

**WUTC DOCKET NO. UT-023003**  
**CONFIDENTIAL STATEMENT OF STEVEN E. TURNER**  
**IN RESPONSE TO VERIZON VZLOOP 7A FILING**  
**JUNE 16, 2004**

1. My name is Steven E. Turner, and I am the same Steven E. Turner that provided testimony before the Commission in the above-referenced docket. I consider myself to continue to be under the oath that I took during the evidentiary hearings in making the following statement.

2. I have run Verizon 7A of VzLoop both with Verizon's inputs and with the inputs that I identified and used in my prefiled testimony and exhibits. In both cases, I found that the results of the analysis did not change. While the correction I advocated resulted in approximately a 20 percent reduction in the number of digital loop carriers ("DLCs") with the inputs used in California, a similar result did not occur in Washington. I nevertheless continue to recommend that the Commission use the corrected code in light of the significant change that resulted in California and the possibility that the Commission may adopt inputs other than those proposed by Verizon or AT&T that may cause the negative denominator to occur in Version 7 of VzLoop.

3. The lack of any change between the model runs using VzLoop Versions 7 and 7A, however, only illustrates that there are deficiencies in the cross-over analysis used in Verizon's VzLoop model to determine DLC locations as I described in my testimony (Exhibit 751TC) at pages 41-43. In this wire center (ACMEWAXA), Verizon's VzLoop model places DLC 213 feet from the central office when there is only a *total* demand for this network point of \*\*\***CONFIDENTIAL** **END CONFIDENTIAL**\*\*\* lines. As I previously testified, there is something clearly wrong when such a small number of lines so close to the central office is

converted into a modeled DLC location, but VzLoop Version 7A continues to model the network in this manner. This arrangement would never require fiber-fed DLC, and this illustration should continue to cause the Commission concern about the accuracy of VzLoop for use in setting rates in Washington.