, that is identified at the bottom left corner?

19 A Yes.

20 Q It says the room for the air handling
21 unit.

22 A Yes.

23 Q Are you familiar enough to know whether
24 that room is the room that is being addressed here?

25 A I don't think I can answer that.

1 Q You are not familiar enough to be able to
2 answer that?

3 A I don't think I can answer that, because
4 I don't know how current this is. I mean, it is May
5 of '98.

6 Q If you don't know --

7 A I really can't answer that.

8 Q -- then there is no way that we can ask
9 you if you are not familiar with it enough. We will
10 just have to ask somebody that is familiar with it.

11 Let's move to the next page of this same
12 Golden Glades Building Space Plan.

13 Let's see. We have a statement up here
14 of O3T space. What is O3T?

15 A That's the TOPS, I believe.

16 Q This paragraph says: "Assuming the two
17 lineups to the south of the existing O3T switch are
18 reserved" --

19 A Can I interrupt you a second, because I
20 don't think I am really the person to speak about this
21 space. I was here to talk about equipment forecasts.
22 And I don't think I can really talk about your space
23 designations, if that's where you are going with that,
24 as well.

25 Q So, you are not familiar with the space

1 in the office in terms of equipment increases?

2 A I am not prepared to talk about that. I
3 mean, I have been through the office. They have shown
4 me the areas that they have laid out. I have seen
5 Guy's and Jerry's designation on their floor plan of
6 what their planning where.

7 But I have not been intimately involved
8 in the space planning. And I am prepared to talk
9 about the equipment forecast to support the access
10 tandem, the local switch.

11 Q And I appreciate what you are saying, and
12 I'm not going to try to harass you about something
13 that you are not prepared for.

14 This one thing that I was getting ready
15 to read right here, this one sentence, I think deals
16 with the projection issue --

17 A Okay.

18 Q -- in terms of what you told me, you all,
19 normally, worry about in terms of how far ahead.

20 A Okay.

21 Q This says: "Assuming the two lineups to
22 the south of the existing O3T switch are reserved for
23 growth, there is 25 years of growth space available
24 for O3T."

25 Is that, normally, something that you

1 would be worrying about in the projections that you
2 guys do in your shop, that far ahead?

3 A No.

4 I think what he's saying is that in the
5 lineups that are reserved, where he's going to grow
6 that switch, there is adequate space for 25 years;
7 which, obviously, we don't need 25 years. But if
8 there is only one lineup, then that's what it is. It
9 is what it is.

10 Q All right.

11 A And I'm not really familiar with,
12 exactly, that TOPS area. That reserve space in the
13 TOPS area.

14 Q Just hang on a second, and let me see if
15 there is something here that relates to what you are
16 here for. Just one second.

17 (Brief pause.)

18 BY MS. SUMMERLIN:

19 Q There is a sentence here that presumably
20 you might know about. And I recognize what you are
21 telling me, and I'm not going to keep you asking you
22 stuff that you don't know.

23 But I'm thinking that maybe there is one
24 sentence in the center of this OIT and DSO space
25 paragraph that talks about conversions, that may be

1 something that you would be familiar with in your
2 shop.

3 A Yes.

4 I can talk about that.

5 MS. WHITE: The exhaust?

6 THE WITNESS: It says that the exhaust of
7 the growth space can be extended considerably
8 by converting

9 BY MS. SUMMERLIN:

10 Q Okay.

11 A It goes on to say: "However"-something.

12 Q Go ahead and read what it says.

13 A "However, we must be careful to reserve
14 sufficient turn-around space to accomplish these
15 conversions.

16 Q Let me ask you, what are we talking
17 about?

18 A You are back talking now, rather than
19 about the access tandem, about the local switch. So,
20 you are talking about DSO in Golden Glades.

21 In that office, we have old line
22 peripheral modules, that do not
23 support caller ID type services, vertical services.
24 And we have customer packages, line packages, called
25 Complete Choice, that customers have been buying.

1 Q Who would know in this case, do you know?

2 A That is a Switch Capacity Management
3 function. I know that in '98 we replaced

5 Q How many ?

6 A It is , so

8 Q I mean, isn't the whole idea that the
9 handles a higher capacity?

10 A No.

13 Q Provides additional features?

14 A Right.

15 Q So, you need twice as many as you do

17 A Right.

18 But twice as many fit in a frame. So,
19 from a space perspective, which is what you are
20 concerned about, it is like for like space. But it is
21 units,

22 Q So, do you know how many LMs? You don't
23 know about that?

24 A I don't know. I do not know, I'm sorry.

25 Q Now, the that have been put in, you

1 said a few minutes ago that it is kind of like a
2 gradual process of transferring the lines over?

3 A Right.

4 Q To the new deal?

5 A Right.

6 Q Do you all just wait for a customer to
7 call up, and ask for and then you just start
8 putting them on?

9 A Rather than doing an in-service cut,
10 through attrition we let the lines migrate to the new
11 modules.

12 When that threshold gets to a point where
13 it makes sense to remove the customers and put them on
14 the new one, then we would do that.

15 Q When does that happen?

16 A Well, it is labor expense to do it, so
17 you do that when you get down to a fewer number of
18 lines that are left on the old modules.

19 Q So, theoretically, you have got a good
20 number of LMs that are operating at less than what
21 they're fully capable of, because over time you have
22 had people ask for the new stuff, so you put them on
23 the

24 A Right.

25 Q And that means that you just have more

1 and more capacity available, or left unused, or
2 whatever you call it under you guy's terminology?

3 A On the old.

4 Q But you have more and more open lines
5 that are not being used on the LMs?

6 A You have available capacity on the old
7 line modules.

8 Now, do I know that this year we removed
9

10 So, those holes that were created will now
11 be used for '99 growth. We'll go in and fill in those
12 line module holes in '99. And that has been
13 considered in Jerry's forecast.

14 Q But you don't know how many LMs you have?

15 A I do not know.

16 Q So, you wouldn't have any idea how many
17 represents in terms of the whole picture, in terms
18 of how many there are or whatever?

19 MS. WHITE: Number of lines?

20 THE WITNESS: In fact, what we do --

21 BY MS. SUMMERLIN:

22 Q How many LMs there are.

23 A Well, what you are trying to get at is
24 why Why are we doing, ?

25 Q Yes.

1 A The reason why is because we have
2 some data over the past couple of years that that's
3 how many customer requests we have had for these
4 vertical services.

5 So, rather than just going and buying the
6 capacity on the new peripherals and have it sit there,
7 we're buying it based on projected demands

8
9 Q Is there anyone in this case that is
10 going to be able to tell us how many LMs there are and
11 what level of capacity?

12 A If you will let me use the phone when we
13 break, I can get it for you.

14 Q You can get that information?

15 A Yes.

16 Q How many LMs there are, and at what level
17 of capacity they're at right now?

18 A You mean, what level of fill?

19 Q Whatever your word is.

20 A Is that what you mean? I don't know if
21 you mean how many lines are working on them, or what
22 is the percent utilization.

23 Q Percent utilization is what I'm getting
24 at.

25 In other words, however many lines that

1 may be, if you are only using 20 percent of it, or 85
2 percent of it, or whatever for the existing LMs, we
3 would like to know that.

4 A Okay.

5 Q What is the turn-around space? What does
6 that mean?

7 A Turn-around space means that when I buy a
8 new LCM and I put it in, I've got to have that space
9 to put it in before I can remove the old one and then
10 I can put something in its place.

11 Q The interim period while you are working
12 the switch to the new thing?

13 A It has to go in, and it is bolted to the
14 floor. So, that's the turn-around space.

15 You can't just take one out and put one
16 in its place. One has got to go in, first, before you
17 can take it out, and then you can start that roll.

18 Q There is no technical problem with taking
19 lines and switching them to the LCM?

20 A There is no technical problem. There is
21 an expense associated with it. There is a capital
22 investment and there is a labor expense.

23 Q Capital meaning the actual equipment?

24 A Right.

25 Q And then the labor to switch the lines?

1 A To do the transfers.

2 Q But you are assuming that you have
3 already made the capital investment, and you have
4 already got the sitting there?

5 A No.

6 Because I said we buy enough capacity
7 based on . So, if I have got a bunch
8 of lines sitting over here on LMs that are not
9 , then I don't have the capacity. I'm going
10 to need to buy the capital, the hardware and then I
11 can roll them.

12 Q So, if you put someone on the LCM, they
13 have to want caller ID? Is that the idea? You can't
14 just put a person who doesn't want it?

15 A No.

16 A POTS line, a regular old POTS line, a
17 plain old telephone line, can go on an LM or an
18 But if I have got the capacity just sitting there, and
19 they're already working on an LM, I'm not going to
20 just move them just to move them.

21 I am going to move them.

22

23 , I am going to put them there. If a new
24 customer comes in and doesn't want it, they're going
25 on the old, because I have got it sitting there.

1 Q Because you have it there?

2 A Right.

3 Q So, theoretically, at any given period of
4 time, you have less than full utilization of all of
5 the and the LMs that you have in there?

6 A Well, we're trying to keep the
7 utilized as full as possible, because that's new
8 investment. I'm not going to buy new investment just
9 to have it sit there idle.

10 MS. SUMMERLIN: Let's go off the record
11 for a second.)

12 (Discussion off the record.)

13 THE WITNESS: You were concerned about
14 not having the year 2000 engine project on
15 Golden Glades. And I have been wondering why
16 it was on the Gardens' list.

17 And that is because the power planner or
18 the power capacity manager for Gardens has just
19 gone to a new job. So, in getting his office
20 ready for the interim, until we could get
21 someone to replace him, I am sure he has looked
22 forward, beyond the current year plus one, and
23 that's why it is on his list.

24 The power planner for Golden Glades is
25 still on the job. He will do it in the

1 appropriate time.

2 So, I just wanted to clear that up, that
3 we're not trying to hide anything.

4 BY MS. SUMMERLIN:

5 Q I have got you.

6 So, the guy that just left was just
7 taking care of business?

8 A Looking forward a little bit.

9 Q Let me just ask you something.

10 Has there, actually, been a building
11 expansion approved for Golden Glades?

12 A For Golden Glades? There is a plan
13 being developed right now. It is obvious that in
14 mid-2001, we will need a building expansion on the
15 Second Floor.

16 When you talk about approved, the budget
17 would have to be worked, and probably even some money
18 spent in 1999. Money has not been approved yet for
19 '99 at all. Even for my equipment, I do not have a
20 '99 budget yet.

21 So, when you say has it been approved,
22 I'm not really sure what you are talking about.

23 The planning has begun for that in Golden
24 Glades. For Gardens, it is further along than it is
25 even in Golden Glades, because the exhaust is about

1 six months earlier. And we started the planning for
2 Gardens about six months ago. So, the planning has
3 started.

4 Approval, I don't know. When we start
5 spending the money, I guess you could assume it is
6 approved.

7 Q Okay.

8 A We're going to do it, because it is a
9 must do requirement. We are not going to allow
10 customer service to suffer, and we have to have
11 building space to put customer service.

12 So, you are talking about year 2000 and
13 year 2001 exhaust.

14 Q So, whether it has been approved is
15 really irrelevant?

16 A Yes.

17 I think it is irrelevant, because we're
18 going to do something to expand the building.

19 Q Let's see here. So, what you have said
20 today is that you can talk about equipment
21 projections, but when we talk about the space that is
22 available --

23 A I mean, you have two expert witnesses on
24 the space.

25 Q -- we need to talk to whoever, either

1 Jerry Rubin or Guy Ream, for each office and they will
2 know the answers to this?

3 A Yes.

4 And then Jim Bloomer, as well, for his
5 piece of it. They're much more involved and
6 knowledgeable about that.

7 Q Okay.

8 A Even on equipment exhaust, peers of
9 Jerry's and Guy's report to managers who report to me.
10 So, I am, like, two levels up.

11 So, when you are talking about space and
12 equipment, I can tell you, generally, the process and
13 I am briefed on what our activity has been.

14 But when you start getting into the
15 details, like how many LMs are in an office I'm not
16 the switch capacity manager for that office. I can,
17 certainly, go get the information and I will, but I'm
18 not the expert on it.

19 Q Let me just read a couple of sentences
20 out of that same paragraph that we were talking about,
21 recognizing that you are not the space person.

22 MS. WHITE: Is this the power paragraph?

23 MS. SUMMERLIN: No.

24 The one that we just read about the
25 . It is just a couple of sentences

1 prior to that, or just the beginning of the
2 paragraph.

3 BY MS. SUMMERLIN:

4 Q And I recognize that the actual space in
5 the office you are not dealing with. It is the
6 projection aspect of this that I'm asking about.

7 A Okay.

8 Q "O1T and DSO are both on the Second
9 Floor. The space to the west of DSO has been
10 reserved for growth of both switches. And ENET
11 conversion" --

12 A ENET.

13 Q -- "was completed April 26, 1998. This
14 conversion freed up 30 bays.

15

16

17

18 Now, when we talk about the DSO, we're
19 talking about a local switch?

20 A Yes.

21 That is a local. But that's really, I
22 think, talking about O1T. Because when you talk about
23 the ENET conversion, that occurred in O1T.

24 Q And what is O1T?

25 A That's the access tandem that serves Dade

1 County, Southern Dade.

2 MS. WHITE: Can I see that?

3 MS. SUMMERLIN: Yes.

4 THE WITNESS: I would love to have a copy
5 of that.

6 MS. SUMMERLIN: I'm sure you guys have
7 it, since you produced it.

8 MS. WHITE: I just want her to see it.

9 THE WITNESS: It is, basically, west of
10 DSO.

11 Where is the space to the west of DSO?
12 Can you show me on there?

13 BY MS. SUMMERLIN:

14 Q I am sure I cannot.

15 MS. WHITE: This is Glades.

16 BY MS. SUMMERLIN:

17 Q The Second Floor of Golden Glades is what
18 we want. Here is your drawing, if you want.

19 A I'll take that.

20 MS. SUMMERLIN: Is it labeled on here?

21 MR. NILSON: Yes. It is in red.

22 THE WITNESS: Have you seen this before?

23 MS. SUMMERLIN: That you guys have marked
24 proprietary, so you don't want to let everybody
25 see this.

1 THE WITNESS: They have seen the tape, so
2 they may as well see this.

3 MS. WHITE: That makes things easier for
4 me.

5 THE WITNESS: So, they're talking about
6 the space to the west. That must be this.
7 That's your area that you mark as being
8 available for space. That's here. So, the
9 space to the west, I guess that is 30. That
10 must be here. That will provide what?

11 MS. WHITE:

12

13

14

15 THE WITNESS: Well, we know we're talking
16 about OIT. We know that OIT grows

17

18 BY MS. SUMMERLIN:

19 Q Okay.

20 A So, when we fill in these holes and fill
21 this up,

22 : So, what he's saying is that is
23 going to be determined by customer requirements of
24 trunking.

25 See, if you start here, this is OIT, and

1 if you

2

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7

8

9 Q

10 A He was being optimistic. I don't know.

11 But it does say here is our OIT. This is
12 trunk below here. And then future growth for OIT
13 here.

14 Q So, the red right there is future growth,
15 isn't it, also, that is on the left side here?

16 A Yes.

17 I filled these in, first.

18 Q All of that is future?

19 A Right.

20 This is the first year we fill in here,
21 and then we're going to fill in here and then here.

22 Q Thank you.

23 So, apparently, this document is signed
24 down here by Jerome Rubin, so Jerry Rubin would be the
25 person who made that assessment?

1 is the tandem?

2 A O1T is the tandem. That is correct.

3 Q And the DSO is the local switch?

4 A Yes.

5 Q So, your interpretation of this growth
6 rate was that it dealt with the tandem?

7 A Well, I didn't really read it that
8 closely, but that's how I counted.

9 Q Here it is.

10 A I really don't know.

11 Q You don't know?

12 A I mean, I think he's looking at the whole
13 thing, because the whole area there is available for
14 DSO and O1T. As that space plan came together, you
15 saw two lineups, for O1T and one for DSO. So, you
16 would have to ask him.

17 Q The local switch growth would be
18 substantially less?

19 A The local switch growth
20 , is what Jerry has projected.

21 Q

22 A Yes.

23

24

25 Q I have a document here that does not say

1 anything about anything being proprietary. I don't
2 think it is.

3 Its West Palm Beach Gardens Central
4 Office Second Floor Planning Meeting, April of '98.

5 A This, I believe, is the planning meeting
6 that they had to talk about the Second Floor addition
7 at Gardens.

8 Q Is that a meeting that you attended?

9 A No. No, I didn't.

10 Q Let's see here. Would you be briefed on
11 this, theoretically, after it happened?

12 A No.

13 I am sure that they were talking about
14 the plan to add the Second Floor for Gardens, what the
15 time frames would be. And they may have discussed
16 whether half a floor or full floor would be added. I
17 don't know. We have implementation meetings on all of
18 the projects that we do.

19 Q This reflects something that you
20 suggested, supposedly, right here. It has your name
21 on it. Paragraph 8 right down here. I don't think
22 that means that you were at the meeting. I think it
23 means that somebody may have brought that information
24 to the meeting.

25 A Oh, this is where we were considering all

1 of the alternatives. This is where we were projecting
2 that we would exhaust equipment, and we were
3 considering all of the alternatives of avoiding a
4 building expansion. And so, Number 8 was just one
5 alternative that needed to be investigated.

6 Q So, were you at the meeting?

7 A Yes. I was at that meeting, I'm sorry,
8 yes.

9 Q Now, this is not proprietary; is that
10 right?

11 MS. WHITE: I don't believe so.

12 THE WITNESS: I don't think so, no.

13 MS. WHITE: I don't think so.

14 MR. NILSON: You previously stated, as to
15 questions one through eight, that you didn't
16 want manufacturers' names revealed last week.

17 MS. WHITE: Maybe I had better look at
18 it, again.

19 THE WITNESS: Did it have manufacturers'
20 names?

21 MR. NILSON: That was something from last
22 week. I didn't mean to speak in the middle of
23 it.

24 MS. SUMMERLIN: I think what he's talking
25 about is that there were some equipment brand

1 names.

2 MS. WHITE: That's okay, isn't it?

3 THE WITNESS: Yes.

4 MS. WHITE: Yes. We'll say that it is
5 not proprietary. I'm making an executive
6 decision here.

7 THE WITNESS: A lot of that is just
8 planning information. It doesn't even really
9 indicate that we would use that brand or not.
10 That decision is not made until the
11 infrastructure is ready to be purchased.

12 BY MS. SUMMERLIN:

13 Q I don't want to ask you about that. I'm
14 just worried about the confidentiality problem.

15 This was a production of document item,
16 and I am trying to tell the staff where it was, but I
17 don't know which one it was.

18 MS. WHITE: In the first set, I believe,
19 or was it in the second set of POTs? I believe
20 it was in the first set, because you had it at
21 the depositions last week.

22 MS. SUMMERLIN: Yes.

23 It had to be in the first set. Maybe we
24 can figure out which one it is.

25

1 BY MS. SUMMERLIN:

2 Q Anyway, it is titled West Palm Beach
3 Gardens Central Office Second Floor Planning Meeting,
4 April 24, 1998.

5 Possibly Request Number 6.

6 We'll go off the record for a second.

7 (Discussion off the record.)

8 THE WITNESS: It is okay. It is just my
9 page. I'm listening.

10 BY MS. SUMMERLIN:

11 Q I just want to ask you a couple of
12 questions here about the information at the top of
13 this thing.

14 It says the meeting was held to discuss
15 ways of postponing a \$12 million building addition to
16 the Gardens Central Office. "Presently, this is not a
17 funded project, and the amount of capital required is
18 deemed a problem due to that the fact that the company
19 only has budgeted \$40 million per year for building
20 work in BellSouth. Several types of equipment were
21 identified that could possibly trigger a building
22 addition and the times frames that new space would be
23 required. They are as follows."

24 And it appears that you have got an
25 equipment type, and you have got another column saying

1 estimated growth exhaust year.

2 A Okay.

3 Q The first one is LATA tandem, and it says
4 year -- I don't know -- year estimate or estimated?

5 A Year end.

6 Q

7 And then you have got TOPS host,

8 Then you have local switch, year end 2002.

9 STP, SCP, And next to
10 that there is a note: "Can be placed in another
11 office." Then power And then it
12 says:

13 " Areas, I guess it would be.

14 And then toll OSP,

15 I guess what I'm interested in asking you
16 about, because you are the person who knows about how
17 these projections are made, is what I get from this is
18 that it is, basically, saying that based on you all's
19 projections, there appears to be enough room for
20 growth for the LATA tandem that will take you through
21 the year end 2003.

22 A What that piece of paper was doing was
23 establishing the required building relief date. And
24 in going through each of the various areas in a broad
25 gauge perspective, they identified that the trigger

1 for that relief would be the toll area. And I think
2 they called it toll/outside plant.

3 Q Toll OSP?

4 A Yes. OSP is outside plant.

5 So, what they were saying there was that
6 the rigger for the building exhaust or the building
7 relief would be year end 2000, triggered by the toll
8 or circuit outside plan area. That area of the
9 building would exhaust. That area of building growth,
10 equipment growth, would exhaust year end 2000.

11 And that was, specifically, the purpose
12 of that.

13 The other dates were broad gauged. There
14 was not a lot of study work that went into
15 establishing those dates, other than to say what is
16 the most critical factor for determining building
17 exhaust?

18 Q This paragraph below says: "Since
19 Property Management reports that it will require three
20 years to add a second floor to the office, it was
21 decided that because the toll and OSP," or outside
22 plant equipment, "would exhaust their floor space in
23 three years, that a decision would have to be made
24 quickly either to start work on the addition or create
25 space within the existing area."

1 So, it has here year end 2000. But, in
2 fact, we're talking three years. So, does that mean
3 2001? I don't understand?

4 A No.

5 The year end 2000 even agrees with what I
6 told you earlier. We're still expecting the building
7 space, the additional building space, to be available
8 for growth beginning year end 2000 or beginning year
9 2001.

10 And at that point, again, it was a
11 planning meeting to determine what alternatives we had
12 if we could not get building space available for the
13 additional growth.

14 So, that meeting was in April of '98.
15 Building had told us about three years for a building
16 addition, so we were thinking that we were already
17 late. So, that's why we considered those eight
18 alternatives.

19 That would be to extend the life of the
20 building. So, we, specifically, in those items looked
21 at how could we take growth and either modernize or
22 take growth in other places so that we could not
23 exhaust the space of that building.

24 Q Okay.

25 A You can see that even then we were very,

1 very concerned about space in that office.

2 Q Let me ask you, again.

3 What I don't understand is, it says you
4 are in April of '98, and then it says the year end
5 2000 for the toll and outside plant, but then the
6 sentence after that, basically, talks about those
7 areas, the toll and the OSP equipment, or outside
8 plant equipment, would exhaust their floor space in
9 three years, which would take you to April 2001.

10 I mean, how do those line up?

11 A You mean, the three months that you are
12 concerned about?

13 Q You are just saying that because there is
14 only a little bit of 2001, you are just assuming year
15 end 2000?

16 A Or that the three years is a broad
17 estimate, and it could be done in two years and nine
18 months.

19 Q On these items here that are listed, all
20 of these alternatives, are you knowledgeable about
21 these various alternatives?

22 A I am knowledgeable that we made a list.
23 We asked infrastructure to study all of those. They
24 have studied them, and they were not economic and,
25 therefore, we moved ahead with the building addition

1 to be completed as soon as possible.

2 Q You are aware that these suggestions were
3 made, and none of them were determined to be a good
4 idea. Is that what you are saying?

5 A Right.

6 They were all studied economically, and
7 it was determined that the building relief should be
8 planned, rather than modernization, which is what all
9 of those are.

10 Q When we talk about these types of
11 alternatives, this one through eight, are you the
12 person that would know more about that, or would
13 Bloomer be the person? Someone like Bloomer, or Guy
14 Rubin, or Jerry Rubin?

15 A I probably would, but I'm not sure I
16 could get into all of that detail for the transport
17 equipment. But we can try it.

18 MS WHITE: Do you want her to take one at
19 a time?

20 MS. SUMMERLIN: Sure.

21 THE WITNESS:

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25

, as we may discuss if we

1 get through this information, has a very large
2 footprint. So, although, they said

3
4

5 It would be new investment, and the footprint
6 of a is much larger, although, it gives
7 you the flexibility. Good idea to study. Not
8 a good idea for implementation.

9
10

11 . That would be just putting
12 in like for like, but new high density;
13 meaning, you can get more

14
15

16 Again, new technology, like for like, no
17 additional capacity cost money. We could go
18 through all of those, and that is what it is
19 going to be. That it is not economical to
replace this.

20 BY MS. SUMMERLIN:

21 Q Let me ask you, you said like for like,
22 what is the purpose of changing? What was the idea
23 there, to change it?

24 A They were trying to identify smaller
25 footprint bays to use to gain additional space. But

1 when I say like for like, the capability is the same.

2 Q So, actually, these would have been
3 smaller, though?

4 A They would have been smaller, but the
5 cost to do that is considered uneconomical to do
6 that.

7 And I'll, also, tell you that we looked
8 to do this, we want to do this, because we want to
9 modernize our network. So, any opportunity that we
10 would get to do it, we would push to do it. But when
11 it is uneconomical --

12 Q Just meaning that it is more expensive
13 than you thought it was worth?

14 A Well, they studied the cost of the
15 building addition compared to doing all of these
16 things, and how much a square foot a building addition
17 would be, compared to a square foot gain and the
18 capital investment to gain that. And it is
19 uneconomical.

20 Q What is Number 3? I think that is where
21 we are now.

22 A Oh, are we're going to go through all of
23 these? I don't know that I can talk about all of
24 these.

25

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Well, I don't know. I can't really speculate on what that would be.

4

Q Okay.

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Again, you have to buy new DACS equipment to do that, and the labor involved in doing that was uneconomical.

Today we're using asynchronous multiplexers. And they're saying that an option would be to purchase new

s.

22

Q That was just too expensive?

23

A Right.

24

Q Okay.

25

A

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1. Space gain not estimated.

4

And then Number 8,

5

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Space gain not estimated.

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9

And when they studied that, the cost of establishing a new tandem did not offset the cost of deferring the building exhaust.

10

11

12

13

14

And, really, all of these were building deferrals. Now, when we get to a point where we have no choice other than to do one of these or deny customer service, we will do one of these, because we're not going to deny customer service.

15

Q Does that include CLECs?

16

A Absolutely.

17

Q That want physical collocation?

18

19

A Once physical collocation is allowed in that office.

20

21

22

Q Well, you just said that you would take action to do that, and haven't you already denied physical collocation?

23

A Yes.

24

25

But once physical collocation is allowed in this office, once that it is deemed there is

1 adequate space for physical collocation, we absolutely
2 would.

3 Virtual collocation, we're allowing.

4 Q Did we get through eight on there?

5 A Yes.

6 Q Let me see it.

7 On a couple of these, where you mentioned
8 that the space gain was not estimated, like, on seven,

9
10 , basically, what was the reason why you
11 wouldn't even estimate the space gain?

12 A In the meeting, we didn't know what the
13 space gain would be. In the study they did, I'm not
14 sure whether they found that out or not. I would
15 assume that they did.

16 Q So, they have done a study subsequent to
17 this, then, on all of these items?

18 A Yes.

19 Q Do you know whether that has been
20 produced at this point?

21 A I'm not familiar.

22 Q You wouldn't be looking at that study?

23 A That was part of the study that
24 determined that we needed a building addition. And
25 so, that's really the support for the building

1 addition.

2 Q But you have not seen any study? You
3 just know that there was one done?

4 A Right.

5 MS. SUMMERLIN: I would expect that in
6 the kinds of POTs that we have asked for, that
7 would probably have been produced. Do you
8 know?

9 MS. WHITE: I have no idea.

10 BY MS. SUMMERLIN:

11 Q What do you all call that when you talk
12 about a study like that for this type of thing;
13 building addition study?

14 A We call it an economic study.

15 MS. WHITE: Can we go off the record for
16 a second?

17 MS. SUMMERLIN: Yes.

18 (Discussion off the record.)

19 MS. SUMMERLIN: Let's go back on the
20 record.

21 BY MS. SUMMERLIN:

22 Q Ms. Cruit, I had asked you earlier about
23

24 A Right.

25 Q And we are at Golden Glades?

1 A Yes.

2 There are

3
4 Q When we were talking about this,
5 obviously, it was Golden Glades. Has that approach
6 been used in the West Palm Beach Gardens office, also?

7 A
8 I don't have any notes of doing LM to LCM
9 conversions. I would guess that they have already
10 been completed.

11 Q You don't know?

12 A I don't know.

13 Q So, if you have
14 Golden Glades, what you were saying earlier is that
15 the -- tell me, again, in terms of the space
16 aspect of that.

17 A I was saying that in removing an that
18 we would put in twice as many , but they take up
19 the same space as the because they're denser. And
20 we have done a year.

21 Q For how long?

22 A For the last couple of years at least. I
23 know we have been doing it at least for the last two
24 or three years, trying to convert these, to increase
25 the utilization on the So, we're at

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Again, we would just continue to grow
because we're
not at a critical threshold to do a massive line
transfer to the

Q What is the level of utilization of the

A Well, the whole office, we tried to keep
it at about 90 percent utilization, so I don't have
the specifics right here. I don't have it.

Q What I was asking you before, and I
didn't know whether we had found anything, was if
there had been a study. I didn't know that,
apparently, there was something produced that I did
not know about or I would not have asked you. This
appears to be something that was sent to you that
talks about these options.

A This is a draft.

Q So, that is something that you did see?

A Well, it is a draft. I'm not sure that I
saw it or not.

You can see up here at the top that it
did not come to me. The e-mail address was not
addressed to me. This a draft of a letter that was
supposed to come to me, but it didn't come to me. It

1 went to other people for review, because it says:

2 "Your comments would be appreciated."

3 Q So, you haven't seen that, then?

4 A No, I haven't.

5 Q Okay.

6 A So, these are all the same alternatives.

7 They have done the cost study.

8 I mean, is there a bottom line?

9 Q No.

10 I was just trying to find out if you had
11 seen it.

12 A Oh, I'm sorry.

13 MS. WHITE: There is no Exhibit 1, then,
14 late filed.

15 MS. SUMMERLIN: Unless there is something
16 that has, actually, been finalized.

17 THE WITNESS: I think what happened was,
18 they reviewed that. What I was told was that,
19 bottom-line, it was not economical so there was
20 no official request for funding issued.

21 BY MS. SUMMERLIN:

22 Q To follow up on any of these eight
23 choices?

24 A Right.

25 Because it was determined that we should

1 move forward with the building addition.

2 Q Who makes that determination?

3 A This organization, infrastructure
4 planning, they do the economic study. I think it is
5 apparent that that's the decision that was made,
6 because we are moving forward with that building
7 addition.

8 Q On this thing that we were looking at
9 earlier, the Second Floor planning meeting, the Item 8
10 was, supposedly, your suggestion;

11

12 Space gain not estimated.

13 Can you explain what you meant by that
14 idea, if that was your idea?

15 A Can I see that?

16 Q Sure.

17 A Let me see what they found.

18 Q You want to see what you found?

19 A Well, what they found.

20 And it wasn't a good idea. Is that what
21 you want me to say? It says it is a \$2 million cost
22 penalty, so that's not a good idea. It was an idea.

23 Q I wasn't going to show you that. I
24 didn't even know that.

25 What I'm asking is, what is the idea,

1 and forth, and you are moving traffic around a
2 geographical area.

3 Q In other words, you would need to create
4 a new one that was able to communicate with the old
5 one?

6 A As well as all of the other end offices,
7 as well as all of the CLECs, as well as all of the
8 interexchange carriers.

9 Q Okay.

10 A I mean, it was an idea. Hey, we were
11 trying to think of everything.

12 Q I was not trying to embarrass you because
13 of your idea. I was trying to find out what the idea
14 was.

15 MS. WHITE: I will be reporting you to
16 your supervisor, your bad idea.

17 THE WITNESS: Thank you.

18 BY MS. SUMMERLIN:

19 Q One thing that we would like to look at
20 is on the document that you have produced, or you all
21 have produced, that you are knowledgeable about. What
22 we would like to look at is the switch, the individual
23 switches. I guess we will go to those charts that you
24 were talking about before, like, page 4?

25 A All right.

1 Q We want to look and see and try to
2 identify or get you to identify, specifically, where
3 is the growth occurring.

4 In other words, you have got analog,
5 digital and ISDN portions of this; is that right?

6 I mean, I could easily be totally off the
7 mark on this, but what I'm trying to get you to do is
8 give us some idea of where is the growth occurring,
9 and how much customer growth are you, actually,
10 experiencing?

11 A Well, on page 4, GG O4T, that is a graph
12 of DS1s. Each bar, and I don't know that you can see
13 the bars on your Xeroxed copy, is 200 T-1's, it says
14 that up at the top. It says NAL/DIV equals 200. Two
15 hundred T-1's would be each bar.

16 Q When you say bar, what are you talking
17 about?

18 A Well, I said that you probably can't see
19 it.

20 Q What is it that you are pointing to? I
21 don't know what you mean, exactly.

22 A Right here.

23 Q You mean, the very tiny graph thing?

24 A Right.

25 So, the only point of that is, say, if

1 you look at January of '98,

2

3

4

5 So, this whole chart is talking about
6 trunking. DS1 capacity, this is an access tandem and
7 all we have to worry about here is trunking. So, this
8 is interconnection with any carrier who wants to come
9 into our network via the tandem.

10 It could be an interexchange carrier, it
11 could be a wireless carrier, it could be a CLEC
12 serving the North Dade/Broward area. This is how
13 carriers, usually, interconnect. So, it is T-1's.

14 I told you what is driving it. It is the
15 customer demand that is driving it.

16 This, also, serves BST end users,
17 consumers and small business in trying to have access
18 to their carriers, whoever those carriers are in North
19 Dade and Broward.

20 Q Looking at this, what is all of this
21 stuff?

22 A Project numbers. They all start with P,
23 and they're project numbers. That means that we
24 initiated a project during that time frame. And it
25 will, usually, be associated with a stair-step, unless

1 it is a generic or something that did not add
2 additional capacity.

3 So, a project was initiated in all of
4 those time frames to provide additional, in this case,
5 T-1 or DS1 capacity.

6 Q Let me take this one up here. And I am
7 sure that everyone else understands what you are
8 talking about, except me.

9 This top number up here, like, right up
10 here?

11 A PMA 41-11.

12 Q What does that mean?

13 A That's a project number, MA 41-11, that
14 initiated capacity in 1996, because that's the time
15 line on the graph. And it went from 1480 capacity to
16 1520, so it provided capacity for 40 T-1's.

17 Because the beginning of the P, if you
18 draw it down, is associated with a stair-step.

19 Q It went from 1480 to what?

20 A Fourteen-eighty to 1520.

21 Q And where is this on here? Is it 1520,
22 the number right there?

23 A Yes.

24 Q It is hard to read. These numbers do not
25 come through too well.

SECRET

1 A It is very hard to read, because there
2 are so many jobs here, because there is so much
3 activity.

4 Q So, on every one of these projects, you
5 have put the beginning and ending numbers on here?

6 A Well, that's how the system does it. It
7 shows the capacity in service with that project. And
8 then the next project takes it to the next level. The
9 next project would take it to the next. And the
10 system tries to did its best to get all of the numbers
11 on there.

12 Q When we talk about projects, is that
13 somebody?

14 A It is a TEO, a telephone equipment order.

15 Q A telephone equipment order?

16 A Yes.

17 So, that's our initiation on a vendor to
18 provide equipment.

19 Q Do you have a copy of this with you?

20 A Yes, I do. I have that one, but I, also,
21 have this one.

22 Q Let me look at the one that you have,
23 just to see how much clear it is.

24 A All right.

25 MS. SUMMERLIN: I sure do wish that we

1 could get one that we could read. It would be
2 helpful.

3 MS. WHITE: Is that the way your copy is?

4 THE WITNESS: Right. And then it was
5 Xeroxed and faxed.

6 MS. SUMMERLIN: You know, it is very,
7 very hard to figure out what is going on with
8 this one.

9 MS. WHITE: If you can, see if the
10 Commission's copier can copy it. I don't know
11 what else to do.

12 MS. SUMMERLIN: We can't even see these
13 little light things there at all.

14 MS. KEATING: We can try, if you would
15 like.

16 MS. SUMMERLIN: Yes.
17 It may not do any good, but it would be
18 great if we could try.

19 BY MS. SUMMERLIN:

20 Q We'll we're waiting for this, if we can
21 get to you explain what these descriptions are down
22 here at the bottom.

23 A All right.

24 That is telling you what that particular
25 project is doing. The first one is adding trunks.

1 The second one says

2 Q What is that?

3 A I don't remember. Let me see if it is
4 adding capacity. You can see that in October of 1995,
5 that particular project, 5202, did not add any
6 capacity. So, it is doing some sort of change out
7 without adding capacity. It could have to do with a
8 generic upgrade or something.

9 Q You are saying that because the line
10 remains flat, the capacity line?

11 A Right.

12 So, then, the next one, 5204, is
13 associated with an increase in capacity to 1280. And,
14 again, it says trunks.

15 The next one, I think it says 5693, is
16 associated with trunks and a generic. GA means growth
17 addition, which you can see interchangeably they're
18 using GA for growth addition or trunks. Because this
19 is a tandem, that's all that we do is add trunks in
20 this tandem, and then maintain the office in terms of
21 the generic release.

22 Q Generic what?

23 A Generic release. That's a software.

24 Q I don't understand. Generic release is
25 software?

1 A It is a software that makes the switch
2 work.

3 Q So, this project was upgrading the
4 software?

5 A Yes.

6 Q Wherever the next switch is, we could go
7 to that and ask a couple of questions about that while
8 we're waiting for the copies.

9 A That is page 18. That's the TOPS tandem.
10 You can see that --

11 Q What page are you on?

12 A -- on 18 they are not adding capacity in
13 this office. The only time that capacity would be
14 added is if they're doing an optical extension that is
15 requested by operator services to provide additional
16 features for operator services.

17 Q All right.

18 A So, there is no capacity added here.

19 And I believe that in Golden Glades we
20 have not reserved any additional space. Only the
21 existing lineup for the TOPS remote.

22 Q There is a TOPS host?

23 A At the Gardens.

24 Q At the Gardens?

25 A Yes.

1 This is a TOPS remote.

2 Q So, based on this chart here, you are
3 saying that there is no reservation for future use
4 associated with this?

5 A Well, based on what I see, adding trunks
6 or links, there is no additional equipment.

7 Now, if there is equipment required for
8 an retrofit or additional services that the
9 operator services plans to add, that is not identified
10 on these charts.

11 Q What is an ? What does that mean?

12 A It is a processor and an
13 And it provides more capacity than the old
14 what they call .

15 But it is an enhancement. It just gives
16 us additional capacity.

17 Q What did stand for?

18 A I don't know.

19 Q Just the old thing?

20 A The old stuff.

21 Q What is the next one?

22 A Page 28. I'm sorry, it is page 26.

23 Now, we're going to get into -- this is
24 the local switch. So, in the local switch, there are
25 lots of components.

97

1 There are lines, both analog and digital.
2 There are digital systems. There are trunks. When
3 you talk about digital systems, there is TR008, which
4 is an old kind of system, outside plant system.

5 And then there is the next generation
6 digital loop carrier, which we refer to as TR303. So,
7 when a switch capacity manager is dealing with a local
8 switch, there are lots of influences that he has to be
9 concerned about.

10 The first chart that you have, page 26,
11 is a chart of the overall office capacity in terms of
12 lines. The bottom line is the overall office line
13 forecast.

14 The top line is the capacity. And it is
15 provided either via digital or analog capacity,
16 whether it be TR303 or TR008, but it is the overall
17 line capacity. So, in order for a capacity manager to
18 do their job, they have to look really at it
19 separately by each component.

20 Q Well, from what you just said, does that
21 mean that this is the overall picture for the local
22 switch, with all of the components taken into account?

23 A Right. For lines.

24 Q Okay.

25 A So, on page 27, it is looking at the

1 digital lines.

2 Digital lines are served via digital
3 systems, whether they be TR008 or TR303, but this is
4 the digital lines. And you know that because you can
5 look at the left-hand side of the page and see where
6 it says digital up in the description.

7 Q Digital CCS/NAL, is that where you are
8 talking about?

9 A No.

10 Up on the side. Read sideways.

11 Q Digital network.

12 A That's the digital lines. But, you know,
13 that is really driven by digital systems, which we'll
14 get to in a second.

15 Page 28 is the analog lines. So, this is
16 the combined capacity.

17 So, you can see that we increase a little
18 bit, like, in early '97. I guess that is late '97.
19 I'm sorry it is '98. We increased a little bit of
20 capacity, and that would have been from buying those
21 and removing some of the capacity.

22 Q Where are you talking about right now?

23 A In May of '98. This little riser right
24 there. It is associated with Project 5763.

25 No, I am sorry, it is not. It is

1 associated with the one below it, 5906.

2 Q 5906.

3 A See it below the line?

4 Q So, just go straight up to that?

5 A Yes.

6 That's associated with that capacity.

7 But what that is, is adding some
8 capacity and removing some capacity, so you don't
9 get the entire capacity add that you would from the

10

11 So, that's the overall utilization of the
12 analog lines in the office. And you can see that it
13 is not growing a lot. It is growing some, and so we
14 try to maintain the growth on the new component.

15 Q So, let me make sure that I know what
16 we're doing here. This overall page is on page 26; is
17 that right?

18 A Twenty-eight.

19 Q It says analog network?

20 A Yes. I'm sorry. That's the overall.

21 Q And it includes the digital network and
22 the network access, whatever those other words are?

23 A Digital access lines and network access
24 lines.

25 Q Those two components are all combined.

1 In other words, if we had to look for the growth of
2 the local switch, we would look on 26, and this is the
3 expected growth? Flat, basically? Am I right or am I
4 wrong?

5 A You know, I misled you. I'm sorry.

6 The one on page 28 is the overall office,
7 because it says just network access lines. So, that's
8 the overall office forecast, overall office
9 utilization.

10 The one that says analog is analog. The
11 one that says digital is digital.

12 Q So, the overall one, then, is on page 28?

13 A Right.

14 Q This is the projected growth here?

15 A Yes.

16 Which is just kind of following along the
17 trend. That growth will be satisfied either through
18 analog capacity or digital capacity.

19 And you can see that,

20 because that's the
21 upward line on the chart. The analog
22 capacity --

23 Q So, if I were to look at this, this is
24 where you are at today. Where are you at in terms of
25 the actual capacity that you all have right this

1 minute?

2 A October of '98, so that's

3 Q Right here?

4 A Yes.

5 Q All right.

6 So, basically, where you are at right
7 now, at that point in time, would satisfy the growth
8 that is projected out to the end of this chart, 2001?

9 A It would if it satisfied the analog and
10 digital capacity, which that is why I said they have
11 to look at each component. So, the capacity manager
12 needs to look at the analog, which is on page 26.

13 Normally, you would say I don't need any
14 capacity on the analog
15 so you
16 wouldn't need it. But that's where they are doing the

17
18 Q On the analog?

19 A Right. On page 26.

20 The growth addition, the capacity
21 addition, is coming from page 27,

22
23

24 Do you see that?

25 Q You are saying that the need for

1 of the total lines in the office, there is a capacity
 2 of correct? Do you see that on
 3 the overall chart, That's the overall
 4 capacity in the office.

5 Q Where are you looking?

6 A Where we pointed out earlier,
 7 lines.

8 Q All right.

9 A So, is the overall capacity in the
 10 office.

11 Q All right.

12 A Of that, on the analog side,
 13 So, the majority of the office is
 14 served by analog.

15
 16

17 . So, I have got to have capacity for that
 18 knew growth.

19 So, what that means is that the overall
 20 churn in the office, as people move out of one place
 21 into another, if they're moving into areas that are
 22 served by

23

24 So,

25

SECRET

1 the office, although still served on analog lines, we
2 need the new kind of capacity to serve the caller ID
3 like features;
4 know, those kinds of features.

5 But as the growth occurs in these other
6 areas, that outside plan is serving based

7
8
9
10
11

12 But there is growth, and that's what this
13 is saying.

14
15

16 And it is part of Jerry's forecast or his
17 actuals of what took up office space in 1998.

18
19

20 These frames, we shipped two of them.

21 Now, we're not to trunks yet. If you are
22 ready to go there, I'll go there.

23
24

Q No.

25 I want to ask you a couple of questions
first, if I can.

1 MS. WHITE: About how much more do you
2 think you have? I'm just saying that if we're
3 going to be here all day, maybe we can take a
4 lunch. If we're going to be here another 30,
5 40 minutes, then maybe not. I am just trying
6 to get an idea.

7 MS. SUMMERLIN: I don't think it will be
8 more than that.

9 MS. KEATING: I have another question,
10 while we're at it. I'm supposed to go to the
11 airport at two. Do I need to arrange for
12 someone else to go?

13 MS. WHITE: She has got a 3:45 flight.
14 Is she going to be on that flight?

15 MS. SUMMERLIN: I don't think it is going
16 take us that much longer. I really don't.

17 MS. WHITE: Then let's keep going. I
18 just wanted to get a better handle on it.

19 BY MS. SUMMERLIN:

20 Q Just from a very uneducated look here on
21 this digital chart that you have here, you have got
22 your capacity and your growth.

23 A Yes.

24 Q I guess growth would be the dotted line,
25 basically, or projected growth?

1 A Yes.

2 Q But you have got a very close match
3 there.

4 A Right.

5 Q That, basically, means that you have got
6 the equipment to do what that capacity demanded,
7 pretty much on the money right there; is that right?

8 A Right.

9 Q What I see here is an awful lot of
10 capacity that is not being utilized, and there seems
11 to be no projected growth that will ever utilize that;
12 is that right?

13 A

14

15 Q So, theoretically, if you get rid of some
16 of those , you will be bringing that a lot closer
17 together?

18 A Right.

19 Q But you all have been getting rid of
20 of them a year for the last year or two? Is that what
21 you said?

22 A For the last few years, as we have seen
23 or those vertical services demands,
24 we're doing it on an economic basis to satisfy the
25 demand of the

1 Q So, you have removed for the last two
2 years. Isn't that what you were telling me?

3 A I said that I know that we did for sure
4 in '98, and I know that we did it in '97. And there
5 could have been more in '97, but I'm not sure, because
6 I don't have the information with me.

7 So, as we have been doing our planning
8 reviews, we have talked about this for the last
9 several years.

10 Q You said you have _____ ?

11 A There _____, yes.

12 Q _____

13

14

15

16 A It is a serving hardware.

17 Q So, why does everything remain static?

18 A _____

19

20

21

22 Q Will there ever be a reduction on the
23 side if you continue this trend on _____?

24 A There could be.

25 Q So, theoretically, you would end up with _____

1 the increase in working --

2 Q

3 A Yes, . That's TR008 capacity.

4 Q What is that? Who uses that?

5 A Well, the switch capacity manager uses
6 that to determine how many systems are going to be
7 integrated into the switch. How many TR008 systems
8 will be integrated. And based upon that, he provides
9 capacity, switching digital capacity. And we call
10 them

11 And I'm sorry that we have to go down
12 into such details, but these are the equipment
13 components in a switch.

14 Q Switching what?

15 A Components.

16 Q , was it?

17 A I don't know what it stands for.

18 It is TR008 integrated capacity.

19 Q And is there a certain kind of customer
20 that uses this kind of stuff?

21 A No.

22 This is strictly dependent on how outside
23 plant serves the areas in the wire center.

24 Q When you talk about outside plant, what
25 do you mean when you say that?

1 a downward projection at some point?

2 A If the growth took off to such a degree
3 and the outside plant was serving more of the growth
4 in the office on . . . , from an inward movement
5 perspective, than what is going in, then you would see
6 a decline.

7 Q So, you were going to move to us
8 trunking. Is that the next chart?

9 A Right.

10 So, now, on page --

11 Q Page 41?

12 A -- there is various kinds of digital
13 equipment. And so that you don't think that I'm
14 trying to mislead you, I am just jumping over to the
15 various kinds.

16 Like, is on page 42.

17 Page 45 is TR303.

18 Page 47 is trunking.

19 Q So, these charts that you were just
20 talking about are various subsets of the digital?

21 A Yes.

22 Q Which set of the digital is responsible
23 for the growth? I mean, is there one chart that shows
24 you more than any other?

25 A Well, you can see on page 41 that that is

1 A The loop, the feeder.

2 Q The loop, and how that serves the what?

3 A The customers in the wire center.

4 Q And that is not any particular type of

5 customers? That is everybody?

6 A Within a serving area, if they go in and
7 they put in a , a subscriber loop carrier or
8 a digital loop carrier system, if they decide to,
9 based on their projected growth, put in a TR303
10 system, then they notify us and that's the switching
11 equipment that we use to terminate it in the switch.

12 Q When you say "they," you mean, the
13 customer?

14 A No.

15 I mean, outside plant.

16 Q Your outside plant?

17 A Yes. BellSouth's outside plant --

18 Q Okay. I got you.

19 A -- administrators.

20 Q Based on whatever they choose to use to
21 serve?

22 A Right.

23 Q So, that is a subset, basically?

24 A Well, these are the systems. These are
25 systems. These are not lines. This is systems. And

1 they are projecting.

2 And you can see, from the dotted line to
3 the heavy line, that their projection has not occurred
4 yet. But this is working, so it is about the same.

5 So, their projection for what they
6 thought they were going to do in this wire center for
7 1998 has not occurred on forecast, on track. It could
8 by the end of the year, but it has not so far. And
9 you can see that in the difference between the dotted
10 line and the --

11 Q That's on 41?

12 A Yes.

13 Now, we're talking about here one frame.
14 So we can keep it in perspective, we're talking about
15 one frame, one bay.

16 Q Working SLC systems?

17 A No.

18 The switch capacity provided. This is
19 one bay of capacity.

20 Q You have lost me there.

21 A I'm talking space.

22 Q What is one bay of capacity, exactly?

23 The difference, you mean, between this and this?

24 Is that what you are talking about?

25 A The , the capacity, do you

1 see the capacity?

2 Q , that's one bay?

3 A Yes.

4 That's

5 My point is, we're spending a lot of time
6 talking about the local switch, when, in fact, the
7 tandem is really what is using up all of the space.

8 Q We'll get to it.

9 A You have already been through it.

10 Q I am just trying to find out what all of
11 this is here.

12 A So, trunks, on page 47.

13 Q Okay.

14 A Okay what?

15 Q You are pretty well taking the lead here.

16 MS. WHITE: Explain page 47.

17 BY MS. SUMMERLIN:

18 Q I didn't want to interrupt you.

19 A In terms of DS1 trunks --

20 Q Okay.

21 A -- you can see that the demand increased
22 sharply in early 1998. Well, all year 1998.

23 Q And what is that resulting from;
24 Internet, ISC, CLECs?

25 A All of that.

1 And, plus, we have some 1-A replacement
2 projects taking place. And when you do that, you have
3 to turn up systems to those new offices.

4 Q 1-A replacement projects, what does that
5 mean?

6 A We are replacing 1-A switches in the
7 area. And so, any offices, any switches, that have a
8 community of interest, a strong community of interest,
9 with Golden Glades, you would see a sharp demand like
10 that, which occurred this year.

11 We have replaced Brentwood and we
12 replaced Oleta, which are both in this area.

13 The dip that you see in whatever month
14 that is, August or September, was really to reclaim
15 those systems that you turned up to Brentwood or,
16 actually, the old system.

17 So, the increase, all I'm saying is that
18 there is some demand here. We don't think that there
19 is a lot of demand. This does not really reflect the
20 demand in this office in terms of trunking. It is
21 something between where it is and where it has been.

22 Q Let me see if I understand what you are
23 talking about.

24 This sharp rise from this point up here,
25 which is basically what, '98, early '98 --

1 A Yes.

2 Q -- you are just now saying to me that
3 that sharp rise is not, actually, an accurate
4 depiction of what has increased for Golden Glades,
5 because --

6 A No.

7 I'm saying that that is, actually, what
8 happened with Golden Glades. But I wouldn't use that
9 as a projection for the future, because it includes
10 some one-time events. It includes a cutover of two
11 switches.

12 So, in planning this office, I would not
13 assume that that projection, that trend, is going to
14 continue forever.

15 Q A cutover of two --

16 A Offices. 1-A offices.

17 Q -- 1-A offices, what does that mean?
18 Does it mean that you got rid of those offices
19 completely?

20 A No.

21 It means that I replaced it with newer
22 technology. I replaced the old 1-A, the switch, with
23 a newer switch. An analog switch with a digital
24 switch.

25 And in doing that, I have got trunks

1 going to this one right now. In doing it, I have got
2 trunks going to Brentwood to the 1-A. I turn up at
3 the new switch, so I have got to have trunks going to
4 it, so the night of cutover I can still talk between
5 them. So, that rise is a duplicate of facilities, or
6 of trunking. Some of it is.

7 Q Let me ask you this, so I can understand.
8 I think I'm getting to the idea here. And I know it
9 is real hard when you already know something.

10 But we have got Golden Glades here. All
11 I care about is Golden Glades. What I'm trying to
12 understand right now is, are you saying that for a
13 period of time the business that went on at Brentwood
14 and the other place was taken care of by Golden
15 Glades?

16 MS. WHITE: Let's go off the record for a
17 minute.

18 (Discussion off the record.)

19 MS. SUMMERLIN: Let's go back on the
20 record.

21 BY MS. SUMMERLIN:

22 Q Let me ask one more time and see if what
23 I understand is correct.

24 This segment in '98, which shows an
25 extreme increase in activity at Golden Glades for the

1 first nine months or whatever of '98, reflects two
2 different Central Offices, other than Golden Glades,
3 that had 1-A switches replaced.

4 And during the time frame that the
5 activity was taking place to replace the switch,
6 Golden Glades had to handle the calling for those
7 offices until the actual cutover was done?

8 A We had duplicate facilities turned up to
9 those trunks. So, it appears that the demand for
10 those two offices are doubled, because they were
11 during that time frame.

12 But that is not a normal trend. And in
13 my planning for this office, I know that. And,
14 therefore, I wouldn't use this trend for my future
15 projection. And you can see, in fact, that we have
16 not provided capacity based on that trend.

17 Q I don't see the dotted line? Is there a
18 dotted line?

19 A There is not a dotted line on this.

20 Q Speaking of projected growth, how did we
21 get out of that squirrely thing there? I mean, what
22 kind of a growth projection would you be making on
23 that?

24 A I would project something like that.

25 Q So, are we going to make that one an

1 exhibit, now?

2 A No.

3 All I'm saying is that the demand that is
4 on there, if I were to use that, that would require
5 significantly more frames in 1999 and 2000 than we
6 have planned. And we do not feel that that is a
7 justified trend.

8 So, my point is, because I said that we
9 use current history, we use it with judgment. We
10 don't just take the history and apply it to a trend.
11 We use it with knowledge, with judgment and we only
12 purchase equipment that we think will be required to
13 satisfy the demand in that office.

14 Q Let me ask you, exactly, when did these
15 two one-time events take place?

16 A Brentwood cut in July and Oleta will cut
17 in November. So, the downward trend that you see in
18 the September time frame is getting the trunks back
19 from Brentwood.

20 And the upward trend is turning them back
21 up or turning some up for Oleta, and we will get some
22 back from Oleta.

23 Q Okay.

24 So, Brentwood cut over; is that right?

25 A Yes.

1 Q So, when did Golden Glades start getting
2 calling for Brentwood?

3 A We've always had calling, but we had to
4 turn the facilities up in advance of cutover so that
5 they would be prepared.

6 Q When did you do that?

7 A I don't know. The second quarter
8 sometime, I would say.

9 Q Maybe April or May, maybe?

10 A Yes.

11 Q That's something that is pretty
12 important, I think, because we're trying to analyze
13 what exact growth situation you have got here. And as
14 of January '98, there is a significant difference.

15 So, is that something that you can
16 provide us as a late filed?

17 A Sure. I can find that out.

18 Q The exact date?

19 MS. WHITE: What are you asking for as a
20 late filed?

21 MS. SUMMERLIN: What I am asking for is
22 the exact date that --

23 MS. WHITE: May I ask a question?

24 MS. SUMMERLIN: Yes.

25 MS. WHITE: This sharp rise up, is that a

1 trending that we continued that translated into
2 equipment and, therefore, space in the Golden
3 Glades office?

4 THE WITNESS: No.

5 It is not.

6 BY MS. SUMMERLIN:

7 Q Well, what I am asking you is, when did
8 the increased demand for Brentwood take place? In
9 other words --

10 MS. WHITE: You mean, increased demand
11 for Golden Glades, right?

12 MS. SUMMERLIN: Well, what I understand
13 is that she's saying that that is affecting
14 Golden Glades. So, what I'm asking is when did
15 Golden Glades start getting calling for
16 Brentwood.

17 THE WITNESS: Can you just not accept
18 that it is sometime during the first or second
19 quarter? That the increase in demand that you
20 see there, from January through May, some of
21 that includes the turn up of additional
22 trunking for Brentwood?

23 And it would be a like amount of what you
24 see the downturn to be, because that's turning
25 down those trunks.

1 So, what I would say at this point is
2 that the true demand for this office is
3 somewhere between January of '98 and that point
4 where it came down in September.

5 BY MS. SUMMERLIN:

6 Q So, you are saying that it is somewhere
7 between this little dip here and this little place
8 here?

9 A Right.

10 So, if you draw a line like that and
11 trend that, that says I need another frame, I need
12 relief in 1999.

13 Q What I think that we need to understand
14 is, we need to know, exactly, how much of that is
15 represented by Brentwood and Oleta if we're talking
16 about trying to understand what is an appropriate
17 projection going forward.

18 A But I don't have any space requirements
19 for this.

20 Q Is this not the trunking --

21 A For the local office.

22 Q Just for the local service? Not for the
23 tandem or toll?

24 A No.

25 Q So, is this incorporated in the other

1 chart that we were talking about where there is,
2 basically, a flat projection?

3 A No.

4 This is just trunks.

5 MS. SUMMERLIN: Let's take a two second
6 break, and let me see if I can resolve this
7 with my expert.

8 (Brief recess.)

9 MS. SUMMERLIN: Let's go back on the
10 record.

11 BY MS. SUMMERLIN:

12 Q Okay.

13 A What page are you on?

14 Q I'm still on page 47.

15 A Okay.

16 Q What you have said is that in this
17 particular situation, on this DS1 trunks, you don't
18 project, based on these anomalies of the replacement
19 of the 1-A switches for Oleta and Brentwood.

20 I guess what I need from you is, I need
21 to know what the projection is. You have drawn it on
22 yours, but it is not on anything that we have. Is
23 there a projection that has, actually, been done? You
24 have shown a projection on all of the others. I guess
25 that's why I was wondering.

1 I understand what you are saying. It is
2 an anomaly. I am just trying to figure out what would
3 you do if you start down here at the beginning of '98,
4 and you say you are up there, but you are up there as
5 a result of a bunch of anomalies, how do you know
6 where to go from there?

7 A Because the switch capacity manager
8 knows. They are assigned three or four offices. They
9 know those offices. They know how many are in it.
10 They know their caller ID demand. They know the
11 fluctuations and demand. That is their job, is to
12 understand what is happening in these offices. So,
13 the switch capacity manager would know what caused
14 that.

15 I just happened to mention it to make the
16 point, and I think I'm sorry that I did, that we don't
17 use data that has anomalies in it to project our
18 future requirements. We exclude that, and then we
19 base trends based on that.

20 So, at this point, the switch capacity
21 manager feels that the existing capacity in the office
22 is sufficient for at least the next 12 to 18 months,
23 based on his knowledge of the office.

24 Q How do you know that when you don't have
25 any projection line?

1 A Because he's not adding capacity. If he
2 felt like that was not sufficient capacity in '99, he
3 would have a growth addition. He would show a riser
4 increasing the capacity, and he doesn't.

5 Q What are all of these projects here?

6 A This is a database. And these are
7 projects that are

8 The only ones that we need to be
9 concerned about on this page are those that are
10 associated with the riser on this page, because this
11 is trunking.

12 But when we do a job, we do a job that
13 takes care of trunking requirements, analog line
14 requirements, digital requirements, software
15 requirements, whatever. We try to take into
16 consideration all of the requirements of that office.

17 Q Well --

18 A So, in some of those cases, some of those
19 jobs are not adding capacity, so you don't see a
20 riser. But the job number is still on there, because
21 the job took place in this office.

22 Q What you are saying, then, is only where
23 there is a riser do we need to be concerned. So, we
24 have got one, and we have got two and then we have got
25 three jobs adding capacity during '98?

1 A That's correct.

2 Q Even though this is a period of
3 anomalies?

4 A That's right.

5 Q All right.

6 A But you had to handle the demand. I mean
7 that's why it was there, was to handle the demand.

8 Q I understand.

9 Well, if we can go through these other
10 charts, then, hopefully, we'll be able to get you all
11 out of here. We just want to look at them real quick.

12 A That was trunks. The next one is basic
13 rate interface, BRI, basic rate ISDN, and you can see
14 that he added capacity in 1998.

15

16 He's significantly above the forecast,
17 and he will watch this. And if the trend continues
18 the way it is, he may add cards. Because the hardware
19 is already in there

20 But that's, basically, ISDN.

21 Q The actual forecast, the growth went
22 beyond or higher than the forecast?

23 A That's right.

24 Q So, there has just not been an alteration
25 in the forecast?

1 A Right.

2 Q All right.

3 A That's why we do it based on trends.

4 That's a perfect example.

5 The next one, page 53, is PRI, primary
6 rate interface for ISDN lines. In this one, the
7 forecast is much higher than the actual. Again, we
8 did not provision based on the forecast. We are
9 provisioning based on actuals.

10 Q This is primary rate interface?

11 A Yes.

12 PRI, ISDN. There are two kinds. One is
13 PRI, and one isn't PRI.

14 Q All right.

15 And this is based on actuals. And this
16 trend here started in January of --

17 A June of '97.

18 Q June of '97?

19 A Yes.

20 Q Okay.

21 A Since July of '97 --

22 Q Wait. Is that June of '96?

23 A No.

24 That's '97.

25 Q I'm looking right here where this line

1 goes down. Is that not '96?

2 A '97. June.

3 Q I am sorry. So, it is June of '97.

4 A When initial demand took place, an
5 initial 30 PRIs got turned up. Since then, it has
6 been relatively flat. It has grown a little bit, but
7 not significantly.

8

9

10

11

12

If we see that we need additional
13 capacity, we'll rush it in. But we're not going to
14 spend the money and we're not going to use the floor
15 space especially in this office. I mean, you have to
16 consider the office, as well.

17 Q So, this dotted line represents you all's
18 projection?

19 A That represents the forecast.

20 Q What is that based on?

21 A It is based on what marketing thought
22 they were going to be able to sell, and they haven't,
23 and so we're not provisioning for it until we see that
24 we need the additional capacity.

25 Q What's the next one?

1 A The next one, we're in West Palm. So,
2 we're finished with Golden Glades, and now we're in
3 West Palm, so you might have a better copy of this
4 particular one.

5 If you will look in the bottom right
6 corner, it will say West Palm Beach, Florida.

7 MS. WHITE: Page 57.

8 THE WITNESS: Page 57.

9 O2T is a tandem. It is an access tandem
10 serving West Palm Beach County.

11 BY MS. SUMMERLIN:

12 Q Okay.

13 A This is trunks. This is strictly trunks
14 and O2T. So, these are T-1's. We're slightly above
15 the forecast.

16 Q In terms of the actual?

17 A In terms of the demand.

18

19

20

21 In this case, we have trended the demand.
22 And if you look at my sheet that Wayne made a copy of
23 for you, that you can see the lines on, you can see
24 that I have drawn a line there that represents our
25 most current forecast projection.

1 Q Are you talking about right here?

2 A Are these your copies? Where are the
3 ones that Wayne just made you a copy of? Find the one
4 that says 32.1 at the bottom.

5 Q All right.

6 Now, you have got a line here.

7 A Okay.

8 Q Do you see that?

9 A Yes.

10 So, that is based on the last, say, year
11 and a half.

12 Q When did that line come in?

13 A I just made it yesterday, when I was
14 working on this.

15 Q So, you have altered your projections,
16 then?

17 A Well, the forecast is still the same.
18 Our plan is altered based on the trend.

19 Q I'm just trying to --

20 A You can see that the plan falls in line
21 with that line. And for my own sake, I was looking
22 to see do I still agree with that plan based on
23 current actuals. Every month this changes. So, for
24 my own benefit, I drew that line and I said, yes, it
25 still makes sense based on current demand, current

1 actuals.

2 I am as interested in the space as I am
3 in the capital that is to be spent, the capital
4 investment. So, I want to make sure that I'm not
5 spending the investment too early or too late. So,
6 that line that is drawn on there is mine. Just kind
7 of looking at the projection, at the trend, at the
8 current use.

9 And you can see down at the bottom that I
10 wrote how many T-1's have been turned up.

11 In 1997, 157 T-1's were turned up.

12 . So, our
13 projection for frame space

14 . A little conservative from 1998, but not
15 significantly.

16

17 n.

18 We're in Gardens, and that's what Guy's forecast would
19 be based on.

20 Q Is this the tandem?

21 A Yes.

22 This is the tandem.

23 Q So, you are talking about

24

25 A It is called the PDC. Power distributing

1 cabinet and a DSX.

2 Q And that's what your current deal is per
3 year?

4 A Yes.

5 That's if that
6 materializes.

7 Q You are talking about

8

9 A That's what happened this year.

10 Q From '97 to '98?

11 A All I can tell you is that is what has
12 happened this year.

13 Q So, you are taking a trend, basically,
14 from --

15 A A little less than 1998's trend.

16 Going to page 64 --

17 Q All right.

18 A -- you might be able to see that a little
19 bit better from the copy that Wayne gave to you.

20 Q 32.2?

21 A 32.0.

22 Q All right.

23 A This is the split chart that shows you
24 the analog and the digital lines. These are lines.
25 So, we're back to a local office where we have lines

1 and trunks.

2 This shows you how we're going to serve
3 the analog lines and the digital lines.

4

5 as you were asking about earlier.

6

7

8 Therefore, the

9

10

11 The overall office growth is on page 65.

12 Q Which is 32. what?

13 A 32.0. You don't have a copy. Wayne just
14 made a copy of it.

15 Q This is the overall?

16 A No.

17 That's the analog and digital. The
18 overall is on page 65.

19 Q All right.

20 A In this particular office, about half of
21 the office is served on analog capacity, half of the
22 office is served on digital. That's quite different
23 than in Golden Glades, if you will recall. Most of it
24 was served analog. Some of it digital, very little.
25 We were just starting the digital growth.

1 However, in this office, the serving wire
2 center has growth in pockets of the wire center. And
3 so, that growth

4 . It is being served by digital loop
5 carrier.

6 Q When you say pockets of the wire center,
7 are you talking about geographic areas?

8 A Yes.

9 So, if you don't have any questions about
10 that, I'll talk to you about trunks.

11 Q All right.

12 Let's move on down the road here.

13 A Trunking is on page 78. I'm sorry, page
14 79.

15 Q Okay.

16 A Gardens is very close to West Palm Beach
17 Annex. Annex was a 1-A replacement. So, the same
18 anomaly that you saw in Golden Glades applies here.
19 And you can see that the trend has taken that into
20 consideration.

21 Q So, based on your projection here, you
22 have room until 2002 --

23 A No.

24 Q -- with what you've got lined up, anyway?

25 A What we've got in '99, the growth that we

1 project in '99, will take us through the end of 2000.
2 About an 18-month growth.

3 Q Okay.

4 A The next page is basic rate interface for
5 ISDN, on page 80.

6 Q Okay.

7 A The actual demand is less than the
8 forecast. We haven't provisioned according to the
9 forecast. We have delayed that until first quarter
10 '99.

11 Q So, you have an actual demand that is
12 right here?

13 A Yes.

14 Q And your projection is going sky high.
15 Now, you have delayed what? This one?

16 A Right. Yes.

17 Q So, on here, if we looked at this, this
18 is what you have planned, but you are telling us today
19 that that is not, actually, going to happen?

20 A This is what we have planned. And this
21 is a forecast that we got, but if I was to draw my
22 projection based on trend, I would draw it something
23 like that. That would say that we have it timed
24 appropriately compared to demand and trend, so we'll
25 have some capacity relief there.

1 for future services that operator services may
2 require.

3 But I do know that he has space reserved
4 for for this particular one.

5 Q So, that's how you explain this
6 difference? Is that what you mean?

7 A Well, the difference --

8 Q It appears, just from what I understand,
9 that you have a tremendously greater capacity than you
10 have actual demand; is that right?

11 A I am not real familiar with how they
12 engineer these TOPS host. I understand these are data
13 links. I'm not sure.

14 Well, I guess the point is that there is
15 no future capacity being added, so there is no
16 additional space reserved for frames here, unless
17 required for other services that operator services
18 needs.

19 Q Do you have any idea how much equipment
20 this translates into?

21 A No, I do not.

22 Q Mr. Ream would know that, though?

23 A No.

24 I don't think he would know that.

25 Q Who would know that?

1 You know, once you get to this point, you
2 need some more capacity, so you add it. And then
3 based on this trend, that would last about a year and
4 a half.

5 Q Okay.

6 A The last one, I think it is the last one,
7 on page 83, is ISDN PRI. We are on trend. Excuse me,
8 we're on forecast. We have planned relief for early
9 '99, which appears to be planned early.

10 I am not aware of the specifics of PRI in
11 this office, and why we would have planned that
12 relief, other than I do know that we have gotten
13 significant requests from some of the ISPs for
14 capacity. And that could be based on that. I cannot
15 really say there.

16 On page 86 is a TOPS host. This is the
17 operator services TOPS host.

18 Q Okay.

19 A That's the number of frames that are
20 installed or the links that are turned up.
21 Apparently, there is not a need for any additional
22 ones, and so there is no capacity relief planned.

23 This is the office where Guy has space
24 reserved for a future .. And, again, he
25 would only or we would only replace frames as required

1 A If you need him to know that, we'll ask
2 him to be prepared to know that.

3 Q Yes.

4 I need him to know that.

5 A What that would mean is that we would
6 remove equipment from the office.

7 Q Yes.

8 And that's what I need to know. I need
9 to know what the difference is between what equipment
10 you, actually, are having to use, and what your
11 projection shows that you need and then what you,
12 actually, have.

13 A But if he did that, we can find out how
14 much equipment that translates to, but there would be
15 holes in existing lineups; you realize that. So, that
16 is not really available space for collocation, for
17 physical collocation. It is just holes in existing
18 lineups.

19 Q Well, I understand that that is what it
20 is from you all's perspective. I'm just asking to
21 find out what is available there. You know, just
22 because you remove something out of an existing lineup
23 doesn't mean that there isn't something else that
24 BellSouth could do with that hole. That's all I'm
25 trying to get at.

1 MS. SUMMERLIN: I think we're probably
2 through. If you give me one split second to
3 run out the door, I think that's it.

4 (Brief pause.)

5 CROSS EXAMINATION

6 BY MS. WHITE:

7 Q At the very beginning of the deposition,
8 Ms. Cruit, you made a statement that BellSouth does
9 not get forecasts of trunks,

10 Can you tell me why not?

11 A Well, the trunks that are being served on
12 these access tandems that we talked about are
13 interconnecting with wireless carriers, CLECs,
14 interexchange carriers. And those other customers,
15 those companies, are not willing to share their
16 forecasts with us, because it could be seen as
17 competitive marketing information.

18 And, therefore, since they're not willing
19 to share that forecast, we based our projections on
20 trends.

21 Q What is a footprint?

22 A A footprint is the size, the space, that
23 an equipment bay takes. Some equipment has a larger
24 footprint. It takes up larger space than other
25 equipment. And so, we refer to that as a footprint.

1 Q How are these forecasts that you just
2 spent time going through turned into amount of
3 equipment and, therefore, into space needed in the
4 central office?

5 A The process is that the various capacity
6 managers, based on the forecasts or the trends that
7 they have at the time that they're planning their
8 office, identify their equipment requirements to
9 satisfy those forecasts.

10 They then identify the frames that are
11 required to satisfy those equipment requirements.
12 They provide that to our common systems planners, Guy
13 and Jerry in this case, for these two offices, who
14 then take those equipment requirements, depending on
15 the specific office and they identify where that
16 equipment can go within the boundaries of the switch;
17 whether it be in an isolated ground, or whatever other
18 kind of requirements are needed for that kind of
19 equipment to function properly.

20 Q One of the possibilities that you
21 mentioned about the Palm Beach Gardens office was to
22 stop growing the tandem at the Gardens office and put
23 the growth somewhere else. Do you mean to put the
24 growth into another Central Office?

25 A Yes.

1 That was the idea.

2 Q The wonderful idea?

3 A It was a bad idea.

4 But, yes, it was to put it so that we
5 could relieve the space demands in one office,
6 Gardens, in that case, relieve the space demands and
7 utilize space in another Central Office.

8 Q But wouldn't that use up space in that
9 other Central Office?

10 A Oh, absolutely, it would use up space
11 there.

12 Q One last question: do they provide
13 vertical services other than caller ID?

14 A They provide vertical services that are
15 related to caller ID like services; like, calling name
16 delivery, calling number delivery, call waiting number
17 delivery, those kinds of services where you have to
18 deliver a number or a name to the subscriber.

19 MS. WHITE: Thank you. That's it.

20 (Deposition concluded at 2:00 p.m.)

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CERTIFICATE OF REPORTER

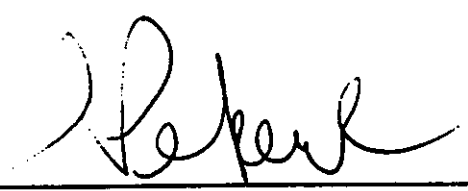
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STATE OF FLORIDA:
COUNTY OF LEON:

I, ANITA M. PEKEROL, do hereby certify that the foregoing proceedings were taken before me at the time and place therein designated; that my shorthand notes were thereafter translated under my supervision; and the foregoing pages numbered 1 through 140 are a true and correct record of the aforesaid proceedings.

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

DATED THIS 19th day of October, A.D., 1998.



ANITA M. PEKEROL, CCR, RPR, CP, CM
100 Salem Court
Tallahassee, Florida 32301
850-878-2221

CERTIFICATE OF ADMINISTERING OATH

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STATE OF FLORIDA:
COUNTY OF LEON:

I, ANITA M. PEKEROL, Registered Professional
Reporter and Notary Public in and for the State of
Florida at Large:

DO HEREBY CERTIFY that on the date and place
indicated on the title page of this transcript, an
oath was duly administered by me to the designated
witness(s) before testimony was taken.

DATED THIS 19th day of October, 1998.



ANITA M. PEKEROL, CCR, RPR, CP, CM
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My Commission Expires: February 20, 1999.