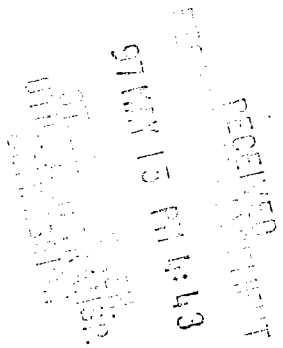
[USWC 119]

BEFORE THE WASHINGTON UTILITIES AND TRANSPORT COMMISSION

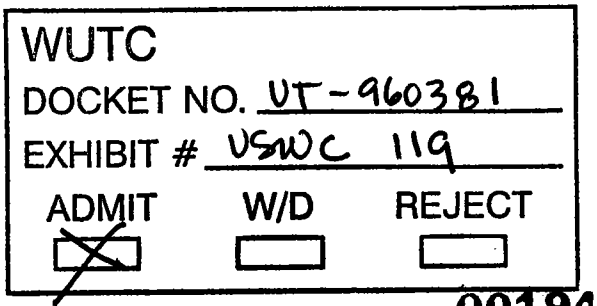
In the Matter of Petition by	)
AT&T Wireless Services, Inc. for	)
Arbitration Pursuant to Section	)
252(b) of the Telecommunications	)DOCKET No. UT-960381
Act of 1996 of the Rates, Terms, and	)
Conditions of Interconnection with	)
U S WEST Communications, Inc.	)



REBUTTAL TESTIMONY OF

CRAIG WISEMAN

MAY 15, 1997



Q. PLEASE STATE YOUR NAME, POSITION, EMPLOYER, AND BUSINESS ADDRESS.

My name is Craig Wiseman. I am employed by U S WEST Communications Inc. ("U S WEST") as a Member of Technical Staff in the Interconnection Planning Group. My business address 700 W. Mineral Ave., Littleton, CO. 80120

Q. HAVE YOU FILED DIRECT TESTIMONY IN THE PROCEEDING?

A. Yes.

PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my rebuttal testimony is to address issues raised in direct testimony of Kurt Maass regarding access to poles used by U S WEST. Mr. Maass requests the Commission to develop requirements that entitle AWS to have access to the tops of poles for the placement of CMRS micro-cell devices and also require U S WEST to replace existing poles with taller poles in order to improve signal reception for the micro-cell devices. My rebuttal testimony discusses several network reliability concerns that must be addressed before micro-cell technology can be placed on pole tops. I also point out that while neither the Act nor the FCC Order require that U S WEST replace existing poles to accommodate AWS's request, U S WEST is willing to explore such accommodations and

negotiate with AWS for the replacement/construction of additional poles. Of course, U S WEST would expect to recover the total cost of replacement and/or construction from AWS through a one-time non-recurring charge.

Q. WHAT IS U S WEST'S POSITION ON AWS'S REQUEST TO PLACE MICRO-CELL TECHNOLOGY ON TOP OF UTILITY POLES OWNED BY U S WEST?

A. U S WEST had no knowledge of this proposal prior to reading the direct testimony filed by AWS. However, after examining the proposal and the potential impacts on network reliability, U S WEST asks the Commission not to adopt the AWS proposal until the network reliability issues have been resolved.

Q. HAS U S WEST PROVIDED THIS TYPE OF ARRANGEMENT TO OTHER WIRELESS OR WIRELINE PROVIDERS?

A. No. As Mr. Maass states on page 37, line 8 through line 10 of his direct testimony, that AWS "will be using poles and other utility facilities in ways perhaps not contemplated by traditional landline providers."

Q. WHAT IS YOUR UNDERSTANDING OF THE AWS MICRO-CELL PROPOSAL?

A. The AWS micro-cell proposal would require that miniature cellular antennas be installed on the top of utility poles. The antennas would be connected to a control

cabinet via a facility, i.e. coaxial cable, that would descend from the pole top to a micro -cell control box at or near ground level. A second facility would exit the control box and ascend the pole to the U S WEST cable facilities where it would be connected to a copper line inside the U S WEST cable. The cooper line would connect the micro-cell to the AWS mobile switching center (MSC).

Q. WHAT ARE THE NETWORK RELIABILITY CONCERNS RELATED TO THIS MICRO-CELL PROPOSAL?

A. Most poles used by U S WEST in Washington are joint use poles shared by U S WEST and other utilities such as cable television and power companies. The power company 's high voltage facilities are usually located at near the top of the pole. For safety reasons, a 40 inch area of separation is provided between the high voltage lines and the other facilities on the pole. The micro-cell proposal requires that a facility be run from the top of the pole down to a micro-cell control box. Another facility will exit the control box and connect to the U S WEST copper telephone cable where it will be connected to telephone lines. If the antenna or the facility that connects it to the control box should come into contact with the high voltage lines, they will act a conduit that could feed high voltage electricity directly into the U S WEST cable. High voltage in a telephone cable can cause serious injury to end users, telephone technicians as well as severely damage the telephone facilities and switching equipment.

Q. WHAT DAMAGE MIGHT OCCUR BY CONNECTING THE POLE TOP MICRO-CELLS TO THE TELEPHONE CABLES?

A. The micro-cell is a miniature cellular antenna that collects high frequency radio waves from wireless phones. Antennas also attract lightening. If lightening were to strike the micro-cell, the high voltage surge could be introduced into the U S WEST telephone cable, exposing end users and telephone technicians to serious injury and severely damaging the telephone facilities and switching equipment.

Q. ARE THERE ANY ISSUES THAT AFFECT U S WEST'S ABILITY TO PROVIDE INTERCONNECTION OF THE MICRO-CELL TO THE U S WEST TELEPHONE CABLE?

A. Yes. In most cases the cable attached to poles is distribution cable. Distribution cable is usually copper cable that is designed for local loops, not T-1 private line transmission facilities. Therefore, the facilities used to transport the micro-cell signals would have to be redesigned to T-1 transmission standards.

Q. WHAT IS U S WEST'S RECOMMENDATION REGARDING THE AWS POLE TOP MICRO-CELL PROPOSAL?

A. Due to the concerns for public safety and the negative affects that the micro-cell proposal may have on network reliability and customer service, U S WEST recommends that the Commission not require U S WEST to provide access to the top of poles for the placement of micro-cells. Instead, U S WEST will evaluate requests on a case by case basis through the bona fide request process. This will allow U S WEST to coordinate the AWS order for a DSI/T1 facility with the

order to place the micro-cell on a specific pole, conduct a site inspection and then perform a feasibility study.

Q. CAN U S WEST PROVIDE ACCESS TO ALL OF THE POLES USED BY U S WEST IN WASHINGTON?

A. No. U S WEST only owns 57% of the poles used by U S WEST in Washington. U S WEST leases space on the remaining 43% from power companies.

Q. WHAT IS THE U S WEST POSITION REGARDING THE AWS PROPOSAL THAT U S WEST REPLACE EXISTING POLES WITH TALLER POLES TO IMPROVE THE MICRO-CELL SIGNAL RECEPTION?

A. The Federal Act does not require U S WEST to construct or rearrange facilities for another carrier. Therefore, U S WEST should not be *required* to construct new facilities or replace existing facilities for the sole benefit of its competitors. However, U S WEST and AWS should be free to negotiate, if they so choose, for the rearrangement of existing facilities or the construction/acquisition of additional poles, conduits and rights of way. Thus, U S WEST may, under some conditions, construct or rearrange facilities that would provide pole or conduit space for AWS. Such agreements should be negotiated on a *voluntary* basis.

Q. HOW SHOULD THE COSTS INCURRED BY U S WEST TO CONSTRUCT, REPLACE OR REARRANGE FACILITIES OR POLES

TO ACCOMMODATE THE AWS REQUEST FOR ACCESS TO POLES BE RECOVERED?

A. U S WEST should recover the total costs plus a reasonable profit to construct, replace or rearrange facilities or poles to accommodate the AWS request to access to poles from AWS on a one time non-recurring charge basis.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.