

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**IN THE MATTER OF CONTINUED  
COSTING AND PRICING OF  
UNBUNDLED NETWORK ELEMENTS,  
TRANSPORT, TERMINATION, AND  
RESALE**

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“ **DOCKET NO. UT-003013**  
“ **Part B**  
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**PART B**  
**SUPPLEMENTAL RESPONSIVE TESTIMONY OF**  
**RON STANKER**  
**OF**  
**AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC.**

**FEBRUARY 7, 2001**

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**Q. WHAT IS YOUR BUSINESS AND PROFESSIONAL BACKGROUND?**

A. I am a senior technical analyst employed by AT&T. I have substantial experience in central office provisioning issues. A full description of my experience and expertise is attached as Exhibit RGS-1.

**Q. WHAT IS THE PURPOSE OF YOUR RESPONSIVE TESTIMONY?**

A. The purpose of my testimony is to address Qwest’s requirement that new entrants use an Interconnection Distribution Frame (“ICDF”) for line splitting. I address the pricing consequences of Qwest’s requirement as well as the necessity of those rate elements. In addition, I address the potential points of failure and maintenance problems introduced by Qwest’s requirement for use of an ICDF. In doing so, I respond to the testimony of Qwest witness, Mr. Hooks.

**Q. HOW IS YOUR TESTIMONY ORGANIZED?**

A. My testimony is organized into two sections. In section one, I address the inappropriate inclusion of the ICDF and the consequences for pricing. In section two, I address specific provisioning and maintenance issues. In addition, my testimony contains two exhibits which show Qwest’s architecture (RGS-2) and AT&T’s proposed architecture (RGS-3)

**I. The ICDF**

1 **Q. IS THE INTERCONNECTION DISTRIBUTION FRAME A**  
2 **COMPONENT OF NETWORK ARCHITECTURE REQUIRED TO**  
3 **ACCESS THE HIGH FREQUENCY SPECTRUM (“HFS”) IN LINE**  
4 **SPLITTING?**

5 A. No. The ICDF is not necessary for the provision of a common splitter bay as  
6 described by Qwest. The network architecture proposed by Qwest is attached to  
7 my testimony as Exhibit RGS-2.

8

9 **Q. DOES AN ICDF INTRODUCE ADDITIONAL, UNNECESSARY, AND**  
10 **COSTLY ELEMENTS INTO A CIRCUIT?**

11 A. Yes. The ICDF introduces additional cable, connecting blocks and cross connects  
12 that result in additional potential points of failure in the circuit. Also, additional  
13 costs are incurred because of the time and labor involved in creating and using the  
14 ICDF.

15 **B.**

16 **Q. DO THE ELEMENTS ASSOCIATED WITH THE ICDF REQUIRE MORE**  
17 **TIME TO DESIGN, INSTALL AND TEST THAN IF THE ICDF WAS NOT**  
18 **REQUIRED?**

19 A. Yes. The Qwest design inclusive of an ICDF requires an additional connecting  
20 block plus installation labor and one additional cross connect per connection up to  
21 100 possible cross connects and one additional cable. Provisioning each of these  
22 unnecessary elements is strictly a manual process and requires substantial time to  
23 accomplish.

1 **Q. HOW COULD THESE UNECESSARY MATERIALS AND LABOR BE**  
2 **AVOIDED?**

3 A. If Qwest were to design and install the common splitter bay to the Main  
4 Distribution Frame (“MDF”), these additional elements would not be required,  
5 avoiding the costs associated with Qwest’s requirement for use of an ICDF.

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7 **Q. PLEASE SUMMARIZE THE DIFFERENCE BETWEEN QWEST’S**  
8 **DESIGN USING THE ICDF AND AT&T’S PROPOSAL?**

9 A. Table 1 below summarizes the difference.

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<b>Table 1</b>			
<b>Elements</b>	<b>Qwest</b>	<b>AT&amp;T</b>	<b>Difference</b>
Cable	6	5	1
Connecting Blocks	6	5	1
Cross Connects	4	3	1

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13 **Q. IS AT&T’S RECOMMENDATION TECHNICALLY FEASIBLE?**

14 A. Yes, it is. In fact, the majority of ILECs use only an MDF and do not use an  
15 ICDF on a normal basis.

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**II. The ICDF Will Cause Provisioning and Maintenance Problems**

**Q. DO THE ELEMENTS ASSOCIATED WITH THE ICDF INTRODUCE POTENTIAL POINTS OF FAILURE IN THE NETWORK?**

A. Yes. Each Termination block introduces the following four additional points of failure:

- The cross connection to the facility side of the element
- The element itself, i.e. connecting block
- The connection to the equipment side of the element
- The additional cable

An ICDF also introduces the potential for failure in the form of the “people factor”, that is, technicians working in and around a frame can and do inadvertently cause outages. By adding an ICDF to the network architecture, Qwest multiplies this “people factor” by two.

**Q. IS THERE SIGNIFICANT LABOR ASSOCIATED WITH THE ICDF?**

A. Certainly. The more equipment that is introduced, the more time will be required to provision and maintain the circuit, most of which is manual. Additional labor results in additional costs to the CLEC.

1 **Q. PLEASE SUMMARIZE PROBLEMS THAT ARE LIKELY TO OCCUR**  
2 **AS A RESULT OF THE USE OF AN ICDF.**

3 A. Problems that are likely to occur include but are not limited to:

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5 • The introduction of an ICDF will cause about four hours of additional time  
6 to install. Additional time is needed by the Qwest provisioning center to  
7 design, check and validate all the connections in the circuit and to do a  
8 final test. If there is a problem, at that time, Qwest will need to isolate the  
9 trouble. The ICDF and associated blocks, terminations and cross connects  
10 also add complication to the circuit as well as introduce possible points of  
11 failure. Moreover, the unnecessary equipment that has to be checked and  
12 cleared.

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14 • A straight connection from the MDF to the common splitter bay is the  
15 most efficient way to provision, as it saves time and money. In addition,  
16 the simpler the architecture is, the more reliable and consistent its  
17 performance will be from the time of installation through the life of the  
18 circuit, including isolating and trouble shooting maintenance issues.

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20 • From a maintenance perspective, introducing an ICDF and associated  
21 blocks and cross connects serves no useful purpose but only adds to the  
22 number of points that have to be checked and cleared when a trouble is  
23 reported.

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**Q. ARE FRAME PROBLEMS GENERALLY EASY TO ISOLATE?**

A. No, they are often illusive in nature, by this I mean that they tend to disappear and appear without immediate resolution. They are often masked. For example:

- Frame problems can be attributed to improper terminations, shorts or grounds at the connecting block or broken wire within the insulation of the cross connect.
- If connections are not properly terminated, shorts, grounds and or oxidation can build up and create a condition or attenuate a signal to a point were the customer notices a degradation or loss of service. When such problems are reported, the technician will remotely or manually access the circuit. This puts out a slight charge on the circuit that often clears the trouble away. The technician will then report that there is no trouble - a “TOK”, “Test Okay, No trouble found”. The technician sees no trouble, the customer comes back on line and everyone is happy. But the problem will be back. In fact, many maintenance centers have dedicated groups of technicians at times to investeigate and remedy repetitive or chronic troubles, such as these.

**Q. DOES QWEST USE THE ICDF FOR ITS OWN SERVICES?**

A. Yes, Qwest has stated that it uses the ICDF for some of its services.

1 **Q. DOES QWEST HAVE THE ABILITY TO DECIDE FOR ITSELF, IF THE**  
2 **USE OF AN ICDF OR MDF IS THE BEST SOLUTION FOR A CENTRAL**  
3 **OFFICE LAYOUT FOR THEIRITS OWN SERVICES?**

4 A. Yes, Qwest infers that not all of its services use an ICDF. Qwest can and does  
5 provision to a MDF without using an ICDF.

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7 **Q. DOES QWEST LIMIT THE CHOICES AVAILABLE TO AT&T OR**  
8 **OTHER CLECS BY ONLY ALLOWING CONNECTION TO A COMMON**  
9 **SPLITTER BAY THROUGH AN ICDF?**

10 A. Yes, Qwest requires AT&T and other CLECs to use the common splitter bay if  
11 the CLEC connects to an ICDF.

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13 **Q. DOES THIS CONSTITUTE A POTENTIALLY DISCRIMINATORY OR**  
14 **ANTI-COMPETITIVE PRACTICE?**

15 A. Yes it does. As I explained above, the use of an ICDF will always add additional  
16 physical elements into the circuit and will cause CLEC additional unnecessary  
17 cost. Further, it introduces additional points of failure. On the other hand, Qwest  
18 can choose to avoid these pitfalls for its own services.

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20 **Q. WHAT SHOULD THE APPROPRIATE NETWORK CONFIGURATION**  
21 **FOR LINE SPLITTING BE?**

22 A. The configuration for connecting to the collocation space or splitter equipment  
23 should be to connect directly to the MDF. As I have already explained, the



1 introduction of an ICDF adds costs and time on a provisioning and maintenance  
2 basis. The ICDF is only an appropriate option when the MDF is at capacity.

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### III. Summary

5 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

6 A. Yes. In summary, an ICDF is not technically necessary for line splitting. The  
7 introduction of an ICDF adds additional, unnecessary points of failure to line  
8 splitting by introducing additional cable, termination/connecting blocks and cross  
9 connects to the circuit. Moreover, additional and unnecessary costs are imposed  
10 by Qwest on CLECs for line splitting as a result of the time and labor needed to  
11 install, provision and trouble shoot the circuit. These additional points of failure  
12 and costs diminish a CLEC's ability to compete with Qwest since Qwest does not  
13 need to use an ICDF for its own services.

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15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A. Yes.

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