

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation into  
U S WEST COMMUNICATIONS, INC.'S  
Compliance with Section 271 of the  
Telecommunications Act of 1996

Docket No. UT-003022

**TESTIMONY OF  
MICHAEL ZULEVIC  
COVAD COMMUNICATIONS COMPANY**

**OCTOBER 10, 2000**

## INTRODUCTION

**Q. PLEASE INTRODUCE YOURSELF.**

A. My name is Michael Zulevic. My business address is 8413 E. Jamison Cir., Englewood, Colorado, 80112. I am the Director, Network Deployment Special Initiatives for Covad Communications Company. From April, 1999, through June, 2000, my title was Director of Network Deployment for Covad, and I was responsible for deploying Covad's network throughout Covad's Central Region, which includes Colorado. Prior to April, 1999, I worked for Covad as the Senior Collocation Program Manager for the U S WEST states. From the time I joined Covad until June, 2000, I had primary responsibility for collocation of Covad's equipment in Qwest's (then U S WEST's) central offices. I still remain involved in collocation issues with Qwest and am currently responsible for the deployment of line sharing equipment throughout the United States.

**Q. PLEASE DESCRIBE YOUR EXPERIENCE PRIOR TO JOINING COVAD.**

A. Prior to joining Covad, I was employed by U S WEST for 30 years, most recently as Manager, Depreciation and Analysis. Prior to that, I worked in Network and Technology Services, providing technical support to U S WEST Interconnection Negotiation and Implementation Teams. While working in these two capacities, I provided testimony on technical issues in support of arbitration cases and/or cost dockets in Minnesota, Iowa, Montana, Washington, Oregon, Arizona, New Mexico, Nebraska, Utah, Wyoming, and Idaho. Prior to this assignment, I was responsible for providing technical support for the U S WEST capital recovery program in the areas of switching, transport, and loop. I also worked as a Central Office Technical and Central Office Supervisor at U S WEST.

My other experience includes the following: Switch and Transport Fundamental Planning Engineer, where I represented Fundamental Planning as a member of the ONA/Collocation Technical Team; Circuit Administration Trunk Engineer, specializing in switched access services; and Custom Network Design and Implementation Engineer working with the design and implementation of private networks for major customers.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of this testimony is to provide current evidence addressing Qwest's collocation policies that fail to satisfy the requirements for the collocation requirements of checklist item one of Section 271 of the Telecommunications Act of 1996 (Act). In some cases, issues I will address have been discussed and may have been partially resolved in workshops in Colorado, Arizona or other Qwest states. Although these issues may not appear in the March 22, 2000 version of the SGAT filed in the State of Washington, it is my expectation that Qwest will reflect updates on many of these issues in its revised filing in Washington on October 20, 2000.

**Q. HOW IS YOUR TESTIMONY ORGANIZED?**

- A. I have organized my testimony into the following four major topics:
1. General Administrative and Policy Issues
  2. Collocation Process Issues
  3. Collocation Intervals and Forecasts
  4. Engineering Issues

**GENERAL ADMINISTRATIVE AND POLICY ISSUES**

**ATM COLLOCATION**

**Q. WHAT IS YOUR UNDERSTANDING OF QWEST'S POLICY ON THE COLLOCATION OF ASYNCHRONOUS TRANSFER MODE (ATM) MULTIPLEXERS?**

A. In reading the testimony of Mr. Freeberg, it appears that Qwest is changing its policy with respect to the collocation of ATMs. Also, during the Colorado 271 workshop, Qwest announced a change in policy which will allow collocation of ATM equipment provided that it is used to provide advanced services such as xDSL.

**Q. WHY IS THIS AN IMPORTANT ISSUE FOR COVAD?**

A. Covad and Qwest both use ATM multiplexers (in Covad's case, the Cisco BPX family of

products) to aggregate data traffic from end-users and direct the traffic to internet service providers (ISPs) and other corporations. The equipment is necessary to gain access to unbundled network elements including interoffice transport facilities and high capacity loops. The equipment is used to create a permanent virtual circuit from the end-user to the ISP, and not to provide “active” switching. In other words, data traffic is directed down a permanent path to and from the ISP and is not switched among a variety of paths the way that, for example, circuit-switched voice traffic is.

It is not possible to provide DSL service across a geographic region without using ATM multiplexers. From our experience with U S WEST before the FCC issued the 706 Order referred to by Mr. Freeberg, the difference between collocating ATM multiplexers in central offices and performing the additional work necessary to place the multiplexers outside the central office can cost a CLEC, and ultimately the consumer, millions of dollars. By not allowing ATM multiplexers to be collocated, therefore, Qwest can prevent meaningful, level competition in the DSL market.

**Q. WHAT QWEST ACTION IS REQUIRED TO RESOLVE THIS ISSUE?**

A. The ATM multiplexer is the heart of the Covad network and its proper placement is essential to providing efficient, competitively priced DSL services to Washington customers. Qwest must make its position clear in the SGAT that it will allow collocation of ATM multiplexers regardless of changes in internal policy, or misdirected interpretations of new or existing orders or opinions of state or federal regulators. In addition, the new policy must apply to all CLECs and their existing interconnection agreements without requiring them to re-negotiate or adopt the SGAT. Otherwise, the policy change is meaningless.

**CONNECTIONS BETWEEN SEPARATE CLEC COLLOCATIONS**

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**Q. COULD YOU PLEASE EXPLAIN THIS ISSUE?**

A. This issue has begun to arise with Qwest's inability to provide a means for Covad and other CLECs to connect two separate collocations in the same central office. This is different from the issue of CLEC to CLEC collocations. Instead, what I am referring to are connections between two separate collocations by the same CLEC in the same central office.

This issue arises, for example, when a CLEC runs out of collocation space in the area originally dedicated to that CLEC. At that point, the CLEC must find new collocation space for its equipment. If the new collocation space is not adjacent to the existing collocation space, Qwest has no process or products in place that will allow the CLEC to connect the two separate collocations. That lack of connection results in increased costs and a decreased ability to manage a CLEC's network. Covad, for example, manages its network remotely from Network Operations Centers spread across the country. That requires that Covad have a network management circuit for its equipment at every collocation site. If there is no way to connect the two different collocation sites within the same central office, then Covad must purchase two network management circuits where one would do the job. Again, this is an additional cost to Covad that Qwest will not incur because it does connect its own equipment together within a central office.

My understanding is that this issue is not addressed in Qwest's SGAT. Qwest did agree, during the Colorado workshop, to address it in the next revision to the SGAT and include interval and pricing proposals. While Covad hopes that the revised Washington SGAT will address this issue, more work is required. Simply putting language in an SGAT does not mean that a process is in place to actually connect the two separate collocations, and without that process in place the SGAT is essentially meaningless. To demonstrate non-discriminatory access for collocation, Qwest must show that it has developed a working process for making these connections, and that Covad and other

CLECs are able to take advantage of that process under their existing interconnection agreements. We believe that this is a fundamental competitive issue that must be addressed before it can be said that collocation is offered in any state under competitive, non-discriminatory terms and conditions.

**ACCESS TO COVAD COLLOCATION ARRANGEMENTS**

**Q. COULD YOU PLEASE EXPLAIN THIS ISSUE?**

A. Access to Covad’s collocation arrangements in Qwest central offices usually requires the use of an electronic “swipe” card. This card serves as a photo identification card and when “swiped” through the card reader by the door of the central office, also electronically releases the door lock for entry. This entry is only granted to those pre-authorized by Qwest when a CLEC files an access request for those needing access to the collocation arrangement.

The problem arises when the card fails to open the door. This has happened to me on two occasions in the past two months, and has delayed Covad technicians in responding to customer service problems on a number of occasions. We have been fortunate in that we have not encountered this problem during a major service outage, but a solution needs to be found before it happens. In most cases, access is restored by simply having Qwest re-enter the authorization into the Qwest security system. This resolution, however, can often take several days to accomplish.

**Q. HOW SHOULD QWEST BE REQUIRED TO RESOLVE THIS ISSUE?**

A. Qwest must be required to provide an 800 number to call for immediate resolution to these access problems. Immediate resolution must be available 7 days a week and 24 hours a day. This is the “best practice” solution used by Bell South and should be adopted by Qwest. The present system, which involves leaving a recorded message and waiting, often for days, for a return call, is totally unacceptable. This system can in no

way be considered “parity” and actually discriminates against Covad with respect to access to its central office equipment.

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**EARLY ACCESS TO COLLOCATION ARRANGEMENT**

**Q. COULD YOU PLEASE EXPLAIN THIS ISSUE?**

A. Early access to collocation arrangements under construction by Qwest has been granted in the past, on an individual case basis, where such access will not impede the work of Qwest or its contractor. This policy has been advantageous to consumers in that it increases the speed to market for the CLEC. In the Colorado 271 Workshop, Qwest proposed that they will no longer allow this “early access” unless 100% of the non-recurring charges have been paid and that CLECs agree to start paying recurring charges at that time.

**Q. WHAT IS COVAD’S POSITION ON EARLY ACCESS?**

A. Covad believes “early access” to collocation arrangements benefits all parties, including Qwest, in that the sooner our equipment is service ready, the sooner Qwest will start receiving revenue from UNEs. Consumers will benefit by our increased speed to market. There is no need to change the existing practice of negotiating “early access” on an individual case basis. The Qwest proposal, which would give them all charges up front, could actually act as a disincentive to complete collocations on time.

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**COLLOCATION DEFINITIONS AND TERMINOLOGY**

**Q. COULD YOU PLEASE EXPLAIN THIS ISSUE?**

A. The SGAT which was filed on March 22, 2000, is somewhat lacking in clarity with respect to collocation definitions and what arrangements are actually being offered by Qwest. This problem was further complicated by the revised SGAT (September 18, 2000) used during the Colorado 271 Workshop. Essentially, Qwest has not clearly drawn

a line between types of collocation (i.e., Caged Physical, Cageless Physical, Virtual, etc.) and physical places where collocation will be provided (i.e., Wire Centers, Adjacent Locations, Remote Terminals, etc.). It is my understanding that Qwest plans to provide more clarity in the revised SGAT to be filed in this proceeding.

**Q. WHAT ARE YOUR SPECIFIC CONCERNS WITH RESPECT TO THE LACK OF CLARITY?**

A. It is my opinion, as well as my understanding of the law, that Qwest has an obligation to provide collocation at any technically feasible point in their network. The language in the SGAT must clearly indicate that all types of collocation, as discussed in my previous response, are available in all physical places that meet the standard of technical feasibility.

**Q. SECTION 8.1.1.4 OF THE MARCH 22, 2000 SGAT DESCRIBES SHARED PHYSICAL COLLOCATION. HOW SHOULD THIS ARRANGEMENT BE REDEFINED?**

A. The ability to share collocation arrangements is crucial to efficient use of space at any Qwest premise. It also increases the efficiency and flexibility of deploying a new entrant's network. The language in 8.1.1.4 appears to limit CLEC sharing of space to Physical Caged arrangements. To maximize the efficiencies gained by sharing, this section must be broadened to provide for sharing of collocation space in any form or arrangement deemed to be technically feasible, including Cageless Physical and Virtual arrangements. Once this is clearly stated, sharing would be available at all physical places applicable to other types of collocation.

**PROACTIVE REMOVAL OF "OBSOLETE AND UNUSED" EQUIPMENT**

**Q. COULD YOU PLEASE EXPLAIN THIS ISSUE?**

A. Where a Qwest premise is determined to be limited in collocation space, Qwest must proactively remove "obsolete and unused" equipment, at no cost to CLECs, so that the



FCC's required 90 day interval for collocation can be met.<sup>1</sup> This is especially true when a CLEC has provided a collocation forecast for this premise. In most cases, the cost for removal of this equipment has already been recovered from Qwest ratepayers and the decision to delay removal is purely a Qwest business decision. These business decisions should not be allowed to relieve Qwest from its collocation interval obligations.

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**BASIC TELEPHONE SERVICE IN COLLOCATION ARRANGEMENTS**

**Q. COULD YOU PLEASE EXPLAIN THIS ISSUE?**

A. Basic telephone service is a requirement in all collocation arrangements for use by CLEC technicians in arranging for and conducting tests. The use of wireless telephones is not allowed in central office environments nor are CLECs allowed to use Qwest telephones. Section 8.2.3.11 of the SGAT states that this service will be provided “per standard U S WEST business service provisioning processes and rates.” From my experience, seldom is the telephone service installed correctly at the time I accept a collocation arrangement, even though our practice is to order telephone service at the same time we send our initial payment for a collocation arrangement. I have even found our telephone service installed in caged collocations of other CLECs. In other instances, the outside plant installation technician has actually installed a network interface device (NID) on one of our relay racks. This device is used on houses, not in central office environments. Covad has also been billed for service never delivered because the installation technician completed the order not knowing that the line had to be extended to the collocation arrangement.

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<sup>1</sup> See In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, FCC 00-297 (August 10, 2000), at ¶¶ 27-29.

**Q. WHAT CHANGES DO YOU RECOMMEND TO RESOLVE THIS PROBLEM?**

A. Because almost all collocations will require telephone service, it seems only logical that this become part of the collocation application process, rather than staying a part of the “business service provisioning process” discussed in section 8.2.3.11 of the SGAT. By doing this, Qwest can develop methods and procedures that include people and practices that relate to the central office environment and collocation. This is a “best practice” which has been used by GTE (Verizon) for years. The delivery of telephone service should be a checklist item for acceptance of a collocation arrangement. Again, Qwest needs to demonstrate that this best practice has actually been implemented (as opposed to simply described in the SGAT) for Covad to feel comfortable that Qwest has resolved this problem.

**FORECASTING AND INTERVALS**

**Q. DOES QWEST HAVE A FORECASTING REQUIREMENT IN THE CURRENTLY FILED SGAT?**

A. No, not that I have found. Qwest did, however, include extensive language in the revised SGAT filed just prior to the Colorado 271 Workshop.

**Q. DO YOU HAVE CONCERNS WITH THE LANGUAGE PROPOSED IN COLORADO?**

A. Yes. The collocation intervals set forth in this version of the SGAT were dependent upon providing accurate forecasts well in advance of making a collocation request. The only way Qwest would agree to meet the FCC required 90 day interval was if a CLEC’s forecasting requirements were met. I fully understand the need to provide the best possible forecasts to Qwest, but this policy is totally unacceptable in that it effectively circumvents the FCC’s rules. It is my hope that the revised language to be filed in Washington omits this proposal.

**Q. DO YOU HAVE ADDITIONAL CONCERNS WITH RESPECT TO INTERVAL LANGUAGE?**

A. Yes. In the SGAT currently filed in Washington at Section 8.4.3.3, Qwest limits the number of standard interval collocation orders to five per week with any number above five being “individually negotiated.” Again, this effectively circumvents the FCC’s required 90-day interval and must not be allowed.

**COLLOCATION PROCESS ISSUES**

**SPACE AVAILABILITY**

**Q. WHAT CHANGES TO THE COLLOCATION PROCESS MUST BE MADE?**

A. First, section 8.2.1.10 of the SGAT states that “Collocation is offered on a first-come, first-served basis.” There are currently no provisions to insure that when space does become available in a “no space” central office that this space will be offered based upon the original collocation requests of CLECs. Without this provision, CLECs who have been waiting for a building addition or other remedy to the space limitation problem, could find themselves in line behind other CLECs making their first request for collocation space after the building addition was completed. Qwest must be required to maintain a waiting list for space and use this list to fulfill the “first-come, first-served” obligation once space becomes available. This was discussed during the Colorado 271 Workshop and I believe Qwest intends to offer new language in its revised filing in Washington. As with other issues, Covad also expects Qwest to demonstrate that it has also established internal processes to meet its "first-come, first-served" obligation, and that the process is open to CLECs without requiring renegotiation of interconnection agreements.

**Q. ARE THERE OTHER CHANGES REQUIRED RELATING TO SPACE AVAILABILITY?**

A. Yes. Section 8.2.1.11 of the SGAT speaks only to denial of collocation requests at a

“U S WEST Wire Center.” This process needs to be expanded to include premises where collocation is requested by a CLEC and denied by Qwest for lack of space.

**Q. WHAT IS THE APPROPRIATE INTERVAL FOR A COLLOCATION REQUEST IF THE REQUESTED AMOUNT OF SPACE IS FOUND TO EXIST DURING A TOUR?**

A. The interval for completing the collocation request should revert back to the interval that would have been appropriate had this mistake not occurred. This will insure that Qwest does everything in its power to accurately evaluate the availability of space prior to a denial.

**POWER AND TRANSPORT AVAILABILITY**

**Q. ARE THERE OTHER CHANGES THAT NEED TO BE MADE TO QWEST’S COLLOCATION PROCESS?**

A. Yes. Just as space availability is critical to establishing a collocation arrangement, equally so are power and transport.

**Q. WHAT CHANGES ARE REQUIRED TO ADDRESS POWER AND TRANSPORT CONCERNS?**

A. Again, power and transport are critical to building a collocation arrangement. CLECs need availability information at the earliest possible time in order to plan their network growth. If a collocation cannot be completed within 120 days in any central office due to a lack of power, transport capability or transport capacity, this information needs to be made available on a “publicly available document, posted for viewing on the Internet...” per Section 8.2.1.13. Currently, this section only applies to “no space” central offices. It needs to be expanded to include major power and transport availability issues in all central offices, and Qwest needs to demonstrate compliance with this increased obligation before the Commission approves its 271 petition.

**Q. WHY IS THIS INFORMATION SO IMPORTANT TO COVAD?**

A. Having this information will allow us to avoid the costs and time delays associated with

needlessly applying for collocations which we can't use. A case in point is the Maple Valley central office here in Washington. I applied for and accepted this collocation in early 1999 without the knowledge that DS3 transport was not available. Without DS3 transport, Covad has no way to connect a collocation arrangement to its network. I was told that DS3 transport would not be available until 2002, unless Covad wanted to pick up the majority of the cost to install the equipment for the entire central office, which would have eliminated the possibility of ever making a profit in that market. Fortunately, DS3 transport became available in about August of 2000, much sooner than we had been originally advised by Qwest, and we were recently able to place this office in service. However, during the time from collocation acceptance in 1999 until just recently, Qwest has been billing Covad for monthly recurring charges and Covad has had many additional thousands of dollars tied up in the initial nonrecurring installation charge for the collocation arrangement. New entrants cannot afford to spend this kind of money and still be competitive in the state of Washington. This could all have been avoided if the necessary information had been made available in advance. Moreover, Qwest possesses this information itself and can avoid investments that will sit idle due to lack of infrastructure. CLECs need the same information to compete on an equal footing with Qwest.

**COLLOCATION REQUEST CHANGES AND CORRECTIONS**

**Q. HOW IS THIS ISSUE CURRENTLY ADDRESSED IN THE SGAT?**

A. Section 8.4.2.1 of the currently filed SGAT requires that “Any changes, modifications or additional engineering requested by the CLEC, subsequent to its initial order, as to the type and quantity of equipment or other aspects or the original Collocation request, must be submitted with a subsequent QPF and Collocation Order Form.” It goes on to say that Qwest will determine if the change will be worked in conjunction with the original

request or as a subsequent activity.

**Q. WHAT ARE YOUR CONCERNS WITH THIS LANGUAGE?**

A. Section 8.4.2.1 does not allow for making corrections to the original Collocation request. The FCC's recent order addressing collocation intervals specifically provides for time to resolve issues relating to a collocation request without lengthening the ordered 90 day interval.<sup>2</sup> Additionally, the FCC has not provided for the charging and additional quote preparation fee (QPF) proposed by Qwest. The Qwest Collocation Order Form is quite detailed and complex, which makes it subject to error when being completed for submission. Also, the form is revised fairly often, which also lends itself to confusion.

**Q. WHAT CHANGES TO YOU RECOMMEND TO THIS SECTION?**

A. The language in 8.4.2.1 must be amended to clearly state that inadvertent errors or omissions on a Collocation Order Form will not require an additional QPF or be subject to changes to the original interval when resolved in accordance with the provisions of the FCC's order.

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**COLLOCATION SPACE ACCEPTANCE**

**Q. WHAT IS THE NEXT COLLOCATION PROCESS CHANGE YOU WISH TO DISCUSS?**

A. The next process issue deals with the actual space acceptance once Covad has been notified that the space preparation is complete.

**Q. WHAT IS THE CURRENT SPACE ACCEPTANCE PROCESS?**

A. The Qwest State InterConnection Manager (SICM) notifies the CLEC when the collocation arrangement will be completed and schedules a meet at that location for acceptance. Unfortunately, this is about the only consistent part of the process. Each Qwest state SICM seems to follow a different process. In only one Qwest state has this

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<sup>2</sup> Id. at ¶¶ 25-29.

process resembled a business transaction. In all others, it is very informal and lacking in proper documentation.

**Q. WHAT CHANGES WOULD YOU RECOMMEND?**

A. First, the SICM needs to have verified that the collocation is complete before scheduling the acceptance meeting. This means that all transmission cables, power cables, A/C outlets, lighting, cable racking, iron work are installed and power fuses are ready to be installed. As I discussed earlier in my testimony, the telephone service should also be available at this time. Next, access to the building must be confirmed. If the building is equipped with a “swipe card” access system, it must be verified that the CLEC has access. Finally, the CLEC needs to be provided with all the information necessary to begin providing service from this collocation. This includes Connecting Facility Assignments (CFA or APOT), verification that the Qwest Operational Support Systems (OSS) have been prepared to accept orders for this location, documentation listing all connecting frame locations, fuse bay locations, etc. Qwest’s current process doesn’t provide this information until well after the acceptance walk through. It is provided as a “completion package” by the CLEC account manager. Placing an office in service has been delayed by as much as a month due to not having this information available. Again, this information should have been provided at the time the collocation was accepted.

**Q. HOW SHOULD COLLOCATION ACCEPTANCE BE DOCUMENTED?**

A. Qwest SICMs should have a standard “check list” for this process. Each item I discussed previously should be itemized and noted as “acceptable” or “not acceptable.” Any deviation from the ordered collocation arrangement must be noted with a proposed correction date. Once this checklist is completed, both the Qwest SICM and the CLEC representative should sign and date the document, with each party receiving a completed copy. Acceptance of a collocation arrangement is a business transaction and should be treated as such.

## ENGINEERING ISSUES

### EFFICIENT CONSTRUCTION OF COLLOCATION ARRANGEMENTS

**Q. WHY IS COVAD CONCERNED WITH THE EFFICIENT CONSTRUCTION OF COLLOCATION ARRANGEMENTS?**

A. Section 8.2.3.4 of the currently filed SGAT states that “U S WEST will design the floor space within each Wire Center that will constitute CLEC’s leased space.” This section makes no reference to “efficient” construction, which can have a significant impact on both the performance of CLEC equipment, as well as the ultimate price Covad will have to pay for collocation.

**Q. HOW CAN THE CONSTRUCTION OF THE COLLOCATION ARRANGEMENT IMPACT THE PERFORMANCE ON CLEC EQUIPMENT?**

A. In the case of Covad, DSL equipment is extremely distance sensitive. As such, the more cable required within the central office, the shorter the distance our service can reach into the local network, thus reducing the number of subscribers qualifying for our service. This situation is most detrimental in large metropolitan central office buildings where collocation arrangements are often engineered by Qwest into the top floor. Such is the case at Seattle East, Seattle Cherry and the Renton central office buildings.

**Q. HOW DOES THE LACK OF EFFICIENT CONSTRUCTION OF COLLOCATION ARRANGEMENTS IMPACT COVAD’S COLLOCATION PRICING?**

A. When collocation arrangements are placed in distant parts of the central office, Qwest includes the transport cable, ladder racking, power cable and other distance sensitive costs into the prices charged to CLECs. These costs could have been substantially reduced had Qwest agreed to construct these collocation arrangements closer to the unbundled network elements CLECs need to access in order to provide service.



**Q. WHAT IS YOUR RECOMMENDATION ON EFFICIENT CONCERNING EFFICIENT CONSTRUCTION OF COLLOCATION ARRANGEMENTS?**

A. Section 8.2.3.4 of the SGAT should be revised to require Qwest to “efficiently” engineer, design and construct collocation space so as not to unnecessarily increase costs to, or degrade the equipment performance of CLECs, based upon business decisions made to benefit Qwest. To make the commitment meaningful, Qwest should be required to implement this policy for all collocation requests regardless of whether the particular interconnection agreement adopts Section 8.2.3.4 of the SGAT.

**ORDERING QUANTITIES FOR DS1 TERMINATIONS**

**Q. SECTION 8.3.1.11(B) OF THE CURRENTLY FILED SGAT REQUIRES THAT DS1 TERMINATIONS BE ORDERED IN INCREMENTS OF 28. IS THIS AN APPROPRIATE INCREMENT?**

A. No. While jack panels used for terminating DS1s can typically terminate 28 each, there is no technical reason why DS1s cannot be ordered in multiples of one. I have seen many cases where multiple CLECs have been terminated on the same jack panel. In the case of Data CLECs, such as Covad, more than one DS1 is seldom required; thus, having to order and pay for a full 28 jack termination panel is costly, wasteful, and unnecessary.

**Q. WHAT IS YOUR RECOMMENDED INCREMENT FOR ORDERING DS1 TERMINATIONS?**

A. DS1 terminations should be ordered in increments of one.

**CHANNEL REGENERATION CHARGE**

**Q. SECTION 8.3.1.9 OF THE CURRENTLY FILED SGAT DESCRIBES A CHANNEL REGENERATION CHARGE. WHEN IS THIS CHARGE APPROPRIATE?**

A. The only time this charge would be appropriate is when a CLEC makes a conscious decision to design its network in such a way as to require such regeneration.

**Q. IN WHAT CASES WOULD REGENERATION BE REQUIRED?**

A. Engineering (ANSI) standards require regeneration of a digital signal when the cabling

distance between the CLEC collocation arrangement and the Qwest cross-connect bay exceeds 655 feet for a DS1 and 450 feet for a DS3.

**Q. WHY SHOULD QWEST NOT BE ALLOWED TO CHARGE FOR CHANNEL REGENERATION IN ALL CASES?**

A. As I discussed above, if regeneration is required due to decisions made by a CLEC, the charge may be appropriate. However, in most cases, regeneration is required because of the location Qwest has chosen for construction of collocation arrangements. CLECs should not be penalized for the business decisions made by Qwest, especially when these decisions result in inefficient construction of collocation arrangements.

**Q. IS THERE ANOTHER REASON WHY YOU FEEL THE CHANNEL REGENERATION CHARGE IS INAPPROPRIATE?**

A. Yes. The Federal Communications Commission, in its Second Report and Order in CC Docket No. 93-162 stated in part that “. . . we require the LEC to provide the repeaters needed to comply with the ANSI standard without imposing any additional costs on the interconnectors.”<sup>3</sup>

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does.

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<sup>3</sup> In the Matter of Local Exchange Carriers' Rates, Terms and Conditions for Expanded Interconnection through Physical Collocation for Special Access and Switched Transport, Second Report and Order, 12 F.C.C.R. 18730, 18782 (1997).

COVAD COMMUNICATIONS COMPANY/SEC.271

DOCKET NO. UT-003022

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