BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation Into US West Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996	)	Docket No. UT-003022
In the Matter of US West Communications, Inc.'s Statement of Generally Available Terms Pursuant to Sections 252 (f) of the Telecommunications Act 1996	)	Docket No. UT-003040

WORLDCOM'S RESPONSE TO QWEST'S MEMORANDUM REGARDING REMOTE DEPLOYMENT OF DSL

In its April 10, 2002 "Memorandum Regarding Remote Deployment of DSL," Qwest claims to have met several of the FCC's standards for presuming a loop technology to be acceptable for deployment,[1] and its memo sets forth the three criteria contained in the FCC's Line Sharing Order.

Qwest's memo states at page 2 that "there do not appear to be FCC or Commission rules directly addressing the spectrum issues surrounding remote deployment of DSL…." That being the case, Qwest cannot claim to have met the first of the FCC's criteria ("complies with existing industry standards"). Notwithstanding this, Qwest then asserts that: "the DSLAM [sic] that Qwest has deployed in the field complies with ANSI T1.417." This cannot be because a) Qwest already admitted that there are no rules addressing spectrum issues arising out of remote deployment of DSL, and b) T1.417 by its own terms does not address such issues. That the T1.417 standard does not address the circumstance presented by Qwest is clearly demonstrated within the T1.417 document itself. In the discussion of Scope at paragraph 7, it states:

> "The requirements in this issue of this standard assume that the DSL system is deployed between a Central Office (CO) and a customer installation (CI). Applications that locate a TU at an intermediate point between the CO and a CI can, in some cases, cause crosstalk that is greater than those that use only a TU-C at the CO and a TU-R at the CI. Applications that use intermediate TU devices between the CO and CI are address in clause 5.2. Clause 5.2 in this standard encompasses both applications that locate the TU-C at intermediate

[1] Memo at 2, citing paragraph 195 of the FCC's *Line Sharing Order*. Qwest asserts, and WorldCom does not disagree, that the FCC envisions the LEC need demonstrate compliance with only one of the 3 criteria.

> pints between the CO and CI and applications that use intermediate repeaters between the CO and CI.
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> 5.2 Spectral compatibility of systems using intermediate TU devices It is recognized that systems with intermediate TU devices between the CO and CI can be deployed in a manner that substantially increases the likelihood of crosstalk interference to the basis systems. Annex L contains models that may be used to estimate the levels of interference. Annex G contains some calculated results of a model in which the NEXT/FEXT effects of the intermediate device are not considered. It is expected that Issue 2 of this standard will address this topic.

The T1.417 Standard document thus is instructive in two key respects. First, the document makes clear that interference can occur where, as in this case, the DSLAM is deployed remotely -- i.e., between the central office and the customer premises. Second, the document on its face does not address issues relating to remote DSLAMs. As a result, the Commission cannot conclude that Qwest meets the first of the FCC's criteria.

Qwest makes a rather feeble attempt at showing that the second of the FCC's criteria have been met by stating that "The remote DSL equipment that Qwest has deployed has been deployed successfully by other carriers, such as Sprint."[2] No evidence is presented in support of this claim, which therefore should be disregarded.

Qwest next argues that it has met the third of the FCC's criteria -- namely, "that the technology … has been successfully deployed by any carrier without "significantly degrading" the performance of other services."[3]

In support of that claim, Qwest states that it has "successfully deployed 1,492 remote DSLAMs across its 14-state region and 242 within Washington."[4] The "evidence" Qwest supplies in support of its claim fails completely to demonstrate that the remote DSLAM technology has not (or, more importantly, will not) degraded the performance of other services. This failure is demonstrated by Qwest's statement that it intentionally "chose locations ***that would not interfere*** with its own or CLECs' central-office based DSL."[5] It should be obvious that the remote DSLAMs deployed by Qwest using this deployment criterion would not have "interfered" with other services, and Qwest's memorandum should not be sufficient to satisfy the ALJ and the Commission of the feasibility of Qwest's remote DSLAMs.

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[2] Id., at 3.

[3] Id., at 2, citing the FCC's *Line Sharing Order*.

[4] Id.

[5] Id., emphasis added.

Qwest cannot claim on the one hand that it avoided situations where interference might be caused, and then state on the other hand that it has demonstrated its remote DSLAM deployment does not interfere with its own or other carriers' central-office based DSL services. For such a claim to be credible, two revisions must be made to Qwest's "test." First, it must test its remote DSLAMs in a situation where another central-office based DSL capability has been deployed. Second, the services of both the remote and the central-office based DSLAMs must serve customers in the same distribution binder group (known within the industry as the F2 portion of the loop plant).

WorldCom respectfully requests that the ALJ order Qwest to test its remote DSLAMs with these two revisions in mind, preferably with the cooperation of a CLEC who has central-office based DSL capabilities in Washington.

Respectfully submitted on May 6, 2002.

WORLDCOM, INC.

By:_____

Michel Singer-Nelson
WorldCom, Inc.
707 17th Street, Suite 4200
Denver, CO 80202
303-390-6106