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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

**SUPPLEMENTAL RESPONSIVE TESTIMONY OF
MICHAEL ZULEVIC
COVAD COMMUNICATIONS COMPANY**

OCTOBER 31, 2000

INTRODUCTION

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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.

Q. ARE YOU THE SAME MICHAEL ZULEVIC WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of this testimony is to address several parts of Qwest's revised SGAT which are still detrimental to Covad and other CLECs.

Q. WHAT SPECIFIC POINTS WILL YOU BE DISCUSSING?

I will be providing additional comments relating to Shared Physical Collocation, Connections Between Separate CLEC Collocation Arrangements within a Qwest premise, Collocation Intervals, and Channel Regeneration.

SHARED PHYSICAL COLLOCATION

Q. WHAT IS YOUR UNDERSTANDING OF QWEST'S POSITION PERTAINING TO SHARED PHYSICAL COLLOCATION?

A. Qwest's proposed SGAT language at 8.1.1.4 describing "Shared Caged Physical Collocation" excludes Cageless Physical Collocation and other forms of collocation from being Shared.

Q. WHY IS THIS AN IMPORTANT ISSUE FOR COVAD?

A. Covad uses Cageless Physical Collocation in the vast majority of its Qwest central offices. There could very well be circumstances where Covad would want the ability to share its space with another provider. This could be the case in central offices with

1 limited collocation space available. Covad, and other CLECs that opt for collocation
2 arrangements which make more efficient use of available central office space, should not
3 be discriminated against for having done so. Qwest should be required to provide Shared
4 Collocation regardless of the type of collocation being used by CLECs.

5
6 **CONNECTIONS BETWEEN SEPARATE CLEC COLLOCATIONS**

7 **Q. THE REVISED SGAT LANGUAGE INDICATES QWEST WILL PROVIDE**
8 **CONNECTIONS BETWEEN SEPARATE CLEC COLLOCATIONS WITHIN**
9 **THE SAME QWEST PREMISES. WHY IS THIS STILL AN ISSUE FOR**
10 **COVAD?**

11 A. Qwest has not proposed an interval for this type of connection. In many cases,
12 interconnection of non-contiguous collocation arrangements can be completed in as little
13 as 30 minutes, without requiring any additional engineering or installation effort by
14 Qwest. Often, it is only a matter of running a single small diameter cable along an
15 existing ladder rack for a distance as short as 10 feet. In cases such as this, having to wait
16 90 days is totally unacceptable.

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

18 A. Qwest must be required to provide language similar to that found in 8.2.1.27 (conversions
19 of collocation arrangements) of their proposed SGAT language which will provide for a
20 much shorter interval when the work involves primarily administrative and billing
21 changes. When these circumstances exist, the interval should be no longer than 30 days.

22 This section reads:

23 8.2.1.27 Conversions of the various Collocation arrangements (e.g.,
24 virtual to physical) will be considered under the Bona Fide Request
25 Process described in Section 17 of this Agreement. However, conversions
26 from Virtual Collocation to Cageless Physical Collocation, where the
conversion only involves an administrative and billing change, and the
Virtually Collocated equipment is located in a space where Cageless
Physical Collocation is available, shall be completed in thirty (30)
calendar days. CLEC must pay all associated conversion charges.

1 **COLLOCATION INTERVALS**

2 **Q. QWEST’S REVISED SGAT INTERVALS REQUIRE CLECS TO MEET**
3 **CERTAIN FORECASTING REQUIREMENTS IN ORDER TO TAKE**
4 **ADVANTAGE OF THE FCC’S RECENT ORDER REQUIRING A 90 DAY**
5 **COLLOCATION INTERVAL. DO YOU FEEL THIS IS THE CORRECT**
6 **APPLICATION OF THE FCC ORDER?**

7 A. No. Although I am not an attorney, I have found no language in the order that would
8 condition the receipt of the FCC ordered 90 day interval to providing a collocation
9 forecast. Covad does recognize the need to cooperatively work with Qwest to provide
10 the best possible forecasts; however, it is entirely unreasonable for Qwest to condition
11 providing a 90 day collocation interval, as ordered by the FCC, upon CLECs meeting
12 Qwest’s forecasting demands.

12 **CHANNEL REGENERATION CHARGE**

13 **Q. QWEST’S REVISED SGAT LANGUAGE PROVIDES FOR CHARGING CLECS**
14 **FOR CHANNEL REGENERATION. IS THIS CHARGE APPROPRIATE?**

15 A. No. In my experience, Qwest has designated Covad’s collocation areas within the central
16 office, and has shown very limited flexibility in permitting alternatives. If the distance
17 from the collocation to the network interconnection point is great enough to require
18 channel regeneration, then it must be done, but not at CLEC expense. Again, unless the
19 CLEC makes a conscious decision to design its network in such a way as to require
20 regeneration, Qwest must be required to pay for any necessary regeneration.

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

22 A. Yes, it does.

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COVAD COMMUNICATIONS COMPANY/SEC.271

DOCKET NO. UT-003022

I hereby certify that I served the foregoing SUPPLEMENTAL RESPONSIVE TESTIMONY OF
MICHAEL ZULEVIC FOR COVAD COMMUNICATIONS COMPANY on:

Please see attached Service List

by the following indicated method or methods:

- by **faxing** full, true, and correct copies thereof to the attorneys at the fax numbers shown above, which are the last-known fax numbers for the attorneys' offices, on the date set forth below. The receiving fax machines were operating at the time of service and the transmissions were properly completed, according to the attached confirmation reports.
- by **mailing** full, true, and correct copies thereof in sealed, first-class postage-prepaid envelopes, addressed to the attorneys as shown above, the last-known office addresses of the attorneys, and deposited with the United States Postal Service at Seattle, Washington, on the date set forth below.
- by sending full, true and correct copies thereof via **overnight courier** in sealed, prepaid envelopes, addressed to the attorneys as shown above, the last-known office addresses of the attorneys, on the date set forth below.
- by causing full, true and correct copies thereof to be **hand-delivered** to the attorneys at the attorneys' last-known office addresses listed above on the date set forth below.
- By **e-mailing** to the e-mail addresses as noted on attached service list

DATED this 10th day of October, 2000.

Carol Munnerlyn

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