

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**IN THE MATTER OF THE CONTINUED)
COSTING AND PRICING PROCEEDING)
FOR INTERCONNECTION, UNBUNDLED)
ELEMENTS, TRANSPORT AND)
TERMINATION, AND RESALE)**

DOCKET NO. UT- 003013

DIRECT TESTIMONY OF

**JOHN RIES
PROGRAM MANAGER-ACCESS SERVICES**

ON BEHALF OF

GTE NORTHWEST INCORPORATED

SUBJECT: COLLOCATION POLICY

MAY 19, 2000

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is John Ries and my business address is 600 Hidden Ridge, Irving, Texas
3 75038.
4

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT IS YOUR POSITION?**

6 A. I am employed by GTE Service Corporation as Program Manager, Access Services and
7 am representing GTE Northwest Incorporated ("GTE") in this proceeding.
8

9 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
10 **EXPERIENCE.**

11 A. I graduated from the University of Missouri - Columbia in 1982 with a Bachelor of Arts
12 degree in Mathematics and Statistics. My employment with GTE commenced in May
13 1982 in the Network Planning Department. I held several positions during my first six
14 years with Network Planning. My responsibilities included capital budgeting, capital
15 portfolio management, implementation of enhanced support products for Network
16 Planning, and coordination of technical responses for business customer requests. In
17 1988, I moved into the Business Pricing group and remained there for four years. My
18 responsibilities there included pricing new network services for tariff offerings, as well
19 as pricing individual case applications.
20

21 In December 1992, I became the Product Manager for Expanded Interconnection
22 Services. My responsibilities included coordinating GTE's response to the FCC's
23 Docket 91-141 Order on Special Access and Switched Transport Interconnection, a task

1 which required organizing diverse resources within GTE to determine how the Company
2 would offer physical and virtual collocation.
3

4 In January 1998, I moved into my current position of Program Manager, Access
5 Services. Over the past year and a half, I have been involved in analyzing competitive
6 information relating to GTE's Network Services, as well as contract negotiations with
7 major interexchange carriers and competitive local exchange carriers.
8

9 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY OTHER**
10 **REGULATORY COMMISSIONS?**

11 A. Yes, I have testified in California, Florida, Hawaii, Indiana, Michigan, Missouri, New
12 Mexico, Texas and Wisconsin.
13

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

15 A. The purpose of my testimony is to respond to the Commission's invitation in the 17th
16 Supplemental Order for comment on the "scope of third party provisioning of
17 collocation in light of the FCC's finding that cageless collocation must be provided by
18 ILECs." 17th Supplemental Order: Interim Order Determining Prices; Notice of
19 Prehearing Conference (September 23, 1999), Docket Nos. UT-960369, 960370,
20 960371, ¶ 291.
21

1 **Q. WHAT IMPACT DOES THE FCC'S ADVANCED SERVICES ORDER¹ HAVE**
2 **ON THIRD PARTY PROVISIONING OF COLLOCATION?**

3 A. The same rules surrounding third-party provision of caged collocation should apply to
4 the cageless arrangements that have become available as a result of the Advanced
5 Services Order.

6
7 **Q. WHAT IS GTE'S POLICY WITH REGARD TO THIRD PARTY**
8 **PROVISIONING IN A CAGED OR CAGELESS ARRANGEMENT?**

9 A. A CLEC may utilize an ILEC-approved contractor to provision certain aspects of their
10 caged or cageless collocation arrangement. For example, a CLEC may hire an ILEC-
11 approved contractor to perform work within its caged or cageless space provided that the
12 work is specific to the CLEC collocation arrangement.

13
14 **Q. WHAT CRITERIA DOES GTE USE TO APPROVE CONTRACTORS?**

15 A. GTE requires that all contractors utilized by GTE or by the CLEC be certified or meet
16 the same qualifications as a GTE-certified vendor to perform installation services within
17 its central offices. The certification requirements are the same for all contractors or
18 CLEC employees performing installation services within GTE's central offices, and
19 therefore these requirements are non-discriminatory. Further, GTE will provide, upon
20 request by the CLEC, a complete list of all contractors certified to perform installations
21 in GTE's central offices, as well as its vendor qualification guidelines. Once a carrier

¹ First Report and Order and Further Notice of Proposed Rulemaking on *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket Nos. 98-147, FCC 99-48 (rel. March 31, 1999).

1 has been certified, the contractor may perform work for the CLEC or for GTE in any
2 GTE central office.

3
4 **Q. SHOULD A CLEC BE PERMITTED TO HIRE AN ILEC-APPROVED**
5 **CONTRACTOR TO PERFORM WORK OUTSIDE OF THE CAGE OR**
6 **CAGELESS SPACE?**

7 A. No. GTE has a responsibility to all of its customers located in or served by a particular
8 central office to ensure safe, smooth and efficient operation of that office. Because
9 provisioning of a collocation arrangement affects more than just the collocation space of
10 a particular CLEC, it is imperative that GTE maintain control of and responsibility for
11 the contractor doing work outside the caged or cageless space. GTE control over such
12 work will avoid scheduling conflicts, liability issues and will ultimately result in quicker
13 and more efficient installations than if each CLEC directed the contractor's work,
14 without any centralized control.

15
16 **Q. WHAT ARE THE TYPES OF WORK ACTIVITIES OUTSIDE OF THE**
17 **COLLOCATION SPACE THAT NEED TO BE PERFORMED OR**
18 **CONTROLLED BY GTE?**

19 A. Work activity that may occur outside a CLEC's collocation space and requires GTE
20 control includes work associated with the provisioning of power, space preparation,
21 overhead superstructure, and various cabling assignments. Although GTE will
22 coordinate this work activity, GTE and the CLEC may mutually agree on utilizing GTE-

1 certified contractors for these activities or the CLEC may apply to become a certified
2 contractor itself.

3

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes.