BELLSOUTH TELECOMMUNICATIONS, INC

TESTIMONY OF JERRY KEPHART

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 990649A-TP

NOVEMBER 8, 2001

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

A. My name is Jerry Kephart. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am a Senior Director – Regulatory for BellSouth. I have held this position since October of 1997.

Q. PLEASE SUMMARIZE YOUR EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY AND YOUR EDUCATIONAL BACKGROUND.

A. My career in the telecommunications industry spans over 30 years and includes responsibilities in the areas of network operations, commercial operations, administration, and regulatory. I have held positions of responsibility in BellSouth that include managing installation and maintenance personnel engaged in providing customer telephone service and also managing staff operations in support of these activities. I also have extensive experience in managing regulatory activities for BellSouth including Federal Communications Commission ("FCC") docket management work and public

policy planning. I graduated from Daytona Beach Junior College in 1964, with an Associate of Science in Electronics Technology. I obtained a Bachelor of Business Administration degree from the University of Florida in 1968.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to describe BellSouth's hybrid copper/fiber xDSL-capable loop offering as ordered by this Commission and the technical feasibility of BellSouth's providing such.

Q. WHAT IS A HYBRID COPPER/FIBER XDSL CAPABLE LOOP?

A. The Hybrid Copper/Fiber xDSL-Capable loop is an unbundled network element ("UNE") that enables an Alternative Local Exchange Carrier ("ALEC") to provide Digital Subscriber Line ("DSL") capability to its customers over a facility that is comprised of fiber optic cable in the portion of the loop referred to as loop feeder and copper cable in the portion of the loop referred to as loop distribution. Exhibit JK-1, which is attached to my testimony, depicts the layout of this service. Beginning at the ALEC's network interface device ("NID") at the end user's premises, the loop distribution portion consists of a dedicated, non-designed two-wire copper physical transmission facility, which is connected to a Digital Subscriber Line Access Multiplexer ("DSLAM") located within the Remote Terminal ("RT"). An individual end user's DSL traffic is intermingled with the DSL traffic of other end users and is conveyed to the Central Office over a dedicated DS1 facility. The DS1 facility runs from the DSLAM located in the RT through Multiplexers located in the RT and thence forward to the Central Office. Within the

Central Office, the DS1 facility is extended to the ALEC's collocation arrangement. The segment of the DS1 between the Remote Terminal and the Central Office is served by fiber optic cable facilities. This portion of the loop is provisioned through BellSouth's design process in order to specify DS1 channels through the appropriate multiplexers in the fiber transmission system and to inventory the DS1 in BellSouth's Trunk Inventory Record Keeping System ("TIRKS"). The DSLAM can accommodate up to 16 end user lines and as many as four (4) DS1s. Associated with the DSLAM is an administrative DS1 which terminates into a DSL hub bay in order to allow BellSouth's technicians to handle the provisioning, maintenance and repair of the loop.

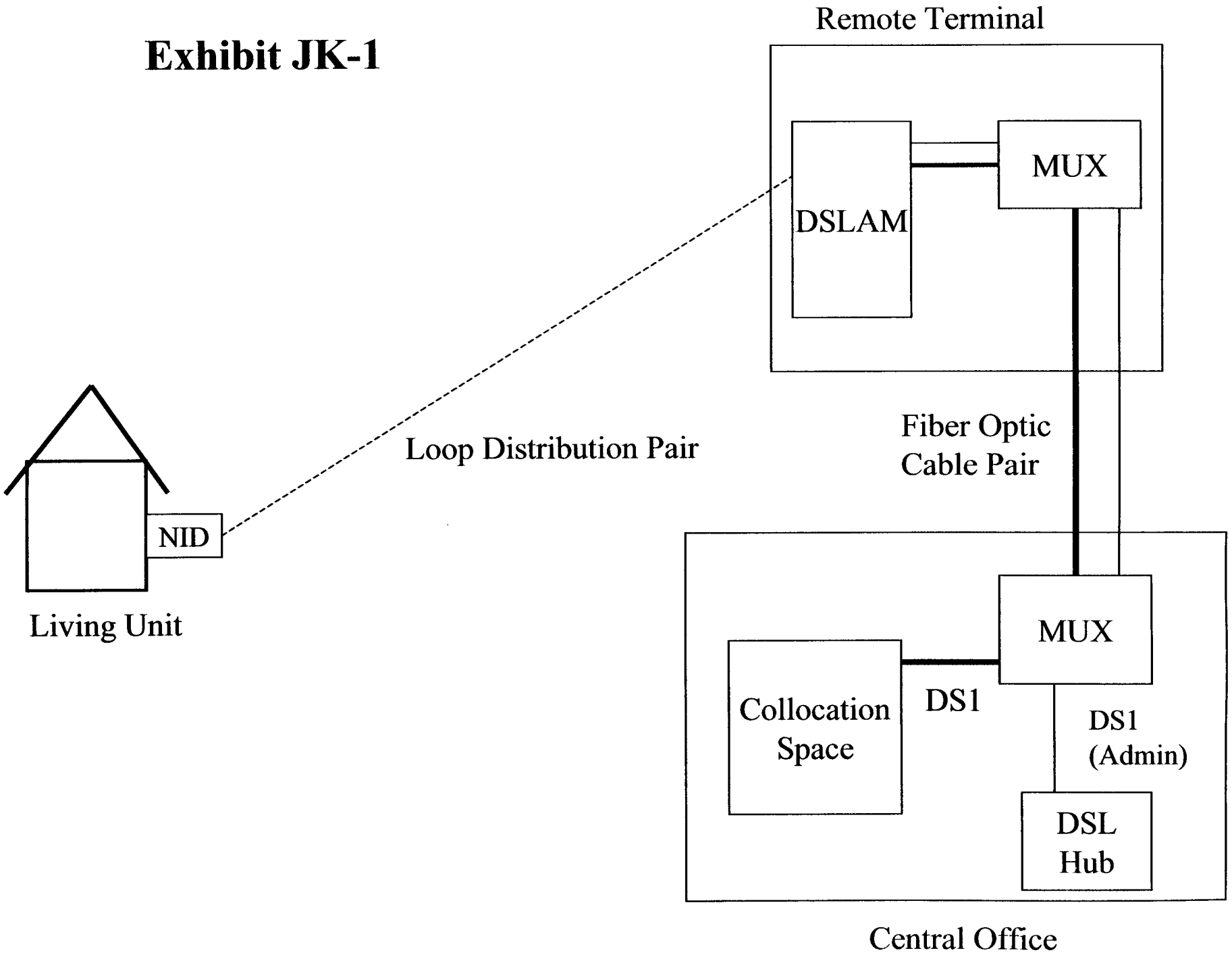
Q. IS IT TECHNICALLY FEASIBLE FOR BELLSOUTH TO PROVIDE THIS OFFERING?

A. Yes. It is technically feasible for BellSouth to provide this Hybrid Copper/Fiber xDSL-Capable loop as I have described above. However, one of the elements of this offering is the DSLAM which the FCC has exempted as a UNE [see Rule 51.319 (c) (3) (B)] except in circumstances where BellSouth has deployed digital loop carrier systems, has no spare copper loops available to ALECs to support xDSL services, has deployed packet switching capability for its own use, and does not permit ALECs to deploy their own DSLAMs at the remote terminal sites. There are currently no situations in the State of Florida where these circumstances exist.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes

Exhibit JK-1


Remote Terminal
DSLAM
MUX
Loop Distribution Pair
Fiber Optic
Cable Pair
NID
Living Unit
MUX
Collocation
Space
DS1
DS1
(Admin)
DSL
Hub
Central Office