

**Exhibit \_\_\_\_\_-T (RTW-1T)**  
**Docket No. UT-011439**  
**Witness: Robert T. Williamson**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of**  
**VERIZON NORTHWEST, INC.**  
**For waiver of WAC 480-120-071(2)(a).**

**Docket No. UT-011439**

**REPLY TESTIMONY OF**

**Robert T. Williamson**

**STAFF OF**  
**WASHINGTON UTILITIES AND**  
**TRANSPORTATION COMMISSION**

**September 20, 2002**

1 **Q. What is your name, business address, and position?**

2 A. My name is Robert T. Williamson. My business address is 1300 South Evergreen Park  
3 Drive Southwest, P.O. Box 47250, Olympia, Washington, 98504-7250. I am employed  
4 by the Washington Utilities and Transportation Commission as a utility engineer in the  
5 telecommunications division.

6

7 **Q. Have you previously filed testimony in this case?**

8 A. No.

9

10 **Q. Generally, what do you state in this testimony?**

11 A. I testify that there could be benefits for existing customers in addition to the Timm Ranch  
12 residents if Qwest completes this extension.

13

14 **Q. If Qwest were to reinforce the existing cable as described in its testimony, could it  
15 also benefit other customers?**

16 A. Yes, any existing customers that were moved to the new cable and digital subscriber  
17 systems would see improved service. As stated by Mr. Hubbard in his rebuttal testimony  
18 on pages 4 through 5, and subsequently reiterated in Mr. Hartzog's response to Staff's  
19 data request WUTC 02-030(a), Qwest would reinforce the existing air core cable by  
20 placing new gel filled cable and installing a number of small digital subscriber carrier  
21 systems. It is apparent that the new cable would parallel the existing cable for at least  
22 part, if not all, of the existing route. It is conceivable that the Qwest engineer, using good  
23 engineering judgment, would install access points that would accommodate the

1 movement of at least some of the existing customers to the new cable. It all depends on  
2 the engineering design at the time of the installation. Mr. Hartzog is correct that analog  
3 and digital subscriber carrier systems cannot exist in the same cable sheath, but the  
4 installation of digital subscriber carrier systems in the new cable would improve service  
5 for any existing customers that were moved to those systems in the future. It would be an  
6 engineering decision as to the appropriate time to make those changes.

7 **Q. Are there any other possible benefits?**

8 A. Yes, I believe there could be some reduction of maintenance costs for Qwest in the  
9 future. As the existing air core cable ages, maintenance costs will rise. The analog  
10 subscriber carrier is an older and more expensive system to maintain. Engineering the  
11 ability to move existing customers to the new cable and converting them from analog  
12 subscriber carrier to digital subscriber carrier should reduce maintenance costs in the  
13 future for Qwest. Any movement from the old cable to the new creates additional spare  
14 cable pairs for improved maintenance in the old cable. The exact number depends on the  
15 engineering design criteria at the time of installation.

16  
17 **Q. Does this conclude your testimony?**

18 A. Yes.  
19