BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF DETERMINING PRICES FOR UNBUNDLED NETWORK ELEMENTS (UNEs) IN QWEST CORPORATION'S STATEMENT OF GENERALLY AVAILABLE TERMS (SGAT)	))))	**CASE NO. TC01-098**

REBUTTAL TESTIMONY

OF

GEORGANNE WEIDENBACH

QWEST CORPORATION

JULY 28, 2003

I. INTRODUCTION

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

A. My name is Georganne Weidenbach. I am employed by Qwest Corporation ("Qwest") as a Director in the Technical Regulatory Group, Local Network Organization. My business address is 250 Bell Plaza, Salt Lake City, Utah 84111.

Q. ARE YOU THE SAME GEORGANNE WEIDENBACH WHO FILED DIRECT TESTIMONY IN THIS CASE?

A. Yes, I am.

II. OVERVIEW OF REBUTTAL TESTIMONY

Q. PLEASE PROVIDE AN OVERVIEW OF YOUR REBUTTAL TESTIMONY.

A. My testimony responds to the direct testimony of Staff witness Sid Morrison, in particular issues he raises relating to Qwest's provisioning rate elements applicable to direct CLEC-to-CLEC connections.

In addition to direct CLEC-to-CLEC connections, my testimony also addresses Mr. Morrison's statements regarding remote terminal collocation. Mr. Morrison's testimony proposes that instead of utilizing Qwest's remote collocation product, which provides CLECs with the same access to loops that Qwest itself has, Qwest should allow CLECs to virtually collocate line cards within Next Generation Digital Loop Carrier (NGDLC) remote terminals. I will provide a detailed explanation of the reasons this is not a viable option.

III. TESTIMONY OF SID MORRISON

A. DIRECT CLEC-TO-CLEC CONNECTIONS

Q. WHAT IS A CLEC-TO-CLEC DIRECT CONNECTION?

A. CLEC-to-CLEC Connections allow CLECs to connect with each other within a Qwest premises for the purpose of mutually exchanging traffic. It also allows CLECs to connect their own non-contiguous collocation spaces. The direct CLEC-to-CLEC configuration is direct in the sense that it does not include any type of Qwest intermediate frame or bay for cross-connections.

CLEC-to-CLEC Connections may be used to connect collocation spaces of two different parties within the same Qwest premises and may also be used to connect multiple forms of a CLEC's collocations within the same Qwest premises (e.g., Physical to Physical, Physical to Virtual, Virtual to Virtual, or non-contiguous cageless bays).

A direct CLEC-to-CLEC Connection is a central office cable path engineered by Qwest between two collocation spaces. The CLEC(s) will be responsible for providing their own cable, as well as placing and connecting the cable between the two collocations sites themselves.

Q. MR. MORRISON STATES THAT THE QWEST COST STUDY DOES NOT PROVIDE ADEQUATE INFORMATION TO DETERMINE IF THE LABOR HOURS CHARGED FOR WORK ITEM TASKS ARE JUSTIFIED. PLEASE EXPLAIN THE NON-RECURRING RATES ELEMENTS THAT COMPRISE DIRECT CLEC-TO-CLEC CONNECTIONS.

A. Mr. Morrison's criticisms are inaccurate. Qwest's rates properly reflect the time and labor required to perform these direct CLEC-to-CLEC requests. As described in my direct testimony, the network components that go into the rate elements for CLEC-to-CLEC direct connections are: (1) order processing; (2) design and engineering; and (3) virtual collocation connections and cable holes, if applicable.

Q. PLEASE PROVIDE THE ACTIVITIES THAT GO INTO QWEST'S ASSUMPTION THAT ONE HOUR OF CPMC TIME IS REQUIRED?

A. Qwest's Collocation Project Management Center ("CPMC") is the gateway for assuring a request for a CLEC-to-CLEC connection is handled properly.

A CLEC-to-CLEC order involves the necessary step of having Qwest's CPMC review the CLEC's request for completeness. During this task, Qwest collects all associated e-mails and forms from the CLEC to start a working file, or job folder. This includes assigning a Billing Account Number ("BAN") and transferring the information into the collocation database.

Once all of the information is properly documented and entered into the database, the CPMC determines which engineer (wire center specific) should receive the request.

Once all of the data has been thoroughly validated to be free of errors or questions, the CPMC forwards the work package information on to the appropriate engineers (Common Systems Planner (CSPEC) and Interoffice Facility (IOF) Planner).

If Qwest personnel have questions about the CLEC-to-CLEC request or there are obvious errors, it is up to the CPMC to make contact with the Wholesale account team and the customer to further clarify any issues that arise. The clarification work can take several hours of the CPMC's time. This clarification work may include coordinating a conference call with the CLEC, so that clarifying questions can be answered.

Once the engineers have determined the feasibility of the request, the information is forwarded back to the CPMC to validate and update the

collocation database. After the CPMC updates the database, the CPMC forwards the information to the Wholesale account team and on to the CLEC.

Considering all of the activities and tasks performed by the CPMC (project manager) and the need to build a database file, prepare a comprehensive package for the engineer, and update and forward the information obtained back to the customer, one hour of labor performed in the CPMC is very conservative.

Q. MR. MORRISON ALSO STATES THAT QWEST'S TIME FOR CSPEC, ENGINEERING AND QUALITY CHECK IS OVER-STATED. WHAT FUNCTIONS DOES THE CSPEC GROUP TAKE TO FINALIZE A JOB?

A. Once the Common Systems Planner ("CSPEC") receives the work request from the CPMC, a Common Planning Document ("CPD") is opened. This database tracks all of the necessary information (material and labor) pertinent to each job. The CSPEC planner will create a CPD regardless of whether additional cable racking is required for a CLEC-to-CLEC request because all jobs require a CPD opened to track work.

Once the CPD is opened and populated with the scope of the job (synopsis of job), dates associated with the job, and the funding authorization for the job, the CSPEC planner will hand the job off to the IOF engineer for the actual design.

The IOF design engineer looks at the Central Office Equipment Facility Management ("COEFM") system, requests a "walk-through" of the central office

in question, designs the job based on records and the walk-through report, and creates the design work package ("DWP") stating what work is required.

Q. WHY IS A WALK-THROUGH OF THE CENTRAL OFFICE NECESSARY ON A CLEC-TO-CLEC DIRECT REQUEST?

A. Qwest performs a "walk-through" on all CLEC-to-CLEC direct connection jobs. The walk-through provides a field verification for racking availability; this includes the type of racking required, a clear path in the racking, and verifies the necessary capacity is available throughout the racking path.

Five hours is a conservative estimate of the time necessary to complete all of the CSPEC time mentioned above, as well as the engineering components, which include the field engineering walk-through, structure verification, and design work.

Q. WHY ARE THE FORMS/FOLLOW UP NECESSARY?

A. The functions involved in Forms/Follow Up include quality check and State Interconnection Manager ("SICM") cable route walk through. Once completed, Qwest performs quality checks on all work performed and within its central offices. The SICM performs a walk-through of the central office with the customer, if the customer chooses to attend. The SICM makes sure the engineered path was followed to specification by the CLEC and/or its vendor.

The SICM also makes sure that the CLEC places its cables in a timely manner. Once the cables are in place, the SICM checks to make sure the cables were not only placed in the designated racking (engineered path) but placed correctly as well. In addition to confirming that the job specifications were followed correctly, the SICM verifies that the work site has been cleaned-up, validates that cable holes were filled properly, if applicable, and fills out a collocation acceptance form that is signed off by Qwest and the CLEC. In Qwest's experience, on average, these specific functions take two hours to complete.

B. REMOTE COLLOCATION – CARD AT A TIME

Q. MR. MORRISON STATES THAT QWEST SHOULD BE REQUIRED TO UNBUNDLE ADDITIONAL NETWORK ELEMENTS, PROVIDING ADVANCED SERVICES OVER DIGITAL LOOP CARRIER ("DLC") EQUIPMENT. IS QWEST REQUIRED BY THE FCC TO DO THIS?

A. No. Mr. Morrison's proposal is directly contrary to the FCC rule that governs when incumbent local exchange carriers ("ILECs") must provide access to unbundled packet switching ("UPS"). As I discuss below, in 47 C.F.R. § 319(c)(5)(i-iv) the FCC established that ILECs are not required to provide access to UPS unless four clearly defined conditions are met. Mr. Morrison's proposal is an attempt to circumvent this rule and allow CLECs to gain access to UPS without satisfying the FCC's conditions.

Q. MR. MORRISON SEEMS TO IMPLY THAT IT IS A SIMPLE METHOD TO PROVIDE POTS AND DATA OVER AN EXISTING ALCATEL LITESPAN SYSTEM. WOULD YOU COMMENT ON THIS ISSUE?

A. It is not as easy as Mr. Morrison would like you to believe, but regardless Qwest simply does not provide DSL over fiber fed loops using that technology. Thus, Qwest has costed out the method that it uses to provide UPS and remote collocation at the sites where it provides fiber fed DSL.

Q. WHAT TYPE OF INDIVIDUAL CHANNEL CARD WOULD BE REQUIRED FOR THE ALCATEL LITESPAN SYSTEM?

A. Even if Qwest provided fiber fed DSL over the Alcatel Litespan, ASDL Digital Line Unit ("ADLU") cards are vendor-specific and configured for a specific type of DLC system and network configuration.

Q. CAN THE ADLU CARD BE UNBUNDLED AS A STAND-ALONE NETWORK ELEMENT?

A. No. It is not possible for several reasons. First, the ADLU does not function as a stand-alone network element. The ADLU card provides voice/data combination functionality and limited routing capability. It does not function alone to permit service as a stand-alone element. Further, the card will not function without power. Finally, the ADLU line card shares the CPU and transport platform of the DLC system. Therefore, the ADLU is *not capable* of functioning as a stand-alone

network element and should not be unbundled as a separate network element. In addition, control cards are static and cannot be partitioned.

Q. MR. MORRISON SUGGESTS THAT CLECS OBTAIN THE DESIRED LINE CARD(S) AND TRANSFERS OWNERSHIP OF THE CARD(S) TO THE ILEC (FOR A NOMINAL FEE) THUS, ALLOWING CLECS TO VIRTUALLY COLLOCATE LINE CARDS WITHIN NGDLC RTS. WOULD THIS WORK?

A. No. Testimony in Illinois by an Alcatel representative makes it clear that Mr. Morrison's suggestion would not work. According to Dr. Niel Ransom, Chief Technology Officer for Alcatel USA, Inc., in testimony filed in July 2001 before the Illinois Commerce Commission, Docket No. 00-0393, he states that:

> Ownership of pieces of hardware of the Litespan® system, in no way enhances the capabilities available to these CLECs. Instead, ownership of Litespan® line cards by CLECs would itself create an unprecedented and strange situation where a piece of telecommunications equipment is jointly owned by separate (and potentially competing) companies. This would raise numerous issues such as system warranty service where the differing "owners" of the system may have purchased different levels of support from Alcatel.

Additionally, Mr. Ransom states:

> The features, capabilities or "flavors" of service, as the CLECs call it, are determined by the Litespan® system as a whole, not a specific part of the Litespan®, such as a card. **As a result, deployment or virtual collocation of CLEC line cards is not the answer. New functionality**

must be implemented at the system level, not the part level.[1] (Emphasis added)

Q. IS THERE A PHYSICAL NETWORK DEMARCATION POINT IN THE ADLU LINE CARD?

A. No. The ADLU line card shares a common back plane with the DLC platform. This means the advanced services traveling through it are commingled with those of Qwest's for transport back to the central office.

Q. WITHOUT A DEMARCATION POINT, HOW WOULD A CLEC "PICK UP" ITS DATA TRAFFIC FROM QWEST?

A. The data is formed into packets at the DLC platform and transported back to an ATM switch. The CLEC would "pick up" packets at the ATM switch.

Q. IS QWEST REQUIRED BY THE FCC TO UNBUNDLE DLC OR DSLAM PLATFORMS?

A. No. Qwest is required by the FCC to provide unbundled loops from its integrated digital loop carrier systems but not to unbundle the systems themselves. DSLAMs are part of the packet switch network and, as such, are subject to unbundled packet switching rules. The FCC has not ordered the DSLAM platform itself to be unbundled.

[1] Testimony of Dr. Niel Ransom, Chief Technology Officer for Alcatel USA, Inc. before the Illinois Commerce

Q. PLEASE DESCRIBE QWEST'S OBLIGATION TO OFFER UNBUNDLED PACKET SWITCHING.

A. Consistent with the *UNE Remand Order* and 47 C.F.R. § 319(c)(5)(i-iv), Qwest provides UPS to CLECs when all four of the following conditions are met:

- Qwest must have deployed digital loop carrier systems, including but not limited to, integrated digital loop carrier or universal digital loop carrier systems, or must have deployed any other system in which fiber optic facilities replace copper facilities in the distribution section of the loop.

- There are no spare copper loops available capable of supporting the xDSL services the requesting carrier seeks to offer.

- Qwest has placed a DSLAM for its own use in a remote Qwest premises but has not permitted a CLEC to collocate its own DSLAM in the same remote Qwest premises or, alternatively, by collocating its DSLAM in the same remote Qwest premises, a CLEC cannot support xDSL services at parity with the services that can be offered through Qwest's UPS.

- Qwest has deployed UPS capability for its own use.

Commission, Docket No. 00-0393, at Springfield, Illinois July 18, 2001.

Q. WHAT AUTHORITY DOES QWEST RELY UPON FOR ITS ASSERTION THAT ACCESS TO UNBUNDLED PACKET SWITCHING IS REQUIRED ONLY IN A LIMITED CIRCUMSTANCE?

A. In its UNE Remand Order, the FCC found "one limited exception to [its] decision to decline to unbundle packet switching."[2] The FCC then laid out its criteria: where the ILEC has deployed digital loop carrier (DLC) systems, no spare copper facilities are available, and the incumbent has placed its DSLAM in a remote terminal. The FCC went on to find that the ILEC will not be required to offer access to unbundled packet switching "if it permits a requesting carrier to collocate its DSLAM in the incumbent's remote terminal, on the same terms and conditions that apply to its own DSLAM."[3]

Q. DOES THE FCC'S FORTHCOMING TRIENNIAL REVIEW ORDER DISCUSS UNBUNDLED PACKET SWITCHING?

A. Yes. In its Attachment to its Triennial Review press release dated February 20, 2003, the FCC stated that "Incumbent LECs are not required to unbundle packet switching, including routers and DSLAMs, as a stand-alone network element." (Attachment at 1) Thus, while the order has not been issued yet, it appears that it will completely eliminate the current limited requirement for unbundling of packet switching. In light of that, there is no legal or practical basis for the

[2] UNE Remand Order at ¶ 313.
[3] Id.

unwarranted expansion of Qwest's packet switching obligations as proposed by Mr. Morrison.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes it does.