ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF MR. THOMAS G. WILLIAMS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 001797-TP

MAY 23, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS ADDRESS.

A. My name is Thomas G. Williams. I am employed by BellSouth as Product Manager for Line Sharing for the nine-state BellSouth region. My business address is 3535 Colonnade Parkway, Suite E511, Birmingham, Alabama, 35242.

Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND?

A. My career at BellSouth spans over 14 years and includes positions in various product management positions. I also have seventeen years service with AT&T and Southern Bell, during which I held various positions in sales, marketing, and operations. I have a bachelor's degree in Marketing.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE OTHER STATE COMMISSIONS?

A. Yes. I previously testified before the Georgia, Louisiana, and Alabama Public Service Commissions and the Public Service Commission of South Carolina.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I respond to the testimonies of Messrs. Thomas Allen, Joseph Riolo and Ms. Elizabeth Kientzle, in regard to line sharing issues.

Q. DOES BELLSOUTH SUPPORT LINE SHARING ARRANGEMENTS?

A. Yes. BellSouth has been providing line sharing since June 6, 2000, in compliance with requirements of the Federal Communications Commission's (FCC) *Line-sharing Order* and *Line-sharing Reconsideration Order.* BellSouth continues to work with ALECs to streamline the processes to provision line sharing.

Q. DO YOU AGREE WITH MR. ALLEN'S STATEMENT ON PAGE 5 OF HIS TESTIMONY THAT BELLSOUTH FIRM ORDER CONFIRMATION IN TWO (2) BUSINESS DAYS?

A. No. BellSouth has reduced their interval to return a Firm Order Confirmation in 18 hours.

Q. DO YOU AGREE WITH MR. ALLEN'S STATEMENT ON PAGE 27 OF HIS TESTIMONY THAT BELLSOUTH SHOULD PROVIDE A DAILY

COMPLETION REPORT TO COVAD FOR LINE SHARING ORDERS?

A. No. BellSouth agrees that it must provide accurate information to the ALECs concerning the status of its line sharing orders. Line sharing is a non-designed unbundled network element (UNE) and should be handled like other non-designed UNE services. Mr. Allen states that BellSouth should "send Covad a service order completion like it does for other loop orders". Line sharing is not provisioned like other loop orders. Because line sharing works on existing analog voice telephone lines it uses plane old telephone service (POTS) processes. POTS processes do not include a service order notification process. BellSouth does provide completions information to Covad. BellSouth's CLEC Service Order Tracking System (CSOTS) provides the status of its UNE orders, including line sharing. In fact, BellSouth has developed additional capabilities in CSOTS for line sharing. CSOTS provides the status of both the billing and provisioning orders. Additionally, BellSouth provides ALECs with a "Line Sharing COSMOS or SWITCH Report" that provides the status of the BellSouth line sharing work order. Covad simply has to check that report and it will be advised as to the current status of its order.

Q. DO YOU AGREE WITH MR. ALLEN'S STATEMENT ON PAGE 31 OF HIS TESTIMONY THAT BELLSOUTH SHOULD USE ITS SUNSET TEST SET TO TEST COVAD'S DATA SIGNAL ON ITS LINE SHARING ORDERS?

A. No. BellSouth is responsible for correctly wiring ALEC's line sharing orders. BellSouth is willing to test the continuity of its wiring. BellSouth has made it

clear that in addition to testing the voice service it will also test the wiring of the high frequency spectrum for line sharing orders. In January 2001, BellSouth announced to the line sharing collaborative that it would begin using the new Line Sharing Verification Transmitter (LSVT), to test the wiring of the high frequency spectrum within its central offices. The device is now deployed and use of this device has been included in procedures for installation and maintenance of line sharing loops.

BellSouth uses Sunset test equipment to test its own ADSL data signal from its DSLAM. BellSouth has no responsibility to test Covad's data signal from its DSLAM. BellSouth may or may not have test equipment that could test Covad's data signal. ALECs use different data equipment with different protocols that require different test equipment. Obviously, BellSouth must perform nondiscriminatory testing of line sharing orders. It would be unreasonable for BellSouth to have several test sets compatible with the various ALECs involved with line sharing. BellSouth's use of the LSVT confirms that the data portion of the line share circuit is correctly wired and this should meet its responsibility. The FCC addressed the request for ILECs to test ALEC's data service and rejected the notion with paragraph 123 of the Line Sharing Order, cited above. Paragraph 123 says, "BellAtlantic also states that it will not be able to use its own equipment to test the data portion of the shared line, making BellAtlantic's ability to maintain those competitors' xDSL services 'more difficult'. The record does not indicate nor do we foresee, that incumbent LECs such as BellAtlantic would have occasion to test a competitive LEC's xDSL equipment or products." (Emphasis added.)

Q. DO YOU AGREE WITH MS. KIENTZLE AND MR. RIOLO, AS THEY STATE ON PAGES 12 AND 13 OF THEIR TESTIMONY, THE SPLITTER SHOULD BE FRAME MOUNTED SPLITTER OR WITHN 25 FEET OF THE MDF?

A. No. The most efficient architecture to deploy line sharing when BellSouth owns the splitter is to place the splitter in a rack either in the common area close to the collocation area or in a rack in the BellSouth lineup. Also, to use the frame-mountable splitter would ignore the experience gained in the Line Sharing trial pilot. BellSouth found, during the Line Sharing pilot in Atlanta, Georgia, that main distributing frame-mounted splitters could not accommodate the manual test access jacks (the so-called "bantam jacks") that BellSouth provides to each ALEC. These bantam jacks provide the ALEC direct access to the outside plant cable pair for testing. In BellSouth's proposed architecture, the bantam jacks are located adjacent to the rack-mounted splitter shelves in the ALEC's common area. The Collaborative agreed that frame-mounted splitters allowed more room for testing with the bantam jacks and eliminated the possibility of accidentally loosing other cross-connections on the frame.

Many central offices where ALECs have ordered splitters have COSMOS frames. It is not possible to mount a splitter on a COSMOS frame. While BellSouth recognizes that locating splitters on a central office frame is

technically feasible, BellSouth feels that splitters are better located in a relay rack in the ALEC common area.

Q. DO YOU AGREE WITH MS. KIENTZLE AND MR. RIOLO, AS THEY SAY ON PAGE 13 OF THEIR TESTIMONY, THAT EARLY LINE SHARING PROPOSALS INDICATE THAT BELLSOUTH ORIGINALLY PLANNED TO PLACE THE SPLITTER ON THE MDF?

A. No. Several different architectures were considered but frame mounted splitters was at no time the desired architecture.

Q. DO YOU AGREE, AS MS. KIENTZLE AND MR. RIOLO SAY ON PAGE 13 AND 14 OF THEIR TESTIMONY, THAT COVAD SHOULD NOT HAVE TO PAY FOR THE BANTAM TEST SHELF?

A. No. Paragraph 118 of the FCC line sharing order required ILECs to provide access to the loop for testing. Paragraph 118 says, "We require that, at a minimum, incumbents must provide requesting carriers with loop access either through a cross-connection at the competitor's collocation space, or through a standardized interface designed for to provide physical access for testing." (Emphasis added.) BellSouth believes that the bantam-type test jack is that "standard interface" and its use is a good solution to provide ALECs direct access to the loop for testing for line sharing. When BellSouth proposed using the bantam test jack shelf in the line sharing collaborative, the participants did not object. Current interconnection agreements preclude ALECs, including

Covad, from direct testing from the frame but the bantam jack solution offers the same electrical equivalent. The bantam jack allows the ALEC to test the loop from the splitter to the NID. This bantam jack is made to accept a test cord. When the cord is inserted, the voice and data signals and associated central office wiring are isolated from the outside plant copper loop. This leaves the loop ready for unobstructed wideband testing by the ALEC technician, with no central office battery or DC blocking capacitors to interfere with the test results. If testing via the bantam jack is not adequate for the ALEC, they could choose to own the splitter. This would allow the ALEC to view the circuit from the loop side of the splitter. BellSouth does not deploy the bantam test shelf with the ALEC owns the splitter.

Q. DO YOU AGREE, AS MS. KIENTZLE AND MR. RIOLO SAID ON PAGE 14 OF THEIR TESTIMONY, THAT PLACEMENT OF THE SPLITTER ON THE MDF ELIMINATES UNNECESSARY CABLING AND OTHER COSTS?

A. No. Most of the 470 central offices in BellSouth's region where ALECs have ordered splitters to date have COSMIC style main distributing frame and Main Distributing Frame (MDF), where ALECs interconnect. As I stated, it is not possible to mount a splitter on a COSMOS frame.

The witnesses testified on page 14 that a frame located splitter arrangement requires six frame-mountable splitter blocks, each of which are capable of serving sixteen end user line sharing lines. This is inefficient due to the frame

space that approach requires. This architecture requires 6 blocks to serve 96 end user lines. BellSouth's preferred rack-mounted architecture requires four frame mounted blocks, or 89 type blocks, which can serve 96 end user lines. The rack-mounted architecture is one third more efficient than mounting the splitter on the frame. This frame-mounted architecture proposed by Covad would cause BellSouth to prematurely exhaust its frame and is, therefore, much less efficient than the rack-mounted approach.

Q. DO YOU AGREE WITH MS. KIENTZLE AND MR. RIOLO THAT PLACING A SPLITTER ON A DIFFERENT FLOOR FROM THE MDF COULD ADD A THOUSAND FEET OF UNNECESSARY CABLING, AS HE SAYS ON PAGE 16 OF THEIR TESTIMONY?

A. No. The maximum additional distance added to an ALEC loop, of which I am aware is in BellSouth's region was is in the Marietta, Georgia Main CO. There the ALEC data signal has to traverse up and down two floors vertically with approximately 250 feet being added to the circuit.

Q. DO YOU AGREE WITH THE SPLITTER OPTIONS PROPOSED BY MS. KIENTZLE AND MR. RIOLO ON PAGE 19 OF THEIR TESTIMONY?

A. No. The witnesses proposed the following options:

- BellSouth owned splitter mounted on the MDF
- Covad owned splitter mounted on the MDF

- Covad owned splitter in Covad's collocation area

I previously explained that placement of the splitter on the frame is a poor choice. Most of the offices with splitters have a COSMIC frame. It is not possible to place a splitter on the COSMIC frame and placement of the splitter on the MDF unnecessarily takes one third more frame space than the rack mounted option. The second option is an incredibly bad choice. This option would place the splitter on the BellSouth side of the demarcation point. Covad's interconnection agreement with BellSouth clearly states that BellSouth is responsible for all work on that side of the demarcation point. Placing a Covad owned splitter on BellSouth's frame would be potentially confusing to BellSouth's technicians. If Covad wishes to own the splitter, it is welcome to do so, provided they place the splitter in their collocation space, the third option. Covad may also choose to own the splitter in a virtual collocation arrangement.

Q. DO YOU AGREE WITH MS. KIENTZLE AND MR. RIOLO, AS THEY STATE ON PAGE 26 OF THEIR TESTIMONY, THAT BELLSOUTH SHOULD PROVIDE LINE SHARING INTERVALS OF 24 HOURS IF THE LOOP REQUIRES NO DECONDITIONING?

A. No. Rather than an arbitrary interval, the appropriate comparison for line sharing provisioning intervals is to BellSouth's ADSL service provided to its customers. This is the retail analog that BellSouth proposed in Docket No. 000121-TP, which was filed with the FPSL on March 1, 2001. This is

contained in exhibit DAC-1 of Dave Coon's direct testimony. BellSouth's planned interval for ADSL service is four days. BellSouth's plan for line sharing is to return to the ALEC a firm order confirmation no later than the next day for an electronic order, and eighteen hours for manual orders. The planned provisioning interval is three days after return of the firm order confirmation.

It may be possible to provision line sharing loops is some cases in less than three days if all information flows correctly through all of BellSouth's provisioning systems. However, if orders fall out of the electronic systems for manual handling, three days will be required. Therefore, to be sure all parties, including the end user, have appropriate expectations; three days after the return of the firm order confirmation is the appropriate interval. This interval places line sharing at parity with BellSouth's own ADSL offering.

Q. DO YOU AGREE WITH MS. KIENTZLE AND MR. RIOLO, AS THEY TATE ON PAGE 28 OF THEIR TESTIMONY THAT BELLSOUTH SHOULD PROVIDE COVAD ACCESS TO THE PHYSICAL LOOP FOR TESTING?

A. Yes. But, BellSouth believes that the use of the bantam-type test jack is a better solution to provide ALECs direct access to the loop for testing for line sharing. Covad's current interconnection agreements preclude Covad from direct testing from the frame but the bantam jack solution offers the same electrical equivalent. The bantam jack allows the ALEC to test the loop from

the splitter to the NID. As I previously stated, I believe the FCC envisioned ALECs testing from their collocation space and from the splitter with a bantam type testing arrangement.

If the bantam type testing arrangements are not adequate for Covad, they could choose to own the splitter. This allows Covad to view the circuit from the loop side of the splitter to the NID.

Q. DO YOU AGREE WITH MS. KIENTZLE AND MR. RIOLO, AS THEY STATE ON PAGE 31 OF THEIR TESTIMONY THAT BELLSOUTH DOES NOT PERMIT COVAD TO DEPLOY DSL OVER FIBER FED LOOPS?

A. No. BellSouth does allow Covad and other ALECs to provide DSL over loops that are fiber fed. Their testimony is a bit confusing. I'm not sure what "line sharing over fiber" is. It is certainly not line sharing in the sense that it applies to copper. In the copper sense, line sharing provides the high frequency spectrum to the ALEC. That is not possible on fiber, as the notion of spectrum does not apply to fiber. Given that thousands of circuits can be multiplexed over one fiber, what is accomplished via line sharing? As the witnesses point out on page 29, the fiber does not extend all the way to the customer, only to an intermediate point. Copper extends from there to the network interface device (NID), at the end user's location. It is not clear how Covad would

expect the "line sharing over fiber" to work from the intermediate point to the NID.

All current DSL technologies require an all copper dedicated loop. The witnesses are correct when they say BellSouth widely deploys digital loop carrier (DLC) systems in Florida because it reduces the cost of loops. Some DLC is fiber fed and some is copper. Even when it is copper fed, the loop is not dedicated because DLC is a multiplexer. DSL requires a dedicated copper loop. The FCC in its Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Docket No. 96-98, released November 5, 1999, defines the solution that BellSouth proposes in a DLC environment. Paragraph 313 says, "When an incumbent has deployed DLC systems, requesting carriers must install DSLAMs at the remote terminal instead of at the central office in order to provide advanced services". BellSouth established an industry collaborative to develop a line sharing solution in a DLC environment. Covad was a participant of this collaborative. BellSouth developed this option as completely as possible and stands ready to implement it, if requested by Covad or other ALECs. BellSouth provides its own wholesale ADSL service by placing its DSLAM at remote terminals to access the copper sub-loop. Covad could do the same.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.