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REBUTTAL TESTIMONY OF
JAMES A. TAMPLIN, JR.
ON BEHALF OF AT&T COMMUNICATIONS OF
THE SOUTHERN STATES, INC.
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 900855-TP
Filed: August 30, 1996

Q. PLEASE STATE YOUR NAME.

A. My name is James A. Tamplin, Jr.

Q. HAVE YOU PREVIOUSLY OFFERED TESTIMONY IN THIS PROCEEDING?

A. Yes. I provided direct testimony on July 31, 1996 and supplemental testimony on August 23, 1996.

Q. WHAT IS THE PURPOSE OF THE TESTIMONY YOU ARE CURRENTLY OFFERING?

A. I am providing rebuttal testimony that responds to the testimony of BellSouth on selected issues. Specifically, I am responding to statements made by Messrs. Scheye, Varner, Atherton and Milner. My rebuttal testimony focuses on appropriate trunking arrangements (issue 8); the provision of unbundled network elements (issue 10(a)); and access to unused transmission media (issue 11).

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
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- EAG _____
- LEG _____
- LIN _____
- OPC _____
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- SEC _____
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FPSC-RECORDS/REPORTING

1 **ISSUE: WHAT ARE THE APPROPRIATE TRUNKING ARRANGEMENTS**
2 **BETWEEN AT&T AND BELLSOUTH FOR LOCAL INTERCONNECTION?**

3

4 **Q. HAVE YOU REVIEWED THE TESTIMONY SUBMITTED BY**
5 **BELLSOUTH ON THE ISSUE OF ONE-WAY TRUNKING FOR LOCAL**
6 **AND INTRALATA TRAFFIC?**

7 **A. Yes.**

8

9 **Q. DOES THE TESTIMONY OFFERED BY BELLSOUTH PROVIDE A**
10 **JUSTIFICATION FOR THEIR REFUSAL TO PROVIDE TWO-WAY**
11 **TRUNKS?**

12 **A. No. Mr. Varner admitted that 47 C.F.R. Section 51.305(f) provides that, if**
13 **technically feasible, BellSouth must provide two-way trunking upon request. Mr.**
14 **Atherton, however, offered only cost considerations and billing issues as support for**
15 **BellSouth's refusal to provide two-way trunking arrangements. A determination of**
16 **technical feasibility does not include consideration of economic, accounting, or billing**
17 **issues. 47 C.F.R. §51.5 (to be codified).**

18

19 **Two-way trunking is technically feasible. BellSouth currently provides AT&T with**
20 **two-way trunking on AT&T's interLATA access. Moreover, AT&T has conducted**
21 **studies which demonstrate that two-way trunks provide efficiencies of up to 24%**
22 **greater than one-way trunks. Accordingly, BellSouth can and should provide two**
23 **way trunking.**

24

25 **ISSUE: ARE THE ITEMS SOUGHT BY AT&T CONSIDERED TO BE NETWORK**

1 **ELEMENTS, CAPABILITIES, OR FUNCTIONS? IF SO, IS IT**
2 **TECHNICALLY FEASIBLE FOR BELLSOUTH TO PROVIDE AT&T WITH**
3 **THOSE ELEMENTS?**

4
5 **Q. HAVE YOU REVIEWED THE TESTIMONY SUBMITTED BY**
6 **BELLSOUTH ON THE ISSUE OF UNBUNDLED NETWORK ELEMENTS?**

7 **A. Yes. I have reviewed the testimony of Messrs. Scheye, Milner and Varner.**

8
9 **Q. BASED ON YOUR REVIEW, WHAT ARE THE REMAINING**
10 **DISAGREEMENTS REGARDING ACCESS TO UNBUNDLED NETWORK**
11 **ELEMENTS?**

12 **A. According to Mr. Varner, BellSouth agrees that, based on the FCC's order, they must**
13 **provide non-discriminatory access, on an unbundled basis, to the following elements:**
14 **(1) the local loop, which includes three of AT&T's requested elements, Loop**
15 **Distribution, Loop Concentrator/Multiplexer, and Loop Feeder; (2) the Network**
16 **Interface Device ("NID"); (3) switching capability, including both local switching and**
17 **tandem switching capability; (4) interoffice transmission facilities, which includes**
18 **both dedicated and common transport; (5) signaling networks (access to service**
19 **control points through the unbundled STP) and call-related databases; (6) operation**
20 **support systems functions; and (7) operator services and directory assistance.**

21
22 **Various areas of disagreement, however, still exist. First, the Commission must**
23 **resolve the issue of routing capability. BellSouth maintains that it will provide the**
24 **local loop, local switching, operator systems, and dedicated and common transport,**
25 **but it has refused to provide the type of switch changes that are necessary to provide**

1 customized routing for AT&T's customers. Instead, BellSouth contends that
2 customized routing is not technically feasible. Second, there are unsettled issues
3 regarding the nature of access to the NID that BellSouth will allow. Third, this
4 Commission must decide whether it is technically feasible to unbundle the subloop
5 elements to which AT&T seeks access. Fourth, BellSouth wants to provide access to
6 Advanced Intelligence Network ("AIN") triggers only in conjunction with a mediation
7 device. AT&T seeks unmediated access. Finally, AT&T is seeking access to unused
8 transmission media, or dark fiber. BellSouth claims it is not required to provide this
9 access.

10

11 **CUSTOMIZED ROUTING**

12

13 **Q. WHAT IS CUSTOMIZED ROUTING?**

14 **A.** Customized routing , what BellSouth calls "selective routing," is the ability of the
15 switch to distinguish between customers for various purposes, including directing a
16 competing LEC's customers' calls to a designated operator system, trunk group or
17 other device. It thus affects access of AT&T's customers to services provided by
18 AT&T, such as the ability of AT&T customers to reach an AT&T operator by
19 dialing "0," and the branding of services.

20

21 **Q. WHAT NETWORK ELEMENT AFFECTS ROUTING CAPABILITY?**

22 **A.** The switch affects routing capability. All that is necessary to provide customized
23 routing is to provision data about AT&T's end user customers on the existing switch.

24

25 **Q. HOW DO YOU RESPOND TO BELLSOUTH'S CLAIM THAT IT IS NOT**

1 **TECHNICALLY FEASIBLE TO PROVISION THE SWITCHES BECAUSE**
2 **THERE IS INSUFFICIENT CAPACITY ON THE SWITCHES TO ENTER**
3 **THE INFORMATION?**

4 A. A number of other incumbent LECs, including Ameritech, NYNEX, Pacific Bell,
5 SNET and GTE, have agreed that customized routing is technically feasible. In
6 Florida, sufficient capacity exists to provide customized routing by adding line class
7 codes to the switches. This would provide the interim arrangement until the “selective
8 routing” feature that Mr. Milner speaks about could be developed and deployed. See
9 e.g., Exhibit WKM-11, attached to Direct Testimony of Keith Milner. Additionally,
10 the industry should consider whether “selective routing” or some other alternative is
11 the appropriate long-term solution.

12

13 **Q. ON WHAT DO YOU BASE YOUR STATEMENT THAT SUFFICIENT**
14 **CAPACITY EXISTS ON THE SWITCHES CURRENTLY IN USE TO ADD**
15 **LINE CLASS CODES?**

16 A. BellSouth utilizes five switches in Florida: the 1AESS, the 2BESS, the 5ESS, the
17 DMS-100, and the EWSD. The 1AESS switch uses chart column tables, instead of
18 line class codes, as a routing technique. The capacity is a maximum of 1023. The
19 2BESS has 512 line class codes. The maximum number of line class codes in the
20 5ESS switch is 6000. The Northern Telecom DMS-100 switch employs line
21 attributes that are the equivalent of line class codes, and has a current capacity of
22 1024, with an increase to 2048 in the pending release. This capacity will further
23 increase to 4096 in the second quarter of 1997. The EWSD has a capacity of 4096.
24 This data is summarized in a comprehensive report to the Georgia Public Service
25 Commission, submitted on July 12, 1996. That report is in the record as JC1, Tab

1 287.

2

3 BellSouth currently uses up to 350 line class codes per switch. The Commission
4 should not assume that each competitor entering the market would require the same
5 number of line class codes currently used by BellSouth. One line class code is
6 required for each group of similarly situated customers, in other words, those
7 customers with the same routing/blocking treatment. Conservation of line class codes
8 could ensure that capacity is not exceeded. Further, switch capacity will be expanded
9 by the normal replacement of switches with newer models. Line class code
10 conservation together with switch capacity expansion can be used to allow
11 customized routing for all customers until a permanent industry solution is available.
12 Therefore, all of the customized routing AT&T has requested is technically feasible.

13

14 **NETWORK INTERFACE DEVICE ("NID")**

15

16 **Q. DOES THE FCC ORDER ADDRESS ACCESS TO THE NID?**

17 **A.** Yes. The FCC Order assumes that a new entrant, when providing its own facilities,
18 will install its own NID on the customer's premises and interconnect to the
19 customer's inside wiring by an external connection from the new entrant's NID to the
20 existing NID. 47 C.F.R. § 51.319(a) (to be codified); FCC Order No. 96-325,
21 ¶¶ 377-96, at 187-96. It states, however, that State Commissions should determine
22 whether direct connection between a new entrant's local loop and the LEC's NID is
23 technically feasible in the context of a specific request for such access. FCC Order
24 No. 96-325, ¶ 396 at 196.

25

1 **Q. HOW WILL THE METHOD ASSUMED BY THE FCC AFFECT**
2 **COMPETITION?**

3 A. The arrangement in the FCC rule will be a deterrent to competition because many
4 customers will object to defacing their homes by attaching multiple devices, some of
5 which are attached to exposed wires. The exposed wires connecting these devices
6 have the potential to increase service outages for the customer because they are
7 exposed to the elements or could be inadvertently broken. Finally, installing a new
8 NID at each location will increase the labor and material costs to entrants into the
9 market.

10

11 **Q. DOES THE ARRANGEMENT ASSUMED IN THE FCC ORDER CREATE**
12 **ANY PRACTICAL CONCERNS?**

13 A. The connection method in the FCC rule assumes that all NIDs look like the one
14 depicted in Exhibit WKM-2 to Mr. Milner's testimony. The drawing in that exhibit
15 represents a recent generation NID. Although the recent generation NIDs have
16 separate chambers for customer wiring and loop connections, many older NIDs do
17 not. The customer's wiring may not be in a separate location from BellSouth's
18 wiring. Accordingly, AT&T must have the right to access the portion of the
19 BellSouth NID that contains the loop connection, even if AT&T provides its own
20 NID.

21

22 **Q. WHAT WOULD AT&T LIKE THE COMMISSION TO ORDER WITH**
23 **REGARD TO THE NID?**

24 A. For single residence homes, AT&T would like the opportunity to use any existing
25 capacity on the ILEC NID to directly connect its loops. If no spare terminals are

1 available on the existing device, AT&T would like to directly connect to the
2 BellSouth NID after disconnecting and grounding the BellSouth loop distribution
3 facility. This solution will mitigate BellSouth's concerns regarding bodily harm and
4 property damage because, in all cases, its loops will still be terminated on the existing
5 NID and will have the protection the device provides. This solution also eliminates
6 problems introduced by exposed wiring, and it will reduce the number of cases in
7 which customers will be inconvenienced by multiple devices attached to their homes.

8

9 **Q. BELLSOUTH HAS STATED A CONCERN THAT PROVIDING**
10 **UNLIMITED ACCESS TO THE NID WOULD CAUSE A PROBLEM**
11 **BECAUSE OF ELECTRICAL HAZARDS. HOW WOULD AT&T**
12 **ADDRESS THAT CONCERN?**

13 **A. AT&T understands the grounding requirements for the NID. Properly trained**
14 **technicians would ensure that all changes to the NID were consistent with the**
15 **National Electrical Code.**

16

17 **Q. WHAT DOES AT&T WANT THE COMMISSION TO ORDER WITH**
18 **REGARD TO MULTIPLE DWELLING UNITS AND OFFICE**
19 **COMPLEXES?**

20 **A. Mr. Milner states in his testimony that a wide variety of NIDs are utilized in the**
21 **business setting, depending on customer requirements. He also noted that the NIDs**
22 **used in a business setting may not differ from those used in residential settings. If the**
23 **outside NID is similar to a single residence NID, it should be treated similarly to that**
24 **of a single residence. There should be no universal rule barring access to NIDs used**
25 **in a business setting. Absent technical or operational concerns specific to the type of**

1 NID present, access should be allowed.

2

3

SUBLOOP ELEMENTS

4

5 **Q. DID THE FCC ORDER REQUIRE UNBUNDLING OF THE SUBLOOP**
6 **ELEMENTS?**

7 **A. The FCC determined that the technical feasibility of subloop unbundling is best**
8 **addressed at the state level on a case by case basis, and “encourage[d] states to**
9 **pursue subloop unbundling in response to requests for subloop elements by competing**
10 **providers.” FCC Order No. 96-325, ¶ 391, n.851, at 194.**

11

12 **Q. AT&T HAS REQUESTED THE UNBUNDLING OF THE LOOP**
13 **DISTRIBUTION, LOOP CONCENTRATOR/MULTIPLEXER, AND LOOP**
14 **FEEDER. IS THE UNBUNDLING OF THESE ELEMENTS**
15 **TECHNICALLY FEASIBLE IN THE STATE OF FLORIDA AT THIS**
16 **TIME?**

17 **A. Yes.**

18

19 **Q. PLEASE EXPLAIN BELLSOUTH’S POSITION ON TECHNICAL**
20 **FEASIBILITY.**

21 **A. BellSouth claims that it is not feasible to unbundle loop distribution and the loop**
22 **feeder because operations and support systems for administration of the loop would**
23 **be affected, special facilities would be necessary to provide access to the distribution**
24 **facilities, and establishing a permanent point of interface could constrain BellSouth**
25 **from altering the feeder/distribution networks or using new technology such as “fiber**

1 in the loop” as a replacement for copper.

2

3 **Q. WHAT IS AT&T’S RESPONSE?**

4 **A.** All of BellSouth’s concerns can be addressed through modifications to these network
5 elements. The FCC Order recognizes that obligations imposed by §§ 251(c)(2) and
6 251(c)(3) include modifications to facilities to the extent necessary to accommodate
7 interconnection or access to network elements. First, BellSouth will be able to
8 administer their system if AT&T connects only to the loop distribution or the loop
9 feeder. Their operations and support systems equipment and monitoring equipment
10 may be located at various points in the line. It need not be located so that it monitors
11 only the entire loop. Additional monitors could be placed at the interfaces on the
12 Feeder Distribution Interconnector (FDI), for example. Second, AT&T is not asking
13 for the unbundling of items that it is infeasible to unbundle such as fiber loops.
14 Seventy percent of BellSouth’s loops are copper. Connections to the subloop
15 elements could be made at the NID, at either the feeder side or the distribution side of
16 the FDI and/or at the Main Distribution Frame (“MDF”). Further, the FCC
17 specifically states that it is technically feasible to unbundle Integrated Digital Loop
18 Carriers. FCC Order No. 96-325, ¶ 391, at 194.

19

20 **ADVANCED INTELLIGENCE NETWORK**

21

22 **Q. BELLSOUTH MAINTAINS THAT IT CANNOT PROVIDE ACCESS TO**
23 **THE ADVANCED INTELLIGENCE NETWORK (“AIN”) IN CERTAIN**
24 **SWITCHES BECAUSE IT IS NOT TECHNICALLY FEASIBLE TO**
25 **PROVIDE ACCESS WITH ALL OF THE FEATURES AT&T HAS**

1 **REQUESTED. WHAT IS AT&T'S RESPONSE?**

2 **A.** BellSouth maintains that access can be allowed only through a mediation device and
3 that such mediation device is not currently available. Mediation devices are not
4 necessary and they decrease the quality of the service available to AT&T customers.
5 I have attached as Exhibit JATR-1 a copy of a test report summarizing tests that
6 AT&T and BellSouth conducted on AIN interconnection. See AT&T Integrated Test
7 Network ("ITN") - BellSouth AIN Test Laboratory, Advanced Intelligence Network
8 ("AIN"), Interconnectivity Test Report, Approval Copy, dated November 15, 1995.
9 This report demonstrates that unmediated access to the AIN through the SS7
10 signaling system is technically feasible.

11

12 **Q.** **DID THE FCC ORDER ADDRESS ACCESS TO THE AIN?**

13 **A.** The FCC Order concluded that access to AIN Service Control Points ("SCPs") is
14 technically feasible, but noted that such access may present a need for mediation
15 mechanisms to, among other things, protect data in the AIN SCPs and ensure against
16 excessive traffic. FCC Order No. 96-325, ¶ 488, at 240. AT&T does not believe
17 that mediation is necessary. The SS7 already contains safeguards against traffic
18 overload and unauthorized access. If mediation is to be allowed, any mediation must
19 be performed on a non-discriminatory basis. Mediation of only the competing LEC's
20 interchange with the SCPs will create an unfair competitive advantage for the
21 incumbent LECs. Mediation will take time and increase post dial delay, thereby
22 creating a difference between the service offered by the incumbent and the service
23 offered by others. Similarly, any network management controls invoked to protect the
24 SCP from an overload condition must be applied equally for all users of that

1 database, including the LEC.

2

3 **ISSUE: DO THE PROVISIONS OF SECTIONS 251 AND 252 APPLY TO**
4 **ACCESS TO UNUSED TRANSMISSION MEDIA (E.G. DARK FIBER)?**

5

6 **Q. BELLSOUTH MAINTAINS THAT DARK FIBER IS NEITHER A**
7 **NETWORK ELEMENT NOR A RETAIL SERVICE AND, THEREFORE, IT**
8 **NEED NOT BE PROVIDED. WHAT IS AT&T'S RESPONSE?**

9 **A.** Dark fiber is a network element that is currently not in use. It is nonetheless a part of
10 the network because it is "a facility or equipment used in the provision of a
11 telecommunications service." 47 C.F.R. § 51.5 (to be codified). The fact that it is
12 not currently in use does not change its purpose: its only use is the provision of
13 telecommunications services. Therefore, it is a network element currently in the
14 possession of incumbent LECs which, if provided to new market entrants, could
15 facilitate competition. For example, AT&T will want to deploy SONET rings in
16 certain market areas to create competitive facilities. Building these rings will require
17 the placement of many miles of fiber with the attendant difficulties of obtaining
18 rights-of-way, conduit and pole space, and building permits.. BellSouth's failure to
19 provide fiber already in place will increase the financial and administrative cost of the
20 telecommunications services AT&T seeks to offer.

21

22 **Q. WHY WAS DARK FIBER NOT ONE OF THE ORIGINAL TWELVE**
23 **NETWORK ELEMENTS THAT AT&T REQUESTED?**

24 **A.** AT&T has always asked for the ability to purchase dark fiber at cost-based rates.
25 Our proposed interconnection agreement, however, categorized dark fiber as an

1 ancillary function, along with collocation and right-of-way. The categorization does
2 not change the need for dark fiber to promote facilities-based competition.

3

4 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

5 **A. Yes.**