

Exhibit T-___ (TLS-16T)
Docket No. UT-023003
Witness: Thomas L. Spinks

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Review of)
Unbundled Loop and Switching Rates and) DOCKET NO. UT-023003
Review of the Deaveraged Zone Rate Structure)
)
_____)

SUPPLEMENTAL TESTIMONY OF
THOMAS L. SPINKS
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION STAFF

June 29, 2004

1 **Q. Please state your name and business address.**

2 A. My name is Thomas Spinks, my business address is 1300 South Evergreen Park
3 Drive Southwest, P.O. Box 47250, Olympia, Washington 98504. My e-mail
4 address is tspinks@wutc.wa.gov.

5

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by the Washington Utilities and Transportation Commission as a
8 Regulatory Consultant.

9

10 **Q. What are your education and experience qualifications?**

11 A. My qualifications are provided as Exhibit 1052.

12

13 **Q. What is the purpose of your testimony?**

14 A. The purpose of this testimony is to provide an update to Staff's UNE loop cost
15 estimates using the revised version of HAI 5.3 and to briefly respond to
16 Verizon's June 18, 2004 testimony regarding the revised HAI model.

17

1 **Q. Mr. Murphy states that HM 5.3 Revised produces copper distribution lengths**
2 **that exceed 18,000 feet in 239 of the 829 of the main clusters with some as long**
3 **as 38,000 feet and the average being over 22,000 feet. Do you agree?**

4 A. No. Mr. Murphy's testimony addresses copper distribution lengths before
5 making the loop length adjustments that the Commission has directed be made
6 in virtually every phase of the generic cost dockets since 1997. The Commission
7 should be concerned about the adjusted loop lengths used to calculated cost, not
8 the unadjusted "intermediate" loop lengths. Staff's revised cost estimates
9 contains loop lengths that have been on average reduced by 61 percent¹ from the
10 loop lengths cited in Mr. Murphy's testimony.

11
12 **Q. Mr. Dippon states that, "the modeled network is too short to serve all the**
13 **locations outside the circle in the map." (Ex. __ CMD-8T, page 8, lines 9-10.)**
14 **Please comment.**

15 A. Staff has two concerns with this testimony. First, to the extent there is
16 insufficient cable as Mr. Dippon contends, the loop length adjustment would
17 correct for this result. Second, and more importantly, by referring to a "circle,"
18 Mr. Dippon may leave the erroneous impression that the circle represents some

¹ See Ex. __ TJT-5T, page 5, line 8.

1 parameter of the model. This is not the case. The circle is Verizon's chosen
2 representation of the cluster shape. The reality is that the area within the circle
3 represents the square miles of land within which facilities will be constructed to
4 serve customer locations in the cluster. A proper analysis would have compared
5 the area of the cluster with the area encompassing the customer locations to be
6 served within the cluster.

7

8 **Q. Has Staff updated its results to reflect the changes caused by HM 5.3 Revised?**

9 A. Yes. The revised testimony, exhibits and workpapers are included in the CD-
10 ROM filed with this testimony.

11

12 **Q. Do you have any further testimony at this time?**

13 A. No.