

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF CONTINUED)	
COSTING AND PRICING OF)	DOCKET NO. UT-003013
UNBUNDLED NETWORK ELEMENTS,)	<i>Part B</i>
TRANSPORT, TERMINATION, AND)	
RESALE)	

SUPPLEMENTAL DIRECT TESTIMONY

OF

PERRY W. HOOKS, JR.

ON BEHALF OF

QWEST CORPORATION

OCTOBER 19, 2000

1 I. IDENTIFICATION OF WITNESS

2 ARE YOU THE SAME PERRY W. HOOKS, JR. THAT FILED DIRECT
3 TESTIMONY IN PART B OF THIS COST PROCEEDING ON AUGUST 4, 2000?

4 A. Yes, I am.

5 PURPOSE OF SUPPLEMENTAL DIRECT TESTIMONY

6 WHAT IS THE PURPOSE OF THIS SUPPLEMENTAL DIRECT
7 TESTIMONY?

8 A. This Supplemental Direct Testimony is filed in response to the Commission's
9 Supplemental Order dated September 12, 2000. This testimony describes
10 Qwest's proposed Line Splitting product.

11 DISCUSSION OF LINE SPLITTING

12 Q. PLEASE DEFINE THE TERM "LINE SPLITTING."

13 A. The FCC has defined the term "line splitting" as the delivery of voice and data services
14 provided by competitive carriers over a single loop.¹ Qwest's proposed Line Splitting

¹ In the Matter of Application by SBC Communications inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, inc., d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to provide In-Region, interLATA Services in Texas, FCC 00-238,

1 product provides Competitive Local Exchange Carriers (CLECs) with an opportunity to
2 offer voice and data services simultaneously over a single unbundled loop using
3 Qwest's UNE-P POTS offering.

4 **PLEASE DESCRIBE QWEST'S UNE-P POTS OFFERING.**

5 A. UNE-P POTS is an acronym used to identify Unbundled Network Element-Platform
6 "Plain Old Telephone Service" which Qwest makes available to a CLEC that requests
7 the conversion of Qwest's working residential or business exchange services to the
8 CLEC as a combination of unbundled network elements. Qwest will also, upon request
9 from a CLEC, connect non-working residential and business lines, for which facilities
10 are in place, and transfer those lines and related functions to the CLEC as a UNE
11 platform.

12 **Q. WILL QWEST PROVIDE LINE SPLITTING OVER UNE-P POTS TO CLECS**
13 **THAT REQUEST THIS SERVICE?**

14 A. Yes. Qwest will provide Line Splitting over UNE-P POTS to CLECs that request such
15 service, just as Qwest will provide Line Sharing to CLECs that request the high
16 frequency portion of the loop used to provide Qwest's exchange services.

**1 Q. WHAT IS THE DIFFERENCE BETWEEN QWEST'S LINE SHARING
2 PRODUCT AND ITS LINE SPLITTING PRODUCT?**

3 Line Sharing provides a CLEC with the ability to use the high frequency portion of a loop
4 that is simultaneously being used by Qwest to furnish the end user with voice-grade
5 service over the low frequency portion of the loop. Line Splitting provides two different
6 CLECs with the opportunity to use both the high frequency portion of the loop and the
7 low frequency portion of the loop simultaneously.

1 **Q. WHICH SERVICES MAY A CLEC PROVIDE USING LINE SPLITTING?**

2 A. A CLEC may provide any telecommunications service using Line Splitting that an
3 unbundled loop is capable of supporting.

4 **Q. IS QWEST OBLIGATED TO OFFER XDSL SERVICE SUCH AS QWEST'S**
5 **MEGABIT PRODUCT FOR USE BY CLECS THAT ORDER A UNE-P POTS**
6 **UNBUNDLED LOOP?**

7 A. No. Qwest is not obligated to offer xDSL service such as its MEGABIT product for
8 use by CLECs that order a UNE-P POTS unbundled loop. Qwest's position on this
9 issue is once again supported by the FCC in its opinion rendered in the Texas 271 case:
10 "Under [FCC] rules, the incumbent LEC has no obligation to provide xDSL service
11 over [a] UNE-P carrier loop."²

12 **WHAT TYPES OF SERVICES MAY BE PROVIDED OVER THE HIGH**
13 **FREQUENCY PORTION OF THE LOOP?**

14 A. The CLEC may provide any xDSL service that is compatible with the UNE-P POTS
15 service. XDSL services that are currently presumed to meet this standard include
16 ADSL, RADSL, G.lite and Multiple Virtual Line transmission systems. In the future,
17 additional services may be used by the CLEC to the extent those services are

1 ² Texas Order at ¶ 330.

1 determined to be acceptable for UNE-P POTS Line Splitting deployment under
2 applicable FCC rules.

1 Q. IS QWEST OBLIGATED TO OFFER A LINE SPLITTING PRODUCT?

2 Yes. The FCC has stated that “incumbent LECs have an obligation to permit competing carriers
3 to engage in line splitting over the UNE-P where the competing carrier purchases the entire
4 loop and provides its own splitter.”³

**5 WHAT IS THE PURPOSE OF THE SPLITTER REFERRED TO BY THE FCC IN
6 THE SOUTHWESTERN BELL ORDER?**

7 Simply stated, the splitter separates the voice and data traffic and thus allows for the
8 simultaneous transmission of voice and data communication.

9 IS QWEST RESPONSIBLE FOR PROVIDING THE SPLITTER?

10 No. The CLEC is responsible for providing the splitter and any other equipment necessary
11 for the end user to receive separate voice and data service across a single UNE-P POTS
12 loop.

**13 IS QWEST OBLIGATED TO MAKE THE SPLITTER AVAILABLE TO CLECS
14 THAT WISH TO ORDER LINE SPLITTING?**

15 A. No. Qwest is not obligated to own and maintain splitters on behalf of CLECs that wish
16 to order Line Splitting. Qwest’s position is supported by the FCC in its opinion

¹ ³ Texas 271 Order at ¶325.

1 rendered in the Texas 271 order in which the FCC stated:

2 The Commission has never exercised its legislative rulemaking authority under
3 section 251(d)(2) to require incumbent LECs to provide access to the splitter, and
4 incumbent LECs therefore have no current obligation to make the splitter
5 available.⁴

1 ⁴ Id.

1 HOW MAY CLECS ORDER LINE SPLITTING?

2 First, the CLEC must determine whether to add data services to an existing UNE-P POTS
3 loop. Once this is determined, a Local Service Request (LSR) is prepared by the CLEC
4 and submitted to Qwest for processing.

**5 Q. DID QWEST PREVIOUSLY RECOMMEND THAT LINE SPLITTING BE
6 HANDLED VIA THE BONA FIDE REQUEST (BFR) PROCESS?**

7 A. Yes. Qwest recommended in Part A of this cost proceeding that requests for Line
8 Splitting be handled through the BFR process. However, as noted in the preceding
9 answer, CLECs may now order Line Splitting via the LSR process.

**10 Q. IS THE SPLITTER INSTALLED IN CONJUNCTION WITH QWEST'S
11 PROCESSING OF THE CLEC'S REQUEST FOR LINE SPLITTING?**

12 A. No. It is necessary that any construction required to install the splitter be completed
13 before Qwest can process the CLEC's request for Line Splitting.

14 Q. WHERE IS THE SPLITTER INSTALLED?

15 A. The splitter may be installed by the CLEC in its collocation space, or the splitter may be
16 installed by Qwest at a location within the central office at a common area on the
17 splitter bay; on the Intermediate Distribution Frame (IDF); or on the Main Distribution
18 Frame (MDF).

1 **Q. PLEASE GENERALLY DESCRIBE HOW VOICE AND DATA TRAFFIC IS**
2 **DELIVERED TO A CLEC FOR THE PROVISIONING OF VOICE AND DATA**
3 **SERVICES TO THE END USER CUSTOMER.**

4 A. First, an Interconnection Tie Pair (ITP) carries both voice and data traffic from the
5 UNE-POTS loop termination on Qwest's COSMIC/MDF (Main Distribution Frame) to
6 an Intermediate Distribution Frame (IDF). Next, a Tie Cable carries both the voice and
7 data traffic from the IDF to the CLEC's splitter. The splitter separates the traffic,
8 sending voice traffic to the switch port termination assigned to the "voice" CLEC and
9 data traffic to the "data" CLEC's collocation area where data equipment is then
10 attached.

11 **Q. IS THE METHOD DESCRIBED ABOVE THE ONLY WAY IN WHICH VOICE**
12 **AND DATA TRAFFIC CAN BE DELIVERED TO A CLEC?**

13 A. No. The CLEC may chose to make a direct connection from the splitter located in its
14 collocation space to the loop termination at Qwest's COSMIC/MDF.

15 **Q. WHEN IS THE TYPE OF CONNECTION TO BE MADE BETWEEN THE**
16 **SPLITTER AND THE LOOP TERMINATION DECIDED?**

17 A. The CLEC will determine the ITP and Tie Cable arrangements that best meet its needs
18 at the time the splitter is installed.

**1 IN ADDITION TO THE SPLITTER, IS ANYTHING ELSE REQUIRED BEFORE A
2 CLEC'S LINE SPLITTING ORDER CAN BE PROVISIONED?**

3 Cable augmentation and other work within the central office needed to support Line Splitting
4 may be required before Qwest can provision a CLEC's request for Line Splitting.
5 These additional requirements may be ordered at the same time as the new collocation
6 space is ordered.

**7 Q. HOW CAN THE CLEC DETERMINE WHETHER IT IS POSSIBLE TO ADD
8 DATA SERVICES TO A UNE-P POTS UNBUNDLED LOOP?**

9 A. The CLEC will use the Loop Qualification tool to determine whether it is possible to
10 add data services to a UNE-P POTS unbundled loop. In addition, the Loop
11 Qualification tool will identify whether line conditioning is required. Once these
12 factors are determined, the CLEC will submit a Local Service Request (LSR) using a
13 process similar to that used for ordering an unbundled loop.

**14 MAY A CLEC REQUEST THE CONVERSION OF A WORKING RESIDENTIAL OR
15 BUSINESS EXCHANGE SERVICE LINE TO A UNE-P POTS UNBUNDLED
16 LOOP WHEN THAT LOOP IS CONNECTED TO A SPLITTER?**

17 A. Yes. Qwest will convert a working residential or business exchange service line to a
18 UNE-P POTS unbundled loop that is connected to a splitter with the consent of the

1 entity that owns the splitter.

1 **Q. WHAT INTERVAL GUIDELINE DOES QWEST'S FOLLOW FOR**
2 **PROVISIONING LINE SPLITTING?**

3 A. Once the splitter has been installed, either in the CLEC's collocation space or in
4 Qwest's central office, Qwest will provision Line Splitting using the same standard
5 interval guideline that Qwest follows for the installation of an unbundled loop.

6 **WILL QWEST FOLLOW THE STANDARD INTERVAL GUIDELINE FOR THE**
7 **PROVISIONING OF LINE SPLITTING IF LINE CONDITIONING IS**
8 **REQUIRED?**

9 A. Yes. Qwest will follow the same standard interval guideline for the provisioning of
10 Line Splitting if line conditioning is required. The timeframe for installation will vary,
11 however, due to the additional requirement of line conditioning.

12 **PLEASE GENERALLY DESCRIBE THE INSTALLATION PROCESS USED FOR**
13 **UNE-P POTS LINE SPLITTING ORDERS.**

14 A. The installation process involves the basic "lift and lay" procedure. Using this
15 procedure, a CLEC technician lifts the loop from its termination in the Qwest central
16 office and lays the loop on a new termination connecting it to the CLEC's collocated
17 equipment located in the same central office.

18 **Q. WILL QWEST PERFORM LINE CONDITIONING OF THE UNE-P POTS**

