

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of	)	
	)	DOCKET NO. UT-991930
MOUNT ST. HELENS TOURS, INC.	)	
	)	
For Designation of a Telecommunications	)	
Common Carrier to Serve an Unserved	)	
Community, or Portion Thereof.	)	
.....	)	
In the Matter of the Petition of	)	
	)	DOCKET NO. UT-991931
BARBARA BRADY	)	
	)	
For an Exchange Area Boundary Change.	)	
.....	)	
In the Matter of Designation of a	)	
Telecommunications Common Carrier to Serve	)	DOCKET NO. UT-993000
WILDERNESS LAKE COMMUNITY, or	)	
Portion Thereof, on the Commission's Own	)	
Motion	)	
	)	
U S WEST COMMUNICATIONS, INC.	)	
	)	
GTE NORTHWEST INCORPORATED	)	
_____	)	

**RESPONSE TESTIMONY OF**

**DON HARTZOG**

June 12, 2000



1 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

2 A. Don Hartzog

3 904 N Columbus St  
4 Spokane, WA 99202

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. By U S WEST, as a Field Operations Manager.

7 **Q. HOW LONG HAVE YOU HELD THIS POSITION?**

8 A. Ten months.

9 **Q. WHAT ARE YOUR DUTIES IN THIS POSITION?**

10 A. I manage U S WEST's field engineering operations for eastern and southwestern

11 Washington.

12 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EDUCATION.**

13 A. I have a B. A. in Mechanical Engineering from Washington State University, an E.I.T.

14 certification and I expect to obtain my professional engineer's license in October of

15 2000.

16 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

1 A. I have five years of telecommunications experience in all aspects of outside plant  
2 engineering and construction. In my present position, I manage the U S WEST  
3 engineering operations for eastern and southwestern Washington, which includes fifty  
4 five exchanges and approximately eight hundred fifty thousand access lines.

5 **Q. ARE YOU AWARE OF THE REQUEST BY MT. ST. HELENS TOURS THAT**  
6 **U S WEST BE DESIGNATED AS AN INVOLUNTARY CARRIER UNDER**  
7 **SECTION 214(E)(3) OF THE TELECOMMUNICATIONS ACT OF 1996 TO**  
8 **PROVIDE TELECOMMUNICATIONS SERVICE TO THE LOCATION ON**  
9 **SR 504 KNOWN AS ECO PARK IN COWLITZ COUNTY?**

10 A. Yes.

11 **Q. HAVE YOU INVESTIGATED THE PHYSICAL CONDITIONS PERTAINING**  
12 **TO TELECOMMUNICATIONS SERVICES AND EXISTING**  
13 **TELECOMMUNICATIONS FACILITIES IN THE AREA OF SR 504 IN**  
14 **COWLITZ COUNTY?**

15 A. Yes.

16 **Q. WHAT HAVE YOU DONE IN THIS INVESTIGATION?**

17 A. I researched U S WEST Outside Plant cable records to see what cable facilities  
18 U S WEST owns in the area. I conducted a field survey of the locations of  
19 U S WEST cable facilities in the area. I researched the available capacity of

1 U S WEST's network at the closest location of U S WEST facilities to Mt. St. Helens  
2 Tours. I surveyed possible ways for U S WEST to provide telecommunications  
3 service to Mt. St. Helens Tours. I searched for the location of Mt. St. Helens Tour's  
4 radio phone transmitter and possible alternative locations for same.

5 **Q. WHAT TELECOMMUNICATIONS FACILITIES EXIST IN THIS AREA?**

6 A. U S WEST has copper cable facilities located three miles from the entrance of Mt. St.  
7 Helens Tours, at approximately mile marker 21 on SR 504. Verizon (Airtouch) has  
8 cellular service that reaches the Mt. St. Helens Tours location. The National Forest  
9 Service has a fiber optic cable running up SR504 from mile marker 21 to points  
10 beyond Mt. St. Helens Tours. Mt. St. Helens Tours owns a radio phone with the  
11 transmitter located at a point near the Sediment Retention Dam and the receiver  
12 located at the Mt. St. Helens Tours location.

13 **Q. WHO OWNS THOSE FACILITIES?**

14 A. U S WEST owns the copper cable along SR 504 up to mile marker 21, Verizon owns  
15 its cellular facilities, the National Forest Service owns the fiber optic cable from mile  
16 marker 21 up the mountain, and Mt. St. Helens Tours owns its radio link between the  
17 U S WEST copper cable and the Eco Park location.

18 **Q. WHO OPERATES AND MAINTAINS THOSE FACILITIES?**

19 A. Same as above.

1 **Q. HOW DO YOU KNOW THAT?**

2 A. U S WEST – physical inspection and examination of records.

3 Verizon – I used my Verizon wireless phone at the Mt. St. Helens Tours location.

4 National Forest Service – physical inspection of fiber optic cable at the 21 mile

5 marker and information from colleagues who have spoken with representatives of the

6 National Forest Service.

7 Mt. St. Helens Tours – physical inspection of transmitter location.

8 **Q. IF U S WEST RECEIVES A REQUEST FROM THE U. S. FOREST SERVICE**  
9 **OR ITS CONCESSIONAIRES, OR WEYERHAEUSER LEARNING CENTER,**  
10 **OR THE COWLITZ COUNTY PUD OR THEIR CONCESSIONAIRES TO**  
11 **INSTALL NEW FACILITIES OR CHANGE SERVICES IN THE MT. ST.**  
12 **HELENS AREA THAT ARE OUTSIDE U S WEST’S SERVING AREA, HOW**  
13 **ARE THOSE REQUESTS HANDLED?**

1 A. U S WEST terminates the requested facilities at the National Forest Service's fiber  
2 hut at the 21 mile mark on SR 504. The service is then transported to the desired  
3 location via the Forest Service's fiber optic system.

4 **Q. SO MUST U S WEST RECEIVE FACILITY ASSIGNMENTS FROM THE**  
5 **FOREST SERVICE ON THE CHANNEL BANK THAT TERMINATES THE**  
6 **FOREST SERVICE FIBER, IN ORDER TO ACCOMPLISH THE**  
7 **CONNECTION OF DIAL TONE TO MEET REQUESTS OF CUSTOMERS AT**  
8 **THESE UPSLOPE LOCATIONS?**

9 A. Yes, any assignments for the transmission of U S WEST service on the Forest Service  
10 fiber system are made by the Forest Service and not U S WEST.

11 **Q. IS THE ECO PARK LOCATION OUTSIDE OF U S WEST'S AUTHORIZED**  
12 **SERVING AREA?**

13 A. Yes.

14 **Q. HOW DO YOU KNOW THAT?**

15 A. Verification of U S WEST cable records and a visit to the location.

16 **Q. DOES U S WEST TODAY PROVIDE DIALTONE SERVICE THAT IS**  
17 **RECEIVED AT THE ECO PARK LOCATION OUTSIDE THE U S WEST**  
18 **DEFINED SERVING AREA?**

1 A. Yes.

2 **Q. HOW IS THAT SERVICE PROVIDED?**

3 A. Service is provided by U S WEST copper cable facilities to a point of demarcation at  
4 the Sediment Retention Dam location, inside U S WEST territory and is then  
5 transmitted to the Eco Park location via a customer provided, privately owned radio  
6 phone.

7 **Q. DOES U S WEST TODAY PROVIDE DIALTONE SERVICE THAT IS**  
8 **RECEIVED AT THE JOHNSTON RIDGE, COLDWATER RIDGE,**  
9 **WEYERHAEUSER LEARNING CENTER, HOFFSTADT BLUFFS AND**  
10 **WASHINGTON DEPARTMENT OF FISH AND WILDLIFE FACILITIES**  
11 **OUTSIDE OF THE U S WEST DEFINED SERVING AREA?**

12 A. Yes.

13 **Q. HOW IS THAT SERVICE PROVIDED?**

14 A. Service is provided by U S WEST copper cable facilities to a point of demarcation  
15 inside the exchange at the National Forest Service “telecommunications hut” building  
16 at mile marker 21 on SR504 and is then transmitted to the various locations via  
17 National Forest Service owned fiber optic cable and multiplexing equipment, or in the  
18 case of the Fish and Wildlife hatchery, by a state owned copper cable in the Forest  
19 Service’s conduit.



1 **Q. IS THERE ANY FUNCTIONAL DIFFERENCE FROM U S WEST'S**  
2 **STANDPOINT BETWEEN ECO PARK'S USE OF A CUSTOMER-PROVIDED**  
3 **RADIO LINK TO TRANSPORT THE DIAL TONE SERVICE TO THE ECO**  
4 **PARK LOCATION OUTSIDE THE U S WEST SERVING AREA AND THE U.**  
5 **S. FOREST SERVICE'S USE OF ITS OWN FIBER OPTIC CABLE OR THE**  
6 **FISH AND WILDLIFE DEPARTMENT'S USE OF A STATE OWNED**  
7 **COPPER CABLE TO TRANSPORT THE DIAL TONE SERVICE TO THESE**  
8 **OTHER LOCATIONS THAT ARE ALSO OUTSIDE THE U S WEST**  
9 **SERVING AREA?**

10 A. No.

11 **Q. SO IS U S WEST TREATING ECO PARK DIFFERENTLY THAN IT TREATS**  
12 **THE U. S. FOREST SERVICE, WEYERHAEUSER LEARNING CENTER,**  
13 **THE COWLITZ COUNTY PUD OR THE STATE DEPARTMENT OF FISH**  
14 **AND WILDLIFE OR ANY OF THE CONCESSIONAIRES THAT OCCUPY**  
15 **THE FACILITIES OPERATED BY ANY OF THESE ENTITIES NEAR MT.**  
16 **ST. HELENS WITH REGARD TO THE PROVISION OF LOCAL EXCHANGE**  
17 **TELECOMMUNICATIONS SERVICE OUTSIDE THE U S WEST SERVING**  
18 **AREA?**

19 A. No.

1 **Q. WOULD IT BE PHYSICALLY POSSIBLE FOR U S WEST TO PROVIDE**  
2 **WIRELIN SERVICE TO THE ECO PARK LOCATION?**

3 A. Yes.

4 **Q. PLEASE DESCRIBE IN DETAIL THE TASKS THAT WOULD NEED TO BE**  
5 **ACCOMPLISHED FOR U S WEST TO PROVIDE WIRELIN SERVICE TO**  
6 **ECO PARK.**

7 A. U S WEST would need to place copper cable from the end of our facilities at mile  
8 marker 21 on SR504 to the Eco Park location at mile marker 24.

9 The most cost-effective means of doing this would be to utilize the conduit structure  
10 owned and maintained by the National Forest Service. Utilization of this conduit  
11 structure would require modifications at each hand hole location between mile marker  
12 21 and 24 to allow for placement of U S WEST copper cable with the existing  
13 primary power.

14 The second alternative for the above mentioned cable placement would be to directly  
15 bury a copper cable in a combination of gravel and asphalt shoulder. This method  
16 would be more time consuming and much more expensive than the first alternative.

17 **Q. HAVE YOU ESTIMATED THE COST U S WEST WOULD INCUR TO**

**1 PROVIDE SERVICE TO ECO PARK?**

**2 A.** Yes.

**3** Approximately \$80,000 - \$125,000 for the first alternative depending on requirements  
**4** of the National Forest Service and the WSDOT.

**5** Approximately \$300,000 - \$400,000 for the second alternative depending on  
**6** requirements of the WSDOT and the amount of rock encountered during the  
**7** trenching.

**8 Q. PLEASE EXPLAIN HOW YOU CALCULATED THE ESTIMATES.**

**9 A.** Both of these estimates are approximate but include U S WEST providing all  
**10** materials and labor necessary. The estimates are based on estimated costs per foot to  
**11** pull cable in conduit or bury cable along a road, the cost per foot of the cable itself  
**12** and hand holes and the approximate number of feet of extension involved and  
**13** approximate number of hand holes. In order to provide a more exact cost, U S WEST  
**14** would need to perform a detailed engineering study. This study would include, but  
**15** not be limited to, detailed field notes of the proposed cable placement, coordination  
**16** with WSDOT as to any requirements or restrictions in conjunction with the proposed  
**17** cable placement, coordination with National Forest Service as to any requirements or  
**18** restrictions in conjunction with utilization of any portion of the existing conduit

1 structure, and coordination with Eco Park and the developers of the Elk Run and Mt.  
2 St. Helens Retreat. This entire process would take approximately 60-90 days.

3 **Q. IS YOUR ESTIMATE THE LOWEST COST THAT U S WEST OR ANYONE**  
4 **ELSE WOULD INCUR TO EXTEND WIRED COMMUNICATIONS FROM**  
5 **THE END OF THE EXISTING U S WEST FACILITIES AT MILEPOST 21, TO**  
6 **THE ECO PARK LOCATION AT MILEPOST 24 ON SR 504?**

7 A. No, I assume that utilization of the existing National Forest Service fiber optic system  
8 would be much less costly and provide approximately the same quality of service.  
9 This assumption is based on the fact that the Forest Service has been proven reliable  
10 and cost effective in providing service to other locations beyond mile marker 21 on  
11 SR504. However, my estimate is the lowest cost that anyone would incur to extend  
12 copper cable facilities to Eco Park.

13 **Q. HAVE YOU FAMILIARIZED YOURSELF WITH THE PHYSICAL LAYOUT**  
14 **OF THE ECO PARK LOCATION?**

15 A. Yes.

16 **Q. HOW AND WHEN DID YOU DO THIS?**

17 A. I drove through the parking lot located at mile marker 24 on SR504 on 05/23/2000.

18 **Q. IS ECO PARK OR THE PROPERTY IN ITS IMMEDIATE VICINITY**

1           **CURRENTLY UNSERVED BY A TELECOMMUNICATIONS COMMON**  
2           **CARRIER?**

3   A.    No.

4   **Q.    TO YOUR KNOWLEDGE, WHAT TELECOMMUNICATIONS SERVICES**  
5           **ARE CURRENTLY AVAILABLE TO ECO PARK AND THE PROPERTY IN**  
6           **ITS IMMEDIATE VICINITY?**

7   A.    U S WEST service via privately owned radio phone.

8           Verizon wireless service.

9   **Q.    HOW DO YOU KNOW THIS?**

10   A.    Physical inspection of the radio phone transmitter at the Sediment Retention Dam

11           location and reports that the radio phone system exists.

12           I used my Verizon wireless phone at the Eco Park location.

13   **Q.    WHAT TYPE OF RADIO SYSTEM DOES THE PETITIONER USE TO**  
14           **CONNECT TO U S WEST'S SYSTEM?**

15   A.    It appears to be an FM radiotelephone system.

16

17   **Q.    HAVE YOU REVIEWED THE DOCUMENT ATTACHED TO THE**  
18           **FEBRUARY 4, 2000 COMMENTS FILED BY THE PETITIONER,**  
19           **ENTITLED EXHIBIT E?**

20   A.    Yes, I have reviewed a document titled "History of Radio Phone Service at Eco Park

1 Resort, February 2000”.

2 **Q. IS THE DESCRIPTION IN EXHIBIT E CONSISTENT WITH THE RESULTS**  
3 **OF YOUR EXAMINATION OF THE RADIO SYSTEM?**

4 A. Yes. The system described in Exhibit E is consistent with the transmitter I observed  
5 at the Sediment Retention Dam location.

6 **Q. ARE YOU AWARE THAT THE PETITIONER HAS CLAIMED IN ITS**  
7 **FEBRUARY 4, 2000 COMMENTS THAT THE RADIO TRANSMITTER**  
8 **COMMUNICATIONS DO NOT PROVIDE ADEQUATE SERVICE TO**  
9 **“ADVANCED TELECOMMUNICATIONS AND INFORMATION**  
10 **SERVICES” IN THAT COMMUNICATION IS ALLEGEDLY OFTEN**  
11 **INTERRUPTED AND INAUDIBLE, AND FACSIMILE TRANSMISSIONS,**  
12 **INTERNET ACCESS AND ELECTRONIC MAIL COMMUNICATIONS ARE**  
13 **NOT AVAILABLE?**

14 A. Yes.

15  
16 **Q. DO YOU HAVE AN OPINION ON THE CAUSE OF THESE ALLEGED**  
17 **PROBLEMS?**

18  
19 A. Yes.

20  
21 **Q. PLEASE STATE THAT OPINION.**

22  
23 A. From my experience with other users of similar systems, the performance of the  
24 radiotelephone described by the Petitioner is consistent with experiences related to me

1 by other users of similar, low cost systems. My understanding of these systems is that  
2 they are intended for voice grade transmission only and not for more sophisticated  
3 data or fax transmission. However, since U S WEST does not deploy this type of FM  
4 radio transmitter, I do not have direct experience with this system.

5 **Q. DO YOU HAVE AN OPINION ON WHETHER THE TYPE OF RADIO**  
6 **SELECTED AND INSTALLED BY THE PETITIONER FOR ITS LINKAGE**  
7 **TO U S WEST'S COPPER CABLE FACILITIES IS RESPONSIBLE FOR**  
8 **THE ALLEGED DIFFICULTIES?**

9 A. Yes.

10 **Q. PLEASE STATE YOUR OPINION.**

11 A. My opinion is that the "Optiphone 2000" purchased and installed by the Petitioner is  
12 the direct cause of the problems described by the Petitioner in its comments. To my  
13 knowledge, U S WEST has had no complaints from customers in the near vicinity of  
14 the Petitioner's transmitter location regarding difficulty obtaining "advanced  
15 telecommunications and information services."  
16

17 **Q. WOULD ANY SUCH COMPLAINTS, IF THEY HAD BEEN MADE,**  
18 **NORMALLY COME TO YOUR ATTENTION BECAUSE OF THE NATURE**  
19 **OF YOUR RESPONSIBILITIES IN THE COMPANY?**

20 A. Yes.

21 **Q. IS THERE ANOTHER TYPE OF RADIO THAT IS USED IN**  
22  
23

1           **TELECOMMUNICATIONS BY U S WEST FOR SERVICE IN REMOTE**  
2           **AREAS THAT, HAD IT BEEN CHOSEN BY THE PETITIONER, WOULD**  
3           **ALLOW UNINTERRUPTED AND AUDIBLE COMMUNICATIONS,**  
4           **FACSIMILE TRANSMISSION, HIGH SPEED INTERNET ACCESS WITHIN**  
5           **THE LIMIT OF THE COPPER CABLE TO WHICH IT WAS CONNECTED**  
6           **AND ELECTRONIC MAIL COMMUNICATIONS?**

7    A.     Yes, U S WEST has deployed a fixed wireless loop extension digital microwave radio  
8           system made by Cylink in other areas of the country where it is not cost effective to  
9           place wireline facilities to serve customers within the company's exchange  
10          boundaries. This system is capable of transmission of data rates up to 1.544 Mb/s,  
11          has a range of 25 miles and is extremely reliable.

12   **Q.     IS THAT TYPE OF RADIO SYSTEM AVAILABLE ON THE OPEN**  
13          **MARKET TO A POTENTIAL PURCHASER SUCH AS THE PETITIONER**  
14          **IN THIS CASE?**

15   A.     Yes, based on recent research, I believe a company called P-Com now owns the  
16          Cylink system and offers a wide range of configurations to the general public.

17   **Q.     IS THE PHYSICAL LAYOUT OF THE PETITIONER'S DESIRED**  
18          **RECEPTION LOCATION AT MILEPOST 24 ON SR 504 AND THE**  
19          **TRANSMITTER LOCATION AT THE SEDIMENT RETENTION DAM**  
20          **SUITABLE FOR THIS MICROWAVE TYPE OF RADIO SYSTEM?**



1 A. Yes, based on the available information, this system is capable of providing the  
2 desired type and quality of service.

3 **Q. HOW MANY LOOPS DOES THIS PRODUCT SUPPORT?**

4  
5 A. Fifteen per module.

6  
7 **Q. CAN THIS PRODUCT SUPPORT VOICE, HIGH SPEED DATA, INTERNET**

8 **ACCESS AND FACSIMILE TRANSMISSIONS WITHIN THE LIMITS OF**

9 **THE COPPER CABLE TO WHICH IT IS CONNECTED LEADING TO THE**

10 **CENTRAL OFFICE?**

11 A. Yes.

12 **Q. HAVE YOU INVESTIGATED WHETHER CELLULAR**

13 **TELECOMMUNICATIONS SERVICE IS AVAILABLE AT THE ECO PARK**

14 **LOCATION?**

15 A. Yes.

16 **Q. HOW AND WHEN DID YOU DO THIS?**

17 A. On 05/23/2000 I drove to the Eco Park location and carried on a conversation on my  
18 Verizon wireless phone for approximately 10 minutes.

19 **Q. WHAT WAS THE RESULT OF YOUR INVESTIGATION?**

20 A. The wireless service works well.

1 **Q. ARE YOU AWARE OF WHETHER ECO PARK HAS ALLEGED THAT IT**  
2 **ACTUALLY USES U S CELLULAR SERVICE?**

3 A. Yes, I am aware that it has alleged this.

4 **Q. IS DATA TRANSMISSION AVAILABLE OVER VERIZON CELLULAR**  
5 **SERVICE?**

6 A. Yes.

7 **Q. BASED ON YOUR INVESTIGATION, AND PUTTING ASIDE THE**  
8 **EXISTING RADIO LINK BETWEEN ECO PARK AND U S WEST'S**  
9 **COPPER CABLE AT MILEPOST 21 ON SR 504, IS U S WEST THE**  
10 **COMMON CARRIER THAT IS BEST ABLE TO PROVIDE**  
11 **TELECOMMUNICATIONS SERVICE TO THE ECO PARK LOCATION?**

12 A. No.

13 **Q. WHY NOT?**

14 A. Verizon and US Cellular service are already available at the Eco Park location  
15 without any need for construction.

16 **Q. ARE YOU AWARE OF WHETHER OR NOT U S WEST EMPLOYEES**  
17 **PERFORM TASKS AT THE COLDWATER RIDGE, JOHNSTON RIDGE,**  
18 **WEYERHAEUSER LEARNING CENTER AND HOFFSTADT BLUFFS**

1 **VISITOR CENTER?**

2 A. Yes.

3 **Q. WHAT ARE THOSE TASKS?**

4 A. Maintenance of U S WEST coinless pay phones.

5 **Q. ARE THOSE TASKS THE PROVISION OF REGULATED LOCAL**  
6 **EXCHANGE TELECOMMUNICATIONS SERVICE?**

7 A. No.

8 **Q. IN THE COURSE OF YOUR INVESTIGATION, DID YOU LOOK FOR ANY**  
9 **RETAIL COMMERCIAL ACTIVITY AT THE ECO PARK LOCATION AND**  
10 **ITS IMMEDIATE VICINITY?**

11 A. Yes.

12 **Q. DID YOU FIND ANY?**

13 A. There appears to be a gift shop and a restaurant as well as the Mt. St. Helens Tours  
14 business.

15 **Q. IF U S WEST WERE ORDERED TO PROVIDE SERVICE TO MT. ST.**  
16 **HELENS TOURS, INC. BY EXTENDING FACILITIES TO THE ECO PARK**  
17 **LOCATION, AND IF U S WEST WERE SOMEHOW PERMITTED TO**  
18 **PERFORM THIS EXTENSION BY USING THE EXISTING FIBER OPTIC**

**1            FACILITIES THAT RUN IN THE CONDUIT SYSTEM ALONG SR 504,**  
**2            WHAT TASKS WOULD NEED TO BE ACCOMPLISHED AND HOW MUCH**  
**3            WOULD THIS EXTENSION COST?**

**4** A.    In order for U S WEST to make use of the existing federally owned fiber optic cable,  
**5**        we would have to install a Central Office Terminal in the Castle Rock Central Office.  
**6**        This equipment will convert the DS0 service from the switch to DS1 service for  
**7**        transport. U S WEST would also need to install a fiber optic multiplexer in the  
**8**        National Forest Service Hut at mile marker 21. This equipment would convert the  
**9**        electrical DS1 service transported from the Castle Rock Central Office along the  
**10**       existing U S WEST copper facilities, to optical DS1 service for transport along the  
**11**       existing National Forest Service fiber cable. At the Eco Park location at mile marker  
**12**       24, U S WEST would need to install another fiber optic multiplexer and a Remote  
**13**       Terminal. This equipment would convert the optical DS1 service to an electrical DS1  
**14**       service and the DS1 service to DS0 service which will be handed off to the end user.  
**15**       U S WEST would also require commercial power at the fiber hut at the 21 mile  
**16**       marker location and the Eco Park location, approximately 2 bays of equipment space  
**17**       in the fiber hut, a 10' x 15' private easement at the Eco Park location and  
**18**       uninterrupted use of four fibers from the fiber hut to the Eco Park location. The cost  
**19**       for this work would be approximately \$200,000 - \$250,000. Alternatively, if a new  
**20**       “node” were established at Eco Park, equipment would have to be used that U S

1 WEST does not now use for its own operations. I have no information on the cost to  
2 accomplish this type of installation. For the reasons stated in Mr. Gallagher's  
3 testimony, U S WEST would never willingly undertake this type of installation.

4 **Q. IF U S WEST SOMEHOW WERE ALLOWED TO USE THE EXISTING**  
5 **FIBER OPTIC FACILITIES TO EXTEND SERVICE TO THE ECO PARK**  
6 **LOCATION AS YOU HAVE DESCRIBED, WHAT IMPLICATION WOULD**  
7 **THERE BE FOR THE USE BY THE EXISTING USERS OF THOSE FIBER**  
8 **OPTIC FACILITIES?**

9 A. Four of the existing fibers between the National Forest Service Hut at mile marker 21  
10 and the Eco Park location at mile marker 24 would be unavailable for use by any  
11 other entity, other than U S WEST. That would mean that U S WEST would have to  
12 arrange to hand off the traffic that is now carried by the fiber optic system to the  
13 Forest Service, at a relocated Forest Service terminal at the Eco Park location. At a  
14 minimum there would be substantial disruption of service to existing users while the  
15 rearrangement was being accomplished.

16 **Q. DOES THIS CONCLUDE YOUR RESPONSE TESTIMONY?**

17 A. Yes.