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October 3, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: 960786-A-TL (Section 271)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Revised Direct Testimony of Wylie (Jerry) G. Latham, W. Keith Milner and Thomas G. Williams, and Revised Surrebuttal Testimony of Ken L. Ainsworth, Cynthia K. Cox (CKC-10 has also been striken), W. Keith Milner, Ronald M. Pate, David T. Scollard, and Alphonso Varner, which we ask that you file in the captioned docket. This filing is pursuant to Order No. PSC-01-1830-PCO-TL issued September 11, 2001.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties of record as shown on the certificate of service.

Sincerely,

Lisa S. Foshee

Lisa S. Foshee (LKA)

Enclosures

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

DNS 12566-01 thru 12574-01

CERTIFICATE OF SERVICE
DOCKET NO. 960786-A-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 3rd day of October, 2001 to the following:

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(+) Signed Protective Agreement

BELLSOUTH TELECOMMUNICATIONS, INC.

REVISED DIRECT TESTIMONY OF THOMAS G. WILLIAMS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 960786A-TL

OCTOBER 3, 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 TESTIFIED PREVIOUSLY?

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

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and filed testimony with the Alabama, and Florida Public Service Commissions and the Public Utility Commission of North Carolina.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is to address certain aspects of the Commission's Issue 5. First, I will demonstrate that BellSouth provides nondiscriminatory access to the high frequency portion of the loop in compliance with requirements of the Federal Communications Commission's (FCC) *Line-sharing Order* and *Line-sharing Reconsideration Order*.[1] Second, I will demonstrate that a single competing carrier, or two separate carriers acting together, can provide voice and data services over a single unbundled loop obtained from BellSouth (the FCC refers to the latter arrangement as "line splitting.").[2]

Issue 5: **In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271 (c) (2) (B) (iv) of the Telecommunication Act of 1996. Does BellSouth currently provide unbundled local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271 (c) (2) (B) (iv) and applicable rules and orders promulgated by the FCC?**

Q. WHAT IS LINE SHARING?

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[1] *Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of Local Competition Provisions of the Telecommunications Act of 1996,* Third Report and Order CC Docket No. 98-147 and Fourth Report and Order CC Docket No. 96-98, 14 FCC Rcd 20,912 (1999)(*"Line-sharing Order"*); Deployment of Wireline Services Offering Advanced Telecommunications Capability, Order on Remand, CC Docket Nos. 98-147, 98-11, 98-26, 98-32, 98-78, 98-91 (1999)(*"Line-sharing Reconsideration Order"*).

[2] *Line-sharing Reconsideration Order*, ¶ 16-18.

A. Line sharing allows a Competitive Local Exchange Carrier (CLEC) to provide high speed data services to BellSouth voice customers. The CLEC's data service is provisioned over the high frequency portion of a copper loop. The high frequency portion of the loop is the frequency range above the voice band on a copper loop facility that is being used to carry analog circuit switched voice band transmissions.[3] The data signal typically is split off from the voice signal by a splitter and then delivered to a digital subscriber line access multiplexer (DSLAM) located in the CLEC's network at its collocation space. The DSLAM converts the data signal into packets for transmission over the CLEC's network.

BellSouth developed its line-sharing product in conformance with the obligations set forth in the FCC's *Line-sharing Order* and the *Line-sharing Reconsideration Order*. In these Orders, the FCC created a new Unbundled Network Element ("UNE") that consisted of the high frequency portion of the copper loop over which the Incumbent Local Exchange Carrier ("ILEC") provides analog voice service to the end user. According to the FCC, line sharing consists of the following:

- Two carriers - one voice provider (ILEC) and one data provider (CLEC) serving a customer at a single address, i.e., one customer per loop. (*Line-sharing Order,* 14 FCC Rcd at 20,948, ¶ 74);

- xDSL technologies that do not use the frequencies immediately above the voice band, (i.e. ADSL), preserving a "buffer" zone

[3] 47 C.F.R. §51.319(h)(1).

to ensure the integrity of the voice band traffic (*Id.*, at 14 FCC Rcd at 20,943-44, ¶64);

- xDSL technologies that do not interfere with analog voice band transmission. (*Id.* at 14 FCC Rcd at 20,946-47, ¶¶ 70-71); and

- Lines that carry traditional Plain Old Telephone Service (POTS) analog voice band services provided by the ILEC. If the ILEC's retail POTS service is disconnected, the data provider must purchase the entire stand-alone loop if it wishes to continue providing xDSL to the customer. Similarly, ILECs are not required to provide line sharing to a requesting carrier when the CLEC purchases a combination of network elements known as a UNE platform. (*Id.*, at 14 FCC Rcd at 20,947-48, ¶¶ 72-73).

BellSouth offers line sharing in accordance with FCC rules. Specifically, line-sharing is available to a single requesting carrier, on loops that carry BellSouth's POTS, so long as the xDSL technology deployed by the requesting carrier does not interfere with the analog voice band transmissions. BellSouth allows line-sharing CLECs to deploy any version of xDSL that is presumed acceptable for shared-line deployment in accordance with FCC rules and will not significantly degrade analog voice service. To facilitate line sharing, BellSouth will perform Unbundled Loop Modification (line conditioning) at the request of a CLEC on any loop, regardless of loop length, unless such conditioning would significantly degrade the customer's analog voice service provided by BellSouth.

Q. HOW WAS BELLSOUTH'S LINE SHARING OFFERING DEVELOPED?

A. In accordance with the suggestion in the *Line-sharing Order*,[4] BellSouth developed its line-sharing product through a collaborative process with all interested CLECs. BellSouth invited CLECs to a collaborative line-sharing meeting in Atlanta on January 26, 2000. Twelve CLECs participated in the meeting. The participants agreed to form several working teams to develop, test, and refine the procedures for use by CLECs and BellSouth to implement line-sharing successfully. The first meeting of the working teams was held on February 2, 2000. The participants jointly decided to have two sub-committees: a technical sub-committee and a systems/process sub-committee. Each sub-committee would meet one day each week. The technical sub-committee worked on technical issues, such as systems/network architecture and testing. The systems/process sub-committee focused on the pre-ordering, ordering, provisioning, maintenance, and billing issues associated with line sharing. Each sub-committee listed and prioritized issues and action items. The sub-committees addressed and resolved issues essential to the development of the architecture and operations plan for the line-sharing product. Beginning April 12, 2000, the collaborative consolidated the two sub-committees and conducted the collaborative meetings on one full day each week.

Q. WHAT WAS THE GOAL OF THE COLLABORATIVE MEETINGS?

A. The primary goal of the collaborative meetings was to jointly develop procedures and operations plans to implement central office-based line sharing.

[4] *Line-sharing Order*, 14 FCC Rcd at 20,971-72, ¶ 128.

Attached to my testimony are several exhibits that the participants developed in the collaborative to assist in the development of the line-sharing product.

Six companies regularly participated in the joint CLEC/BellSouth meetings for central office-based line sharing: BellSouth, Covad, NorthPoint, Rhythms, NewEdge, and DuroCommunications. Other companies also participated in the meetings, although less actively. They include AT&T, MCI, BlueStar, NetworkTelephone, and Sprint.

Beginning June 28, 2000, the collaborative formed two additional teams. One team is addressing the development of the CLEC-owned splitter option for central office-based line sharing. Exhibit TGW-9 is the charter for this collaborative team. Active participants for this collaborative team are the "owners" listed in the charter: BellSouth, Covad, DuroCommunications, NewEdge, Rhythms, and Sprint. NorthPoint was a monitoring member. The second new collaborative team is developing the architecture and procedures for remote-site line sharing. Covad, Rhythms, DuroCommunications, NewEdge, and Sprint have been regular participants for the Remote Site Line-sharing Collaborative. The charter for this collaborative is Exhibit 10. These new collaborative teams meet on alternate weeks for one half day. The CLEC-owned splitter arrangement and remote-site line sharing are discussed in more detail later in my testimony.

Q. WHAT STEPS DID BELLSOUTH TAKE TO INSURE IT COULD BEGIN OFFERING LINE SHARING END USER SERVICE WHEN THE FCC INTENDED?

A. To ensure that CLECs could avail themselves of the line-sharing product on June 6, 2000, BellSouth permitted CLECs to order splitters in advance of the implementation deadline. In Georgia, CLECs began ordering splitter systems on March 26, 2000. In other states, including Florida, ordering began on April 6, 2000. On June 6, 2000, BellSouth began accepting end user line-sharing orders from CLECs. BellSouth provisioned these orders in accordance with the procedures developed in the CLEC/BellSouth Collaborative Meetings and in the Pilot.

Q. HAS BELLSOUTH ENTERED INTO INTERCONNECTION AGREEMENTS FOR LINE SHARING WITH CLECS IN FLORIDA?

A. Yes. BellSouth has entered into region-wide interconnection agreements with CLECs such as Covad, NewEdge, BlueStar, NorthPoint, and Rhythms for the ordering and provisioning of line sharing in the BellSouth region. Copies of these line-sharing agreements are attached as Exhibits TGW-11, TGW-12, TGW-13, TGW-14, and TGW-15 to my testimony. These agreements are current and in effect in Florida and several other agreements containing line sharing will soon be signed. Many of the general provisions and operational terms and conditions found in these agreements were worked out in the weekly collaborative meetings. Specific language for each CLEC was negotiated to satisfy the needs of that CLEC. These agreements contain interim rates, subject to true up from the individual state regulatory bodies, including the Florida Public Service Commission. BellSouth's proposed rates for line sharing are discussed in the testimony of Daonne Caldwell, filed in this proceeding. The use of interim rates allowed CLECs to engage in line sharing by the FCC's June 6, 2000 implementation deadline.

BellSouth also offers line sharing in its Revised Florida Statement of Generally Available Terms and Conditions (SGAT). Proposed rates for line-sharing are set forth in Attachment A to the SGAT and are supported by cost studies filed with the Commission in this proceeding. The current version of BellSouth's standard terms and conditions for line sharing offered to CLECs is attached to my testimony as Exhibit TGW -16.

Q. WHAT ARCHITECTURE IS BELLSOUTH USING TO DEPLOY LINE SHARING?

A. Attached to this testimony, as Exhibit TGW-17, is a diagram that illustrates the splitter arrangement for the BellSouth-owned splitter in the central office. BellSouth allows CLECs to order splitters in three different increments: full shelf (96 line units); one-fourth of a shelf (24 line units); or an 8-port option, currently under development. Under these options, BellSouth purchases, installs, inventories, leases, and maintains the splitters. BellSouth installs a splitter in its equipment space or in a common area close to the CLEC's collocation area. BellSouth will provide to requesting carriers loop and splitter functionality that is compatible with any transmission technology that the requesting carrier seeks to deploy using the high frequency portion of the loop, provided that such transmission technology is deployable pursuant to Section 51.230 of the FCC rules. BellSouth provides a bantam jack at the splitter so the CLEC can test the high frequency portion of the loop.

Under any of these three options, a group of splitter ports is assigned to a specific CLEC. The splitter is connected to BellSouth's frame via cabling. One cable is connected to the splitter carrying the shared voice and data signal from the frame to the splitter. A second cable carries the voice traffic from the

splitter back to the frame. A third cable carries the data traffic from the splitter to the frame. After the cables are run between the splitter and the frame, the technician performs a "streaker card" test. This test insures appropriate connectivity between the splitter and the BellSouth frame and that the splitter is ready to support end user line sharing orders.

When wiring the end user line sharing service, collocation cross-connections are used to connect the loop carrying the shared voice and data traffic to the splitter termination on the frame. A second cross-connection carries the voice traffic from the splitter termination to the BellSouth voice switch. The data traffic is then carried to the CLEC collocation space by a cross connection. After the wiring is completed for the end user line service, BellSouth tests the voice service and also the cross-connections necessary to provide end user data service. In order to verify that the data cross-connections are correct, BellSouth recently completed work with a supplier who developed a Line-sharing Verification Transmitter test set. BellSouth technicians use this test set to ensure that the data portion of the circuit is wired correctly for the end user service.

Q. DOES BELLSOUTH ASSIST CLECS IN DETERMINING IF LOOPS QUALIFY FOR ITS DATA SERVI CE?

A. Yes. BellSouth provides its loop make up information via the Loop Make Up service that a CLEC may use to help determine if a loop can support the CLEC's data service. Loop make-up information for a particular loop is the same whether the CLEC intends to purchase a stand-alone xDSL-capable loop or engage in line sharing. Thus, there is no difference in the process for obtaining loop make-up information between the two offerings.

Q. WHAT ARE THE CLEC'S OPTIONS IF THE LOOP IS DETERMINED TO BE UNSUITABLE FOR ITS DATA SERVICE?

A. The CLEC may request that BellSouth modify the loop with BellSouth's Unbundled Loop Modification (ULM) offering. ULM allows the CLEC to order removal of load coils or excessive bridged tap. ULM for line sharing is the same process described in the testimony of Wiley (Jerry) G. Latham.

If the CLEC determines that a loop cannot be used or conditioned to provide data service on the high frequency spectrum, the CLEC can attempt to identify alternative loops via the Loop Make Up process (LMU). If unloaded copper loops are available, the CLEC can reserve the facility for 96 hours. The LMU process will provide the CLEC a facility reservation number (FRN). The CLEC may place the FRN on the line sharing LSR to have high frequency spectrum provisioned on the reserved loop.

If modifying a loop will significantly degrade the voice services BellSouth is providing over a loop, and the CLEC is unable to locate another loop that satisfies the technical requirements of the CLEC, the CLEC will not be allowed to offer data service on a loop shared with BellSouth. If necessary, BellSouth will make a showing to the state commission that the existing voice service will be degraded and that no alternative loops are available..

Q. HAS BELLSOUTH PROVISIONED LINE SHARING SERVICE IN FLORIDA?

A. Yes. As of April 30, 2001, BellSouth had installed splitters in 470 wire centers region-wide, and 123 wire centers in Florida. As of April 30, 2001, BellSouth

has provisioned line sharing on 780 lines in Florida and 2,765 lines region-wide.

Q. IS BELLSOUTH WILLING TO CONSIDER ANY OTHER ARCHITECTURES FOR PROVIDING LINE SHARING?

A. During the initial meetings of the collaborative, several CLECs requested the option of providing line sharing via a CLEC-owned splitter located in the CLEC's collocation space. BellSouth agreed to investigate a CLEC-owned splitter option in the collaborative meetings following the successful commercial launch of the BellSouth-owned splitter product on June 6, 2000. As described earlier, the parties established an additional collaborative to serve as a vehicle for these discussions. Exhibit TGW-9 to my testimony is the charter for this initiative. The goal of this collaborative team was to "support the development of, with the mutual agreement to, the processes and procedures required to jointly implement line-sharing utilizing CLEC-owned splitters collocated in the central office...." *See* Exhibit TGW-9. This collaborative developed processes and procedures that enable CLECs to engage in line sharing by means of a CLEC-owned splitter. Rates for line sharing via a CLEC-owned splitter are set forth in Attachment A to BellSouth's Revised SGAT. A diagram for the planned CLEC-owned splitter option for line sharing in the central office is Exhibit TGW-18 to my testimony.

Despite the initial enthusiasm for a CLEC-owned splitter arrangement, to date no CLEC has installed its own splitter. Sprint committed to test the option beginning in January 2001, but then withdrew. No other CLEC has agreed

even to test this option with BellSouth. BellSouth remains committed to testing its offer of line sharing via a CLEC-owned splitter.

In the line sharing collaborative, BellSouth and the CLECs jointly agreed to a schedule for development of methods and procedures for the various requirements of the *Line Sharing Order*. Exhibit TGW-10 to my testimony is the charter for the remote terminal collaborative team. The stated goal of this collaborative "is to support the development of, with the mutual agreement to, the processes and procedures required to jointly implement line-sharing utilizing splitters located in the remote terminal as one of the options to meet the requirements of the FCC line-sharing order." *See* Exhibit TGW-10. BellSouth has developed the RT Line Sharing option and performed internal testing. Because no CLEC had collocated a DSLAM in a remote terminal, nor demonstrated interest in ordering the RT line sharing option, the RT line sharing development effort has been suspended. BellSouth has completed internal testing and the development of methods and procedures. BellSouth can deliver this option 60 days after successful completion of end-to-end testing with a participating CLEC.

Notwithstanding the apparent lack of CLEC interest, BellSouth stands ready to provide line sharing from the remote terminal, if requested. BellSouth will work independently with any interested CLEC to provide this service. To provide line sharing from the remote terminal, the CLEC must collocate in the remote terminal and place a DSLAM in its collocation space. The CLEC may then purchase the high frequency portion of the copper subloop from the remote terminal to the end user customer. To date, however, no CLEC has

requested line sharing from the remote terminal or line sharing over the copper portion of the loop from the remote terminal to the customer premises.

Q. WHAT IS LINE SPLITTING?

A. Line splitting is when a CLEC provides voice service and a data LEC provides data service to the same end user over the same loop and neither of the carriers is BellSouth. BellSouth will allow CLECs (either one CLEC or two CLECs working together) to offer both voice and data over a single unbundled loop. *See* Revised SGAT, §IV.B9.

Q. HOW DOES BELLSOUTH PLAN TO OFFER LINE SPLITTING?

A. BellSouth offers the same arrangement to CLECs as that described by the FCC in the Texas 271 Order and the *Line-sharing Reconsideration Order*. Specifically, BellSouth facilitates line splitting by CLECs by cross-connecting an xDSL-capable loop and a port to the collocation space of either the voice CLEC or the data CLEC. The CLECs may then connect the loop and the port to a CLEC-owned splitter, and split the line themselves.

Q. IF BELLSOUTH IS CURRENTLY THE VOICE PROVIDER AND A PROVIDER OF DATA SERVICES (A "DATA CLEC") IS THE ADVANCED SERVICES PROVIDER, AND THE END USER SUBSEQUENTLY CHOOSES A CLEC FOR VOICE SERVICE (A "VOICE CLEC"), HOW WOULD LINE SPLITTING OCCUR?

A. If the original line sharing arrangement was established with a Data CLEC-owned splitter, then BellSouth would not be involved with the splitter provisioning and, accordingly, any decisions regarding use of the splitter

would be left up to the Data CLEC. If, however, the original line sharing arrangement were established with a BellSouth-owned splitter, then BellSouth would allow the Data LEC to continue leasing the BellSouth splitter under the following conditions:

- The existing Data CLEC remains the end user's advanced services provider, and
- The Data CLEC has an agreement with the Voice CLEC to use the upper frequency spectrum of the loop to continue providing the advanced services.

Q. WHAT PLANS DOES BELLSOUTH HAVE TO PROVIDE LINE SPLITTING OTHER THAN CONVERTING FROM LINE SHARING?

A. Where a line sharing arrangement does not already exist, BellSouth will work cooperatively with Voice CLEC and Data LEC to develop methods and procedures whereby a Voice CLEC and Data LEC may provide services over the same loop. Under this process, BellSouth will deliver a loop and port to the collocation space of either the Voice CLEC or Data LEC, as specified in the *Line Sharing Reconsideration Order*. The loop and port cannot be a loop and port combination (i.e. UNE-P), but must be individual stand-alone network elements. The Voice CLEC or the Data LEC shall be responsible for connecting the loop and port to a CLEC-owned splitter. BellSouth shall not own or maintain the splitter used for this purpose.

To participate in line splitting, the voice provider, the data provider, or both the voice and data providers will need a collocation agreement with BellSouth and will need authorization to order cross-connections, loops, and ports. If more

than one CLEC is involved, the second CLEC will need an agreement to share the CLEC of record's loop. This arrangement would provide a UNE loop and port to provide the CLEC's end user with voice service. The high frequency portion of the loop would be available for data because of the CLEC-provided splitter, which is accessed via a cross-connection from the frame to the CLEC's collocation space. A second cross-connection would return the voice signal from the splitter in the collocation space to the BellSouth voice switch port. BellSouth would bill the CLEC that purchases the loop and the purchaser of the loop will be responsible for all charges associated with the line splitting UNE arrangement. Where the data LEC is different than the voice CLEC, the purchaser of the loop may authorize the other party to act on their behalf. For example, the voice CLEC and data LEC may need an arrangement between themselves for the data LEC to report data troubles.

Q. WHAT PLANS DOES BELLSOUTH HAVE FOR A LINE SPLITTING COLLABORTATIVE?

A. BellSouth announced a "kick-off" meeting to discuss Line Splitting and to initiate a Line Splitting Collaborative. This meeting was April 19, 2001 in Atlanta. Eight voice CLECs and data LECs attended the kick-off and indicated an interest in participating in the collaborative. The first line splitting industry collaborative was held May 3, 2001. The line splitting collaborative plans to meet weekly until the product is introduced and stable. Notwithstanding the Collaborative Schedule, however, BellSouth stands ready to provide line splitting, if requested. BellSouth will work independently with any interested CLEC to provide this service.

Q. WHAT CHARGES DOES BELLSOUTH BELIEVE ARE APPROPRIATE FOR LINE SPLITTING?

A. The applicable recurring charges to be paid by the Voice CLEC for this line splitting arrangement will be the loop, the port, and two collocation cross-connections, as shown on Exhibit TGW-19. The applicable nonrecurring charges to be paid by the Voice CLEC for this line splitting arrangement will be the nonrecurring rate for the loop-port combination (switch-with-change to add the two cross connections).

The rates for line splitting are not independent rates but rather are comprised of cost-based rates already set forth in Attachment A to BellSouth's Revised SGAT and in various interconnection agreements.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.