

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Continued Costing and  
Pricing of Unbundled Network Elements,  
Transport, Termination, and Resale**

**Docket No. UT – 003013**

*Part D*

**SUPPLEMENTAL DIRECT TESTIMONY**

**OF**

**ROBERT F. KENNEDY**

**QWEST CORPORATION**

**November 30, 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. ARE YOU THE SAME ROBERT F. KENNEDY THAT FILED DIRECT**  
8 **TESTIMONY ON NOVEMBER 7, 2001 IN THIS DOCKET?**

9 A. Yes

10 **II. PURPOSE OF DIRECT TESTIMONY**

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

12 A. This supplemental direct testimony describes Qwest's poles, ducts and Right of Way  
13 (ROW) products and how their associated rate elements are applied.

14 **A. ACCESS TO POLES, DUCTS, CONDUITS AND RIGHTS OF WAY**

15 **Q. WILL QWEST PROVIDE A CLEC WITH ACCESS TO RIGHT OF WAY?**

1 A. Yes. Where Qwest has ownership or control to do so, Qwest will provide to a CLEC  
2 access to available ROW for the purpose of placing telecommunications equipment. This  
3 is accomplished by the CLEC and Qwest entering into an access agreement.

4 **Q. IS QWEST INTRODUCING RATE ELEMENTS IN THIS PROCEEDING FOR**  
5 **ACCESS TO ROW?**

6 A. Yes. Qwest is introducing two ROW rate elements:

- 7 • ROW inquiry fee
- 8 • ROW Documentation Fee

9  
10 **Q. WHAT IS THE ROW INQUIRY FEE?**

11 A. The ROW inquiry fee recovers the cost to research and provide a CLEC with copies of  
12 publicly recorded easements and a matrix of private easements that the CLEC's route will  
13 pass through.

14 **Q. WHAT IS INCLUDED IN THE ROW DOCUMENTATION FEE?**

15 A. The ROW documentation fee recovers the cost of research and preparation of documents  
16 associated with private easements, including the preparation of quit claim deeds as  
17 required.

18 **Q. DOES QWEST PROVIDE ACCESS TO ITS POLES?**

19 A. Yes. CLECs may connect to Qwest's existing poles where space is available.

1 **Q. HOW DOES A CLEC ACQUIRE ACCESS TO SPACE ON QWEST POLES?**

2 A. To acquire access to pole space the CLEC utilizes a two part pre-ordering process. This  
3 pre-ordering process includes two steps for which separate nonrecurring charges apply.

4 The two steps are:

- 5 • Pole inquiry. During this part of the process, Qwest processes and tracks the  
6 order, creates a log for the job in Qwest's database and assigns a field  
7 engineer who conducts a database search.
- 8 • Field verification. The field engineer who was identified in the pole inquiry  
9 step will be available to the CLEC as Qwest's contact. The engineer will work  
10 with the CLEC for joint verification of the poles and route. Upon completion  
11 of the joint verification, Qwest will provide the CLEC with a field verification  
12 report. The report identifies the availability of facilities, Qwest owned or  
13 controlled poles and any make ready requirements.

14 Once the pre-ordering process is completed the CLEC can order access to poles by sending  
15 Qwest a signed copy of the Poles/Innerduct Order form along with make-ready charges (if  
16 any) and the recurring annual charges for the current period.

17 **Q. WHAT PRICES FOR ACCESS TO POLES IS QWEST INCLUDING IN THIS**  
18 **SUPPLEMENTAL TESTIMONY?**

19 A. Qwest is including prices for the pole inquiry and field verification.

20 **Q. DOES QWEST PROVIDE ACCESS TO DUCTS/INNERDUCT?**

21 A. Yes. CLECs may use Qwest's existing ducts/innerduct where space is available.

22 **Q. HOW DOES A CLEC ACQUIRE ACCESS TO SPACE ON QWEST POLES?**

1 A. To acquire access to Qwest's ducts/innerducts the CLEC utilizes a two part pre-ordering  
2 process. This pre-ordering process includes two steps for which separate nonrecurring  
3 charges apply. The two steps are:

- 4 • Innerduct inquiry. During this part of the process, Qwest performs a database  
5 search and prepares a duct diagram that identifies distances between manholes  
6 and access points for the manholes. The inquiry step includes only the  
7 location and mapping of Qwest facilities but does not indicate if space is  
8 available.
- 9 • Field verification. Qwest will open and inspect each manhole on the requested  
10 route to determine if space is available. Upon completion of the field  
11 verification, Qwest will provide the CLEC with a field verification report.  
12 The report identifies the availability of facilities and any make ready  
13 requirements.

14 Once the pre-ordering process is completed the CLEC can order access by sending Qwest a  
15 signed copy of the Poles/Innerduct Order form along with make-ready charges (if any) and  
16 the recurring annual charges for the current period.

17 **Q. WHAT PRICES FOR ACCESS TO DUCTS/INNERDUCT IS QWEST**  
18 **INCLUDING IN THIS SUPPLEMENTAL TESTIMONY?**

19 A. Qwest is including prices for the innerduct inquiry and field verification.

20 **Q. IS QWEST INTRODUCING RATE ELEMENTS IN THIS PROCEEDING THAT**  
21 **ARE USED FOR DUCT/INNERDUCT ACCESS WHEN THE CLEC USES A**  
22 **QWEST APPROVED CONTRACTOR TO PROVIDE FIELD VERIFICATION?**

23 A. Yes. Qwest is introducing three additional rates for access to duct/innerduct when the  
24 CLEC uses a Qwest approved contractor to perform the verification. These rates are:

- 1 • Planner verification (per manhole)
- 2 • Manhole verification Inspector (per manhole)
- 3 • Manhole make-ready inspector (per manhole)

4 **Q. PLEASE DESCRIBE THE PLANNER VERIFICATION FEE.**

5 A. When the CLEC uses its own contractor to perform the field verification and provides the  
6 butterfly drawings; Qwest's tactical planner reviews records and produces a final field  
7 inspection report of availability. The planner verification fee is a nonrecurring charge that  
8 covers the cost for Qwest's tactical planner.

9 **Q. PLEASE DESCRIBE THE MANHOLE VERIFICATION INSPECTOR CHARGE.**

10 A. When a CLEC performs the field verification step of an innerduct request a Qwest  
11 inspector is present throughout the verification to ensure that manholes are opened and  
12 sealed properly and that work safety standards are followed by the CLEC's workers. The  
13 manhole verification inspector charge is a nonrecurring charge assessed per manhole.

14 **Q. WHAT IS THE PURPOSE OF THE MANHOLE MAKE-READY INSPECTOR**  
15 **FEE?**

16 A. The manhole make-ready Inspector per manhole fee recovers the cost for a Qwest inspector  
17 to be present during the placement of innerduct by a CLEC. The inspector will ensure that  
18 manholes are opened and sealed properly, that the innerduct materials used by the CLEC's  
19 workers meet the appropriate standards and that work safety standards and guidelines are  
20 followed.

1

**III. CONCLUSION**

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

3 A. Yes it does. Thank you.