

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of)	
)	DOCKET NO. UT- 041127
THE JOINT PETITION FOR)	
ENFORCEMENT OF)	AFFIDAVIT OF
INTERCONNECTION)	JEFF HALTOM
AGREEMENTS WITH VERIZON)	
NORTHWEST, INC.)	
(a/k/a GTE))	

I, Jeff Haltom, declare as follows:

1. I am an Advisory Engineer in the Network Engineering Department for MCI.
2. I hold a Bachelor of Science degree in Electrical Engineering (BSEE) from Purdue University and have more than 10 years of industry experience in Local, International, Long Distance, Voice over IP, Data, Wireless, and Packet Switching services and technologies.
3. In my position, I evaluate, recommend, and install new technologies into the MCI network.
4. On October 27, 2004, I submitted an Affidavit as Attachment A to the Joint CLEC Response to Verizon’s Motion for Judgment on the Pleadings filed in this proceeding.
5. I hereby incorporate by reference all of the statements in my prior Affidavit, and wish to submit this Supplemental Affidavit to provide additional relevant information that was not available to me at that time.
6. On January 21, 2005, I appeared as a witness on behalf of MCI, Inc. in a hearing in California examining Verizon’s effort to deploy the same Nortel Succession switches in California as Verizon has already deployed at the Mt. Vernon central office (“CO”).
7. Mr. Michael Lipchock, Verizon’s national director of network planning and Mr. Danny Peeler, a solution architect for the Nortel Succession family, also appeared as a witnesses in the California hearing. I was present during both Mr. Lipchock and Mr. Peeler’s entire testimony.
8. During cross examination, Mr. Lipchock testified that Verizon intends to deploy the Nortel Succession switch in a uniform manner in all states, and

that Verizon would deploy the ENET circuit switching fabric as part of every Nortel Succession switch it deploys.

9. Mr. Lipchock further testified that Verizon has deployed the ENET circuit switching fabric as part of the Nortel Succession switch deployment at Mt. Vernon.
10. Therefore, Mr. Lipchock confirmed the statements in my prior Affidavit that the Nortel Succession switch, as deployed by Verizon at Mt. Vernon, is a dual function hybrid switch capable of supporting both circuit switching and packet switching.
11. Mr. Lipchock also testified in California that Verizon is re-deploying the existing ENETs that had been configured as part of the legacy DMS-100s in place in California, and that Verizon is upgrading the capacity of the ENETs to the maximum capacity possible. Mr. Lipchock further testified that Verizon will not make full use of the capacity of the ENETs, and that there would be sufficient capacity to support all CLECs' UNE-P traffic at the COs in California.
12. Because Mr. Lipchock testified that Verizon is deploying the Nortel Succession switch in a uniform configuration in every state, I believe that Verizon is re-deploying the existing ENET at Mt. Vernon (rather than deploying a new ENET). For the same reason, I believe that Verizon has upgraded the capacity of the ENET to the maximum possible. Therefore, on information and belief, Verizon easily could handle all CLECs' UNE-P traffic on the ENET deployed at the Mt. Vernon CO.
13. On November 12, 2004, Mr. Peeler submitted a Declaration as Attachment A to Verizon's Reply to the Answers of Staff and CLECs. In his Declaration, Mr. Peeler stated that Verizon had not configured the Nortel switch to make available the circuit switching capability to support unbundled local switching for POTS customers.
14. However, Mr. Peeler testified in the California hearing that the Nortel Succession switch could be configured to support POTS traffic using both TDM circuit switching and packet switching, and that he is aware of other Nortel customers who have done so.
15. The Joint Respondents are providing relevant excerpts from the California hearing transcript as Attachment 2 to their Response.

VERIFICATION

The facts stated in this affidavit are true and correct to the best of my knowledge and belief.

Executed on this 13th day of March, 2005.

A handwritten signature in black ink, appearing to be 'JEFF HALTOM', written in a cursive style.

Jeff Haltom