

1

**I.INTRODUCTION**

2

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is John J. Boshier. My business address is 600 Hidden Ridge Drive, Irving,  
5 Texas 75038.

6

7 **Q. HAVE YOU FILED PHASE A DIRECT TESTIMONY IN THIS DOCKET?**

8 A. Yes, I have.

9

10 **ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS PROCEEDING?**

11 I am presenting testimony on behalf of Verizon Northwest Inc., which was formerly known as GTE Northwest  
12 Incorporated. The company recently changed its name after the closure of the merger between its parent  
13 company, GTE Corporation, and Bell Atlantic Corporation. The merged company name is Verizon  
14 Communications.

15

16 **IN YOUR TESTIMONY HOW DO YOU USE THE TERMS "VERIZON NW" AND "GTE"?**

17 My fellow witnesses and I use "Verizon NW" to refer to Verizon Northwest Inc., the company that is a party to this  
18 proceeding and on whose behalf we are testifying. I use "GTE" to refer to the former GTE companies,  
19 which are now part of the Verizon Communications companies along with the former Bell Atlantic  
20 companies. This will make clear that we are talking about cost studies and inputs that have been developed  
21 by and for the GTE telephone operating companies and about those companies' operations, practices and  
22 procedures.

23

24 **Q. WHAT IS THE PURPOSE OF YOUR PHASE A RESPONSIVE DIRECT TESTIMONY?**

25 A. The purpose of my phase A responsive direct testimony is to address comments made by Dr. Richard Cabe

1 on behalf of Rhythms Links and Covad Communications regarding the status of Verizon NW line sharing  
2 agreements in Washington and to respond to comments made by Joseph Gillan on behalf of AT&T  
3 regarding line sharing in conjunction with UNE Platform (“UNE-P”) arrangements.  
4

5 **II.STATUS OF VERIZON NW/CLEC LINE SHARING AGREEMENTS**

6  
7 **Q. DR. CABE STATES IN HIS PHASE A DIRECT TESTIMONY THAT HE IS NOT**  
8 **AWARE OF ANY LINE SHARING AGREEMENTS THAT HAVE BEEN**  
9 **SIGNED WITH VERIZON NW IN WASHINGTON AND DOES NOT BELIEVE**  
10 **THAT VERIZON NW IS CURRENTLY MAKING LINE SHARING**  
11 **AVAILABLE TO ANY CLEC IN WASHINGTON (CABE DIRECT AT 7).**  
12 **SUBSEQUENT TO THE FILING OF PHASE A DIRECT TESTIMONY ON MAY**  
13 **19, 2000, HAS VERIZON NW SIGNED ANY LINE SHARING AGREEMENTS**  
14 **WITH CLECS THAT ARE CURRENTLY EFFECTIVE IN WASHINGTON?**

15 **A.** Yes. Verizon NW has signed agreements with Covad, New Edge Networks, Rhythms and Northpoint,  
16 which are effective in the state of Washington. The Covad agreement was effective June 7, 2000. All of  
17 the other agreements were effective on June 6, 2000.  
18

19 **Q. DO THE CONTRACTS SIGNED BETWEEN VERIZON NW AND THE CLECS**  
20 **IMPLEMENT LINE SHARING SERVICE CONSISTENT WITH THE FCC'S**  
21 **ORDER?**

22 **A.** Yes, they do.  
23

1 **Q. HAS VERIZON NW NEGOTIATED RATES, TERMS AND CONDITIONS FOR**  
2 **THE SPLITTER CONFIGURATION #1 YOU REFERRED TO AS OPTION NO.**  
3 **1 IN THE CONTRACT YOU FILED AS EXHIBIT JJB-2 WITH YOUR PHASE**  
4 **A DIRECT TESTIMONY?**

5 A. No. Verizon NW is presenting proposed rates in this docket for the splitter configuration #1, referred to  
6 as Option No. 1, in paragraph 2.3 (a) of exhibit JJB-2 to my phase A direct testimony. The costs and  
7 pricing are addressed in detail in the testimonies of Verizon NW witnesses Linda Casey, David Behrle, and  
8 Robert Tanimura.

9

10 **III.LINE SHARING IN CONJUNCTION WITH UNE-P**  
11 **ARRANGEMENTS**  
12

13 **Q. WHAT IS SERVICE PROVISIONING THROUGH THE USE OF UNE-P?**

14 A. When a CLEC acquires all unbundled network elements ("UNEs") necessary to provide  
15 a service from the incumbent local exchange carrier ("ILEC") on an unbundled yet  
16 pre-assembled basis, it is said to provide that service using the "UNE Platform" or  
17 "UNE-P". The form of UNE-P service provisioning that is relevant here is UNE-P  
18 provision of voice service, in which the CLEC acquires the unbundled local loop,  
19 network interface device ("NID"), switching, and other elements necessary for local  
20 voice service.

21

22 **Q. AT&T WITNESS GILLAN STATES THAT VERIZON NW MUST PROVIDE**  
23 **LINE SHARING CAPABILITIES TO A CLEC PROVIDING SERVICES OVER**

**1 THE UNE-P. DOES THE FCC LINE SHARING ORDER REQUIRE LINE**  
**2 SHARING WHEN A CLEC PROVIDES SERVICE VIA THE UNE-P?**

**3** A. No. The ILEC’s obligation to provide line sharing does not cover the situation where the CLEC is the  
**4** voice provider on the shared line. The text of the Line Sharing Order is crystal-clear:

**5** [L]ine sharing contemplates that the incumbent LEC continues to provide  
**6** POTS services on the lower frequencies while another carrier provides  
**7** data services on higher frequencies.... [I]ncumbent carriers are not  
**8** required to provide line sharing to requesting carriers that are purchasing  
**9** a combination of network elements known as the platform.  
**10** (Line Sharing Order, ¶ 72 (internal footnote references omitted)).

**11** Both AT&T and MCI/WorldCom have petitioned the FCC for reconsideration on this point. (See, Petition  
**12** of AT&T Corp. for Expedited Clarification or, in the Alternative, for Reconsideration, filed Feb. 9, 2000  
**13** (AT&T Reconsideration Petition); Petition for Clarification of MCI WorldCom, filed Feb. 9, 2000.)

**14**

**15 Q. WHAT IS VERIZON NW’S POSITION ON THE OPERATIONAL AND**  
**16 TECHNICAL ISSUES RAISED WITH OFFERING LINE SHARING IN**  
**17 CONJUNCTION WITH UNE-P?**

**18** A. Even AT&T recognized the technical issues in its petition for reconsideration of the FCC’s line sharing  
**19** decision, which states that UNE-P line sharing will require the development of “procedures that enable [the  
**20** UNE-P CLEC], or a third party, to add, modify, or remove xDSL capabilities to a new or already operating  
**21** UNE-P line...” and that “no such procedures are currently in existence.” (AT&T Petition at 5.)

**22**

**23** Evaluating the issues presented by UNE-P line sharing will take substantial time; resolving them will take  
**24** far more. As Verizon NW wrote in response to the petition for reconsideration referenced in the previous  
**25** answer:

**26** [T]he FCC should allow time for the procedures and system changes  
**27** surrounding ILEC/CLEC line sharing to stabilize before adding a

1 CLEC/CLEC line sharing requirement. The ILEC/CLEC procedures will  
2 be finalized by June 6, 2000. As with all modifications to complex  
3 systems, a time period after that will be needed to assure that any  
4 unanticipated problems can be resolved. Specifically, GTE respectfully  
5 suggests allowing a minimum of 180 days from the effective date of any  
6 order adopting such rules.  
7 (See, Comments of GTE, CC Docket No. 98-147, filed March 22, 2000, p. 9.)  
8

9 **Q. IS LINE SHARING WITH UNE-P CRITICAL TO LOCAL COMPETITION?**

10 A. No. In fact, CLECs are able to assemble unbundled elements and combine them with DSL service today.  
11 The splitter located in the CLEC collocation area is an excellent place to combine an unbundled loop,  
12 unbundled port, and DSL signal into a single facility arrangement for the end user. This is not "line  
13 sharing" because in this case the CLEC is the provider of both the data and voice services.

14

15 **Q. WOULD TWO DIFFERENT CLECS BE ABLE TO USE THIS**  
16 **ARRANGEMENT?**

17 A. Yes, current collocation rules allow CLECs to share physical collocation arrangements.

18

19 **Q. DOES THIS CONCLUDE YOUR PHASE A RESPONSIVE DIRECT TESTIMONY?**

20 A. Yes.

21

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

**IN THE MATTER OF THE CONTINUED**            )  
COSTING AND PRICING OF UNBUNDLED        )  
NETWORK ELEMENTS, TRANSPORT,        ) DOCKET NO. UT- 003013  
TERMINATION, AND RESALE                    )                    PHASE A

PHASE A RESPONSIVE DIRECT TESTIMONY OF

JOHN J. BOSHER

GROUP MANAGER-WHOLESALE MARKETS

ON BEHALF OF

**VERIZON NORTHWEST INC.**

**Formerly Known as GTE Northwest Incorporated**

**SUBJECT: LINE-SHARING POLICY AND TERMS & CONDITIONS**

**JULY 21, 2000**

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