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January 29, 2004

**Via Overnight Delivery**

Ms. Carole J. Washburn  
Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P. O. Box 47250  
Olympia, Washington 98504-7250

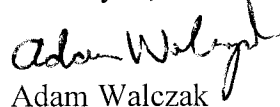
Re: In the Matter of the Petition of Qwest Corporation in Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order, Docket No. UT-033044.

Dear Ms. Washburn:

Enclosed for filing are the original and 14 copies of corrected pages 17 and 35 to the Direct Testimony of Robert V. Falcone on Behalf of AT&T on Network Architecture (Exhibit RVF-1T) in this matter.

On page 17, California was corrected to Washington, SBC and Verizon were changed to Qwest and the correct number of wire centers was provided for Qwest. On page 35, the reference to Exhibit RVF-9 was corrected to Exhibit RVF-10. Please remove pages 17 and 35 and replace them with the new pages.

Thank you,

  
Adam Walczak

Enclosures  
cc: Service List

1           Accordingly, CLECs cannot use the same kind of connections, *i.e.*, merely the MDF  
2           jumper wire pairs used by ILECs, to link their customers' loops to their distant  
3           switches. Rather, CLECs must deploy an extensive *backhaul network* that extends  
4           the existing customer loops – all of which terminate at ILEC wire centers – to a  
5           distant CLEC switching location. In Washington, there are 112 Qwest wire centers  
6           from which CLECs must “backhaul” end-user loops if they want to use their own  
7           switching to serve customers in all of Qwest's service area.

8   **Q.   WHAT MUST A CLEC DO TO “BACKHAUL” ITS CUSTOMERS' TRAFFIC**  
9   **TO ITS OWN SWITCH?**

10  A.   For a CLEC to “backhaul” its customers' traffic to its own switch, the CLEC must  
11       first create an overlay network infrastructure that is largely dedicated to the subset of  
12       customers won from the incumbent in a specific wire center. In essence, the CLEC  
13       must add a very long, costly and dedicated “extension cord” to connect its end-users'  
14       loops to its switches. This requires the CLEC to:

- 15       (1)   establish and maintain collocations at ILEC wire centers, where customers'  
16           loops are “collected;”
- 17       (2)   install and maintain the equipment necessary to digitize and, using  
18           concentration and multiplexing techniques, aggregate the traffic on those  
19           loops to permit connections to the CLEC's switch at acceptable quality levels;  
20           and
- 21       (3)   establish the necessary transport facilities that provide the physical path  
22           connecting the CLEC's collocations and its switch.

23       Only after all of this infrastructure and these functionalities are in place and  
24       operational in each ILEC wire center in which it wishes to compete can a switch-

1 of the additional tandem switching costs and transport facilities that will be needed to  
2 complete each of its calls. Additionally, because the CLEC will route a large  
3 percentage of its traffic to the ILEC's tandem switch, it will face the potential for  
4 operational impairments such as inadequate subtending trunking from the ILEC's  
5 tandems to its end offices (See Exhibit RVF-10).

6  
7 **VI. CONCLUSION**

8 **Q. CAN THE FUNDAMENTAL CHARACTERISTICS OF THE EXISTING**  
9 **SINGLE-USE ILEC NETWORK BE MITIGATED WITHOUT**  
10 **TECHNOLOGICAL CHANGE?**

11 A. No. Until the underlying local network architecture that has created these  
12 impairments is changed, CLECs will continue to face significant practical and  
13 economic impairments in serving mass market end-users on ILEC loops *via* their own  
14 switches.

15 **Q. PLEASE SUMMARIZE THE CRITICAL ISSUES YOU DISCUSS IN YOUR**  
16 **TESTIMONY.**

17 A. The critical issue of this proceeding is not whether CLECs can "deploy" their own  
18 switches. Instead, the critical issue upon which this Commission should focus is  
19 whether a CLEC can "efficiently use" its own switch to connect to the local loops of  
20 end users. The differences in the way end users' loops are connected to carriers'