

BEFORE THE WASHINGTON AND UTILITIES TRANSPORTATION COMMISSION

**IN THE MATTER OF THE CONTINUED)
COSTING AND PRICING OF UNBUNDLED)
NETWORK ELEMENTS, TRANSPORT,)
TERMINATIONS AND RESALE)**

Docket No. UT-003013

Part D

DIRECT TESTIMONY

OF

ROBERT F. KENNEDY

QWEST CORPORATION

NOVEMBER 7, 2001

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1 **I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH**
3 **QWEST CORPORATION.**

4 A. My name is Robert F. Kennedy. My business address is 1314 Douglas-on-the-Mall, 6th
5 Floor, Omaha, Nebraska, 68102. My principal business responsibility is to testify in
6 regulatory and legal proceedings concerning Qwest's wholesale services and products.

7 **Q. PLEASE BRIEFLY REVIEW YOUR EDUCATIONAL BACKGROUND.**

8 A. I hold a Bachelor of Science degree in education from the University of Nebraska at
9 Omaha. I have completed numerous technical courses concerning the installation and
10 maintenance of telecommunications equipment and facilities.

11 **Q. BRIEFLY OUTLINE YOUR EMPLOYMENT BACKGROUND.**

12 A. I began my career in the telecommunications industry in 1972 with the former
13 Northwestern Bell in Omaha, Nebraska. From 1972 to 1978, I held the positions of
14 lineman and cable splicer. In 1978, I moved into a management position where I was an
15 instructor and course developer for outside plant courses. In 1985, I joined the former U S
16 WEST's custom pricing organization where I developed the cost models used in pricing
17 DS1, DS3, SHARP and SHNS products, among others. From April 1996 until April, 2000
18 I was U S WEST's lead negotiator for interconnection agreements with competitive local
19 exchange providers ("CLECs"). Since April of 2000, I have been the lead policy
20 representative in Qwest's wholesale marketing organization.

1 **II. PURPOSE OF DIRECT TESTIMONY**

2 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

3 A. This direct testimony describes certain of Qwest's products and services and how the
4 associated rate elements are applied to these products and services. For the most part the
5 rate elements presented augment products and services presented in earlier cost dockets.

6 Specifically, I describe the following products and services and their associated charges:

7 Local interconnection service ("LIS")

- 8 • Trunk Nonrecurring Charges
- 9 • Collocation
- 10 • Channel Regeneration
- 11 • Fiber Terminations
- 12 • Adjacent Collocation
- 13 • Remote Collocation
- 14 • CLEC to CLEC Connections
- 15 • Space Availability Report
- 16 • Collocation Space Optioning

17 UNEs

- 18 • Channel Regeneration
- 19 • Unbundled Loops

20 Nonrecurring charges for:

21 DSO Coordinated Installation without Cooperative Testing

1 DSO, DS1 DS3 Basic Installation with Cooperative Testing

- 2 • OCn loops
- 3 • Sub-loop
- 4 MTE-POI inventory charge
- 5 Service order charge with and without dispatch
- 6 • Unbundled Dedicated Interoffice Transport ("UDIT")
- 7 OC- 48
- 8 DS3 to DS1 Multiplexing
- 9 • Unbundled Dark Fiber
- 10 Additional single strand rate elements
- 11 Dark Fiber Splice
- 12 Other services including
- 13 • Enhanced extended loop ("EEL") transport
- 14 • Bona Fide Requests ("BFR")

15 **III. LOCAL INTERCONNECTION SERVICE ("LIS")**

16 **Q. PLEASE GENERALLY DESCRIBE QWEST'S LOCAL INTERCONNECTION**
17 **SERVICE ("LIS").**

18 A. Qwest currently groups the rate elements associated with local interconnection into a
19 service known as "local interconnection service" or LIS. Through the use of LIS rate
20 elements, CLECs and Qwest may connect their respective networks together to transmit
21 and route telephone exchange service traffic and exchange access traffic.

1 **Q. WHAT LIS PRODUCTS IS QWEST INTRODUCING IN THIS PROCEEDING?**

2 A. Qwest is introducing one LIS product: LIS Trunk Nonrecurring charges.

3 **A. TRUNK NONRECURRING CHARGES**

4 **Q. PLEASE DESCRIBE LIS TRUNKS.**

5 A. Once facilities have been established between a CLEC's Point of Interface ("POI") and
6 Qwest's end office a CLEC can order LIS trunks over these facilities. Trunks provide
7 paths on these facilities and, through switch translations, are given the routing information
8 necessary to move traffic between the switches. Trunk nonrecurring charges are used to
9 recover Qwest's nonrecurring costs for providing these trunks.

10 **Q. WHEN DOES QWEST PROPOSE THAT TRUNK NONRECURRING CHARGES**
11 **SHOULD APPLY?**

12 A. Qwest proposes that nonrecurring installation (and disconnection) charges be assessed for
13 the first and each additional trunk ordered by a CLEC on an access service request
14 ("ASR"). The charges will vary depending on whether the trunks will interface with DS1
15 or DS3 LIS facility.

1 **IV. COLLOCATION SERVICES**

2 **A. GENERAL**

3 **Q. PLEASE DESCRIBE COLLOCATION.**

4 A. Collocation is an arrangement whereby Qwest provides space within a Qwest premises for
5 the placement of a CLEC's equipment to be used for the purpose of interconnection or
6 access to unbundled network elements ("UNEs") and ancillary services. The equipment
7 can either be owned and maintained by the CLEC or, in the case of a virtual collocation,
8 the equipment may be leased back to and maintained by Qwest.

9 **Q. WHICH ADDITIONAL COLLOCATION RATE ELEMENTS ARE BEING**
10 **OFFERED IN THIS PROCEEDING?**

11 A. The Collocation rate elements being introduced include: Fiber Terminations; Channel
12 Regeneration; Adjacent Collocation; Remote Collocation; Virtual Remote Terminal
13 Collocation; CLEC-to-CLEC Connections; Space Availability Report; and, Space
14 Optioning.

15 **B. FIBER TERMINATIONS**

16 **Q. WHAT ARE FIBER TERMINATIONS?**

17 A. Fiber Terminations are facilities that run between a CLEC's collocation space and an
18 Interconnect Distribution Frame ("ICDF"). These terminations are used to access UNEs.

1 **Q. WHAT CHARGES IS QWEST INTRODUCING FOR FIBER TERMINATIONS?**

2 A. Qwest is introducing a recurring rate element known as Fiber Terminations. This rate
3 element allows for the recovery of Fiber Distribution Panels ("FDP") costs not included in
4 the rates ordered by the Commission in Part A of this docket. Please see the testimony of
5 Qwest witness Teresa Million, Exhibit TKM-T26, for a further discussion of this rate
6 element.

7 **C. CHANNEL REGENERATION**

8 **Q. PLEASE DESCRIBE QWEST'S CHANNEL REGENERATION OFFERING.**

9 A. Channel Regeneration is an optional feature available to CLECs with the purchase of DS1
10 and DS3 loops. Channel Regeneration boosts the signal of the DS1 and DS3 loops to
11 compensate for signal losses resulting from the gauge of the copper facility and/or the
12 length of the facility within a Qwest wire center.

13 **Q. UNDER WHAT CIRCUMSTANCES DOES QWEST PROPOSE THAT A CHARGE**
14 **FOR CHANNEL REGENERATION SHOULD APPLY IN WASHINGTON?**

15 A. Qwest proposes that a charge for Channel Regeneration should apply under the following
16 circumstances. When the CLEC requests that Channel Regeneration be provided, despite a
17 determination by Qwest that the technical specifications contained in the industry standards
18 ANSI T1. 102-1993 Digital Hierarchy-Electrical Interface, Annex B do not require Channel
19 Regeneration, a charge for the requested regeneration should apply. Qwest witness Robert
20 J. Hubbard provides a technical discussion of this matter in his testimony, Exhibit RJH-T8.

1 **Q. WHAT CHANNEL REGENERATION RATES ARE BEING PROPOSED?**

2 A. Recurring and nonrecurring rates for both DS1 and DS3 regeneration are being proposed.

3 **D. ADJACENT, REMOTE AND VIRTUAL REMOTE TERMINAL COLLOCATION**

4 **Q. PLEASE DESCRIBE ADJACENT COLLOCATION.**

5 A. When space is exhausted at a particular Qwest premises, a CLEC may request adjacent
6 collocation. To the extent it is technically feasible, Qwest will make space available in
7 controlled environmental vaults or similar structures that are adjacent to Qwest's premises.
8 Alternatively, Qwest will permit a CLEC to construct or otherwise procure an adjacent
9 structure on property owned or controlled by Qwest. Adjacent collocation is offered on an
10 Individual Case Basis ("ICB").

11 **Q. IS AN ICB CHARGE APPROPRIATE FOR ADJACENT COLLOCATION?**

12 A. Yes. Qwest has not processed a request for adjacent collocation and, therefore, does not
13 have experience in performing the work activities required to provide this service.
14 Standard costs and prices for Adjacent Collocation can only be developed using
15 meaningful data that may only be gleaned from the actual work activities required to
16 provide a service such as Adjacent Collocation. Therefore, until such time as Qwest is able
17 to develop standard costs and prices, Qwest recommends that Adjacent Collocation be
18 priced on an ICB.
19

1 **Q. PLEASE DESCRIBE REMOTE COLLOCATION.**

2 A. Remote Collocation provides space in available remote cabinets on a Standard Mounting
3 Unit ("SMU") level. The space includes access to AC/DC power, heat dissipation and
4 access to Feeder Distribution Interface ("FDI") terminations.

5 **Q. DOES QWEST PROPOSE A RECURRING RATE FOR REMOTE**
6 **COLLOCATION?**

7 A. Yes. The recurring rate for space includes maintenance costs associated with the
8 equipment, plus a portion of the power pedestal. The recurring FDI termination rate
9 includes the maintenance costs associated with this equipment. The recurring rates are
10 listed in Exhibit TKM-35 of Ms. Million's testimony.

11 **Q. DOES QWEST PROPOSE NONRECURRING RATES FOR REMOTE**
12 **COLLOCATION?**

13 A. Yes. Qwest proposes a nonrecurring Collocation Space rate, an FDI Termination rate and a
14 Quote Preparation Fee ("QPF"). The Collocation Space rate includes the cost of the
15 cabinet space, the cabinet itself, all of the work and materials associated with placement of
16 the cabinet and also the provisioning of access to power. The nonrecurring FDI
17 Terminations rate is per-25 pairs and includes the costs associated with augmenting the
18 FDI to provide terminations. These activities include: trenching between the FDI and the
19 remote cabinet; splicing of cable to the FDI; and, splicing of cable to the remote cabinet.
20 Finally, Qwest proposes a QPF charge that is ICB.

1 **Q. IS AN ICB CHARGE APPROPRIATE FOR THE QPF ASSOCIATED WITH**
2 **REMOTE COLLOCATION?**

3 A. Yes. While the process of establishing a collocation within a Qwest central office is
4 generally predictable and, therefore, lends itself to standard costing and pricing, the same
5 cannot be said for the work associated with establishing a remote collocation site. For
6 example, distances between the FDI and the remote collocation sites will likely vary from
7 one request to another. Also, the survey work required for remote collocation requests may
8 vary, thereby making a determination of standard costs and prices difficult. For these
9 reasons, Qwest maintains that ICB is the appropriate method for pricing the QPF associated
10 with a request for a Remote Collocation.

11 **Q. PLEASE DESCRIBE VIRTUAL REMOTE TERMINAL COLLOCATION.**

12 A. Virtual Remote Terminal Collocation allows CLECs to purchase and deliver to Qwest their
13 own equipment for Qwest to install, repair, and maintain in a Qwest remote premises. In a
14 virtual collocation arrangement, customers do not have physical access to their virtually
15 collocated equipment in the Qwest remote premises.

16 **Q. WHAT CHARGES APPLY TO VIRTUAL REMOTE TERMINAL**
17 **COLLOCATION?**

18 A. The Flat Charge is a nonrecurring charge that includes the cost for processing a service
19 order and dispatch of a technician to the remote collocation site. In addition, nonrecurring
20 charges apply for Engineering, Maintenance, Installation and Training.

1 **E. CLEC-TO-CLEC CONNECTIONS**

2 **Q. PLEASE DESCRIBE CLEC-TO-CLEC CONNECTIONS.**

3 A. CLEC-to-CLEC connections provide CLECs with the ability to connect with each other
4 within the same Qwest wire center for the purpose of mutually exchanging traffic. CLECs
5 may also use the connections to connect multiple forms of their own collocations together
6 within the same wire center.

7 **Q. HOW IS A CLEC-TO-CLEC CONNECTION ACCOMPLISHED?**

8 A. Qwest offers two methods for CLECs to connect to one another. The two methods are
9 known as CLEC-to-CLEC Direct Connection and CLEC-to-CLEC Cross-Connection.

10 **Q. PLEASE DESCRIBE CLEC-TO-CLEC DIRECT CONNECTION.**

11 A. When a direct connection is requested, a cable is placed between the collocations of each
12 CLEC. The connection may be physical-to-physical, physical-to-virtual, or virtual-to-
13 virtual collocations.

14 **Q. PLEASE DESCRIBE THE PRICE ELEMENTS THAT APPLY WHEN A CLEC
15 DIRECT CONNECTS WITH ANOTHER CLEC'S COLLOCATION.**

16 A. The CLEC ordering the CLEC-to-CLEC direct connection will be charged:

17 (1) **Design, Engineering and Installation Flat Charges.** These nonrecurring charges
18 covers order processing, development of the price quote, and the hours to engineer
19 and install cable racking.

- 1 (2) **Cable Racking.** This recurring charge is a per foot, per month charge that recovers
2 the cost of the racking used to support the cabling, but not the cabling itself. Prices
3 also vary by the type of cabling supported (e.g., DS0, DS1, DS3 and fiber).
- 4 (3) **Virtual Connections.** This nonrecurring charge covers the labor that connects a
5 cable to a virtual collocation but not the cable itself. If two virtual collocations are
6 involved two Virtual Connections are charged. Prices vary by type (e.g., DS0 per 100
7 connections, DS1 per 28 connections, and DS3 per each connection).
- 8 (4) **Cable Hole.** This nonrecurring charge is incurred per occurrence. It covers the labor
9 and material that is required to open and close holes or slots between floors or
10 through interior walls designed to be compartmentalized. These holes and slots are
11 closed with approved firestop material that meets OSHA standards and Qwest policy.

12 **Q. UNDER WHAT CIRCUMSTANCES MAY A CLEC WISH TO USE CLEC-TO-**
13 **CLEC CROSS -CONNECTS RATHER THAN DIRECT CONNECTION TO**
14 **CONNECT WITH ANOTHER CLEC'S LOCATION?**

- 15 A. A CLEC may wish to use CLEC-to-CLEC cross connection when both CLECs have
16 capacity available on their collocation termination cables. These cables terminate on ICDF
17 frames and the terminations are identified by Connection Facility Assignments (CFAs). By
18 identifying each CLEC's CFA on an Access Service Request (ASR), a CLEC can request
19 Qwest to run a cross connect between the two CFAs. Collocation termination cables are
20 made available through the collocation process. Rates for collocation termination cables
21 were established in Part A of this docket.

1 **Q. WHAT CHARGE IS QWEST INTRODUCING FOR CLEC-TO-CLEC CROSS**
2 **CONNECTION?**

3 A. Qwest is introducing a CLEC-to-CLEC cross connection nonrecurring charge that covers
4 Qwest's costs for processing the order and designing and installing the cross connection
5 between the two CLECs' CFAs.

6 **F. SPACE AVAILABILITY REPORT**

7 **Q. PLEASE DESCRIBE THE SPACE INQUIRY REPORT.**

8 A. Upon request from a CLEC, Qwest will prepare a central office space inquiry report. The
9 report will include the number of collocations within the central office, the number of
10 equipment bay spaces available for collocation, any measures that Qwest has underway to
11 make additional collocation space available, and finally, any modifications that Qwest may
12 have made in the use of space since the last report was issued. A nonrecurring charge will
13 apply for each central office Space Availability Report ordered by the CLEC.

14 **G. COLLOCATION SPACE OPTIONING**

15 **Q. PLEASE DESCRIBE COLLOCATION SPACE OPTIONING.**

16 A. Collocation space optioning allows a CLEC and Qwest, or a Qwest affiliate, to option
17 space in a Qwest wire center premises. Optioned space is offered to CLECs for Caged,
18 Cageless, and Virtual Collocation arrangements. Space can be optioned for transmission

1 equipment for up to 1 year, circuit switched equipment for up to 3 years, or power plants
2 for up to 5 years.

3 **Q. WHAT RATE ELEMENTS ARE BEING INTRODUCED FOR COLLOCATION**
4 **SPACE OPTION?**

5 A. Two rates are being introduced. The first is a recurring rate known as Space Option Fee.
6 The Space Option Fee is based on the amount of space being optioned on per-month and
7 per-square foot basis. The Space Option Fee is a charge that was agreed to in the 271
8 workshops. As such, there is no cost study that supports that charge. The second charge is a
9 nonrecurring charge known as Space Option Administration Fee. The Space Option
10 Administration Fee is intended to recover the cost of processing the application, feasibility,
11 common space engineering, records management, and administration of the right of first
12 refusal process.

13 **V. UNBUNDLED NETWORK ELEMENTS ("UNES")**

14 **A. UNBUNDLED LOOPS**

15 **Q. WHAT NONRECURRING INSTALLATION CHARGES ASSOCIATED WITH**
16 **UNBUNDLED LOOPS ARE ADDRESSED IN YOUR TESTIMONY?**

17 A. Qwest is addressing two new nonrecurring loop installation charges for loops. The first
18 charge applies only to DS0 loops and is known as Coordinated Installation without

1 Cooperative Testing. The second charge applies to DS0, DS1, DS3 and OCn loops. This
2 charge is known as Basic Installation with Cooperative Testing.

3 **Q. PLEASE DESCRIBE THE COORDINATED INSTALLATION WITHOUT**
4 **COOPERATIVE TESTING.**

5 A. When an existing Qwest end-user or a CLEC end-user changes to another CLEC using this
6 option, Qwest will disconnect the loop and deliver it to the requesting CLEC via an
7 Interconnection Tie Pair ("ITP") to the demarcation point. This option offers the CLEC the
8 ability to coordinate the conversion activity, thus allowing the CLEC's end-user the ability
9 to minimize any service interruption. No testing is performed. At the appointed time,
10 Qwest will disconnect the loop from its current termination and deliver it via an ITP to the
11 point of demarcation. Charges for Coordinated Installation without Cooperative Testing
12 apply to each loop so installed.

13 **Q. WHAT RATE ELEMENTS IS QWEST INTRODUCING FOR COORDINATE**
14 **INSTALLATION WITHOUT COOPERATIVE TESTING?**

15 A. Qwest is introducing both installation and disconnection nonrecurring charges for
16 Coordinated Installation without Cooperative Testing.

17 **Q. PLEASE DESCRIBE BASIC INSTALLATION WITH COOPERATIVE TESTING.**

18 A. Coordinated Installation with Cooperative Testing may be ordered for new or existing DS0,
19 DS1 and DS3 service. When an existing Qwest end-user, or a CLEC end-user, changes to
20 another CLEC that orders this service, the coordinated installation will include cooperative
21 testing and a technician dispatch. At the appointed time, Qwest will disconnect the loop

1 from its current termination and deliver it to the point of demarcation in coordination with
2 the CLEC. Qwest will complete the required performance tests and perform other testing
3 as requested by the CLEC. A charge for Coordinated Installation with Cooperative Testing
4 applies to each loop so installed.

5 **Q. WHAT RATE ELEMENTS IS QWEST PROPOSING FOR COORDINATE**
6 **INSTALLATION WITH COOPERATIVE TESTING?**

7 A. Qwest proposes using the nonrecurring installation and disconnect rate elements for
8 Coordinated Installation with Performance Testing introduced in previous Washington cost
9 proceedings.

10 **Q. DOES THE FACT THAT THE PROPOSED PRICES FOR COORDINATED**
11 **INSTALLATION WITH COOPERATIVE TESTING AND COORDINATED**
12 **INSTALLATION WITH PERFORMANCE TESTING ARE THE SAME SUGGEST**
13 **THAT THESE TWO OPTIONS ARE LIKEWISE THE SAME?**

14 A. No. While there is no difference in price, there is a significant difference from a product
15 perspective between the two installation options. Qwest performs the same activities for
16 both types of installation options. However, with a coordinated installation, the CLEC has
17 the ability to coordinate the installation and testing with Qwest should it choose to do so.
18 The CLEC's ability to coordinate the installation does not change the activities that Qwest
19 performs.

20 **Q. IS QWEST INTRODUCING RATES FOR HIGH CAPACITY DIGITAL LOOPS**
21 **OTHER THAN DS1 AND DS3 LOOPS IN THIS PROCEEDING?**

1 A. Yes. Qwest is introducing recurring rates for OC-3, OC-12, and OC-48 digital loops.
2 Qwest proposes using the nonrecurring rates for DS3 installation and disconnections filed
3 in previous proceedings for the installation and disconnection of OC-3, OC 12, and OC-48
4 digital loops.

5 **B. SUB-LOOP UNBUNDLING**

6 **Q. PLEASE DESCRIBE THE INTRABUILDING CABLE LOOP PRODUCT.**

7 A. When the CLEC places outside plant to a building and wishes to access the buildings riser
8 cable and inside wire through a Qwest owned building terminal it must order an intra-
9 building cable Loop.

10 **Q. WHAT CHARGE APPLIES WHEN AN INTRABUILDING CABLE LOOP IS**
11 **ORDERED BY THE CLEC?**

12 A. A monthly recurring charge applies per intrabuilding cable pair ordered by the CLEC. This
13 recurring rate element was introduced in Part B. Nonrecurring installation for first and
14 each additional and disconnection charges are being introduced for the rate elements
15 described below:

- 16 • Dispatch. When Qwest provides the jumper work at a Multi Tenant Environment
17 (MTE) Point of Interface (POI), nonrecurring charges will be assessed. These charges
18 recover the cost of processing service orders and dispatching a technician.

- 1 • Without Dispatch. When the CLEC provides the jumper work at MTE POI
2 nonrecurring charges will also be assessed. These charges recover the cost of
3 processing service orders only.
- 4 • MTE Site Inventory. This nonrecurring charge recovers the cost of Qwest
5 inventorying an MTE POI when a CLEC initiates activity within a MTE POI. This
6 charge is applied only the first time an MTE POI is inventoried.

7 **C. UNBUNDLED DEDICATED INTEROFFICE TRANSPORT ("UDIT") AND EXTENDED**

8 **Q. PLEASE DESCRIBE QWEST'S UNBUNDLED DEDICATED INTEROFFICE**
9 **TRANSPORT ("UDIT") PRODUCT.**

10 A. Qwest's UDIT product consists of several pricing elements that allow Qwest to recover its
11 costs for distinct network components that the CLEC leases from Qwest to provide a
12 dedicated circuit to its end user customer. These rate elements are:

- 13 • Enhanced-UDIT ("EUDIT") recovers the cost Qwest incurs for a CLEC using a facility
14 (i.e. DS1, DS3 and OCn) between its Point of Interface ("POI") and the Qwest serving
15 wire center. This is a dedicated network facility that is engineered to meet the traffic
16 needs of a single location in Qwest's dedicated loop network, therefore it is priced
17 using flat-rated, distance-averaged rate elements. DS1 and DS3 EUDIT terminate at
18 DS1 and DS3 electrical levels at the CLEC POI while OCn EUDIT terminates at an
19 optical level.

- 1 • EUDIT Remote Node Port. In Washington, Qwest offers the CLEC the option of
2 leasing the equipment necessary to take the optical signal delivered by EUDIT and,
3 through use of the remote node port option, deliver it at lower digital speeds. For
4 example, a CLEC leasing an OC-12 EUDIT can use the remote node option to obtain a
5 combination of OC-3, DS3, or DS1 ports off of the OC-3 EUDIT.

- 6 • UDIT recovers the cost that Qwest incurs when the CLEC uses its shared interoffice
7 network. The interoffice network is engineered to meet the traffic needs of all types of
8 traffic (exchange, exchange access, private line, etc.) hauled between two wire centers
9 within Qwest's multi-point interoffice network. Therefore, it is priced using fixed and
10 per-mile rate elements.

- 11 • UDIT Multiplexing recovers the cost that Qwest incurs when providing a stand-alone
12 multiplexer that terminates 1 DS3 and 28 DS1s or 1 DS1 and 24 DS0 level circuits
13 within a CLEC's collocation.

14 **Q. DOES THE FCC REQUIRE THAT A PARTICULAR PRICING METHODOLOGY**
15 **BE USED FOR INTERCONNECTION SERVICES AND UNES?**

16 A. Yes. In Paragraph 685 of the FCC's Local Competition First Report and Order (CC 96-98,
17 released August 8, 1996), the FCC stated that, "the forward-looking pricing methodology
18 for interconnection and unbundled network elements should be based on costs that assume
19 that wire centers will be placed at the incumbent LEC's current wire center locations, but
20 that the reconstructed local network will employ the most efficient technology for
21 reasonably foreseeable capacity requirements."

1 **Q. DOES QWEST'S PROPOSED PRICING STRUCTURE SATISFY THESE**
2 **REQUIREMENTS?**

3 A. Yes. Qwest's proposed EUDIT/UDIT pricing structure recognizes that Qwest is using two
4 existing network architectures in providing UDIT service within an exchange area. A flat
5 rated distance averaged rate such as EUDIT is the appropriate structure for any rate
6 element using Qwest's dedicated loop network. Fixed and per mile rate elements are
7 appropriate for rate elements using Qwest's shared inter-office network, i.e., UDIT. This
8 pricing structure recognizes that Qwest uses multiple wire centers to serve a local exchange
9 area.

10 **Q. PLEASE IDENTIFY THE EUDIT CHARGES THAT QWEST IS INTRODUCING**
11 **IN THIS DOCKET.**

12 A. Qwest is introducing recurring rates for OC-48 EUDIT. Qwest is also introducing OC-48
13 nonrecurring charges for installation and disconnection.

14 **Q. PLEASE IDENTIFY THE EUDIT REMOTE NODE PORT NONRECURRING**
15 **CHARGES THAT QWEST IS INTRODUCING IN THIS DOCKET.**

16 A. Qwest is introducing nonrecurring installation and disconnect charges for each DS1, DS3,
17 OC-3, and OC-12 remote node port provided.

18 **Q. PLEASE IDENTIFY THE EUDIT REMOTE NODE PORT RECURRING**
19 **CHARGES THAT QWEST IS INTRODUCING IN THIS DOCKET.**

20 A. Qwest is introducing the following recurring charges for EUDIT remote node port:

- 1 • For OC-3 EUDIT, Qwest offers both DS1 and DS3 remote node ports.
- 2 • For OC-12 EUDIT, Qwest offers DS1, DS3 or OC-3 remote node ports.
- 3 • For OC-48 EUDIT, Qwest offers DS3, OC-3 or OC-12 remote node ports.

4 **Q. PLEASE IDENTIFY THE UDIT CHARGES THAT QWEST IS INTRODUCING IN**
5 **THIS DOCKET.**

- 6 A. Qwest is introducing recurring rates for OC-48 UDIT. These recurring rates are grouped
7 into four mileage bands and consist of a fixed and per mile rate element for each mile band.
8 Qwest is also introducing OC-48 nonrecurring charges for installation and disconnection.

9 **Q. PLEASE DESCRIBE UDIT REARRANGEMENTS.**

- 10 A. A CLEC may request that UDIT terminations be moved or rearranged at the CLEC
11 demarcation point. A CLEC may also request that UDIT options be changed.
12 Rearrangements may be ordered by the CLEC for working UDITS in place at single and
13 dual office locations.

14 **Q. WHAT CHARGES APPLY TO UDIT REARRANGEMENTS?**

- 15 A. Nonrecurring charges apply for rearrangements involving DS0 single offices and DS0 dual
16 offices, and DS0 high capacity single offices and DS0 high capacity dual offices.

17 **Q. HOW IS MULTIPLEXING USED IN RELATION TO THE UDIT PRODUCT?**

- 18 A. Multiplexing is the process of either combining multiple lower bandwidth communications
19 channels into a single higher bandwidth circuit (example: 28 DS1s into a DS3) or
20 separating a higher bandwidth signal into multiple lower bandwidth signals (example: DS3
21 into 28 DS1s). Multiplexing is an optional service that a CLEC may purchase from Qwest.

1 As traffic is moved throughout the network on a UDIT, the various speeds of the traffic on
2 that UDIT may be multiplexed as traffic is distributed to various locations enabling more
3 efficient use of the circuits.

4 **Q. WHAT MULTIPLEXING NONRECURRING CHARGE IS QWEST ADDING TO**
5 **THE CHARGES PRESENTED IN PART B OF THIS DOCKET?**

6 A. Qwest proposes a nonrecurring charge for installation and disconnection for DS3 to DS1
7 multiplexing.

8 **Q. PLEASE BRIEFLY DESCRIBE THE ACTIVITIES ASSOCIATED WITH THE DS3**
9 **TO DS1 MULTIPLEXING CHARGE.**

10 A. When a CLEC orders DS3 to DS1 multiplexing from Qwest, the CLEC is receiving a
11 "stand-alone" multiplexer. By "stand-alone" I mean that all 28 DS1's and the DS3 must be
12 provisioned to terminate within a CLEC's collocation facilities. Because the CLEC is
13 ordering a stand-alone multiplexer and is not ordering unbundled elements at the same time
14 they order multiplexing, Qwest must process the request for DS3 to DS1 multiplexing as
15 29 separate orders. Therefore, a single multiplexing charge is assessed for the 29 separate
16 orders.

17 **D. UNBUNDLED DARK FIBER ("UDF")**

18 **Q. PLEASE DESCRIBE QWEST'S UNBUNDLED DARK FIBER (UDF) OFFERING.**

19 A. UDF is a deployed unlit pair of fiber optic cables or strands that connect two points within
20 Qwest's network.

1 **Q. PLEASE SUMMARIZE THE UDF CHARGES THAT QWEST IS INTRODUCING**
2 **IN THIS COST PROCEEDING.**

3 A. Qwest is introducing charges for Single Strand Increments for all unbundled dark fiber rate
4 elements filed on a per-pair basis in Part B of this docket (i.e. fiber loop, transport, cross
5 connect and termination). Qwest is also introducing nonrecurring charges for field
6 verification-engineering and dark fiber splice.

7 **Q. PLEASE DESCRIBE FIELD VERIFICATION - ENGINEERING.**

8 A. Field Verification – Engineering is a step in the Field Verification/Quote Preparation
9 (FV/QP) process that identifies additional engineering record searches for splice locations
10 and splicing availability. This rate is charged upfront but deducted from the FV/QP when a
11 single splice is available and the CLEC requests Qwest to move forward with the process.

12 **Q. PLEASE DESCRIBE DARK FIBER SPLICE.**

13 A. Qwest will accommodate a CLEC's request for access to a Qwest fiber UNE-loop or
14 subloop. In doing so, Qwest will provide a fiber stub from an accessible splice point when
15 unspliced fiber (non-ribbon) is available. If space permits, the CLEC may use this fiber
16 stub for making its fiber splice. A nonrecurring charge applies for Dark Fiber Splice.

17 **J. MISCELLANEOUS NONRECURRING CHARGES**

18 **Q. GENERALLY DESCRIBE THE NATURE OF THE ACTIVITIES FOR WHICH**
19 **MISCELLANEOUS NONRECURRING CHARGES WOULD APPLY.**

1 A. Miscellaneous nonrecurring charges are intended to cover additional engineering, labor and
2 testing when incurred by Qwest. Miscellaneous charges may be assessed when at the
3 direction of a CLEC, work activity is requested that is not part of the nonrecurring charges
4 normally associated with a product.

5 **Q. PLEASE PROVIDE A LIST OF THE MISCELLANEOUS NONRECURRING**
6 **CHARGES?**

- 7 A. Additional Engineering - Basic (per 1/2 Hour)
8 Additional Engineering - Overtime (per 1/2 Hour)
9 Additional Labor Installation -Overtime (per 1/2 Hour)
10 Additional Labor Installation - Premium (per 1/2 Hour)
11 Additional Labor Other - Basic (per 1/2 Hour)
12 Additional Labor Other - Overtime (per 1/2 Hour)
13 Additional Labor Other - Premium (per 1/2 Hour)
14 Testing and Maintenance - Basic (per 1/2 Hour)
15 Testing and Maintenance - Overtime (per 1/2 Hour)
16 Testing and Maintenance - Premium (per 1/2 Hour)
17 Maintenance of Service - Basic (per 1/2 Hour)
18 Maintenance of Service - Overtime (per 1/2 Hour)
19 Maintenance of Service - Premium (per 1/2 Hour)
20 Additional Coop Acceptance Test - Basic (per 1/2 Hour)
21 Additional Coop Acceptance Test - Overtime (per 1/2 Hour)
22 Additional Coop Acceptance Test - Premium (per 1/2 Hour)

- 1 Nonscheduled Coop Test - Basic (per 1/2 Hour)
- 2 Nonscheduled Coop Test - Overtime (per 1/2 Hour)
- 3 Nonscheduled Coop Test - Premium (per 1/2 Hour)
- 4 Nonscheduled Manual Test - Basic (per 1/2 Hour)
- 5 Nonscheduled Manual Test - Overtime (per 1/2 Hour)
- 6 Nonscheduled Manual Test - Premium (per 1/2 Hour)
- 7 Cooperative Scheduled Test - LOSS (per Month)
- 8 Coop Scheduled Test-C - Message Noise (per Month)
- 9 Coop Scheduled Test-Balance (per Month)
- 10 Coop Scheduled Test - Gain Slope (per Month)
- 11 Coop Scheduled Test-C - Notched Noise (per Month)
- 12 Manual Scheduled Test - Loss
- 13 Manual Scheduled Test-C - Message Noise (per Month)
- 14 Manual Scheduled Test-Balance (per Month)
- 15 Manual Scheduled Test-Gain Slope (per Month)
- 16 Manual Scheduled Test-C - Notched Noise (per Month)

17 **Q. UNDER WHAT CIRCUMSTANCES WOULD QWEST CHARGE THE**
18 **OVERTIME AND PREMIUM CHARGES DESCRIBED ABOVE?**

- 19 A. Generally, overtime charges will apply when the CLEC requests that work be performed by
20 Qwest technicians before 8:00 a.m., after 5:00 p.m., or on a Saturday. Generally, premium
21 charges will apply when the CLEC requests that work be performed by Qwest technicians
22 on a Sunday or Holidays. The application of Overtime and Premium charges may vary
23 somewhat depending upon the terms of the particular interconnection agreement. Premium

1 charges also apply to the 50th or greater hour worked by a technician in a given work
2 week.

3 **Q. DOES QWEST PROPOSE OTHER MISCELLANEOUS ELEMENTS IN**
4 **ADDITION TO THOSE ADDRESSED IN THIS PROCEEDING?**

5 A. Yes. Qwest proposes to introduce an additional dispatch charge, date change and design
6 change elements in this cost proceeding

7 **Q. PLEASE DESCRIBE WHEN A NONRECURRING CHARGE WOULD APPLY**
8 **FOR ADDITIONAL DISPATCH.**

9 A. A nonrecurring charge would apply when, at the request of the CLEC, a Qwest technician
10 is dispatched an additional time to a CLEC designated location.

11 **Q. PLEASE DESCRIBE WHEN A NONRECURRING CHARGE WOULD APPLY**
12 **FOR A DATE CHANGE.**

13 A. A date change nonrecurring charge would apply when the CLEC changes a previously
14 established due date for service. Such a change necessitates the issuance of a new service
15 order.

16 **Q. PLEASE DESCRIBE WHEN AN INDIVIDUAL NONRECURRING CHARGE**
17 **WOULD APPLY FOR DESIGN CHANGE.**

18 A. A nonrecurring charge would apply when a design change occurs that requires an
19 engineer's review. Such design changes may include a change of end user premises, the

1 addition or deletion of optional features or functions, or a change in the type of transport
2 termination.

3 **Q. PLEASE DESCRIBE WHEN A MISCELLANEOUS NONRECURRING CHARGE**
4 **WOULD APPLY FOR TROUBLE ISOLATION.**

5 A. Qwest will bill appropriate Maintenance of Service charges as set forth in Exhibit TKM-28
6 for dispatched work done by Qwest where the trouble is found to be on the end user's side
7 of the NID or the trouble is found to be in the CLEC's portion of the network.

8 Miscellaneous charges may also be assessed when the CLEC authorizes Qwest to repair the
9 trouble on the CLEC's behalf. Qwest will charge the CLEC the appropriate Additional
10 Labor Charges from this list of miscellaneous charges in addition to the Maintenance of
11 Service charge.

12 **Q. HOW DOES QWEST PROPOSE TO CHARGE FOR EXPEDITES AND**
13 **CANCELLATIONS?**

14 A. Qwest proposes to develop charges for expedite and cancellations on an ICB. The ICB
15 pricing process will be based upon the critical dates, with terms and conditions consistent
16 with the Washington Access Tariff, Section 5.2.3, and the applicable nonrecurring charges
17 referenced in the CLEC's agreement.

1 **VI. OTHER SERVICES**

2 **A. ENHANCED EXTENDED LOOP ("EEL")**

3 **Q. PLEASE DESCRIBE QWEST'S ENHANCED EXTENDED LOOP ("EEL")**
4 **OFFERING.**

5 A. An EEL is a means by which a CLEC may access an end user customer not located in the
6 same Qwest wire center in which the CLEC is located. An EEL is a combination of a loop
7 and dedicated interoffice transport facilities. The EEL may also include multiplexing or
8 concentration capabilities.

9 **Q. WHAT IS EEL TRANSPORT?**

10 A. EEL Transport consists of the dedicated interoffice facilities between Qwest wire centers.
11 Qwest offers recurring fixed and recurring per mile charges for OC-3, OC-12, and OC-48.

12 **Q. WHAT RECURRING CHARGES FOR EEL TRANSPORT IS QWEST**
13 **INTRODUCING INTO THIS DOCKET?**

14 A. Qwest is introducing OC-48 fixed and per mile recurring charges for four separate mileage
15 bands.

16 **B. BONA FIDE REQUESTS**

17 **Q. PLEASE DESCRIBE A BONA FIDE REQUEST ("BFR") AND THE ASSOCIATED**
18 **NONRECURRING CHARGE.**

1 A. A request by a CLEC for interconnection or access to a UNE or ancillary service that
2 Qwest does not make readily available will be treated as a BFR. Qwest will use the BFR
3 process to determine the terms and timetable for providing the requested interconnection or
4 access to UNEs or ancillary services. Qwest is proposing a nonrecurring nonrefundable
5 processing fee for the BFR process. This fee covers Qwest's network cost to process the
6 request and project manage the technical feasibility evaluation.

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

8 A. Yes it does. Thank you.