

**Collocation for Central Office
Telecommunication Rulemaking Workshop
UT-990582
July 15, 1999
9:30 a.m. - 5:00 p.m.**

Attendees:

Christine Mailloux, North Point Comm.
Kaylene Anderson, Nextlink
Glenn Harris, Sprint
Eric Heath, Sprint
Jane Delahany, GST
Jo Gentry, ACI-Rhythms
Chris Murphy, AT&T
Don Dennis, CenturyTel
Clyde Maclver, ACI
Gary Yaquinto, GST Tekcom, Inc.
Frank Paganelli, ACI-Rhythms
Wayne Hant, Idaho PUC
Rogelio Pena, MCI WorldCom
Janis Stys, MCI WorldCom
Karen Maguire, Bell Atlantic
Clay Deanhardt, Covad Comm. Co.
Ron Gayman, AT&T
Tom Rogers, Ellensburg Telephone
Mike King, Ellensburg Telephone
Tom Harris, Oregon PUC
Roy Lathrop, MCI WorldCom
John Boshier, GTE
Rodney Langley, GTE
Sterling Sawyer, Oregon PUC

Greg Kopta, Davis Wright Tremaine
Jeff Hubbard, US West
Sue Henson, US West
Perry Hooks, US West
Sandy Smith, GTE
Joan Gage, GTE
Rex Knowles, Nextlink
Doug Sobieski
Carol Burdine, SBCN
Allan Woodruff, SBCN
Mike Miner, Integro Telecom
Scott Sawyer, Centurytel
Art Butler, ATER Wynne LLP
Rex Knowles, Nextlink
Tim O'Connell, Steel Rives, GTE
Rick Finnigan, Bell Atlantic
Kristian Hedine, High Speed.Com
Randy Swearingin, High Speed.Com
Mark Reynolds, US West
Dennis Pappas, US West
Peter Gunderson, ELI
Phillip Popoff, Puget Sound Energy
Lisa Anderl, US West
Kath Thomas, ATG Santa Rosa, CA
(Bridge)
Peggy Egbert, Div. of Public Utilities-
Utah

Mary Tribby, AT&T

WUTC Staff:

Rebecca Beaton
David Griffith
Larry Berg
Glenn Blackmon
Jacob Wexler
Greg Trautman

RB: Introductions, Welcome and Overview of Agenda

LB: The Commission is confident that a final order will be issued on or around July 31, 1999. There's presently a draft that circulating and it's nearing a final draft stage. If it isn't entered on or before July 31 it will be entered soon thereafter.

DG: I did provide testimony in the generic costs study case which we're expecting a decision on by the end of the month. Staff also participated in another docket which was UT-960323 on collocation activities with about three CLEC's. Staff provided comments in that case did not provide any testimony and the comments were mainly in the form of legal briefs from the AG's office. Our only testimony on the collocation is actually on the cost study proceeding.

LB: Opening Statements

RB: Introduction of Karen McGuire, Director of Collocation Implementation, Bell Atlantic

KM: Presentation: Collocation - Bell Atlantic Experience (See handout attached)

Collocation Offerings (see page 3 of the handout)

Traditional Physical-Amount of square footage within a central office, historically always surrounded by a cage. Bell Atlantic does not provide cages any more for the most part. It's an option rather than a requirement.

Virtual Collocation-A favorite among most of our CLECs.

SCOPE-First foray into a cageless offering. We sell space on a frame or on a bay by bay increment. It's a secured environment. It's in the same type of environment that a physical collocation arrangement would be in. It would not be co-mingled or in the same area as the Bell Atlantic transport or equipment.

Assembly Room-It's actually a place where a CLEC can provide a cross connect bay within a central office. The idea was to allow the CLEC to

cross connect loops and ports without having to collocate any electronic equipment. It was based on a collaborative effort session with the New York Commission. They're only located in New York. There hasn't been any thought of discussion of expanding that any further.

CLOSE-the next step toward cageless collocation. It was an offering to allow collocation in the same area as the Bell Atlantic network equipment. Sort of like virtual with the CLEC having access to the equipment directly like they would in physical. The requirement was to have a Bell Atlantic escort for the length of the time the CLEC was working on the equipment. It has since been withdrawn. It is superseded by are latest offering.

CCOE-That is what we believe in Bell Atlantic as the offering that meets the FCC requirement that we have cageless collocation.

Collocation Implementation Organization (see page 4 of the handout)

Collocation Applications Received (see page 5 of the handout)
Resources that we provide

Collocation In-Service and In-Progress (see page 6 of the handout)

Resources Available to CLECs for Collocation (see page 7 of the handout)

One that's not on here that I mentioned before is actually, obviously, the people. That's probably the first resource that I should list on this slide.

FCC 706 Order: Conditions BA Had Already Met (see page 8 of the handout)

I understand that there are interpretation issues around this. We believe that we've got an offering that meets all of the requirements of the order. The way the FCC looked at it was that we ought to file in the state tariffs not in the federal tariffs, so we filed in all 14 of our jurisdictions some modifications to our tariffs to comply with the order. We are in a proceeding right now that, they will migrate down different paths as each local commission takes a look at those and make changes. The way we filed it is fairly consistent across the different regions.

What I wanted to talk about are some of the things we had already been doing, some under our own steam and others under the recommendation of local commissions, particularly in New York.

What Changed as a Result of the FCC 706 Order (see page 9 of the handout)

From the Bell Atlantic perspective we are very concerned still about security requirements. Often when I'm talking one on one with a CLEC

you can develop that trust and try to work through types of arrangements. But when you're talking about multiple carriers and trying to manage a multiple carrier environment, we do have concerns about security, both intentional and non intentional problems. I will say that Bell Atlantic has had some bouts with sabotage already, mostly. Cable cut type thing etc. It's been both to CLEC equipment as well as to Bell Atlantic equipment. Frankly it's been more the CLEC equipment. We are concerned about security type requirements. As part of our offerings we put some parameters around it. The three things we took from the order was that we could put up security cameras. We could put up access cards that would track who had been in the central office and when. We took the part that was maybe meant a little tongue in cheek by the FCC but the Bell Atlantic can cage off it's own equipment if it feels necessary. So we have put a separation between are standard where we would collocate CLEC equipment versus where we would put our equipment, so if the time came and it was near some equipment that we feel was particularly sensitive, maybe we will put a cage around our own equipment to protect it. We are much more concerned with obviously tandem equipment or equipment that has the ability to affect both carriers and end line users. We got some guidelines we are using to determine where we would place cageless equipment, but there are a couple of variables we are looking at and one of them is: How sensitive is the equipment we are collocating next to?

Implemented Flat Rates for Cost Recovery Across the Region:

There is either a flat rate recurring charge or a flat rate non-recurring charge. That is something we had been doing for a while in New York and Massachusetts and some other states and we had not been doing in the old Bell Atlantic states before the Bell Atlantic and INX merger. The cageless flat rate that we filed across the region is actually a flat recurring rate. There's not an up-front room construction on an up front security construction charge. It's a recurring rate structure. We modeled that after the New York flat rate structure that we had in place for traditional types of collocation. That was based on an order from the New York Commission that we do our rates in a recurring charge and not in an up front one time charge. The rest of our flat rates for regular types of collocation or other than cageless collocation is a flat rate one time charge in all of the other states other than New York.

Some of the things I would be thinking about, in this forum is, flat rate recurring charges have a bit of a danger in them from our perspective. Without having some kind of an up-front commitment we're worried that there will be CLECs out there that will come in, because there's not much of an up front charge, maybe they don't have capital, maybe they have the dollars to do what they need to

do. They'll come in and build a bunch of collocation arrangements, maybe even start moving in and then not have the funds to keep them maintained. We don't have any mechanism for recovering those costs. If an area where we've got another collocater coming in there may be an ability to recycle that space but it's a significant concern. We believe that a facilities based provider should have some kind of up-front capital requirement to get into business. If we build a whole bunch of collocation arrangements and then consolidation comes later, we may have a problem with unused space and space that we're just out the funds for that.

The other flat rate includes a one time up front charge. The cost for building collocation arrangement varies wildy, from not too expensive to off the charts expensive. We sort of went down this path a little bit reluctantly but with a lot of encouragement from various parties. We got to the point where we have some pretty significant volume. When you deal with averages, when you're only dealing with a little bit of volume, it doesn't work. We've got to the point where I think we've got a critical mass.

Sample Intervals (see page 10 on handout)

Collocation Challenges (see page 11 on handout)

RB: Opened up to questions and answer.

??: I just wanted to confirm that your offerings are, physical, virtual and cageless and then assembly room?

KM: Assembly room is only in New York. The other ones are all region wide.

JG: Can y explain the definition of assembly rooms and the difference of that and the cageless?

KM: An assembly room was established to meet one need. It could be a room or a panel somewhere. It's a cross connect block, period. There's no electronics associated with it. It provides a CLEC with the ability to order an unbundled loop from Bell Atlantic and an unbundled port from Bell Atlantic and combine itself within the central office. It evolved through the proceedings of UNI platforms where Bell Atlantic was restoring UNI platforms as an offering. One of the issues that came about, again this is just New York, was that we had to allow the CLEC the ability to combine the elements themselves if you will no longer provide them with a platform requirement. Initially we said that collocation is a way to do that and had a back and forth debate. The debate focused around you don't need to put electronics. You don't need the same types of environmental conditioning requirements. It's a very watered down version for a very specific requirement,

just cross connecting loops and ports.

GK: You were talking about sample intervals that you have for completing collocation and I believe that you said you were doing fairly well with meeting those sample intervals. Do you have a quantification of how you're doing as far as meeting those intervals and how far you've missed them on a certain percentage basis of the number of orders that you have?

KM: The interval I was talking about was the New York interval. The way the rules were set up for the three months forecast were set up to just to allow us to handle significant volume. What we're really using this for more often is for this significant space preparation. We file these with the local commissions. From the interval commitment that we've given, whether it's 76 days or 91 or an extension due to forecast, we're meeting the requirements on average over a period of time of approximately 95%. Often that's not the 76-day business day interval. Often we've allowed that extension for non forecasted orders. The way we are measuring ourselves against, a lot of it then parts of what the interval actually is. What we're measuring ourselves against is when we get an application up front we respond back with a "Yes we can do it and here's your due date" and that's what we're measuring ourselves against. In establishing that due date we're following what rules are set out. There is debate from some of CLECs about whether our measurements are correct. You may find that others debate what we're claiming. I'm responsible for measuring that and I measure from when we committed to turn it up which isn't always 76 days, to whether we met that commitment or not. I didn't say we're meeting most of them because we haven't done any yet. I don't know what our performance will be on that.

?? On measuring intervals what do you determine the end date? If you've got a caged turnover where the CLEC then has access to the cage but there are things that may still need to be done by Bell Atlantic to get that cage functional, how do you measure when you've completed the interval?

KM: We measuring the completion of the interval as the date we've committed to have the collocation arrangement ready for turnover. We've had some issues with vendor quality of the work that we have. A lot of it we're building is 90% done by vendors. My measurement is based on a clean turn up that is ready for service to hand over to you. We have run into some issues though, in particularly with this increased volume we're having a heck of a time getting qualified vendors. We've seen actually a dip in the quality of the job turnover. To counteract that we've hired an outside group to go and do a quality audit on our work before we turn it over. Maybe even over the last year we've had some problems with the quality of the job. To answer your question directly I'll measure it as a completion if the CLEC can go in and start using it and I can fix whatever issues I have in parallel with them using it. Don't forget, in a collocation arrangement, when we turn it over the CLEC has to do some work. They have to install their own equipment and get ready to provide service. As long as we can fix whatever perceived

deficiency is in the interim I still count that as a method turn up.

TE: I just had a question about your flat rate. Is that flat across your entire region for say a physical 100 square feet surrounded by a cage? Or is it broken up into a....

KM: It would be different state by state. Part due to we have different cost structures. The other part of it is, to the greatest extent possible when something looks alike in the way we build it we'll file the same rate. What happens though is you get into individual rate cases with states so the rates end up changing. They are fairly significantly different.

TE: Are those costs listed on your Web Site?

KM: Actually no. We leave that to our tariffs. So they are available in the tariffs.

TE: We're doing a lot of augments to our spaces. Do you charge and install fee, a non-recurring charge for a cable augment to a physical collocate?

KM: We charge an augment application fee. There are non-refund charges that come with cabling in most of our jurisdictions. So we would charge that flat rate. Different types of augments. If you were augmenting and you wanted to go from 100 square feet to 200 square feet we treat that pretty much like a new application.

MT: Back the installation commitments you were talking about. How much of the time is Bell Atlantic unable to fill or satisfy a request because of space unavailability and how far do you guys go where space is unavailable to try to find and alternative source?

KM: We have clearly had offices that have ran out of space for traditional types of collocation. That's sort of what I was talking about as were going down this whole process. Prior to the cageless offering I think there were probably close to 100 central offices across our entire region that were closed out for further type physical collocation. A lot of those had up to 15 collocators in them already. Eventually all these offices are going to run out of space. Our process has been iterative. When we started running out of space for traditional cages that's when we came up with maybe will build this scope arrangement. When we get to the point where we go and take another look at all of the offices that we had previously denied for physical and see if we could provide scope. Another iteration of that, offices that have been closed off to both physical and scope, we're taking another look and looking at this more inclusive cageless offering. We're actually right in the beginning of that process. If your question relates to time frames there can be a significant period of time. There are some central offices that I closed off the physical back in late 1995. When I went back and offered scope that was two ½ years later but I did go back to those original carriers. That's obviously a significant amount of time between the two different

types of offerings.

MT: Now with cageless and all your other offerings of your 500 central offices or so, how many are closed off to additional collocation requests at this point in time?

KM: Actually not very many because we haven't evaluated all of them. We had looked at 20 central offices first that were more popular offices and we found that of those 20 we could do some form of cageless actually in 19 of them. But it was 19 of them where we could do cageless but it wouldn't have accommodated everybody who had an interest in that central office. That's what I tried to get at before, that's where we take a look and say collocator "A" asked for 400 square feet. Maybe they don't need 400 square feet. Maybe we should see if we can get folks down to some sort of a smaller kind of what you need to get into business type of arrangement. That's why we modified the application to do that as well.

MT: For scope. Of the requests that you currently have that are outstanding, do you report on a percentage of those requests that are unable to be filled currently because of space problems?

KM: We do report when we've rejected an application. Actually I don't have that information right now.

GK: You've mentioned a couple of times that you file reports with, at least the New York state commission. I don't know whether there are other commissions that you also file reports with. Could you give us an idea of what kind of information you report and on what kind of time periods? Is it monthly? Is it quarterly?

KM: For collocation we've got thousands of matrixes we file for the whole unbundled arena. For collocation the number of applications received in a month, percent on time, and average delay days for the jobs that have been missed. We do that for both the installations, did we complete the job, as well as for our response time to the initial request. I developed those reports internally for every state. I'm not sure where we are in the path in all of the states. I know for example we do file it in New York, Pennsylvania, New Jersey and Massachusetts and probably a couple others. We are trying to set out the same sort of matrix that we're measured on. That's part of our long distance entry. Those are the things that we will pay penalties on if we get into long distance and we miss those measurements. There's criteria against them, as well, that we have to meet or pay penalties.

KM: I was curious about the specific application process. You mentioned a couple times that you've revamped the application so that when a carrier fills an application out they'll put their first request I want physical at central office is you don't have space for physical that they consider cageless and if not.... Just to clarify, the requesting co-locator does not need to submit a new application so

you come back to them and say sorry no room for physical. You kind of automatically go down the list and co-locator does not necessarily need to reapply or submit a new application. Is that correct?

KM: Yes. This is brand new, we just started this for that very reason. If I reject an application for physical but then they come right back and want scope and I can meet that then it's sort of a fuzzy line. They got the space. Maybe not exactly the way they wanted it but they've got space in that central office. We will not require a 2nd application. For example, if you said "I want scope with six bays and that's my minimum requirement" then I came back to you and said "I only have four," then I might need a yes or no go ahead and do that. The idea is not to have back and forth application. We did run into one little glitch. We have different application fees. That's based on the tariff rules. We got a little math to do afterwards. If you applied for scope and you end up getting physical then I've got to balance the books afterwards and ask for more money.

FP: Do you have an interval that you commit to the CLECs to get them to access CFA data that allows a CLEC to order a dedicated or transport to the cage prior to turnover to that two weeks or X number of days? Or when do you provide that?

KM: The way we use to provide it was at the turnover time frame. We have targeted, it's not a commitment because we're having a little trouble with it, but we have targeted to get that couple of weeks earlier. Because of the issue of wanting to order DS3 or DS1 facilities prior to even the cage being ready has been a little parallel processing. We are trying to work with you on that. One of the issues that we have particularly in a virtual collocation arrangement is we can't do that because the equipment first has to be installed before we inventory it. There are some challenges with that. The objective is to try to get you closer to two weeks before. Frankly, there are some CLECs that are very interested in it and some that aren't. We trying to just work individually. If know that somebody has a particular interest for that, I will try to get them that early.

LB: In your traditional caged environment did you allow CLECs to maintain personnel on premises 7 x 24? If so, how do you envision handling such a request in a cageless collocation environment?

KM: CLECs did have 7 x 24 access to their equipment in a caged environment.

LB: Does that mean they could have somebody sitting in the cage if they wanted to?

KM: Installation type activities and normal provisioning type activities were to occur during normal business hours. (Turned tape over).

RB: Other questions?

CD: A moment ago you said that there were some penalties, I guess state penalties,

attached to not meeting some of the turnover timetables for collocation spaces. Can you tell us a little bit more about that? In specific, what the penalties are tied to and maybe the nature of the penalties? Are they set financial penalties? Are they tied to rebates? How that structure works.

KM: That's a little out of my realm. I don't know. I just know that it's complex and all of the measurements, not just for collocation, but for provisioning intervals on UNI's, DS1, DS3 and, no joke, there are 600 plus measurements all tied up in some kind of crazy mathematical formula that comes out with some kind of a penalty is you miss. But that's about the extent of what I know. I know that if I get under 90% I get a minus two and somehow that equates to some amount of dollars. But it also depends on what happens of other areas of our business. In other words, if blow all the intervals of collocation but everybody else does great, we provision everything on time, then the penalties are lower than if Bell Atlantic blows everything.

CD: Is this primarily New York or is this in all the states?

KM: This is part of the agreements that we are making if we get long distance entry. It's tied to long distance entry. We're proposing pretty much the same sets of rules across each of the different states but how that's going along is progressing at different paces in different states and what ends up being spit out is very different in the different states.

DP: Just to clarify. Those are just rules that you would be imposed if once you get 271 to make sure that your quality of service doesn't drop after that point.

KM: That's absolutely right. Thanks for that clarification.

TE: In your physical or scope arrangements can you install the spot frame in the collocate area or is it not even on the floor or on a different floor or is it in the open in a physical arrangement?

KM: We've got a dedicated pot bag in the physical arrangement per carrier that's right outside of the cage. Actually it's open in most cases. We actually have options. This was based on one of the previous FCC orders. We're allowed to provide the pot bag, you as a CLEC can provide your own pot bag outside the cage or you can provide your own pot bag inside the cage. Thankfully nobody has ever put one in the cage because I think that's a mess. That's throwing cables over a cage and not having access to our own D-mark. It just doesn't make any sense from a space planning either. Those are the three options. Scope and cageless have shared pot bag options. In cageless, this is a result of the FCC Order, the collocater has the ability to put in their pot bag right in their own frame. But in scope it's just one shared pot bag.

MT: Following the FCC 706 order Bell Atlantic, I thought we said has filed

modifications in all 14 states regarding your collocation offerings. Did you go into all the states where you exist and file modifications to the interconnection agreements or were you talking about the tariffs?

KM: I was talking about the tariffs.

MT: What have you done with respect to interconnection agreements?

KM: Most of our interconnection agreements refer to the tariffs. That's where most of our rules now. To the extent that somebody wants to change, and there are some slight interconnection agreement rules that are slightly different than our tariffs. And to the extent that a CLEC wants to open up negotiations to do something like that I guess we would be open to it. I don't really think there's anything to that. Most of the interconnection agreements point to the tariffs.

MT: So cageless collocation, for example, would be available under all of your interconnection agreements as it is set out in your tariff?

KM: Right.

RB: Thank you.

*****BREAK*****

RB: Introduction of Jo Gentry.

JG: Presentation: Collocation - A CLEC's Perspective.

What a CLEC requires from Collocation (see second page of handout)

Flexibility

Options

Realistic Timeframes

Reasonable Rates

Business Practices

DSL and why it's important. It's more a technology driven offering. I say that in contrast to some of the other things we do in telecom. It requires equipment. It requires the equipment that is placed in the central office. It requires a consideration for what's going to be at the end user's premise. Their computer, potentially some kind of card that might go in the computer. It may require an additional line put into the house, everything from a jack and that type of thing. I say that in contrast to long distance. Because if you decide to change from carrier one to carrier two it's by in large a software change that's instantaneous, it has to go through a system, but we are not talking about you have to go and have somebody sit at your house for four hours for a dispatcher to come out or that

somebody has to go to the central office and make any major wiring changes. The reason for that contrast is that that can happen fairly simply. It's not labor intensive. Whereas, someone who commits to DSL, in many cases, does have to have that dispatch. So with that there's not going to be the churn that we've seen in the long distance environment. It's more a commit and stay. With that said, I'll paraphrase, Joe Zell, who is enterprise president for US West, said it very aptly in a Denver Post article a couple of months ago, it's first to market and who gets market share first. Two themes I want to leave you with throughout my discussion it's options and timing. That's what crucial to all of us right now. Speed to market. We are fierce competitors but we're in the same environment trying to get the opportunity to provide service to end users. We're purchasing from our biggest competitor the ability to provide the service. In the situation with US West I have to purchase collocation from them and unbundled loops from them but at the same time I'm their customer and their competitor.

Collocation Options (see third page of handout)

Physical

Caged/Cageless/Common

Adjacent

In that central office premise, which would be potentially the parking lot, it could be the roof of the building. In many central offices you know that there is land and/or buildings immediately next door, across the alley, there's times like that that we would utilize that space. If there are none of those then we might, for instance, go down the street to a strip mall. Because the density of population in California, it is always at a premium. So we've gone to a strip mall, we've sublet a small area and it's like a broom closet and it becomes the most highly intensified telecom area that you've ever seen with this cabling coming in. But, the alternative was no collocation. So what we've done is, we've worked, specifically with Pacific Bell, we pulled in entrance facility, done all this routing. It's been kind of a combined effort with them and in most cases they've been quite agreeable with doing that because they understand that the requirement was to allow collocation and they were helping our creativity in providing that. Our personal opinion is that we won't do adjacent collocation if there is space. Because the further away that you get from the central office the longer your loop is. The nature of DSL is distance sensitive. So the speed that I can provide to my end user is impacted by the distance of my loop. When you look from the end user to the main distribution frame, from the main distribution frame by whatever

that tie cable or EICT, that cross connect that's going to go from the NDF to my facility. If I've got to go two blocks down the street, I've just increased my distance. The usability of that can diminish. The more places you have connect gives you more error potential. You don't want to go into it callously. It has to be a last resort. Options should be out there. It costs you a whole bunch more money. Estimates are two to four times more than a traditional physical collocation.

If we are in the position that we need to an adjacent, if that is the only alternative, I want the option not to be required to come back inside that central office when, if fact, space is made available. The build plan is in constant mode. If they don't believe they are going to modify that office in a specified time frame that they're not going to expand that office to accommodate more collocation, in a time frame that allows me to wait for that opportunity of build and I need to go to adjacent, once I invest that money I don't want to be forced back in three years from now when they do build. That's something you do need to consider when you're going into that.

Shared

Virtual

ILEC installs/maintains

CLEC installs/maintains

Virtual has always been kind of an unfortunate opportunity. ACI Rhythms opinion is probably because of the access to the equipment, the maintenance issue. DSL, we give service guarantees to our end users. So we pretty much have a 99.9 percent service guarantee. That's one of our marketing choices. That means reliability of service. If I can't have access to my equipment to immediately repair it, then I have difficulty providing that service guarantee. Whereas, if I allowed the ICEC ARBOC to maintain on my behalf everyone of their central office techs does not understand my equipment. You can't stay up on the different brands. To be dependent on them makes it undesirable. From an options point of view, I would want the option to have virtual collocation that they install and I install and I maintain. It's the combination of all of the above.

Realistic Provisioning Timeframes (see fourth page of handout)

Feasibility - 10 calendar days; includes space and prior considerations

Price Quote - 15 calendar days

Build: Cageless - 45 calendar day

Physical - 60 calendar days

Augments - 30 calendar days

If there has been anything that's been the most difficult it would be the provisioning intervals. US West has a feasibility, yes there is or not there's not, space available. The quicker they can tell us that goes right back to where we were a few minutes ago, speed to market. The faster I can know that there is or is not space is an asset to me. I need to have a reliable answer. I need to know that when they tell me, I submitted money, an application and they give an answer I need to know that that answer has been well researched and not in three to six weeks they come back with whoops I made a mistake, I found some. Those things cause huge marketing issues because you're in a resubmit stage. The accuracy of the feasibility is paramount.

Also, timing turnaround. I think that we all are familiar with the advance services that are out of the FCC. They think that 10 days is a realistic feasibility. I would tell you that as close to ten days would certainly be desirable. What is unacceptable is 25 to 30 days because we believe that that process needs to be put in a mode that they can quickly respond to our requests.

Price quotes. If the service is not tariffed and/or flat rated in the environment that we're in US West, they actually did an individual case base. Everything is measured or determined by your individual request. It doesn't really matter that in Seattle main and Seattle east you ask for physical collocation and wanted a 10 x 10, they're going to do a literal work up. That takes extra time. We have an accuracy issue. You need to know that the quote was something that you can depend on. That is something that is paramount. We had some difficulty with that and numbers fluctuating. It's a confidence level and an opportunity of trusting what you've got so that you can build your market plans. A small startup that has no idea how much collocation is going to cost has a heck of a time figuring out where it's going to go. You know that to be able to determine your profitability you've got to take the cost of you collocation in addition to the cost of your loop. Whatever administrative additives you have before you can determine your price. If you're working with a real slushy area as to how much collocation is going to be your talking about something that's going to be between \$50,000 and \$100,000 per increment you need some more assurance.

The third stage is the bill stage. In a situation like Texas we've had situations where they have worked with us and we're having a 45 days cageless build time. So for cageless collocation, free standing base we're working on about a 45-day interval. On physical we're working on about a 60-day interval. That's for total build. That's positive stuff that lets us get to market a lot quicker. It lets us have that opportunity to collocate the equipment.

Augments, more structure around the augments. We go in with a set quantity of DSO that are cabled to us. But, we know in six months we will need more and twelve months we will need more, for any of you that have ever done any kind of forecasting. The theory of forecasting is your trending off of something. I do provide forecasts, but I like to work with that ILEC ARBOC. Once I know more about that marketplace. Once I know more about the dynamics of that city or location within it. I don't have any of the market trends not only for what DSL is going to be but realistically how accessible their loops are going to be. It's hard to forecast if you don't know what percentage of the loops will be made available to you. Specifically if that ILEC or ARBOC has a lot of digital loop carrier. Specifically integrated digital loop carrier. Those loops may not be made available to me. If they have 30% of their market that falls in that realm, that 30% that I'm not going to have. So my forecast is skewed because I thought that I could go to that neighborhood. To forecast for my collocation in the Ameritech region is, their central offices are ringed with digital loop carrier. I certainly support the concept of forecast, but then it might be a situation that that ILEC or ARBOC discloses to me a little bit more about the profile of their wire centers. So that I can factor that into my marketing decisions so that I can factor that into the forecast. If you will disclose to that this central office has this kind of profile, this kind of digital loop carrier, this kind of Digital Add Main Lines (DAMLS), the different kinds of technology. I could be more accurate in what I do for you. To hold me to that, yes in turn if you'll be held to fact that if I give that you'll guarantee the service will be there when I want it. Those are usually two way streets. So, for me to take a penalty, you would take a penalty.

Also, with the whole concept of provisioning the opportunity to expedite central offices. This would be a situation like if I have my sales marketing people say I just really need this little pocket of central office. I've got this customer base and they really need it. I'm on my time line. I would like the opportunity to work with ILEC or ARBOC to expedite. If that means time and materials then I'll discuss that with them. I'm not asked for favoritism or pulling me out of line of all the CLECs, I just want some flexibility. I want some opportunity to ask for something different and pay the appropriate charges if, in fact, I choose to do that. An opportunity to speed up the central office in some time line other than what had been established.

Reasonable Rates (see fifth page of handout)

TELRIC based
Optional flat rates, e.g., per bay
No ICB components
Audit provisions

The term would be what would be reasonable. The density of Seattle is different than the rural of some other city. I need to know that they are TELRIC based. I need to know that they are forward looking. That they have reasonable assumptions built into them. That they have a foundation that you actually discuss with somebody and understand where they came to pass. In most situations they have not been reviewed or scrutinized by that utility commission because it is an in depth process. I would like to have the opportunity to ask them why was it constructed in this manner? It's an understanding on why was that cost methodology not so much as the number but understanding why something is recurring in contrast to non-recurring. I also would like to have the opportunity for flat rated prices. The timeframe that goes into making these prices quotes. With the accuracy that's suspect, because I'm not sure how much somebody really measured some distance, I'd like the opportunity to know that physical collocation is X. Because their waiting or averaging potentially is no different or worse than what it would have been if they incrementally added up the 10 of 15 things. They are going to weight in the same factors or considerations. At least it lets me, going in, knows what that collocation is going to cost. I want that as an option, a consideration that I could have flat rated, physical or cageless. US West is offering a flat rate or cageless now. But, my contract opportunities, it comes in a two or four or six-bay increment. But if I want five bays I pay the same as six bays. So, you need to have some flexibility when you're looking at this. What's incremental, what's additive. It's the evolution of where we're going. They've made strides when you just go the couple extra steps.

No ICB. ICB is the same horror that I have been speaking about for the last couple of minutes. Not knowing what the price of something is going to be makes it impossible to do any kind of business decisions or market cases. I would say that everything has a cost underlying support.

I would also like to have the opportunity of doing audits. This is the assumption that something is usage based or distance based. If my racking is X hundred feet. But I happen to know that my cousin, the other CLEC that sits right next to me in his cage, his racking is half the distance. It's those kind of things to see what was the substance behind that? I don't want to have to make an audit situation a PC proceeding. I want to have the opportunity come measure those, get appropriate credits or corrections or whatever. It's those kinds of things that need to be built into the collocation process that gives you that flexibility, also a

consideration where in the central office CLECs for the collocation are placed. I've been through quite a few central offices in the last couple of years and in some cases you are put off in the hinterland. You could be off in the furthest corner and unless your cabling and racking and the length of your loop is greatly extended. Or you're on the fourth floor and they're down on the second floor. It's the consideration of where they placed you. I understand with cages, that some of that is required because there is only so much square footage. Specifically with cageless it's an opportunity that I really wish to be in their base to limit that distance to give that flexibility and have the opportunity.

Reasonable and Documented Business Practices (see sixth page of handout)

- Committed Time Intervals
- Space and Power Availability
 - PUC verification of ILEC claims
- Documented Build/Access Processes
 - Security
 - APOT; Pots
- Escalation Procedures

This is part of the structures that were hoping to be put around the collocation environment. I believe that there were definitions around some of the processes is we had talked them out in some type of forum. It would give people more assurance going forward. Structure around that, if this happens then this happens second, if not here's the repercussion.

The space and power availability I believe needs to be built into that feasibility with more structure. I've experienced that you get a feasibility back that says there is space then 45 of 60 days later there was no power. Then I'm waiting for power. It needs to be a good comprehensive understanding about what you have to offer me and in what time frame.

We've had several occasions to request the involvement of the PUCs or the commissions in their respective states to come with us on the central office walks. They're very helpful and they're always appreciative that the commission comes with us. I think it's an unfortunate nature that it requires that. ILECs, as a family, are kind of driving my behavior. I'm trying to get first to market and sell my wares. The longer you delay me, my frustration level goes up. Then what you're telling me is unless I go to the commission and ask for their assistance, make them come with us, you not going to answer my claims. You're driving my behavior to involve the PUC's and the FCC. If we're going to turn something around, I would say it's the response, keep your commitment, do what you said you were going to do and we can go forward. If I can trust that you say it's Tuesday the 10th I'll know I'm going to get it by Tuesday the 10th. But if on the 11th you call me and I need a couple more weeks and all the time you're selling the same product I'm trying to sell, you're forcing me to change my behavior and become more of a regulatory

kind of litigious kind of environment.

Documented build and access processes. By in large in the US West environment we've not had any significant issues that I'm aware of. We've had the collocations up. We've had lots of techs in and out of the offices. It works quite well. I think US West probably has less of a paranoia about the damage and about the security risks than per change did Texas or California or Ameritech. I think that they realize that our techs are not intended to go and do damage, which is all of our intent. Accidents happen but you try to minimize that. Keep good security rules. You do security checks. You have badges or cameras or whatever the case and then you proceed.

Another area we need some documented process around is when and where we get information to be able to place our transport orders the conclusion after our cages. I put the application, and the collocation is built which is probably a 90 to 120 days process. Now I need to have transport because I need to connect my collocations together, CO to CO, CO back to my POT, out to my network. I need to be able to place the transport orders to tie all of this together. That means I need CFA or APOT or whatever that ILEC calls that type of CFA information to be able to place those orders. I need it as early as possible. And more importantly that it's accurate when you give it to me. If I knew that you were going to give it to me on the 10th day and it's accurate and my orders are going to go through and they're not error out because you forgot to put it in your system, causing my order to error out, which then causes me three to four days delay, that's a milestone. The worst part is I'll get information but it's not correct. This is not specifically US West. This is Ameritech, California. We need to work together in some manner, because by in large that information goes into terks so that these high caps can be provisioned. So that you put in some pro-active measures that lets me have confidence that when I place my transport order it's going to flow through the process. It's not going to error out. Another component of collocation, before I can actually use it or make it commercial is that they have a POTS line in(turned over tape)

This is something that phone companies have been doing for years. But what we found is central office techs totally get blown away because, what do you want a POTS line in here for? This is a central office, you can't have your POTS line in here. So it's an every central office education of they won't bring it in, they won't tie it down, it won't be turned up in time. Accumulation of the collocation build time, the opportunity to have my transport installed and then to have POTS lines up. All those have to be done and available before I can even start my portion, before I'm commercial, before I'm able to turn up service to customers. They're in the family of collocation and they are all equally important in different manners.

Additional Issues (see seventh page of handout)

Another thing is the opportunity to have an expedited escalation process, if

something like that could be built in. It goes with what I was saying before. If there was a forum that I can place a serious issue in front of someone and that says I need this resolved. If the only place I can go is to the PUC then it becomes a little more formal. It shouldn't be me calling my accounting team the 11th hour and having them pulling every string of every person they can find in the company. A process that doesn't cause two people to be totally crazy on the phone to each other at 10 or 11 o'clock at night trying to get a central office up. A well thought out pro-active process to eliminate some of that escalation or PUC involvement.

Performance measurements. It is something that gives us more assurance of what going on. It lets us know what we can expect. It also means that then there are repercussions off the other side, where are you going with this. If an ARBOC or US West or somebody else is not able to meet their commitment that it is displayed somewhere and in numbers that you can track to. So, if the CLEC community summed up all their numbers you could actually see those to be the same numbers that are reported to that regulatory body or to that facilitating body. As a small CLEC my numbers get lost in the shuffle. I can't find my transport orders in the huge realm of that because I'm overshadowed by the quantity of AT&T or MCI. My transport will never show up. But, my unbundled loops probably will. I'm probably selling as many unbundled loops in any ILEC or ARBOC territory as would be an AT&T or an MCI. It's a give and take. When you look at collocation, what was their time for the application to the process to the build and why not, so we can use it as a pro-active method to remedy some of these problems that we are seeing. Performance measurements have a place if they're focused, direct and there actually is a matrix that can be tracked and understood, I think they have great merit. I would also say that they penalties or that the repercussions from that aren't important because again it's a reason for them to, other than "Oh I'm sorry I missed it" it's something that they will have a commitment to.

Just a couple of where we are from this. We need options, we need speed, we need to shorten intervals where we can in each increment. All of those are additive and appreciated. We got to have prices that are based on forward looking costs things that we can assume and know from fact have substance. Reality says we need greater involvement from the PUC in resolving some of the disputes and the lack of agreement, not certainly to burden the utility commission or any of that type of thing but to recognize that sometimes it brings it to closure. Reality says ACI Rhythms has had to take those steps in a few instances. We do have an informal complaint at the FCC over collocation processes here in the US West territory. We are seeing some strides in correcting some of those processes. Again I would say pro-active opportunities to talk those through. To have appropriate attention from that respective ARBOC to correct that, not just talk, action, results, understanding that you're going to follow through with the commitments and that we can count on that and kind of go to the bank on what you said to us. That will help limit and minimize a lot of that frustration. First to

market, market share, business. That's kind of what a lot of us are about.

I leave you with the idea that collocation is here. Let's try to make the best of it use as many options that we have with it and try to share the knowledge that we as a collective group have.

Questions?

TE: Your provisioning time frames. Are those what you're getting? What you're using?

JG: No. Those were ones that were recommended. We recommend that time frame or that general time frame in many jurisdictions. Reality says it depends on when my current contracts, the new ones, are twenty five days feasibility, 35 day quote and 90 day bill. Much different than what I would hope to have.

GH: Something you mentioned just in passing is a big issue we are finding as Sprint the CLEC as we go around the country and that's what we call market addressability data which is this information about the switch, how much of it is accessible to DSL and how much of it can actually be used and what the forecasts are and those types of things. Are you having any success in getting that kind of information, anywhere?

JG: What the infrastructure that surrounds the central office which would allow you to make a decision if that central office is even viable for collocation basically is built on that infrastructure. I've had limited success. We are in the middle of an arbitration in Texas that that has been one of the strongest discussions that we've had. We've made some milestone in that and that should be resolved shortly. We are going to have a foundation for that. California has willingly with not charge a couple years ago offered that loop makeup data both by central office and by specific loop. Depends on the jurisdiction. What we're encouraging every ILEC and ARBOC to do is, it's less that I have to know, "is it 28% or 30% Digital Loop Character (DLC) but do you have universal DLC. Do you have integrated DLC. Do you have... Because then I can know what's going on. That goes before I've invested the money in a central office for collocation. What's my potential opportunity, no guarantees, I know your infrastructure is going to change, but what's the sense. What we are asking for is, not for the space, it's more for the profile of that office and each one will be different and they no liability if their number is a little off or whatever the case is, just a sense of where we are.

DP: You keep referring to the forward-looking costs. That's certainly for the outside plant piece. Doesn't forward-looking costs look at new technology when you're really looking at using the old copper loop?

JG:Usability of space, and moving out of your technology in your central office,

your square footage. I think it has an application in the collocation environment.

LA: I heard you talking worrying about the costs in the central office and wanting flat rated things which are by definition average and then on the other hand kind of blind to, at least suggesting, maybe you want to go out and measure distances and make sure you got charged for the shortest distances. How do you suggest kind of balancing the tension between, do you average things or do you do things on an individual basis? Obviously if you let people pick and choose between those two we're not going to recover cost because people are going to pick average when it's less factual and actual is less than average. What are your thoughts on that?

JG: I am jaded from the experiences I've had in multiple ARBOCs and situations that the ICB are literal price quotes have not been accurate. I've had situations in some states that I've four and five quotes because they couldn't get the mathematics of it right. They just couldn't figure out the square footage and adding it by the same number. Each of those delayed me from getting into the business for different reasons. From an options point of view I like the idea that bays in cageless environment let me have an opportunity of having flat rated. I assume you know that you're going to give me X amount of space, it's my equipment I'm bringing here. You're going to pretty much know what that's going to cost you and there's an economy of scale, 1, 2, 3. Mathematically you can figure that out. I would like the opportunity to know that instead of having each one built. Racking, I would tell you I would wonder how much literal measurement goes into the actual estimates today. Historically some of my competitors and best friend have had some experience with that that have not proven once a literal measurement was made that they're accurate. Do I trust that your literal dimensions are accurate? Am I forced into auditing you or do I know that as long you average and weight in an appropriate cost methodology? It's an option I want us to consider. It goes back to options and thus in turn time to market.

CT: I would suggest that if a flat rated pricing is implemented for collocation it would eliminate substantial delay in getting a collocation begun. The quote development period could thereby be eliminated.

JG: Obviously yes that is very true. You would save 25 to 35 days.

KM: Not doing the quote, at least in our experience, has not been what saves any amount of time. We're still doing the work of figuring out where we're going to build and having architects come in and everything else. I don't think you are going to see much time frame changes based on whether or not there's a price quote or not. We look at, is there really a huge time saving there versus the other benefits you laid out which I think are real. Knowing what you're building, what you're going to get into when you get into it and some sort of certainty.

JG: That was not my understanding in this area. You can speak to what happens in each phase. What happened historically and what may be happening going forward, that is what certainly I'm hoping that Dennis is going to expound on this afternoon.

RK: You mentioned you are often paying 100% of your fees prior to completion.

JG: The minute they'll tell me CFA information or APOT information, the minute that say they are going to give it to me I pay 100% in full. Hoping they're going to give it to me on the day they say they are. So I pay it way before cage turnover. So if they think they'll have it in three weeks before or whatever, I literally courier a check down to them right then in hopes that I'll get that pre-promised.

RK: Is that the same kind of situation with all ARBOCs or is that just US West?

JG: That is US West. Actually I just worked a situation with Cincinnati Bell and I paid them 50% up front with my application so they would start building immediately. So I do different things for different reasons. Anything to cut the time.

RB: Thank you. Next presentation at 1:30.

*****LUNCH*****

RB: Introduction of Dennis Pappas

DP: As we went out and did a lot of the central office tours around the region I think people thought that I woke up one morning and thought of this allowing co-providers into the central office. The question came up of why you're doing this? What's in it for us? This is just a brief eleven minute video that talks about why we're doing it. The benefits to us. How to treat the co-providers. You can tell how much things have changed because since this has been made six weeks ago we've had I think two new collocation types that have rolled out since then.

Video Shown.

DP: Presentation - Collocation in Washington (see handout)

(Refer to page one of the handout) We've got virtual collocation. We've also got a plan to convert the virtuals that we can for those co-providers that are interested that sit in single bays by themselves over to a cageless arrangement. The turnaround on that as long as there's no additional power of termination requirements is probably about a 30 day interval. We're working that process right now.

Physical collocation. We were the first, I believe that came out with the cageless offering. We've got the caged offering also.

Shared space collocation, we rolled that out I believe in May, that gives the co-provider the ability to split their space with someone. We're going to send out a letter of inquiry to you all in the near future to see if you have any interest in putting your name out on the web site for those that are interested in sharing their space. We would just have that there with the locations where you have collocation so that others could contact you.

Adjacent space is something that we're working through right now. From a US West standpoint we view adjacent space as being on contiguous US West real property, offsite collocation and the warehouse of Safeway a block down the road is simply that it's just an offsite arrangement. We really don't view that as adjacent collocation. We view collocation on our property and that's where we've driven the stake right now.

We have microwave collocation. The first one is going in Casper Wyoming.

We've also got ICDF collocation which is just like cross connect blocks. Basically what that give a co-provider the ability to do is establish one collocation in a wire center and then hit the other offices in that wire center with some type of a transport at either a DS1 or DS3 level. Purchase multiplexing. Breaking it down to the low side of the mucks and then coming through the ICDF and then get your connections off of that again.

(See second page of handout) To date the collocation activity in the state of Washington we've got about 193 installed to date. 21 virtuals, 114 physicals, 57 cageless and 1 shared which is just specific to the TCG contract.

The volumes for the first part of 1999 is we have 99 physicals, that's a combination of caged and cageless along with the request for 6 virtuals. With the collocation you have in Washington today which is approximately 30% of the offices, the co-providers have access to about 59% of our loops. Cageless is now taking over it seems to be the collocation of choice and I think that is because we are running out of room. Out on the web today we've got out of space offices there and I think it numbers in the 30's right now. We try to update that every other week.

(See page three of the handout) We do a lookup. It's called a 30, 60, 90 view so we know what we have in front of us. We have 10 jobs waiting. 50% down, 35 in next 30 days that are due. 11 due in the next 30 to 60. One due out 60 to 90 and then two outside the 90 day window. We also in the state of Washington have 41 collocation jobs that are on co-provider hold. The reason they are on co-provider hold is for equipment cable that hasn't been delivered to the central office in most instances. In light of that we have made it an offering where we will go ahead and provide cable for you at a cost and install it. We're not waiting on you on that. Third and fourth quarter forecasts indicates the following. We've got approximately 50 cageless, 24 caged, 5 virtual and 9 augments that are coming in

the third and fourth quarter of 1999. We just sent out forecast information. We did a roll-up and we had 21 companies respond to it. Some of the bigger ones did not respond to it. The reason for the forecast is our plans are to go in and start pre-provisioning space based on your forecast information in an attempt to allow us to be more successful within the 90 day time interval for the ready for service dates.

(See fourth page of handout) Collocation issues: From my standpoint right now it's the ready for service dates and our ability to hit those. This isn't a surprise to anyone in the room. We haven't hit the 95% to 100% I think like are targeted but there have been several process changes, changes in leadership around the collocation area that we think will push us to that in the July, August, September time frame. You'll see a dramatic increase in the amount of ready for service dates we do meet.

Cost Recovery: To date in the state of Washington we spent approximately \$15.7 million on collocation. We have recouped of that \$7 million approximately in non-recurring charges. The rest of course comes in recurring. To give you an example of the builds and the capacity that's out there today, 512,000 DS-O terminations, that's US West wide, we've received requests for 17,000 loops. Which puts us at 3%. The reason I bring that up is because that's the EICT that we've all heard and discussed I'm sure for hours. We have that investment up front and then recoup that of course on a monthly basis over the years and it takes quite a while to recoup the cost of that when you're looking at the only 3% utilization right now with where we're at.

(See fifth page of handout) Some of the changes we've made to help us hit the ready service dates is we have added a large number of new employees to it. We've hired 102 new contractors to assist in the build outs of the collocations specifically. We also added 7 new companies that will be added to the current contractor list. The problem that you run into when you hire, you ask ADC to bump up their head count by 10 people. ADC goes to Lucent and they hire 10 of Lucent's people away to fill that. Whereas Lucent has 20 now they're down to 10 and you still get a zero net out of it. That's some of the experiences we're having right now.

I think the biggest change we've made in the process to date is when we receive your application for collocation today, we are going to start engineering the job and we're going to drop the bomb for the material order even without receiving the 50% down. The expectation is that by the time we receive the 50% down from you we ought to start constructing the job within a week. That's one of the targets that they've set as part this new process implementation that we implemented that I believe was on July 3. In the past we waited for the 50% down, we'd engineer the job, we'd ordered the equipment and at times you wouldn't receive the materials, in a 90 day interval, probably day 50 or 60. Which

only gave you a very short period of time to catch any mistakes we'd made and then do the installation. Now, if we can get that back, it will give us more time to do the build outs and I think you'll see a greater ready for service met and eventually, hopefully, an improved time interval like you were talking about early in your presentation. However, in stating that, that's probably 90 days down the road if we're implementing July 3 on that. You're not going to see immediate improvement on that.

(See sixth page of handout) As I said earlier we talked about pre-provisioning of collocation space and in some of the comments that read there is discussion among the co-providers of wanting to have adjacent space collocation, even in those instances where space is available in a US West central office today. I'm asking not to push that because if we are going to go in and pre-provision and spend the money up front to make sure we have space available and then have you go to the warehouse at the Safeway store next door, we talked about sunk costs earlier, that's another sunk cost for us that we don't pick up.....(Turned tape over)....

The standard interval for placing a POI is pushed out to about an 80 day timeframe. That in itself is a risk to the ready for service date. Our intention is, and we will be designating manholes outside of manhole zero, that was the whole intention of the POI hole, in my opinion, was keep everyone out of splicing or out of any activity in manhole low because of the high concentration of cables there. We are going to designate a manhole along the route of the POI hole and we'll allow all the builds to there and then establish a fiber that goes from there into the central office on an express type basis. We also are migrating away and re-designating the SPOT frame. The SPOT frame has caused quite a fear here it appears with this isolation place, the dark corner you were talking about in the central office where you stick all the co-providers on this frame. The issue that's come up recently is that we were told you can't force anyone through a SPOT frame so we design around it and then we have co-providers call and say it's too expensive for us to go to the DSX so we've changed the engineering and put us through the SPOT frame. Like I said the ball started rolling and picking up momentum that the SPOT frame was a bad thing and then when you start doing the quotes they see the cost associated with them, that they cost you more up front. A lot of companies have come back and asked for the SPOT frame to be put in place. Frankly, I think it makes sense. What we're doing today is we're reclassifying the SPOT frame as joint use type of frame. It will be just in the standard lineup in the US West central office. We'll have circuits there. You can have circuits there. If you wanted a dedicated POT frame or SPOT frame we will certainly do that also. Today we have it located outside the cage. You certainly have the ability to put it inside your cage too, with then connections over to the cosmic or the MDF. We also made modifications to the application form. The newest form will be out on the web on Monday. We had this mammoth size application form. I believe 27 pages or so. That's now been shrunk down to 16 and if I could get it smaller we would. What it does allow you to do is to download

it down onto your desktop, fill it out electronically as you tab through it and then you can e-mail it to us rather than having to fax it to us.

(See seventh page of handout) That is going to lead then to a new system that we're putting in place, hopefully in November, which is back on this that's the next item on the November rollout of IST. That's the tracking system for all the collocations that are going to be coming into US West, we hope in a November timeframe. What that will allow is for your collocation order to be entered into this electronic system. It will send out a message to all the downstream people, your account team representative. The product management group, the Infrastructure Availability Center (IAC). The CSPEC who are space planners. It will also at that time track all those intervals. So on the 10 day feasibility it will send out a message at 5 days and say you only have 5 more days to make sure we have space in this office or whatever that message it. At the same time we are populating the rate tables right now, it will automatically do your quote. Which is a huge plus, at least from my groups standpoint, so that human error is taken out of this process and I acknowledge we've had several errors in the past with this. The intention in the long term, and I'm talking probably second quarter of next year, is to have it where you can go on the web and do your order form and hit send and it sends directly to IST and you're done. Then everything goes down to all the downstream folks and it populates it from there.

RB: QPF?

DP: Quote Preparation Fee (QPF). Integrated System Tracking (IST). It used to be called Fast Track and they changed the name for some reason.

What we're also looking at is electronic submittal of the 50% down and the QPF. Today we exchange more checks than one can imagine. Frankly it's a pain for us to do that. What I'm proposed is that we go ahead and just roll that QPF into your first up front 50% so we don't have this between \$1,600 and \$2,300 check coming into the accounting and then to the product management group. In most cases, especially when we do augments, you send us a check for \$2,000, the work costs \$500, we write you a check back for \$1,500 and that's never in a timely manner. Hopefully this will take care and address that. It's planned that this will be in the first rollout implementation with IST also. Then you will just a bill from us that says that this amount is due for the initial 50% on this bank number. We've agreed to provide the....cable form. We've also implemented a parallel process which will allow early submittal of your collocation application, even when it's pending commission's approval. So you come into a state where you don't have an interconnection agreement today, you sign an interim collocation agreement based out of phase 2.2 language. That means you can submit your collocation applications. Then you negotiate an interconnection agreement. The language in the interconnection agreement supercedes whatever is in the amended language. That just allows you to get in the door a bit earlier. We also gave early access to a collocation space. That's so you can start installing your

equipment and we can kind of work in parallel rather than this serial mode that we're in today. One of the things I hope that everyone will take advantage of is this pre-application meeting. That's something that you can get as you request it through your accounting representative. That gives you the ability to sit down with our engineers, your engineers, your accounting person, an IAC representative and go through your application to make sure that everything is right. Did you really mean to order 2 200 amp feeds. Or were you just asking for a pair of feeds at 200. Errors that are caught at that time don't require a new submittal of an application. It doesn't require a new QPF to be submitted. We make the change right there on the fly. It doesn't affect your ready for service or the interval of anything. We try to do it in the first 5 days that we receive the application. A majority of companies today are a type of a cookie cutter arrangement where it's two bays of equipment, 40 amps of power, 1,000 DSO terminations, it just goes down the line. If you catch a mistake on one it's probably going to be common across all of them so you catch it there and we can correct it.

(See eighth page of handout) To resolve the 706 issues around collocation we've allowed collocation of the DSLAM and ATM muxes and there is still a lot of discussion around ATM switches and what's going to happen with that, I think we've appealed that. Self provisioning of cross-connects within the US West central office between collocation sites, basically you can come and ABC company wants to connect XYZ, send in the application and we'll go and we'll designate the wire run that you are going use, hand you a list of approved vendors and you can contact one of them and have them run the cable for you. All you pay for then is their labor and the capacity that you use on the existing racking. New racking needs to be placed, of course there is a charge for that. That's one thing we are offering. Of course cageless and shared space collocation has been out there since the June timeframe. No minimum space, we used to request 100 square feet minimum, up to 400 square feet. Now on the application form it's got a 1, 2, 3 and 4 and then other so you can designate how much you want. As I said we've got the draft definition on adjacent space and what that entails and they should be out in the next two weeks on the web. The plan is to have that out by the end of the month so people can view it. As I said, interim collocation agreements, we've already talked about that. Then the feasibility yes or no that is stated in the 706 order is a concern. Cutting it down to a 10 day feasibility really is just a yes or no answer on space. Understand that it's 10 calendar days not ten business days. What that does is on day 10 we're going say, no we don't have space in an office it's going to take us 5 more days to take a look. During that five days we have an out of space policy and process that we've put in place today. There's a five step process. We look at COEFM drawings. We all know how accurate everyone's drawings are in drawings and that's where I think we get off on the lengths are incorrect, etc. We take a look at the drawings and verify whether we have space or not and if the answer is no, then we contact the state interconnect manager. Then the state interconnect manager actually does a walk through of that office to validate whether the information on the drawing is correct or not. Upon making the determination that

no space is available then there is series of sign offs that have to take place before we get back with the co-provider to tell them. In the past I think the response has been rather premature to the co-providers. This hasty answer of yes we've got it available or no and then finding out as you start doing this research that we either do or don't. And that does nothing but cause headaches for everyone. Our intention is if we say no on day 10 is to get back to you with an answer on day 15 that says no we don't have caged physical space available. We have 5 bays of cageless available to you and we have power per your request that will be there. The expectation is by day 15 you will have a full response to what your request is. Once again that's one of the new process changes that we have put in place.

(See ninth page of handout) Along with that out of space documentation is the ability for the co-provider to conduct tours at the central office, to do a walk through to make sure that we're not holding a 500 square foot lunchroom for two people, or whatever the circumstances may be. We also along with that in that package have a list of things that can be designated as collocation space. We'll take a look at reducing the lunchroom, the break room, reclaiming admin space, consolidating unused or retired in place equipment. All of those things that go into effect once we do claim an out of space. In the state of Washington we do a formal filing with an out of space claim. The other states we provide documentation to the state reg attorneys and to the commission that have the central office identified, the customer. It gives a colored map of the central office that verifies where everything is in the office and at that time within 10 days you want a tour you can request and we would be more than happy to take you through. We also put a list of the out of space offices on the web. Today it numbers in the 35ish type of range. We continue to see exhaust of those central offices. And I think as long as the demand continues we're going to continue to see that. We also are doing some reclamation, removal of old equipment and consolidation and we do have the same concern of Bell Atlantic as unused space. Co-providers that have 400 square feet and have two bays of equipment in them. I really don't want to get into the policing business of that. As you do your walk-throughs in these offices where we are out of space I would encourage you to kind of question your brother and what they're doing with the space and see if there can be some type of an arrangement made between you for some shared space opportunities.

(See tenth page of handout) Just to close, basically the question should the Commission adopt state specific collocation rules? I think in light of the change that we've made to date that we give those changes time to work. I think it's going to be the end of third quarter, and I think even in July, August timeframe, I think you're going to see a sharp increase in the number of collocation ready for services dates met. A good indication of that is, of the jobs engineered the last week in June and the first week in July, under the new process we've made 100% of the engineering on times, which is the engineering before we receive the 50%. I think that's the first step to making that ready for service date down the road. I

think changes to this point may impede the progress that we've made because of having to stop everything and try to adopt a new rule set, to go forward with the affected of those in the pipeline or those that just getting ready to come in the door. I think you've seen from the list that we are compliant with the majority of what 706 says today. I would encourage you to kind of monitor what goes on third and fourth quarter and I think you will see with the information that we provide to you that there is a marked increase in the amount of collocations we're putting in within the state at intervals specific to the contracts.

Questions?

CM: I'm curious on your cageless products, specifically how you are defining that product. So, when you go into a central office to determine whether there is cageless space, where are you looking? Are you allowing US West and co-provided equipment to be intermingled?

DP: We're allowing it to be intermingled but in a bay a time type of a deal. So you could potentially two bays of North Point, two bays of ACI, three bays of US West type of a deal. Unlike what the scope offering is, where it was kind of in a room by itself and everyone was co-mingled in there, its co-mingling in the existing lineups too.

JG: You were talking about some of the new changes which were optimistic to hear about, specifically that the no minimum space in caged areas and that the feasibility that we would have more certainty on that type of thing. Where are you in the process? Is that across all of your region, or is that just a Washington State kind of thing?.

DP; That's across all 14 states we put that process in place for.

JG: How are you working that? Many of us have contracts in place. I have a contract in Washington but I don't have a contract finished in Iowa or someplace like that. How are you communicating that? I will tell you that, perhaps it's not common knowledge within US West from a contract negotiation point of view as late as last night at 10 o'clock. I would say that those look like optimistic changes but our agreements are lagging and it is not an understood.

DP: Can you give me a specific example and then I'll address it?

JG: You said space. You don't require the 100 square foot minimum any longer that would be one example. Another one would be what is your requirement for accepting five applications per week and staggering them? My contract language says they will basically accept five and I could have five each week for the next whatever quantity I have. That's not clear.

DP: Let me address the five per week per state. This is a concept that we are just

toying with right now. We had some of the co-providers say that they would be willing to work with you and submit five per week per state and then you had some that said I can beat them out in there other 20 offices is I get mine in first so they shove 25 at us of course the other sees what they're doing and think they don't want to get left out so they shove the other 20. We're considering some type of a, and this isn't the correct term, some type of a reservation system that says work with us on this five per week per state and if you've got 25 requests from the state of Washington, we will hold that space for you until we receive that last batch of five at the end, five weeks out, with the understanding that you get this space held for five weeks and if we don't receive that last batch then it goes back into pool and anyone can have it. We've got to do something to try to regulate the number of collocation we get into or the applications that we get into us. It is no where close to what Karen shared with us this morning. We average, roughly, 125-150 collocations. We know what our resource pool is. We know the hours that it takes to build a collocation and frankly we're short when you get above that 120 type of a number. If we can regulate this in any manner, I think it's good for everyone. You're not made because we didn't give you a ready service date that we could not meet. We get paid out of course on the success of meeting the ready for services. You know what that payout was for the first and second quarter at US West in the network organization. That one of the things we're considering.

The 100 square feet. I think in general there's been a tough time getting information out across US West and the best medium to do that. We've been trying to hit the account teams, all the negotiating teams, so I'm bit perplexed why they didn't have the information on that. But I'll make sure that Denny and groups get covered on it.

JG: Another one is your feasibility. I'm seeing what you said here on this slide but what is US West's proposed quantity of days for a comprehensive feasibility which would include power? Not just yes there's square footage.

DP: I'm saying 15 days. After we had our discussion some week s back where all we were telling you is yes or no and go to an office and now there's not space. We made sure that they made sure that they understood from at the CSPEC organization that they need to take those steps to verify, that it's not only space but it's power so we can tell you that space is available, however, the power plant doesn't have ATM's left, we've only got 40. Cut your power requirements and we can do it for you.

JG: Is that calendar a business from your perspective?

DP: They're all calendared from my perspective. We verified that with the FCC on the feasibility, the 10 day feasibility. We asked them flat out, business or calendar and they said calendar.

JG: Add that to your list to talk to your negotiators about please.

DP: OK. I will do that.

JG: What is US West's position on flat rating and the pricing structure?

DP: Right now we don't enjoy the same economies as scale, but they do at Bell Atlantic. We've done a study on what an average caged physical collocation costs us. It's like \$197,000. Then to build from the SPOT frame over to the MDF tags on another it's a substantial amount of money. We cannot go to a flat rated cost at this point until we've done a study and we're in the midst of doing that right now. We've proposed taking five cageless and five caged and five virtuals, find a vendor who will source and do all five jobs and put a format out that they have to comply with to show us exactly what those jobs cost. You can have a collocation job today that you put in that's a cageless for 40 amps of power and if we're out of power then of course we apply that power build, the battery string, all that cabling to that job. So that's what drives the cost up for us. It's the cost causer type of a methodology we've always had. We're trying to get an idea of exactly what it costs us. The hopes are that if we go with flat rating we certainly would. On terminations, for example, it's kind of tough to go flat rating when you can order either 1,000 terminations or 10,000 terminations. There's a huge difference there. So do we say flat rating includes 2,500 terminations. Then you have the smaller co-providers that are only asking for 672 per office saying that that's not fair because they aren't using that. So you're back in this argument, as Lisa brought up, sometimes it's flat rated, sometimes it's an ICB. And right now from a product standpoint I don't have the time in the organization to be fighting those battles and we fight them the ICB way. But we are working toward the flat rate type of a concept. It may just be cageless at this point, but want to try and get something that makes it a bit easier for us to do the rates and do the pricing.

MT: You mentioned a couple times during your presentation that US West is now listing it's out of space on the web. The way I understood the comments that US West put forth in this docket, that's just those central offices where someone has requested space today. So there's 35 roughly you thought of central offices where someone has requested space. Do you have plans to include all your all your central offices on the web?

DP: There's been some discussion about doing that. Understand the cost involved with doing that work. I believe ADC charges quite a good fee to go out and look at offices and if you spread that across 1,230 central offices I think there's some need for cost recovery there. We're starting to work on some of that information. With the last forecast you all provided we categorized our offices to the top 250 and we have ADC going out, I think it's 20 or 30 a month, every month to do walk throughs in those offices. And then for them to correct the COEFM drawings and give us a good idea of what we've got for space and power availability. As we discover that in that office we'll make sure that we get those on the web too.

MT: That brings up a follow-up point. US West is asking carriers to provide forecasts a year in advance?

DP: Are you talking just collocation of unbundled loop?

MT: Let's talk about collocation.

DP: The forecast I just got was just two quarters and then they have something for 2000. So, yes a year or year and a half.

MT: That what you're asking providers to do. If I give you a forecast for the next year and list my central offices, you don't tell me when I give you my list of my forecasts whether the central offices that I'm requesting are out of space. You don't tell me that until I actually place my collocation request. Is that right?

DP: Yes. Nor would we tell you nine months down the road when we run out of space in that office. From an administrative standpoint I think that's a pretty tough one to get your arms around.

GK: On the last page of your slide you discuss a recommendation that the Commission monitor the results of implementing changes. Are you planning to file some kind of reports with the Commission on a periodic basis? If so, what kind of information are you planning to provide?

DP: Jeff can you address that piece as far as report filing to the extent that we do file reports?

Jeff: I believe we do file some collocation reports here in Washington today. Those reports go through Mark.

Mark: Yes we do. Whenever we have an out of space situation, I file with the Commission. Under, I believe, the order of the docket we discussed down here we only have really an obligation to file those reports specific to the LEC involved. But we've taken to filing a report regardless of what LEC it is.

DP: That probably doesn't get to your question though. I guess the question is how much detail do those reports get into? Do we report to the Commission on percentage of ready for services met? Because we certainly measure that internally.

LB: Dennis, the web site you are referring to is that uswest.com?

DP: Yes it is and we can get URLs out to everyone there. If you go into wholesale web site, once you get into uswest.com and then go from there to collocation it will give you all the information there.

- JG: I have yesterdays as it printed. There are seven in Washington state and 33 total.
- CD: Going to the forecasting issue. Forecasting not necessarily the number of C.O.'s but the location of the C.O.'s that a company wants to enter into is something that, at least my company and I think the other DSL companies consider to be competitively sensitive information. We've recently discovered that at least one other ILEC is sharing that information internally between it's wholesale and retail and sides, that their people that are involved in the retail DSL operations that had access to our rollout schedule that we had provided to the wholesale side for our collocation forecast. I'm wondering if there anything that US West has internally implemented to prevent that from happening, or if that does happen?
- DP: We are a safe harbor organization on the wholesale side. I don't know of any instances since I've taken the group or we've shared any information with retail, in fact, if anything, we stay at more than an arms length in light of what's going on now. I'm not aware of any time when that's taken place at US West. I know that's some of the apprehension that companies have about submitting that information to us. They've said it's proprietary and we don't want anyone to know where we're rolling out at. And that's fine it just doesn't allow us to get ahead of the curve and start to pre-provision or go in and look to see if we've got space at those offices.
- CD: Are there any specific procedures or policies in place you could tell us about to prevent that kind of intermingling of information?
- Jeff: We do have safe harbor policy statements that we could certainly make available to you that protect wholesale information from the retail side of the house. I'm aware of those and they are in place for this type of information. We could certainly make that available.
- DP: Other questions?
- ?? I was wondering in the application process, kind of similar to the question I asked Karen McGuire about checking for alternative up front and not requiring a re-submittal of an application.
- DP: That is one of the changes that we made to the application form. It's got a first and second choice there. So you can put your first choice and your second choice. We just ask that you include the information that is pertinent to your second choice on there also. So that we keep going down the road on the application. We were going back to you and saying, we don't have cageless submit an order form for caged, or for virtual or whatever it was and you submitted another order form and then we came back and said that we found it. That's something that's in place. Like I said, the new order form will be out on the web and it's version 5.2 on Monday.

?? That's the fifteen days then? Would that be the checking the various alternatives and getting back to us? We have cageless. That would be that fifteen days then?

DP: Correct.

RL: Can you describe the security measures that you are taking for cageless collocation.

DP: Basically you go through the same security process that you go through with caged. You submit your employees name. We do a background check and we give you cards. In a majority of our offices today we're putting card readers in those offices. We've also had a plan that goes to video tapes. Someone said earlier that we're probably not quite as worried or it doesn't appear that we're quite as worried about security as others are. I think the video tapes are a bit of overkill. I think right now the plan is just to go with the card readers at each door that we let co-providers into so we can monitor that activity.

RL: I have a follow up question. I think it was during Jo's presentation, can you tell me whether US West has filed tariffs in all fourteen states?

DP: No. We have tariffs today in effect in Iowa, Colorado, Oregon. We've got final costs in the state of Arizona and we're doing some ASGAT filings in New Mexico and Nebraska. So no, we don't have tariffs in all fourteen states.

?? ??

Jeff: No

?? So the states you just listed off, that's tariffs in general. Is that physical collocation?

DP: Physical collocation in Colorado, yes.

RL: Do you intend to file tariffs in light of the 706 order in various states?

DP: I think we're making modifications to the tariffs that are in place today to make those modifications. I don't believe there's any move afoot other than the ASGAT to file in the other states for tariffs.

Jeff: You might want to clarify the ASGAT.

DP: Generally agreed to terms. Basically it's like a tariff.

RL: Cageless, for example, is probably a new service offering in most of your states. Do you see that as a modification to an existing tariff.....

LA: The way this is handled in Washington is we don't have any state tariffs in place pursuant to the generic docket which the order is not out yet. We've been treating cageless as a modification to an individual interconnection agreement. We have a standard cageless collocation amendment that we negotiate with the co-providers and then file as an amendment to the existing interconnection agreement.

LB: That gets filed for approval by the Commission. Is that correct?

LA: Yes

DP: But at the same time with having that prior to its signing they have the ability to go ahead and order and get their applications in the mill to start working on.

LB: These days whether it's an amendment to an existing agreement or request for an approval of a fully negotiated agreement where there are not disputes pending, our Commission has been scheduling those requests for consideration by the Commission generally within 14 days but in no recent instance that I can think of more than 30 days of the date of filing with this Commission. So when the requests for approval come in, that are uncontested, they get presented to the Commissioners for approval and routinely approved on fairly quick time line.

LA: And US west is not requiring Commission approval of the amendment before it begins acting on it for the co-provider? As soon as they sign they start implementing.

DP: Just a couple more issues that I want to touch on that are on the fringe of collocation. One is one that Jo brought up in her presentation about loop qualification and that fact that it's not done. As you fill out an LSR for an unbundled loop, you can either mark that as a firm order or an inquiry. At that point that gets submitted and we'll go out and do a loop qualification for you. Or we do take a list of numbers from a customer standpoint that you can send to us and we'll also verify that list of numbers to see which one of those customers are on metallic loops that are within X range and it will give you a DLR view of that. The other one is the contact number for people to call in after the collocations turn up. We're also in the midst of turning that up. Tim Mason is focused on that initiative, to where we can get folks that can call an 800 number and pose questions about collocation or loops or any of that stuff into CP I think is where that's going to be based. I would imagine that it's going to be part of the IAC.

JG: Is there any time difference on your feasibility at this point, with all things that we've said? Where are you with the quote portion from a time frame?

DP: Once again depending on the interconnection agreements. You've got a variance anywhere between 25 days and 31 days I think. I would say our standard is 30 days. Understand though that when we get the marketing sheet from CP it

doesn't come to my group and I tell them to sit on this for 23 more days. We get the marketing sheet from CP after they do their research and, in fact, the comments you made about measuring the actual footages, we're flying engineers out to every collocation for every request we get today. They actually go there and measure the footages. All that work has to be done before it can be put on the marketing sheet and then the marketing sheet comes back into the product group and then we provide the quote. So there's a lot of work that takes place in that 30 day timeframe. My folks usually get the marketing sheet from CP at about day 25 or 26. That gives Sara and others a few days to react and get them pushed out to you.

- TE: You mentioned that days now you use calendar days. Our interconnect agreement refers specifically to the quote period as business. So that 25 business days translate to about 35 calendar days. So I'm wondering if I can reinterpret that now to be 25 calendar days?
- DP: I'll meet you half way. I think that standard that we've been trying to hit is 30 days. There would need to be some modification I'm sure to the interconnection agreement to reflect some new language around that but we're hitting the 30 days very successfully.
- TE: Can you direct me on how I would approach making that modification? Our account manager?
- DP: Go through your accountant manager first and they'll get a hold of somebody in Kathy Fleming's group from a negotiation standpoint.
- LB: One of the hottest topics around the Commission right now are the exercises of Section 252(i) pick and choose rights. Certainly, in fact, if there was another interconnection agreement with a different term for completion of some sort of benchmark subject to 51-809 and other interpretations of the FCC local competition order which are presently being considered at the Commission, a provider like GST with interconnection agreement that provided for business days rather than calendar days, if there was another agreement that said calendar you could probably perceive that as, at least just on the surface, as an arrangement that could be adopted. Let me just say that are 252(i) rights that can be considered in the context of any term to an interconnection agreement.
- LA: I just wanted to point out, I think GST opted into one of our first agreements ever. Certainly US West collocation policies and time frames and processes have evolved significantly in the two and a half years since that agreement was first approved. You're never going to get a perfect ???? of what's in each of the interconnection agreements and the targets that we are trying to hit. I think we're probably trying company wide to hit our targets which in GST's case would be better than what their contract requires and that would work to their advantage. It seems to me that under those circumstances we probably would be willing to talk

about negotiating to modify the agreement. I'd hate to get into a big 252(i) debate on it in terms of how granularly a company can select a term or condition out of another contract.

LB: Those 252(i) issues are being considered at the Commission in several different dockets. I'm sure they will continue to be discussed to try and work out the actual implementation details. It's something that, I'm sure, all parties will continue to track. But, the Commission does have a preference that parties consult with each other and negotiate and work out their own agreement whenever possible. Certainly if you have terms in your contract that deserves to be changed to conform with the current business practices, it appears that US West is receptive to conducting those discussions.

JG: Your bill time frames. Do you perceive a difference in your cageless in contract to your physical for the commit on the bill time?

DP: Today we don't, no. It's a 90 day interval. The cage is probably one the simplest things we do. You can put a 400 foot picket fence in your yard in a weekend. So putting up 40 feet of ten foot high chain link really isn't that. It's the power bill determinations, all that, that's the bulk of the time.

GK: You clarified with Karen this morning about the plan that's in place for Bell Atlantic on remedies for failure to meet performance as tied to their agreement I guess triggered by their entry into the long distance market. Is that also US West's position that any kind of incentives or remedies or dare I say the word penalties, be appropriate only at such time as US West is allowed into the long distance market? Or are you thinking of considering some kind of rebates on non-recurring charges for failure to meet deadlines as part of your (turned tape over).....

DP:I see it as penalties applying once we've received 271 to make sure that we keep towing the line on this stuff.

CM: I was curious going back to the forecasting. In what regards to you guys use forecasting to plan for power? I know you adjust the space as you use the floor...

DP: We are starting to go into with that forecast information not only validate the amount of space that we've got in a COEFM drawings, but validate then how much remaining power plant we've got available too. Basically we're short when it comes to power in a lot of central offices. However, I don't think we've denied collocation today because we've been out of power.

Chris: Do you see power jobs as a result of those forecasts?

DP: I think once we get down the road, yes. That's the intention of doing this forecast so that we can identify those offices where we're short and do the build prior to

getting the demand.

FP: Could you clarify your policy on requiring a collocation agreement prior to starting to accept applications.

DP: We really need something to base the prices off so that we can get you the quote. I guess we could take everything TELRIC, but why not use the rates that you've got in some other type of agreement that you're going to negotiate today. We've had cases where we've had folks put in for collocation under this parallel process or prior to having an approved agreement. The collocation is done and they still haven't gotten their agreement. That doesn't benefit anyone either. We have no chance for cost recovery and they have no change to get into business. I think that's imperative that there's some type of an agreement in place between the two parties.

JG: Isn't it true that you require these terms and conditions that are included in that required collocation interim agreement? So that would be a potential. I understand your need for potential interim pricing. But there are pages of terms and conditions that are required before you let us go forward.

DP: That's the SPOT frame frenzy all over again. The fact is today that when you renegotiate your interconnection agreement, it supercedes the language there anyway. So what's really at risk, with having those TNC's in place today when they're only going to be in place for 30 to 45 days.

Roy: Why do you need them then?

JG: The advanced services order says that an ILEC or ARBOC should not require a signed agreement before proceeding with collocation. If you take that at its face that would say that I shouldn't have to. If you need some kind of a security deposit to mean I really mean it that's a different thing. In most cases you use the state prices for the AT&T, I mean there are set prices that you have. I don't usually negotiate my own prices in most cases.

DP: It's the prices that are in the 2.2 today. I think that's just the stance that we've taken that we require to be signed prior to taking the application.

Rex: Jo talked about being 100% fee paid before you could have APOT information to be able to do the parallel track. One of the concerns we have is that we don't have penalties for not meeting the commitment date or the timeframe for the intervals, and then if we want to really fast track things we try to do the parallel processing which means that US West requires us to pay 100% of the fees before the cage is even ready. So now we're stuck in a situation where we've already paid 100%, the cage doesn't get complete, we have APOT but you can't do anything with it because there is nothing to go to and it's really a situation where we don't have any hammer anymore. At least if you haven't paid 100%

because we could say we're not going to pay you until you finish it. That's a big concern and yet the parallel processing and trying to make things quick is such a paramount issue to us. Is there anything you're thinking about doing to make that a little bit different?

DP: We have several co-providers get early access and then get early APOT and they immediately begin submitting orders. All those orders consequently went to hold because we didn't have it built in the F-1 data base and we get measured and beat up on held orders. So we made a business decision that we weren't going to give out APOT any earlier than day 10. My belief is though on the ACTEL information that you do need that. The fact is 90% of the co-providers used to bury their own fiber to our central offices. They've all stated the same thing in the past year. We're not in the fiber business. We're not in the voice business. They're ordering finished services from us and we're thanking them for staying on our network. But at the same time we need to make sure that we give them the ACTEL information maybe at day 60 or whatever that is, so they can make the determination, do we have the capacity between those offices and such. We're working on the APOT information to get it accurate. I don't think right now there's a move afoot to say no we don't require that final 50% in order to give you this. Because once you've got that information, if it's built, you can submit orders and there's no way we can block them. That's a fact. If it's built in F-1 the orders flow.

Rex: But the flip side is equally ???? from our perspective.

DP: I understand. I don't know what I can do. We can take it back to the team and we can discuss ways that we can get around it and make it more equitable for both parties. But I think there's got to be a common agreement between the both of us on how it works. That if we give it to you at this date that there's no orders issued prior to the ready for service date. I don't know what it is right now.

JG: Dennis, on of the things we spoke about the other day was pro-active, putting information in terks? Not only getting it there but really having it there. Maybe share that with the group because that has been a significant frustration and hopefully we have a positive thing in process.

DP: We fought the same battles here. We had an understanding, in Colorado we a whopping seventeen collocation orders when I was the project manager there, it was very easy to micro-manage all the collocations and we knew that we had very clearly defined and stated milestones and APOT was one of them. So, at day sixty we called the F-1 data base and said, "Do you have it built?" and they we said "Yes we do," and we handed it off to the co-provider and low and behold when they said it doesn't work you called them back and they said "No it's not built." I think we've started to address that. One of the things that we've done is you asked for a print screen off of terks that shows you, if you don't have a print screen, it's not built. That's one of the steps that we are going to reinstate back

into this process. We're also trying to get the project management group to implement the old project plan that we had. Understand that with the volumes we've got it's going to be kind of tough to micro-manage that many projects, but I think from a macro level, we should still be able to identify the key ones. Is the job designed? Is the equipment ordered? More importantly, is the equipment received? Is the install done? Or, when is it scheduled? Is the APOT built and then more importantly is it built correctly. That continues to be a problem. We got I think two folks right now that are working full time on going back on all the old APOT information to make sure that it's built correctly. We realize it's a problem and we've taken steps to address that. Hopefully, in the future, that you going see some vast improvement in that and if not I think the majority of you have my number.

RB: Thank you Dennis. There are some people who would like to talk.

Clay Deanhardt of COVAD would like a few minutes to talk and so would Greg Kopta representing Nextlink.

CD: I wanted to thank the staff for their time in beginning this rulemaking proceeding for the opportunity to say a couple of words here. There are three short things I would like to hit on and our comments we had on two these. The third one I actually just spoke about with Dennis based on some information that we kind of have subsequently developed. The first of those is, we've talked a lot today about how collocation is working and what the current problems are. One of the things that we have, that COVAD has proposed in its comments in this proceeding, deals more with the future of collocation, and that is the issue of collocating in remote terminals. I want to raise that as an issue for everybody to be able to open it up and discuss it today. We see the issue of collocation and remote terminals as one that deals directly with two fundamental issues. Getting faster broad band services to more people, and second, making sure that those people who are at the end of digital loop carrier systems and remote switching units where there are remote terminals, have a choice among providers and they are not simply bound to services provided by the ILEC that has the remote switching unit or remote terminal there. I understand that GTE is already putting DSLAMS in remote terminals in Washington. I have not confirmed that with them. I don't know if US West is doing that yet or not. But, that's an issue we consider to be of great importance and kind of a forward-looking issue to continue the development of growth of competitive digital services in Washington.

The second issue that I want to talk briefly about and put on the table is collocation of ATM. Since Dennis has said that US West is either going to or has appealed that portion of the FCC order, at least two quick things to talk about. The first is that our specific experience with ATM collocation since the FCC order came out has not been positive. I will only speak about US West right now because unfortunately I don't know about our experience with GTE on this issue and I don't mean to be picking on you guys, but it's the only one I know about.

Every ILEC that I am aware of delayed any kind of decision about ATM until after the FCC order went effective. US West has kind of gone the extra step by even then requiring kind of written showing by COVAD and I would assume of other CLECS as well, of the used and useful nature of ATM. That sound like a minor thing, but when you understand that US West uses ATM to provide its own DSL service and is well aware of exactly how ATM interconnects with unbundled elements, their own elements, to provide that service and how essential it is to the network. It kind demonstrates an attitude that suggests why rulemaking processes like theses are necessary, even to implement things that the FCC has already commented on. The second half that I need to talk about now because ATM may be something that is subject to appeal in the FCC order is the original position that not having ATM collocation put CLECs like COVAD in and what the result of that has been. Because ATM is essential to our network we have to have ATM equipment in a hub location in every geographic area that we provide DSL service. Since we were not allowed to collocate our ATM equipment in any central offices, we had to go off site and here in Seattle there's actually a great facility at the Westin Hotel, which pretty much everybody who's a CLEC that can't collocate in US West or GTE's central offices goes to the Westin. As a result, what has happened is US West has been charging us tariffed pricing for our DS3 connections to go back to the ATM facilities. We are in the middle of, on a business level, negotiating that issue with them. It presented us with a classic situation of damned if you do or damned if you don't. The position was that you had to be tariffed because the DS3 connection was going to an off site facility. But, they wouldn't let us put the ATM in the c.o.'s so that we could get the tariffed DS3 rates. I wanted to put that out as well, particularly if theirs is going to be an appeal I think it's something that this proceeding should consider because of its impact on the growth of digital services here.

Finally, this was not in our comments and I was very glad to hear Dennis' response to this. We have recently discovered that there is another ILEC that has been sharing wholesale information with its retail group and there are some justifications we have heard from them from that that we obviously don't agree with. I don't know and I haven't had the opportunity to ask that question of GTE. I think in any event that a simple regulation out of a proceeding like this that says that an ILEC, whoever it is, that receives such information because it's necessary in order for them to provide wholesale services should be required to keep that information separate from its retail group that is providing competitive services with the co-providers or CLECs that are providing them that information, would be very helpful, not only because it would give us more of an enforcement option if we ever found out that that provision was being violated. But also because it might even be more helpful to companies like US West and GTE because it might give a greater sense of security to the CLECs that have to provide this information. And it is information that we consider which we do consider to be very competitively sensitive. Thank you very much for your time.

RB: Thank you very much. We appreciate that information.

DG: I would just like to have kind of a description of the ATM switch you're talking about. There's an ATM switch that is similar to a 5E, but I think there is also one that comes in a box that's not much bigger than a computer desktop.

Clay: The one that we use is not much bigger than a stereo. It's considered a non-standard size because it sticks out a little bit, about six inches longer in width than the standard equipment that goes in a standard bay, so it pokes out a little bit. It is used in providing DSL services as the hub through which all our DSLAMS are connected to provide service and then we run DS3s from our ATM out to our customers, to the ISPs and to the corporate entities that we provide service to. So it's a necessary part of the network but it is, in terms of actual physical size, it's not much bigger than what home stereos were five or ten years ago.

RB: Any other questions?

DP: You brought up the competitive information, being shared with the retail arms. How do you see that differs with the proprietary information that you are asking about of our c.o. makeups from our marketing standpoints.

CD: You mean the cost issues?

DP: I'm talking about what Jo brought up from a marketing standpoint. You want to know the percentage of IDSL universe we have per office to assist you in your marketing.

Clay: It's not so much to assist in marketing it's to assist in understanding whether or not what we can deploy. It's information you have about the network that lets you know whether or not you can actually provide DSL service to any given area. The way that the situation works right now, what Jo was talking about and by way of background for people that don't know this, this is kind of a specific DSL issue. Different varieties of DSL including ADSL, SDSL and HDSL cannot be provided, as the moment, through digital loop carrier systems or remote switching units, etc., unless, and this goes to the more terminal issue unless you can put a DSLAM in the r.t. There is a variety DSL service called IDSL which the CLECs provide which I've seen a recent press release that US West is going to provide, that does work through DLC's. The current situation is that when a loop is ordered we can go out and try to provide service and we find out after we ordered the loop whether it's on a DLC or whether it's behind a RSU. Sometimes we don't find out, particularly with respect to RSU's in GTE territory, we don't find out if it's behind an RSU until we try our installation. Then we find out that we cannot provide service at a 384 or a 786 or at the level that we want to provide because the DLC or the RSU is there. So, the issue to us is not having more, or better, or competitive information, but having the same level information about the network that we have to share so that we can make the same kind of decisions that you can already make and that's all that we're talking.

GH: I want to address that too because as Sprint moves on with ION that's a big issue for us. Again I would just agree with him that we're not asking for market surveys, we're not asking for how many customers have any kind of particular service, we're not asking for anything that we would normally consider proprietary information, just basic information about the network as it's associated with that switch, the percentage of lines that would handle DSL and those kinds of things. Not to have it but that would handle it.

DP: But, the request or the demand at that point goes OK now you've given us that information tell me what percentage of those loops that are on copper now go 6,000 feet, which go 12,000 feet, which go 18,000 feet and percentages beyond that?

GH: You know that don't you?

DP: Yeah, you bet.

GH: Well, we would like to know that too, that's true.

DP: I guess the base of the question is, tell me the difference from the information that you view as proprietary, you want to hold as proprietary, yet you want us to... I just want to understand....

CD: I can address that as well because, one thing is this is part of what we are going to be discussing tomorrow and COVADs comments on the carrier to carrier we talk about having access to whatever data base has loop makeup information so that... So, at that point the difference is when I tell you which central offices I'm planning on rolling out my service in, if your retail side knows that, they can go there and if they're not there they can go well they must know of a business opportunity and they can go and plant their flag first. The hypothetical here is if you've got proprietary information ahead of time, your retail people can go out and plant their flag first, start gaining the customers and doing those kind of things. That's a different issue to my mind than knowing what the fundamental makeup of the network that we all have to share under the requirements of the telecom act now is. That's not going to change. I'm not even talking about for example your forecasting of where you're going to replace copper with DLC at this point. I'm talking about what the network is made of now that we have to share.

??Northpoint: From Northpoint's view the two issues are not analogous. Information about the network that would put us in parody with US West retail operations are critical to us.

KB: I'll now turn this over to Doug Sobieski from Nextlink.

DS: There are four points I want to make sure are on the table. The first one is, from

our experience building collocates in US West territory and specifically in the state of Washington, there is a significant issue with the fact that they failed to meet their deadlines. We don't want to lose sight of that. The collocates are not delivered on time and when they are delivered on time they are far from usable. There's two issues there, they've got to get delivered on time and then when they are delivered, for whatever measurement we are going use to measure deliverability, it has to be usability.

The second one is we are always being confronted with change of policies. They significantly impact the usability of the collocates which we are paying for. A good example of that is, who buys the cable from the collocate cage to the idea. One day they buy it, the next day we have to buy it, the next day they're buying it again, no explanation for what the reason for the policy or why the policy changed, it's just a policy change. Another example of that is termination of fiber in the POT. If you order two POTs they won't terminate either one of them because one because one isn't ready. The next day they change their policy and they'll go ahead and terminate that one. So, policies are impacting our day to day operations.

Requirement of full payment with no facilities delivered is a significant issue for us. Obviously at CFA, APOT driven, we've all talked about it today, typically there is no cable. There's no fiber termination. There's no power. We're basically held hostage to their schedule, when they'll deliver, whatever they will deliver to us. We have no recourse on it.

The fourth point is that even when collocations are complete often US West has no usable network behind the collocate cage. Good examples of that are. We've had significant problems with the deliverability of the signal cable to us. One collocate cage, transmit goes this way and receive goes this way, the next time they roll it all. We have to go back in and completely rewire our cages because they don't have standards to communicate to us on how we should be deploying the cable interconnections. We've had significant problems with power. They say they deliver the cage but they won't turn the power on because our equipment is not installed. At that point it is delivered, but when we go to install our equipment, hook up all the power, just trying to get the power turned up from that point on has taken us weeks, months, often months often and sometimes up to six months to get the power turned on after acceptance of the cage. It's a problem.

Finally when we get it all connected, we order circuits out of it. We've had two main problems. Consistently the distance between the collocate cage to where the circuit has to be terminated is longer than the allowed loop length is for the equipment that is installed there, and so we get no signal in our cage, so we'll order facilities from US West and they will be at such a low level that they're unusable and by the time we get this all through we have forecast our demand and told them what we need to use the collocate cage for repetitively there's no

??? to hook to. A good example of that is currently we are still trying to get feature group D connectivity into the 425 central office. We forecasted it two years ago and we still can't get connectivity to it and right now I think we're projected to get it in September or August. It's still not a usable collocate cage for all the purposes it was intended.

Because of those things I think it's clear that we need rules. We need certainty of terms and conditions. We need some form of reporting of compliance to the measured performance. We need remedies for failure to comply.

DP: On the policy and equipment cables, at no time, and I've ruled out all the changes you just talked about on the equipment cables, has it said that we must provide the equipment cable for you. You have had the opportunity to provide the equipment cable for yourselves since day one. Even though we offered to provide it for you in those instances.

??: That's not exactly true.

DP: I'll e-mail you the policies and I'll highlight those pieces that are....

??: When we did our first six collocations in the state of Utah, US West included the wiring. They didn't say that they would or wouldn't, it was included, it happened. When we did our next six, I don't know which state it was, all of a sudden they said these are all held, we didn't agree to give us cable, what do you mean. Whether it was stated, written down, or not, the fact is the effect on us was that there was something that happened, didn't happen, happened again....

DP: The reason that we got into this is, you know, that we wouldn't provide it is because we had some that came back and said we think you're gouging us on the equipment cable. Fine, you think you can provide it cheaper, go ahead and do it yourself. We still had the option out there though where we would provide it for you at your request. And now that is on the application forms.

?? We didn't know that it was an option. I wasn't communicated.

DP: I'll agree to that. The policy has been changed once. The policy on the POT I'll have to apologize for that one on the splicing. The determination was made that there's no need to send a splicing crew out today and because you don't have fiber to the other POT to send them out in two weeks, we just wait until everything is done because basically you couldn't turn up until you had both legs in anyway.

??: That's not true.

DP: That's a determination we made and we changed that.

RB: Break

*****BREAK*****

RB: I want to point out that staff would prefer that discussion center around the issues of whether we go forward with the rulemaking and the body of that document rather than company to company specific issues. We would also like to ask that parties talk about things that may have been brought up in the discussions this morning or some thoughts that are outside of their specific filed comments. We prefer not to just debate comments that have already been filed. We do have that information and appreciate that. There's really no need to go through that exercise.

Can I open the table to just general discussion. I know that there were some questions that were tabled earlier on either Karen's discussion or the issue of rulemaking.

CD: I want to make one correction to something I said earlier. During the break I had a discussion with some of the members here from GTE and was told that they do have a process in place for determining addresses and things that are on the end of remote switches in DLC in certain situations that I was not aware of. If the comments that I gave earlier misconstrued that in assuming that information is correct I just want to make sure that record is clarified.

JG: Let's talk procedurally. I know that we went through some of that earlier. I'm not as intimately familiar, so to speak, of the process. What is the proper next path if we were to initiate this to go forward? I know it's at the Commission's choice or decision, or is there something that the CLEC community needs to provide to you?

RB: At this point staff will go back and take the information that we've gathered today, the comments that were filed in this docket and consider a recommendation. I would expect that after today that we will ask for more information from the industry, perhaps specific information on whether to move forward with the rule or not. We may ask for language, if a rule is recommended to go forward. I would also expect that we would have another workshop to talk about the details of any staff recommendation. Then at that point we would make a recommendation to the Commission on rule language or what we would call a CR-102 which is a proposal for rulemaking. Right now we are in the pre-proposal statement of intent or information gathering mode. So there is actually a three-step process with a rulemaking and that's the pre-proposal, CR-101, the proposal rulemaking CR-102 and then a rule with language that would be filed and brought before the Commission and that's the third and final step.

JG: Is it of interest to you to know to see the community's perception? Do you want us to vocalize to you that we would like you to go forward, or do you already feel comfortable that you know our position from our past filings?

RB: Unless your position today has changed at all the filing that you made in this docket, and I believe everyone has copies of that and there is a summary, we are well aware that the CLEC community would like to move forward with a rulemaking. There are other parties here that have recommended that we do not, that the FCC order provided sufficient guidance and the Commission orders have provided sufficient guidance, as well, in this issue.

?? I had two questions and that's the interaction between this possible rulemaking and other dockets that either used to be open or that are currently open. That being the larger complaint case that happened before that set a lot of the collocation rules that we're now sort of de facto using and that US West has expanded to apply to other carriers but their position, and probably from reading the order, doesn't necessarily apply to other carriers. We haven't really talked procedurally specifically but that's an issue of concern to Northpoint. A lot of good things came from the work that you all had done earlier on that very large scale complaint case that you had on collocation and certainly one of the issues you have seen is how much of that can just be wholesale imported into our generic proceeding?

My other point is more of a question about any interaction between the costing and pricing docket. Any sort of new collocation products that will be in either terms and conditions which would be finalized in this docket or the rules would be in this docket. For example, cageless I imagine was not an issue and was not priced or costed out in the proceeding that we're expecting a ruling on soon. How do you envision that going forward.....

RB: As I understand your question you're talking about the cost docket that we're expecting an order out at the end of the month and that was not part of that cost docket. We see this as quite separate. Since it is not an element in that cost docket, there will not be a pricing we would expect that the industry would have to price based out of this docket.

?? Right, so that's my question. How would this Commission, going forward, see developing Commission approved permanent rates for US West's cageless product?

Mark: All of our interconnection agreements require Commission approval. Many of the prices and rates in terms of conditions and costs have been arbitrated before the Commission subject to a Commission final order. To say that there are prices out there that have not been reviewed by the Commission or that the Commission has not approved, I don't think is correct. The interconnection agreements we have today are in place as a result of the Commission, including cageless.

Northpoint??: I guess I agree with that statement but, and maybe it's because Northpoint has not been as involved in some of the state proceedings up to this point but I don't imagine that this Commission

has formally approved as all the other rates that they are about to come out with, US West's interim price, I don't know what they are calling it, for their cageless. There's a difference between approving interconnection agreements and actually setting a permanent rate for our products. I'm just curious how procedurally, would it be in the costing docket or would it be in this docket?

DG: I'll try to answer it as closely as I can not knowing what's going to come out in the cost docket. There were several parties that filed testimony in that case and there were costs submitted for certain items. Just how the Commission will rule on those, whether they will ask the parties that are involved to file actual tariffs for those or whether they will accept some of the cost studies that are provided, I'm not sure. I think from our perspective on this particular rulemaking we would like to stay away from the costs as much as possible. It could be that there may be another phase to the generic cost study that might handle some of the collocation pieces that were not adequately addressed during the hearings. I think we just have to take a wait and see attitude for another few weeks just to see how that comes out.

FP: As you know ACI filed a petition in this that kind of started this process several months ago and we appreciate this workshop. I'd like to support COVADs position that there are some future issues that have been raised about remote terminals that weren't mentioned back when we filed that petition that are maybe not on the hot list of things for today, but would be truly a progressive way to address competition by the Commission if they were to consider them in any rulemaking that results from this process because it would be the step of actually getting ahead of the curve a little. Even so, it's not really getting ahead of the curve because a digital loop carrier is already a problem. But it would be one of the more progressive....(changed tape).....much in the way a set Commission rules, but if we were able to get into some of these future issues in a timely fashion it would really make a big difference.

CD: I did want to address something you addressed earlier which is to focus on the necessity of these proceedings. I think one thing that has been useful today, I think from some perspectives, is the discussion that basically evolved about kind of some specific contract terms and some specific policies, that at least US West has implemented. However, I don't think that those changes in policies or the contract terms, that various parties have talked about here, changed the need for regulation. I say that for three reasons. First, at least from the CLEC community perspective, or at least from COVADs perspective, what I found is that the contracts, the interconnection agreements, don't really have teeth. So while we can have terms in contracts that require certain conduct, most contracts negotiated by the ICECs, particularly because CLECs want to get into business and therefore often don't get the best deal that they could, maybe by going by arbitration or through any other procedure, don't really have strong enforcement mechanisms. So that when ILECs don't make the commitments, they don't meet

the commitments that they make in the contract, in the interconnection agreements, there's not a whole heck of a lot we can do about it. We walk around and we try and maybe use one failure to try and get an agreement to get us something else sooner. We try and work out business solutions, but there really are, in most of these interconnection agreements that I've seen, and certainly in COVADs, no strong enforcement mechanisms. Regulations can take the place of that and require on a going forward basis a consistent pattern and practice of pro-competitive behavior rather than kind of promises that aren't kept.

Second, and related to that is that, and I think we heard from the Nextlink experience, policies can be changed and they do change. What is said today is policy, at any particular ILEC or any particular CLEC, tomorrow might not be. If you don't have those pro-competitive policies in some way legislated, and I don't think that regulation necessarily has to be micro-managing, but I do think that are some specific things that can be done to make that the good pro-competitive and appropriate customer treatment policies are kept in place for the long term. I think that that provides a very good reason for this rulemaking proceeding to proceed and for rules to come out of it.

Third, and all of this is somewhat related, one thing that we've found over and over again is that, frankly, there is no action without rules. The ILEC response to a lot of requests, not every request, but to many of our requests is, if we are not required to do it by law, we are not going to do it. ATM is an excellent example of that and for quite some time every ILEC that we tried to, I shouldn't say every, there may have been one exception, at least US West and I believe also GTE and most of the other ILECs, if we requested to put ATM in we were told, well the FCC said we don't have to include switching equipment. So, even though you don't use ATMs as switching equipment, we use it as an aggregator, we're not going to allow you to collocate ATM equipment in our facilities. The most recent example we submitted a, this is not collocation, bonafide request to US West for line sharing and the response that we received said in the first instance that we are not going to provide it because the FCC doesn't yet say that we have to. I then said that by the way there are also some technical feasibility issues which weren't specified. But the lead shot was that the FCC doesn't yet say that we have to do this so we're not going to do it. I think that it's important to understand that while the ILECs, we are the ILECs customers, and we certainly want to be treated in the future and on a forward-looking basis more as customers, we are also competitors. The result of that is that in many cases if it's not mandated, it doesn't happen. I think that the Commission should understand that going forward and I think that argues again for why these proceedings continue to go forward and why the rules that have been suggested should come out of it.

RB: Thank you Clay. We have filings from a number of parties that disagree with that point. We don't need a debate on that. We have it in writing. Thank you.

Mark: Co-providers do have a vehicle as a result of a rulemaking that this Commission

held in its interconnection rules and it does allow them a vehicle to bring issues that can't be resolved between the companies before the Commission in an expedited manner.

RB: Any further discussion. Wrap-up and thank yous.

Thank you for the information we got today. There are some points that were brought out that staff would like to take back and discuss among ourselves as far as where we go from here and I would expect that you will be seeing a letter in the next two weeks asking for further comment on this proceeding. We would like to make a decision from that point on whether we go forward or not and whether take an initial cut at drafting rules and then ask the industry and other parties to assist us in that process.

We appreciate the time that all of you have spent today and hopefully it was an informative day and interesting. If there are any further written comments that you would like to give to us today that you have not stated, there is also a form. We will take that and put it into our record and consider those as well as those that have been formally filed.

Thanks to the speakers.