BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE CONTINUED COSTING AND PRICING OF UNBUNDLED NETWORK ELEMENTS, TRANSPORT AND TERMINATION	**)** **)** **)** **)** **)**	**DOCKET NO. UT 003013** **PART D**

SUPPLEMENTAL REBUTTAL TESTIMONY OF

ROBERT J. HUBBARD

ON BEHALF OF

QWEST CORPORATION

APRIL 17, 2002

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I. IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, EMPLOYER AND BUSINESS ADDRESS.

A. My name is Robert J. Hubbard. I am employed by Qwest Corporation, as a Director in the Local Network Organization. My business address is 700 West Mineral, Littleton, Colorado 80120.

Q. HAVE YOU PREVIOUSLY FILED DIRECT TESTIMONY IN PART D OF THIS HEARING?

A. Yes, I filed Direct and Rebuttal Testimony in Part D of this cost docket.

II. PURPOSE AND ISSUES OF SUPPLEMENTAL REBUTTAL TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL TESTIMONY?

A. The purpose of my Supplemental Rebuttal Testimony is to respond to the Second Supplemental Responsive Testimony of Richard Cabe. Mr. Cabe responds to Covad Data Request 60 and includes his analysis of the data that Qwest has provided. My testimony addresses several of the orders that Mr. Cabe identifies in his analysis. Also, I respond to the Reply Testimony and the Surrebuttal Testimony of Roy Lathrop for WorldCom.

III. TESTIMONY OF MR. CABE

Q. MR. CABE STATES THAT "COOPERATIVE TESTING IS A COLLABORATIVE PROCESS USED TO ENSURE THAT THE INSTALLATION IS DONE CORRECTLY." WILL YOU RESPOND TO THIS STATEMENT?

A. I agree with Mr. Cabe that the testing performed is a collaborative process between two companies. Plainly speaking, the testing that is being performed is the testing of two networks, the "loop" network of Qwest, and the additional network of Covad. When Qwest performs the testing ahead of cooperative testing, Qwest is only testing the "loop" network. The cooperative testing adds the CLEC network and the Qwest network together, thus creating a whole network.

Q. CAN YOU PROVIDE AN EXAMPLE OF THIS?

A. Yes. One of the documents provided in response to Covad's data request No. 60 illustrates this point. This document shows that the loop tests OK with Qwest. But when Covad added its network, the cooperative test showed that the loop was too long with both networks. Qwest then added Total Reach (central office extension technology to extend the loop) to the loop and it was accepted by Covad. This is not a fault of either company, it is just that when both networks are added together there is an increase in the resistance and the total network needed an enhancement (Total Reach) to provide the service (see Exhibit RJH-14

– this document is a more complete record of the order and test process shown in Exhibit RC-5). This is not an error in the testing process on Qwest's part, nor does it establish that Qwest missed issues or failed to perform the necessary test.

Q. MR. CABE CLAIMS THAT EXHIBIT RC-1 SHOWS THAT QWEST DOES NOT TEST THE LOOP THOROUGHLY. WILL YOU PLEASE RESPOND TO THIS?

A. Yes. Mr. Cabe is mistaken in his conclusion. Mr. Cabe fails to point out in his reference to Exhibit RC-1 that Qwest performed its original test prior to the cooperative test with Covad. At that time, the Qwest technician found a defective Buried Service Wire (BSW) in the Network. The technician placed the order in jeopardy while the BSW was being replaced. When the cooperative test was performed there were two cross-connects that needed to be placed within the central office. It is hard to tell what happened with the order when the order went into jeopardy, whether the complete order was not worked or the cross-connects were removed awaiting the buried drop to be replaced. What this means is that Qwest does perform pre-test, or the defective BSW would not have been discovered. I am sure that when the BSW was replaced the Qwest technician thought that was the only thing wrong with the loop and ordered the cooperative test with Covad and that is when the cross-connects were found to be missing. This is not a situation where Qwest failed to test the loop.

Q. ON PAGE 4, MR. CABE ADDRESSES EXHIBIT RC-2. WILL YOU RESPOND TO EXHIBIT RC-2 AND MR. CABE'S OVERVIEW OF THIS EXHIBIT?

A. Exhibit RC-2 is a portion of a test record that was provided in discovery. A problem was found during cooperative testing of a "bad heat coil" in the loop and Mr. Cabe states that Qwest overlooked this problem. What Mr. Cabe doesn't realize is how a test is performed on an unbundled loop with no switching associated with it. To test a loop, a central office technician needs to place a testing "shoe" (test cord) in the same place that a heat coil goes. Therefore, the technician has to remove the heat coil to do the test. When the heat coil was replaced and the cooperative test was performed, the defective heat coil was detected and replaced. The Qwest technician would have not known that the heat coil was bad after he replaced it. In a Network, be it Qwest's or Covad's or any provider's that uses equipment, things break or become defective, it is not anyone's fault that these things happen. Even though Qwest has quality control standards for testing, the "bad heat coil" would not have been detected up front.

Q. MR. CABE STATES ON PAGE 5 THAT IT IS LESS COSTLY FOR QWEST TO USE Covad FOR PRE-TEST RATHER THAN TEST ITSELF. WILL YOU RESPOND TO THIS ALLEGATION?

A. First of all, it is ridiculous for Mr. Cabe to state this. When Qwest performs its test with Covad, Qwest has technicians in the field and in the central office to

perform the test. Covad only has a test technician sitting at a desk to perform the test. In Exhibit RC-3, a Qwest technician was performing a pre-test and thought his testing showed some bridged tap (BT) on the line. The technician then contacted Covad and asked their technician to verify that they could see service affecting BT on the line. The Covad technician could not see any BT and accepted the loop. It is not quicker to contact Covad, as Mr. Cabe asserts, to have a pre-test done by Covad. Qwest was already testing the line and thought we could see something on the loop that indicated BT, and wanted to know if Covad could see the same thing. This is normal in the technician world to verify that their loop would work.

Q. MR. CABE ADDRESSES SEVERAL OTHER EXAMPLES IN HIS TESTIMONY. WILL YOU SUMMARIZE THESE EXAMPLES?

A. Mr. Cabe references four other orders in his testimony (Exhibits RC-4, RC-5, RC-6, and RC-7). In all the orders that Covad had in January, Mr. Cabe has found a few that may have been completed out of process or were not documented correctly. Qwest strives to make sure that the technicians work within the process. On Confidential page 23 of my rebuttal testimony (Exhibit RJH-T10), I address the total number of orders completed in January, 2002 and the number of orders that were fixed prior to cooperative testing with Covad. Qwest does perform pre-test on the Covad loop orders, whether it is documented or not. Sometimes within the course of testing Qwest does contact Covad and request

that they test a loop prior to the cooperative test date to ensure that the loop would work to their specifications. It is obvious to me that Covad does not want this type of interaction between the two companies. I would like to think that Covad would want to ensure that a loop would work when their Network is added on, to ensure that their customer would be happy with the service that they are providing. In Ms. Million's testimony, she addresses the difference between a cost model and real world experiences and how a cost model is based on averages of work completed and how, sometimes, the real world deviates from a cost model.

Q. MR. CABE MAKES REFERENCE ON PAGE 9 TO QWEST HAVING A SPECIAL 271 TEAM. WILL YOU RESPOND TO THIS ASSERTION?

A. Yes. Mr. Cabe suggests that this "special 271 team" is wholly responsible for ensuring proper escalations and service delivery, and that the level of service will disappear when Qwest 271 application is granted. Mr. Cabe is incorrect. The Qwest CLEC Coordination Center (QCCC) is the Overall Control Office (OCO) for all unbundled loop coordinated installations. Therefore, the QCCC has the responsibility for monitoring each installation until its completion. Critical to insuring that all installations are completed within the acceptable time frame, are proper escalations to Qwest departments. Sometimes during a coordinated installation, some breakdown will occur which will endanger the order. In such a case, it is necessary to resolve the breakdown as expeditiously as possible. In this

case, some immediate positive action is needed on behalf of Qwest. At that point, an escalation to achieve positive resolution is necessary. All QCCC Coordinators have the authority to escalate to the Executive Vice-President (EVP) level.

This is the standard escalation process that is in place and will remain in place after Qwest is granted 271 relief. Qwest will still have performance standards to meet after 271, and the escalation process will remain in place to ensure that Qwest meets performance standards or commitments. No matter what Qwest calls the state escalation leads, whether it is 271 State Lead, or something else, the escalation process will remain in tact and will function in the same manner.

IV. TESTIMONY OF ROY LATHROP

Q. WILL YOU PROVIDE AN OVERVIEW OF MR. LATHROP'S FEBRUARY 14, 2002 REPLY TESTIMONY?

A. Mr. Lathrop addresses Qwest's cost study as it relates to Poles, Ducts, Conduits and Rights-of-Way in his reply testimony. Just as in his Direct Testimony, Mr. Lathrop attempts to reduce the time for certain functions that Qwest performs. He provides no information to back up his claims - only that he "thinks" Qwest has overstated the times. In the following testimony, I will provide the steps that go into each function as it relates to Poles, Ducts, Conduit and Rights-of-Way.

Q. PLEASE BRIEFLY EXPLAIN WHAT THE POLES, DUCTS AND ROW PRODUCT IS.

A. Access to Poles, Ducts and Right of Way ("ROW") provides CLECs the ability to attach facilities to Qwest-owned or controlled poles, ducts, and ROW in order to provide telecommunications services. Access is available on a first-come, first-served basis to existing facilities that are not allocated for repair, emergency or projects in progress.

Q. PLEASE EXPLAIN THE CONFIGURATIONS ASSOCIATED WITH THE POLES, DUCTS AND ROW PRODUCT.

A. Access is offered in the following configurations:

- Pole Attachments provide CLECs access to available pole space to place aerial facilities that transmit telecommunications services.
- Qwest provides CLECs space in innerduct for the purpose of placing fiber facilities to transmit telecommunications services. Access to duct or conduit can also be arranged for copper facilities.
- Duct or conduit provides a single, enclosed raceway used for conductors, cable, and/or wire, including riser conduit between floors in a building. The duct or conduit may be in the ground, following streets, bridges, public or private ROW, or may be located in a portion of a multi-unit building. Within a multi-unit building, the duct/conduit may traverse the building entrance facilities, building

entrance links, equipment rooms, remote terminals, cable vaults, telephone closets or building riser.

- Innerduct is a pipe that fits inside the duct or conduit. Three innerducts are pulled into a duct/conduit so the duct may typically carry three fiber cables. Usually, one 4-inch duct accepts three 1-1/4" innerducts. CLECs have the option of either placing the innerduct in an empty duct or conduit, or having Qwest place it.
- For construction of transport facilities, Qwest also provides access to land that Qwest owns or controls. CLECs are responsible for obtaining the necessary legal authority to occupy poles, duct/innerduct and ROW on municipal, governmental, Federal, Native American, and private ROW Qwest owns or controls. A ROW may run under, on, above, across, along, or through public or private property, including multi-unit buildings.

Q. PLEASE DEFINE THE NON-RECURRING ELEMENTS ASSOCIATED WITH POLES, DUCTS AND ROW.

A. The non-recurring elements associated with the poles, ducts and ROW products are:

- Pole Inquiry Fee, per mile;
- Innerduct Inquiry Fee, per mile;
- ROW Inquiry Fee;
- ROW Document Preparation Fee;
- Field Verification Fee, per Pole;

- Field Verification Fee, per Manhole;
- Planner Verification, per Manhole;
- Manhole Verification Inspector, per Manhole;
- Manhole Make-Ready Inspector, per Manhole; and
- Access Agreement Consideration.

Q. PLEASE EXPLAIN WHY THE POLE INQUIRY FEE IS A NON-RECURRING COST ELEMENT ASSOCIATED WITH THE POLES, DUCTS AND ROW PRODUCT.

A. The Pole Inquiry process involves the necessary step of having Qwest's CPMC review the CLEC's request for completeness. During this task, Qwest prints all associated e-mails and forms from the CLEC to start a working file. The CPMC searches the database for the appropriate CLLI code. The information will be entered into a database and a new job will be created. The new job includes all Billing Account Number ("BAN") information, CLEC information, and due dates. The Qwest CPMC will also provide the wholesale account team with the name and the contact number for the appropriate local field engineer for joint validation of the poles and route

The entire bulk of information is then sent to the design engineer, who works in the field. Once the design engineer receives the package from the CPMC, the

engineer reviews the package and coordinates with the CLEC to set up a joint meeting.

The project management center also makes a telephone call to the appropriate design engineer to make sure the engineer has received the work package. The project management center acts as the liaison between not only the design engineers, but also the wholesale account team members for status, answering questions, escalating, and solving any issues that may arise.

Q. PLEASE EXPLAIN THE FIELD VERIFICATION FEE PER POLE AS AN ELEMENT OF POLES, DUCTS AND ROW.

A. The Field Verification Fee is a non-refundable pre-paid charge that recovers the estimated actual cost for a field survey verification required to determine the availability and scope of any required make-ready work.

The field verification element involves identification of the pole number, street code, ownership of pole, and determining space availability on the pole. This verification provides and describes the necessary work required, cable rearrangement, anchoring (steel anchor that runs approximately 6 feet into the ground), guying (wire, sized appropriately, from the pole to the anchor), pole replacement, and documenting the results of the pole field inspection.

The CLEC may elect to do the field verification itself by indicating that preference on the forms submitted to the CPMC.

Q. PLEASE EXPLAIN WHY THE INNERDUCT INQUIRY FEE IS A NON-RECURRING COST ELEMENT ASSOCIATED WITH THE POLES, DUCTS AND ROW PRODUCT.

A. The innerduct inquiry fee is a non-refundable pre-paid charge used to recover the costs associated with performing an internal record review to determine if a requested route and/or facility is available. Qwest's CPMC will complete the database inquiry and prepare a duct/conduit structure diagram (flatline) that shows distances and access points (such as manholes).

Qwest's CPMC will print out all e-mails and forms associated with the request. Qwest is not provided with the CLLI for the wire center on the request; therefore, we must search our OSP FM records, using the CLEC's attached map, to find the CLLI and to insure that all of the information is correct. The information is entered into a data-base and a new job is created. The new job is assigned a data-base number; this includes all BAN information, CLEC information, and due dates.

Once the information has been validated and deemed correct, Qwest searches OSP FM, CIMAGE, or paper records for the route in question. If Qwest

determines that the customer's specified route is available, Qwest creates a rough draft of the requested route and a spreadsheet showing all manhole numbers, the distance between each manhole, and the location of the manhole as it sits on the route according to the street intersections. This information, the rough draft and the spreadsheet, will then be created electronically.

Q. PLEASE ILLUSTRATE THE FIELD VERIFICATION AND PLANNER VERIFICATION FEE, PER MANHOLE, AS ELEMENTS OF POLES, DUCTS AND ROW.

A. Qwest's CPMC will return the results of the innerduct inquiry to the CLEC via the wholesale account team. The CLEC has 30 days to proceed to the next step, field verifications of manholes. In order to initiate that step, the CLEC must submit the appropriate fee and form. This form is forwarded from the account team to the CPMC. The CPMC will review the form for accuracy and completeness; they will update the database records, and make copies of all of the documents for the file. Then, the CPMC will create a work package for the OSP tactical planner. This package consists of a copy of the Field Verification request, a copy of the original flat-line diagram created in the inquiry process, a copy of the original CLEC map, and blank templates used to display the duct structure of the manholes.

Then, the OSP tactical planner reviews all contents of this package and forwards the package to the appropriate field engineer. At this point, it has already been predetermined if the CLEC wants Qwest to do the verification, or if the CLEC wants perform this task itself. If the CLEC requests that Qwest perform the Field Verification, the Qwest field engineer will perform the task.

The engineer and technician will take steps to open each manhole. This includes pumping the manhole free of water, purging it of gases, setting up equipment and work area protection including establishing traffic controls, placement of cones and traffic control signs, etc.

The technician will remove the manhole lid and ventilate the manhole with a blower. The technician will then test for explosive gases with a gas meter. If the manhole is filled with water, it will be pumped clear.

Then, the field engineer will take the blank template, or butterfly drawing, to sketch the duct structure on each manhole wall. This is the process that is repeated for each manhole within the specified route.

Once the sketches are completed, the engineer will return to the office and convert all butterfly sketches to permanent drawings and return these drawings to the OSP tactical planner. The OSP tactical planner will review each drawing. The planner

is looking for innerduct availability or/and conduit availability; the planner also researches an available path associated with the CLECs original requested route. The planner will look at the butterfly drawings; these drawings will indicate vacant and occupied innerduct, conduits, and knockouts. Then, the planner will evaluate any outstanding jobs that could be utilized using spare innerducts throughout the entire CLEC requested route.

The results of this research are forwarded to the CPMC. The CPMC receives the package and assesses for innerduct and conduit availability by reviewing the information provided by the Tactical Planner. The CPMC creates a Field Verification report that portrays the results of the Field Verification. This report includes: sections where innerduct is and is not available; where a conduit is or is not available; where innerduct placement would be required; or a section where conduit and innerduct is not available, referring to a blocked section. This report also includes the distance between manholes, and the number of core drills required. The CPMC then forwards this report to the customer via the account team.

Q. PLEASE EXPLAIN HOW THE MANHOLE VERIFICATION INSPECTOR TASK IS AN ELEMENT OF THE POLES, DUCTS AND ROW PRODUCT.

A. If a CLEC elects to do the work itself, Qwest will send a contract inspector to inspect the work of the CLEC. In other words, the contract inspector will make sure the manhole is opened and closed properly using appropriate safety standards.

Q. PLEASE DEFINE THE ROW INQUIRY FEE AS AN ELEMENT OF POLES, DUCTS AND ROW.

A. The ROW inquiry process involves Qwest's review of a request for completeness and resolution of any discrepancies in the request. The CPMC will print all e-mails and forms associated with the request.

The CPMC will create a log in the database and create a new job. The new job is assigned a data base number and dates are established in the computer as well. The entire bulk of information is then sent out to the ROW agent for the particular area in question.

The ROW agent accesses available job-files in the document retention database. If the ROW agent locates any records, he or she makes copies, and those copies are sent back to the CPMC. The records that could appear in the retention data-base are records such as: private ROW; Bureau of Land Management; Bureau of Reclamation; Forest Service documents, etc.

Regular permits via state and local agencies are public record; therefore, Qwest does not keep them on file.

The CPMC also makes a telephone call to the appropriate ROW agent to make sure the engineer has received the work package. The CPMC acts as the liaison between not only the ROW agents, but also the wholesale account teams. The labor associated with the liaison position requires, as stated above, phone calls to ROW agents and account team members for status, answering questions, escalating, and solving issues that arise in general.

Q. PLEASE CLARIFY THE ROW DOCUMENT PREPARATION FEE AS AN ELEMENT OF POLES, DUCTS AND ROW.

A. The task requires that Qwest prepare a Quit claim deed when requested by the CLEC. Typically, the CLEC provides this to Qwest.

Q. PLEASE SUMMARIZE YOUR TESTIMONY ON POLES, DUCTS AND ROW.

A. Qwest provides access to Poles, Ducts and ROW to CLECs with workable and reasonable methods of accomplishing interconnection with Qwest's network. The Qwest architectures provide CLECs access in a nondiscriminatory manner.

Moreover, based on my review of the poles, ducts and ROW network element inputs to the cost study, and my background in providing access to poles, ducts and ROW, the assumptions and network elements used in the cost study are consistent with, and reflect, the efficient, real-world tasks that engineers and other personnel must perform to provide poles, ducts and ROW.

V. SURREBUTTAL TESTIMONY OF MR. LATHROP

Q. WILL YOU LIST THE ISSUES THAT MR. LATHROP PROVIDED SURREBUTTAL TESTIMONY ON, FILED APRIL 5, 2002?

A. Mr. Lathrop filed Surrebuttal Testimony on the CLEC to CLEC Interconnection Direct Connection cost study and to the inputs to the Space Option cost study. He reduced the cost associated with each study. In the following, I will addresses his review of Qwest's cost studies.

Q. MR. LATHROP ASSERTS ON PAGES 2 AND 3 OF HIS TESTIMONY THAT THE "BAN" NUMBER IDENTIFIED IN YOUR TESTIMONY AND THE COST SUMMARY IS LISTED IN TWO PLACES. WILL YOU RESPOND TO THIS?

A. In my Rebuttal Testimony (Exhibit RJH-T10), I stated the BAN number is pulled by the CPMC and the cost study lists the function under the CSPEC costing element. The CPMC pulls the BAN number for a particular job, and the CSPEC will pull the CPD number and BVAP numbers and list the material required and

the pricing associated with the job under these numbers which will be referenced and tracked by the BAN number. Because this function is basically being handled by two groups the cost study listed the function under one group so as to not double recover the cost.

Q. MR. LATHROP ADDRESSES THE ENGINEERING TIME ASSOCIATED WITH CLEC TO CLEC INTERCONNECTION ON PAGE 4 OF HIS TESTIMONY. WILL YOU COMMENT ON HIS CONCERNS?

A. Mr. Lathrop lists the functions that I described in my rebuttal testimony and he attempts to assign times to each element, without providing any backup information to his time estimates. He assigns 20 minutes to open/create CPD, and doesn't provide any information on why he didn't consider the times that were supplied in response to a WorldCom discovery request (see Exhibit RJH-15 for WorldCom 05-437). According to Mr. Lathrop the CLEC to CLEC Product is at the simple end of the complexity scale and shouldn't require a substantial amount of time to complete. What he fails to consider is the fact that the CLECs involved could reside on different floors within a Central Office or in different locations on the same floor, and a complex route would have to be constructed, which would result in a much greater time. What this Commission needs to remember is that the times in Qwest's cost study reflect the average time associated with each function, taking worst case and best case. What Mr. Lathrop tries to represent is the best case scenario and state that every job is best case.

Q. ON PAGE 8, MR. LATHROP ADDRESSES CLEC TO CLEC INTERCONNECTION: CROSS CONNECTION. WILL YOU PROVIDE COMMENTS ON THIS TESTIMONY?

A. The cross connection can be in any circuit level (DS0, DS1, DS3) and the original job to install the cabling has to be put into Qwest systems (TIRKS) as a design service. Mr. Lathrop is correct that when an order (ASR) is generated by the CLEC to place a cross connect, this is a simple operation of running the cross connects. A CLEC has the option of running the cross connect themselves or having Qwest perform the cross connect for them.

Q. ON PAGE 9, LINES 3 THROUGH PAGE 10, LINE 20 MR. LATHROP ADDRESSES QWEST'S VERIFICATION PROCESS AND UPDATING OF QWEST RECORDS. WILL YOU ADDRESS THIS ISSUE?

A. Mr. Lathrop does not understand why records and field verifications are necessary. Qwest's records about the availability of space and facilities are accurate and reliable, but that does not eliminate the need for field verifications. As with the records of any company that maintains large inventories of a product, there inevitably will be occasions where the records do not completely reflect conditions in the field. No industry that I am aware of that has large inventories of products has an infallible record keeping system; human intervention and human inspection is an essential part of inventory-based businesses. For example,

take the simple, everyday transactions most of us have in places like movie rental stores. The store's database may show that a movie is available but "field" or "shelf" review by a person sometimes reveals that, for some reason, the movie doesn't exist on the shelf. We also see this same real-life occurrence in department stores, lumber yards, and grocery stores.

A telephone network is far more complex than most of these businesses and the challenges of tracking inventory in this environment are substantial. That is why Qwest itself has used field verifications for years for its own needs and jobs. The field verification provides a reliable method for verifying records and qualifying actual inside and outside plant facilities. The field verification also ensures that the facilities in question for use are not damaged. If Qwest were to simply rely on its unverified records, the potential negative impacts on a CLEC would be substantial. Assume, for example, that a CLEC desires space within a central office and asks Qwest to make it available on a specific date in the future. Assume also that the CLEC makes business plans that will be harmed if the date is not met. If the Qwest records show that the space exists, but no verification is made, the CLEC could be seriously damaged if they found that the records were in error or that the actual space was not suitable for collocation. In sum, relying on records does not replace verification by a qualified person to "go see." Field verifications clearly add information to the provisioning process that records alone often do not provide.

Q. ON PAGE 11, MR. LATHROP ADDRESSES SPACE OPTIONING AND SUGGESTS THAT IF A CLEC CHOSE TO MOVE FROM SPACE OPTION TO ACTUAL COLLOCATION, THEN THEY SHOULD BE CREDITED FOR ENGINEERING TIME. WILL YOU RESPOND?

A. In space optioning, actual engineering is required to determine if space is available within the central office, but, this space is not a specified space. When a CLEC elects to collocate, then actual design of the job starts and the space is determined and all of the elements associated with collocation are engineered. For Mr. Lathrop to suggest that a CLEC be credited for engineering associated with space optioning is completely incorrect. It is comparing apples and oranges.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, at this time.