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I.INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is John Ries and my business address is 600 Hidden Ridge, Irving, Texas 75038.

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

A. Yes, I have. I also filed phase A supplemental direct testimony on July 25, 2000.

ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS PROCEEDING?

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

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

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

1 **Q. WHAT IS THE PURPOSE OF YOUR PHASE A REBUTTAL TESTIMONY?**

2 A. The purpose of my phase A rebuttal testimony is to discuss two collocation policy
3 issues: 1) Washington Utilities and Transport Commission witness Dave Griffith's
4 recommendation that Verizon NW prepare prices to establish a 45-day installation
5 interval and 2) Worldcom Inc. witness Roy Lathrop's analysis on the availability of
6 information that is required to develop the collocation space report.

7

8 **II. COLLOCATION INSTALLATION INTERVAL**

9

10 **Q. WHAT IS VERIZON NW'S COLLOCATION INTERVAL FOR SITE**
11 **PREPARATION?**

12 A. Verizon NW has a standard interval to provide collocation within 90 days of the
13 receipt of 50% of the non-recurring charges. However, if major modifications are
14 needed within the central office for power or HVAC, additional time to provision the
15 network infrastructure prior to the site preparation would be required.

16

17 **Q. IS VERIZON NW'S PROPOSED 90 DAY PROVISIONING INTERVAL**
18 **CONSISTENT WITH INTERVALS ADOPTED BY OTHER STATE**
19 **COMMISSIONS?**

20 A. Yes. The California Public Utilities Commission (Rulemaking 97-10-016) and the
21 Florida Public Service Commission (Order No. PSC-00-0941-FOF-TP) have both

1 adopted a 90 calendar day interval for providing collocation arrangements.

2

3 **Q. WHAT ARE THE KEY FACTORS THAT AFFECT THE SITE**
4 **PREPARATION INTERVAL?**

5 A. The first major issue is the condition of the central office and whether the collocation
6 request is the first at a given location or the first to be provisioned within a new
7 vacant area of the central office. These requests typically would naturally require a
8 longer period for site preparation. A second issue is whether power, space, and
9 HVAC requirements of a particular request can be readily met with the network
10 infrastructure that is in place. If system modifications or upgrades are necessary at
11 the central office, the provisioning interval will be longer. Related to this issue is the
12 amount of material that will need to be engineered and ordered by the ILEC to
13 provision the request. Vendor delays in processing and shipping material to the ILEC
14 will also affect interval timelines. It is standard practice to experience a 45 day
15 window just for the engineering, ordering and receiving of the cabling materials
16 required for a collocation request from the Verizon NW vendor contracted to do the
17 installation of the telecommunications requirements for each application. Another
18 critical issue in determining the interval is the availability of contractors and in-house
19 personnel to perform the construction of collocation space, along with the amount of
20 activity that is currently in the queue at the given location.

21

1 **Q. CAN VERIZON NW IMPLEMENT A REQUEST IN A SHORTENED**
2 **INTERVAL WHEN IDEAL CONDITIONS EXIST?**

3 A. Yes, Verizon NW will determine what factors are present at a given location along
4 with the CLEC required due date intervals and will provision the request in the most
5 timely manner possible and will notify the CLEC upon early completion. However,
6 Verizon NW is dependent on the resources of its vendors and contractors as well as
7 the ability of manufacturers to meet supply and demand while responding to already
8 aggressive intervals. Since ideal conditions often do not exist, Verizon NW cannot
9 commit to establishing a standard interval that is less than 90 days.

10

11 **Q. IF THE CLEC REQUESTS A SHORTER TIME INTERVAL THAN IS PROJECTED BY**
12 **VERIZON NW, CAN THE CLEC PAY EXPEDITED CHARGES TO REDUCE THE**
13 **INTERVAL?**

14 A. No, the factors cited above that determine the critical path of a provisioning interval cannot be
15 significantly shortened by paying expedited charges.

16

17 **Q. ARE THERE OTHER OPTIONS A CLEC CAN EXPLORE TO REDUCE**
18 **THE PROVISIONING INTERVAL?**

19 A. Yes, Verizon NW would be willing to allow the CLEC to take more control in
20 managing the interval process if the CLEC believes they can accomplish the
21 implementation intervals in a reduced time.

22

1 **Q. PLEASE DESCRIBE HOW THIS PROCESS WOULD WORK.**

2 A. Verizon NW would perform the initial engineering of the collocation request. Once
3 Verizon NW has completed its portion of the engineering, Verizon NW will provide
4 that information to the CLEC and allow the CLEC to coordinate with the approved
5 Verizon NW vendor of their choice to complete the engineering of the job, order and
6 furnish all of the materials directly with the vendor and schedule the vendor to
7 complete the installation. The CLEC will also be allowed to select a Verizon NW
8 certified and approved contractor(s) and work directly with the contractor to
9 provision the collocation request. This process would allow the CLEC direct control
10 for escalation and expedition for the work performed. However, because multiple
11 parties may request simultaneous work activities, the selected contractor(s) would
12 still be required to contact Verizon NW to coordinate their work activity.

13

14 **III. COLLOCATION SPACE REPORT**

15

16 **Q. WHAT INFORMATION IS TO BE PROVIDED ON THE COLLOCATION**
17 **SPACE REPORT?**

18 A. The FCC Advanced Services Order requires that the Collocation Space Report must
19 specify the amount of collocation space available at each requested premises, the
20 number of collocators, and any modifications in the use of the space since the last
21 report. The report must also include measures that the ILEC is taking to make

1 additional space available for collocation.

2

3 **Q. WHAT ACTIVITIES MUST VERIZON NW COMPLETE WHEN**
4 **PREPARING A COLLOCATION SPACE REPORT?**

5 A. An inventory must be conducted at the premise in question to determine the number
6 of collocators present and the amount of space that is available for future requests.
7 In determining the latter, Verizon NW must review its existing space and determine
8 what space is needed for its own growth as well as the feasibility of supporting
9 collocation requests in any vacant space.

10

11 **Q. MR. LATHROP HAS STATED THAT ALL OF THIS INFORMATION**
12 **SHOULD BE READILY AVAILABLE AND MAINTAINED IN DATABASES,**
13 **THEREFORE THE ILEC SHOULD BE ABLE TO**

1 **PRODUCE A REPORT WITHIN TWO HOURS. HOW DOES VERIZON NW**
2 **RESPOND?**

3 A. There are no databases that house this type of information on a readily available
4 basis, nor is it feasible to design such a system going forward. The Verizon NW
5 central office has switching, transmission, power, HVAC, and cabling requirements,
6 each administered by different groups within the company. The existing demands
7 and forecasted growth of future demands must be reviewed when developing the
8 space report. In today's dynamic environment of telecommunications demands, one
9 cannot expect a company with thousands of central offices (over 4,000 offices in the
10 former GTE territory alone) to maintain such information in a readily available
11 format. Furthermore, because of the constant changes that occur within the vacant
12 areas of a central office, (storage, administration needs, equipment additions, etc.) a
13 physical inspection of the premise must be conducted in order to ensure the accuracy
14 of a collocation space report. Once such a report is finished, it can quickly become
15 outdated within a matter of weeks. To suggest that the preparation of a collocation
16 space report can be accomplished within two hours is simply not practical.

17

18 **Q. DOES THIS CONCLUDE YOUR PHASE A REBUTTAL TESTIMONY?**

19 A. Yes.

20

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

PHASE A REBUTTAL TESTIMONY OF

JOHN RIES

PROGRAM MANAGER-ACCESS SERVICES

ON BEHALF OF

VERIZON NORTHWEST INC.

Formerly Known as GTE Northwest Incorporated

SUBJECT: COLLOCATION POLICY

AUGUST 4, 2000

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