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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE GENERIC
INVESTIGATION INTO U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH CERTAIN WHOLESALE PRICING
REQUIREMENTS FOR UNBUNDLED
NETWORK ELEMENTS AND RESALE
DISCOUNTS.

DOCKET NO. T-00000A-00-0194

**QWEST CORPORATION'S NOTICE OF
ERRATA**

Qwest Corporation ("Qwest") hereby provides notice of errata to its Rebuttal Testimony of James C. Overton, filed in these proceedings on June 27, 2001. The revised testimony is necessary to correct formatting and typographical errors contained in the original testimony. Attached hereto is a corrected version of the Rebuttal Testimony of James C. Overton intended to replace the testimony filed on June 27, 2001.

Additionally, Qwest hereby gives notice that at the hearing, during the week of July 16, 2001, Rachael Torrance will adopt the testimony of James C. Overton and testify on behalf of Qwest.

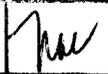
DATED this 13th day of July, 2001.

FENNEMORE CRAIG, P.C.

Arizona Corporation Commission

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JUL 13 2001

DOCKETED BY 

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ORIGINAL and 10 copies of the
foregoing hand-delivered for filing
this 13th day of July, 2001 to:

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COPY of the foregoing hand-delivered and faxed
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CERTIFICATE OF SERVICE

A copy of the foregoing has been mailed and/or faxed and/or e-mailed on this 13th day of July, 2001, to the following:

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**BEFORE THE
ARIZONA PUBLIC SERVICE COMMISSION**

**WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER**

**IN THE MATTER OF INVESTIGATION)
INTO QWEST CORPORATION'S) DOCKET NO. T-00000A-00-0194
COMPLIANCE WITH CERTAIN) PHASE II
WHOLESALE PRICING)
REQUIREMENTS FOR UNBUNDLED)
NETWORK ELEMENTS AND)
RESALE DISCOUNTS)**

**REBUTTAL TESTIMONY OF
JAMES C. OVERTON
QWEST CORPORATION
JUNE 29, 2001**

1 **I. IDENTIFICATION OF WITNESS**

2

3 **Q. PLEASE STATE YOUR NAME, EMPLOYER AND BUSINESS ADDRESS.**

4 A. My name is James C. Overton. I am employed by the Qwest Corporation
5 ("Qwest"), as a Director in the Technical Regulatory Group, Local Network
6 Organization. My business address is 700 W. Mineral Street, Littleton,
7 Colorado 80120.

8

9 **Q. HAVE YOU FILED TESTIMONY IN THIS DOCKET PREVIOUSLY?**

10 A. Yes.

11 **II. PURPOSE OF TESTIMONY**

12

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. The purpose of my testimony is to provide input from an engineering
15 perspective relating to several of the costing and pricing issues that are before
16 the Commission. I provide engineering testimony in response to several
17 assumptions that the CLECs use in their cost studies and in response to CLEC
18 challenges to some of Qwest's assumptions. My testimony addresses: (1)
19 Cox's testimony involving access to multi-tenant environments ("MTEs") and
20 multiple dwelling units ("MDUs"), including a description of Qwest's cable and
21 wire termination policy as it relates to MTEs and MDUs; (2) the engineering
22 assumptions that should be used in the cost studies relating to the methods of
23 placing outside plant that are used in different density zones; (3) the extent to

1 which a telephone can realistically be expected to share the costs of placing
2 outside plant facilities with other utility companies; (4) the nature of the
3 engineering tasks that Qwest must perform for loop conditioning; and (5) the
4 nature of the engineering tasks that Qwest must perform to complete field
5 verifications.

6 **III. ACCESS TO MDUS AND MTES**

7
8 **Q. IN HIS TESTIMONY ON BEHALF OF COX, MR. COLLINS SUGGESTS THAT**
9 **QWEST IS NOT PROVIDING ADEQUATE CLEC ACCESS TO MDUS AND**
10 **MTES. DOES MR. COLLINS PROPERLY UNDERSTAND QWEST'S**
11 **POLICIES RELATING TO THIS ISSUE?**

12 **A.** I don't believe that he does.

13
14 **Q. HOW DOES QWEST OFFER MDU/MTE ACCESS TO THE CLECS?**

15 **A.** Qwest offers MDU/MTE access to the CLECs through the procedures set forth
16 in Qwest's MTE Terminal Access Policy. The type of MTE terminal access that
17 Qwest provides depends on the option that the building owner has selected
18 through Qwest's Cable Wire Service Termination Policy ("CWSTP").

19
20 **Q. WHAT IS THE CABLE WIRE SERVICE TERMINATION POLICY?**

21 **A.** Qwest's CWSTP sets forth the guidelines for the installation of
22 telecommunications facilities and services that Qwest offers. Under the
23 CWSTP, there are four service options that are available to property owners for
24 providing access to terminals in MTEs/MDUs.

1 **Q. PLEASE DESCRIBE THE FOUR SERVICE OPTIONS.**

2 A. The four options that are available pursuant to the CWSTP are described
3 below. The availability of direct access to an MTE terminal depends upon the
4 type of terminal and the CWSTP option that is selected.

5 **CWSTP Option 1**

6 MTE Terminals identified as Option 1 are the equivalent of an MTE network
7 interface device ("NID"). An MTE NID is defined as a terminal that is
8 simultaneously the Minimum Point of Entry ("MPOE") and the demarcation point
9 where Qwest ownership and control ends and the property owner's ownership
10 and control begins. MTE NID access may be obtained at the protector field as
11 well as at the customer's inside wire appearance.

12

13 **CWSTP Option 2**

14 Option 2 sets the demarcation point at the floor level in a multi-story building.
15 Qwest would own and maintain riser cable from the floor level back to the central
16 office. The same architecture could apply at trailer parks or marinas, etc. Option
17 2 typically provides a readily accessible cross connect field for direct MTE
18 terminal access at the MPOE. Qwest, in most cases, has inventories of the
19 Qwest-owned inside wire extending beyond the MTE terminal to the network
20 demarcation point NID. Option 2 MTE terminal access may be obtained at the
21 MPOE protector field or at the floor level NID.

22

23 **CWSTP Option 3**

24 In option 3, the demarcation point is located either in a suite or an apartment
25 unit. Qwest owns and maintains all wire and equipment from the suite or unit
26 back to the central office. Option 3 MTE terminals typically consist of terminals
27 at the MPOE that are hard-wired and contain no readily accessible cross-
28 connect field. The exception would be large buildings and high rise buildings.

1 Prior to direct CLEC access, Qwest-owned and controlled inside wire for Option
2 3 MTE terminals was not always inventoried in provisioning and maintenance
3 databases. Option 3 MTE terminal access may be obtained at the MPOE
4 protector field as well as at the customer cross-connect of Qwest's owned and
5 controlled inside wire.

6
7 **CWSTP Option 4**

8 Option 4 provides a MPOE for campus environments. These terminals are
9 placed near the property line of a campus environment and are detached from
10 MTE buildings usually resting on a separate pad on provided rights of way.
11 Access to Option 4 terminals is provided through Field Connection Point ("FCP")
12 and collocation processes.

13
14 **Q. WHAT IS THE DEFINITION OF A DEMARCATION POINT?**

15 A. A Demarcation Point is properly defined for purposes of this discussion as the
16 point where Qwest-owned or controlled facilities cease, and CLEC, end user,
17 owner or landlord ownership of facilities begins.

18
19 **Q. WHAT IS THE DEFINITION OF A NETWORK INTERFACE DEVICE?**

20 A. A Network Interface Device ("NID") is a network element that is a means of
21 interconnection of end-user customer premises wiring to the incumbent LEC's
22 distribution plant, such as a cross-connect device used for that purpose.

23

24

1 **IV. CABLE PLACING ACTIVITIES**

2

3 **Q. WITNESSES FOR THE CLECS, INCLUDING MR. WEISS ON BEHALF OF**
4 **AT&T, WORLDCOM, AND XO, CHALLENGE THE METHODS OF PLACING**
5 **CABLE THAT ARE ASSUMED IN QWEST'S LOOPMOD STUDY. DO THEIR**
6 **CRITICISMS REALISTICALLY REFLECT THE MANNER IN WHICH**
7 **TELECOMMUNICATIONS COMPANIES PLACE CABLE WHEN INSTALLING**
8 **OUTSIDE PLANT?**

9 **A.** No. As I discuss below, the CLECs primarily challenge the assumption that a
10 telecommunications company would rely on directional boring to place cables.
11 Their position that boring would not be used with some frequency, particularly
12 in high density areas, is wrong.

13

14 **Q. DOES QWEST UTILIZE DIFFERENT CABLE PLACING METHODS?**

15 **A.** Yes. Qwest and the contractors that Qwest retains to perform cable placement
16 rely on a variety of methods for placing cable, including trenching, plowing, cut
17 & restore, and directional boring. These different placement methods are also
18 used in Qwest's LoopMod cost study.

19

20 **Q. WHAT FACTORS DETERMINE THE CABLE PLACEMENT METHOD THAT**
21 **QWEST WOULD USE?**

22 **A.** The method of cable placement that Qwest chooses depends upon a variety of
23 factors, including the density of the area in which the cable is being placed, the

1 terrain, and the hardness or softness of the soil. These environmental factors
2 bear directly on which method of placement is the most cost effective. For
3 example, rural areas that have little development and terrain that is not rocky
4 are conducive for plowing. On the other hand, downtown urban areas that
5 have streets, sidewalks, buildings, and other structures are not conducive for
6 plowing and often require placement methods that minimize disruption to the
7 environment.

8
9 **Q. WHEN DOES QWEST USE DIRECTIONAL BORING TO PLACE CABLE?**

10 A. Placing cable by boring normally occurs in areas where there is a higher
11 density of population. In established areas where streets, service
12 infrastructures and landscaping have been constructed, it is often most cost-
13 effective to use boring, as that method of placement generally avoids the costs
14 of restoring streets, sidewalks, and other structures to their original condition
15 and also minimizes the amount of time that public thoroughfares are disrupted
16 by cable placements. Anyone who lives in an urban area is familiar with the
17 large volume of cable placements that have occurred in cities over the past two
18 or three years. Municipalities and the general public have spoken loudly about
19 their concern over disruption to roads and other infrastructure in cities as the
20 result of cable placement and have been applying increasing pressure on utility
21 companies to place cables with minimal disruption. In my view, this recent
22 experience only makes it more likely that the use of directional boring will
23 increase in high density areas on a forward-looking basis.

24

25

26

1 **Q. HAVE YOU REVIEWED THE ASSUMPTIONS IN LOOPMOD RELATING TO**
2 **THE USE OF DIRECTIONAL BORING?**

3 A. Yes. I have reviewed the assumptions relating to the frequency of placement
4 methods that is assumed throughout the density zones in the model, and I
5 believe that the placement methods assumed for each density group are
6 reasonable and appropriate. With respect to directional boring, the model
7 accurately estimates the frequency with which this method of placement will be
8 used in high density areas. In my view, the CLECs are being unrealistic in
9 suggesting that directional boring will not be used with much frequency in high
10 density areas. This suggestion is contrary to actual experience and the real-
11 world, practical concerns that go into placing a network.

12

13 **Q. WHEN WOULD QWEST PLACE CABLE BY PLOWING?**

14 A. In low density areas where there are larger areas of undeveloped ground,
15 plowing would be the preferred method for placing cable. Due to the fact that
16 there are very few obstructions to contend with, cable can be placed quickly
17 and cost effectively. LoopMod contains reasonable assumptions about the
18 availability of plowing as a common method of placement in low density areas.

19

V. LOOP CONDITIONING

20

21 **Q. WHAT IS LOOP CONDITIONING?**

22 A. Loop conditioning is the process by which bridge taps and load coils are
23 removed from a line. To allow a line to provide digital service, it can be
24 necessary to remove bridge taps and load coils. To ensure that a line is clean,
25 the bridge tap and load coils must be physically removed from the line. This
26 activity requires a technician to actually access a line at each point on the line

1 where bridge taps and load coils have been placed. This can require entering
2 multiple manholes for a single line and traveling from one manhole to another.
3 Before entering each manhole, the technician must purge the manhole to
4 ensure that the air is of an acceptable quality and also, if needed, may have to
5 pump water and mud from the space to gain access to the line. Within each
6 manhole, to remove a load coil or a bridge tap, the technician must perform the
7 tasks needed to physically detach the load coils and bridge taps from the
8 cable.

9
10 **Q. WITH RESPECT TO LOOP CONDITIONING, THE CLECS SUGGEST THAT**
11 **ALL PAIRS IN A BINDER GROUP CAN BE DELOADED WHEN A CLEC**
12 **REQUESTS DELOADING OF A SMALL NUMBER OF PAIRS IN A GROUP. IS**
13 **THAT A REALISTIC ASSUMPTION?**

14 **A. No.**

15
16 **Q. WHY IS IT UNREASONABLE TO ASSUME THAT A TWENTY-FIVE PAIR**
17 **BINDER GROUP CAN BE DELOADED IN ITS ENTIRETY WHEN A CLEC**
18 **REQUESTS DELOADING OF ONLY A FEW PAIRS?**

19 **A.** Some loops in binder groups were loaded for a reason – to allow Qwest to
20 provide voice service at an appropriate level of quality. If Qwest were to
21 unload all circuits in a binder group, the voice service of some customers would
22 be negatively affected. Accordingly, it is not feasible to deload the loops of
23 customers whose loops depend on loading for voice service. In other words, if
24 some circuits are unloaded, they would not function in the way that they were
25 originally designed and would not provide the service that has been requested.
26 Because Qwest did not specifically engineer circuits by twenty-five pair binder

1 groups for specific types of services, most twenty-five pair binder groups have
2 varying types of circuits; this fact makes it very unlikely that Qwest can
3 condition entire binder groups at one time.

4
5 **VI. FIELD VERIFICATION**

6
7 **Q. WHY IS A FIELD VERIFICATION REQUIRED WHEN A CLEC REQUESTS**
8 **ACCESS TO EXISTING QWEST STRUCTURES?**

9 A. Upon receipt of an access request, the request must be reviewed to see if the
10 access is possible. The review is performed in the first instance from records
11 and drawings of potential locations that have been requested. In some cases,
12 the updating of records cannot keep up with the speed of events in the field.
13 Accordingly, it is necessary to have employees physically go to sites to confirm
14 whether access is possible. The field verification ensures that there will be no
15 additional costs to a CLEC by having blocked access or no space available.
16 An example of this would be access to existing Qwest conduit structures. In
17 some cases, conduits running from manhole to manhole could have
18 abandoned cables that are no longer turned up, but have been left in the
19 conduit.

20

21

22

23

24

1 **VII. STRUCTURE SHARING**

2
3 **Q. DOES QWEST ATTEMPT TO SHARE STRUCTURES WITH OTHER SERVICE**
4 **COMPANIES?**

5 A. Yes. In the state of Arizona, Qwest has approximately twelve field engineers
6 who attempt on an ongoing basis to apprise local service companies and
7 CLECs of Qwest plans to open existing structures or place new facilities.
8 Despite these efforts, it is very seldom that other utilities attempt to jointly place
9 their facilities with Qwest and share in the costs of placement.

10
11
12 **Q. WHY DOES STRUCTURE SHARING NOT OCCUR ON A MORE FREQUENT**
13 **BASIS?**

14 A. For most utility companies, it is difficult to plan in advance the placement of
15 facilities to allow placement to coincide with another utility company's
16 placement activities. In addition, in many cases, a CLEC is building structures
17 in locations where Qwest is already established as a service provider and has
18 no need to build additional structures.

19
20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A. Yes