

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**IN THE MATTER OF THE INVESTIGATION)
INTO QWEST CORPORATION'S)
COMPLIANCE WITH §271(C) OF THE) DOCKET NO. UT-003022
TELECOMMUNICATIONS ACT OF 1996.)**

SUPPLEMENTAL TESTIMONY OF

MARGARET S. BUMGARNER

FOR

QWEST CORPORATION

RE: CHECKLIST ITEM NO. 1 – COLLOCATION FORECASTS

MAY 16, 2001

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1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

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

4 A. My name is Margaret S. Bumgarner. I am employed by Qwest Corporation as a
5 Director in the Policy and Law organization. My business address is Room 2803,
6 1600 7th Avenue, Seattle, Washington, 98191.

7 **Q. DID YOU FILE TESTIMONY IN THIS MATTER?**

8 A. Yes, I did. I adopted direct testimony filed by Thomas R. Freeberg and filed
9 rebuttal testimony regarding checklist item 1 – Collocation.

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

11 A. The purpose of this supplemental testimony is to address issues surrounding
12 forecasting by CLECs for collocation space and associated requirements.
13 Specifically, I will review the SGAT language that permits CLECs to submit to
14 Qwest forecasts of their individual collocation needs, the frequency of the
15 forecasts, and how such forecasts are used by Qwest. In addition, I will address
16 why the absence of such forecasts can result in longer intervals for the
17 provisioning of collocation by Qwest.

18

1 **II. EXECUTIVE SUMMARY**

2 **Q. PLEASE SUMMARIZE YOUR SUPPLEMENTAL TESTIMONY.**

3 A. Collocation forecasting, as described in this supplemental affidavit, gives Qwest a
4 comprehensive picture of CLECs' future collocation needs. This allows Qwest to
5 plan for the necessary resources to meet its commitments for completing
6 collocation installations in a timely manner. To date, the volume of collocation
7 applications has varied dramatically from month to month. Qwest will use the
8 forecasts to plan for the resources necessary for: 1) engineering and related
9 personnel to process the applications, and design and engineer the collocation
10 request; 2) Qwest and vendor-provided installation personnel to provision the
11 collocations; and, 3) warehousing of cabling and other common hardware for
12 provisioning collocations. Forecasting allows Qwest to be prepared for CLECs
13 future ordering of collocation, and for meeting Qwest's commitments.

14 **III. CHECKLIST ITEM 1 – COLLOCATION FORECASTING**

15 **Q. WHAT ARE THE FORECASTING REQUIREMENTS THAT ARE INCLUDED IN**
16 **THE SGAT?**

17 A. The SGAT requires a CLEC to submit, on a quarterly basis, a forecast of its
18 collocation requirements for the upcoming year. The forecast includes, for each
19 premise in which collocation will be required: the amount of floor space, power,
20 heat dissipation (for air conditioning), the type of collocation (virtual, physical, etc.),
21 the type of entrance facility, the type and quantity of terminations, and the time

1 frame the CLEC plans to submit an Application (order) for collocation at the Qwest
2 premise.

3 Agreement has been reached on the forecast requirements contained in the SGAT
4 in the previous state workshops regarding Collocation, including the Washington
5 Collocation workshop. The specific SGAT language on forecasting is contained in
6 Section 8.4.1.4 of the SGAT:

7 8.4.1.4 CLEC shall submit an annual forecast, updated at the end
8 of each quarter, of its future Collocation requirements. The quarterly
9 forecast shall be reviewed by CLEC and the Qwest Account team. The
10 CLEC forecast shall be considered accurate for purposes of Collocation
11 intervals if the subsequent Collocation Application correctly identifies a) and
12 e) below, and b) and c) below are within twenty (20) percent of the forecast.
13 If at the time the Application is made the forecasted type of Collocation is
14 not available, the CLEC may specify a different type of Collocation without
15 affecting the Collocation intervals. The forecast shall include, for each
16 Qwest premises, the following:

- 17 a) Identification of the Qwest Premises;
- 18 b) Floor space requirements, including the number of bays for a
19 cageless Collocation arrangement;
- 20 c) Power requirements;
- 21 d) Heat Dissipation (optional);
- 22 e) Type of Collocation (e.g., caged physical, cageless physical,
23 shared, ICDF, virtual, etc.);
- 24 f) Intentionally Left Blank
- 25 g) Entrance Facility Type (e.g., Express Fiber, Private Line);
- 26 h) Type and Quantity of Terminations (optional); and
- 27 i) Month or Quarter during or after which CLEC expects to submit its
28 Collocation Application;

1 j) Intentionally Left Blank

2 8.4.1.4.1 The following terms shall apply to the forecasting process:

3 a) CLEC forecasts shall be provided as detailed in Section
4 8.4.1.4;

5 b) CLEC forecasts shall be confidential information and Qwest
6 may not distribute, disclose or reveal, in any form, CLEC forecasts
7 other than as allowed and described in subsections “c” and “d”
8 below.

9 c) Qwest may disclose, on a need to know basis only, CLEC
10 forecasts, to Qwest network and growth planning personnel
11 responsible for ensuring that Qwest’s local network can meet
12 wholesale customer demand. In no case shall the Qwest network
13 and growth planning personnel that have access to CLEC forecasts
14 be involved in or responsible for Qwest’s retail marketing, sales or
15 strategic planning. Qwest will inform all network and planning
16 personnel with access to CLEC forecasts of the confidential nature
17 of such forecasts, and Qwest will have such personnel sign non-
18 disclosure agreements related thereto. The non-disclosure
19 agreements shall inform such personnel that, upon threat of
20 termination, they may not reveal or discuss CLEC forecasts with
21 those not authorized to receive such information.

22 d) Qwest shall maintain CLEC forecasts in secure files and
23 locations such that access to the forecasts is limited to the
24 personnel designated in subsection “c)” above and such that no
25 other personnel have computer access to such information.

26 **Q. WHY DOES QWEST REQUIRE COLLOCATION FORECASTS?**

27 A. On August 10, 2000, the FCC issued an Order on Reconsideration¹ (“Order”)
28 establishing a national 90 day default physical collocation provisioning interval.
29 This Order required Qwest, under ordinary circumstances, to complete all aspects
30 of collocation in 90 days instead of the 155 days that had been included in

¹ See Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, (FCC 00-297), released August 10, 2000, (“Order on Reconsideration”).

1 Qwest's standard SGAT arrangement. The August 10, 2000 Order also required
2 Qwest and other incumbent LECs to amend their SGATs to reflect the new
3 national standard. The Order also states that "[a]n incumbent LEC also may
4 require a competitive LEC to forecast its physical collocation demands."²

5 On November 7, 2000, in response to waiver requests filed by Qwest, Verizon,
6 and SBC, the FCC released an Amended Order,³ which clarified its earlier
7 decision, and specifically established interim standards that apply during the
8 pendency of the FCC's ongoing reconsideration of its August 10, 2000 Order. The
9 FCC's interim standards for Qwest include forecasts as a precondition for the 90
10 day interval. The FCC's interim standards for Qwest also permit longer intervals
11 (150 days) for unforecasted collocation applications not requiring major
12 infrastructure modifications, and even longer intervals for unforecasted collocation
13 applications that require Qwest to perform major infrastructure modifications such
14 as adding DC Power, Standby Power Generators, and/or HVAC to the requested
15 premises.⁴ These intervals were specifically authorized by the FCC in its
16 Amended Order.

17 The FCC's Amended Order stated that: "Qwest's proposed reliance on forecasts
18 [constitutes a] reasonable . . . interim measure to the extent it permits a 60-day
19 increase in interval length when the carrier requesting collocation has failed to

² Order on Reconsideration at ¶139.

³ See Memorandum Opinion and Order, in CC Docket No. 98-147, In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability, released November 7, 2000, ("Amended Order")

1 provide a timely and accurate forecast. We therefore will allow Qwest to increase
2 the provisioning interval for a proposed physical collocation arrangement no more
3 than 60 calendar days in the event a competitive LEC fails to timely and accurately
4 forecast the arrangement.”⁵

5 This forecasting requirement is reasonable and appropriate because it may be
6 practically, if not physically, impossible to timely provision a collocation
7 arrangement without the forecast. In workshops throughout Qwest’s region, most
8 CLECs have supported the concept of providing collocation forecasts to Qwest.⁶
9 These CLECs recognize that "forecasts are very important for any kind of
10 application like this. One CLEC specifically agreed that it would not object to
11 providing collocation forecasts to Qwest in exchange for the 90 day provisioning
12 interval.”⁷

13 Forecasts are critical because collocation is not a simple request. As of the end of
14 December 2000, for a twenty-four month period, Qwest provisioned a total of
15 4,387 collocation applications in 495 central offices in its region. Qwest received
16 an average of 320.8 collocation applications per month, with an average of over 15
17 applications per business day for year 2000. In the Washington, for the same

4 Amended Order at ¶¶13-20.

5 Amended Order at ¶19.

6 Six State Collaborative Workshops, Salt Lake City, Utah, Workshop 1, October 6, 2000,
Tr. pages 83-84.

7 Six State Collaborative Workshop, Salt Lake City, Utah, Workshop 1, October 4, 2000, Tr. pages
86-87: Mr. Steese: And McLeod would have no objection to submitting collocation forecasts on a
routine basis to get those shortened time frames? Mr. Jennings: We'd have no objection to that.
Mr. Steese: McLeod would be willing to provide forecasts to Qwest to get the shortened intervals?
Mr. Jennings: Yes.

1 period of time, Qwest provisioned a total of 962 collocation applications in 68
2 central offices. Qwest received an average of 47 collocation applications per
3 month, with an average of 2 applications per business day for year 2000. The
4 number of collocation applications received also varies substantially from month to
5 month. In the year 2000, the volume of collocation applications received in
6 Washington varied from 14 to 116 received in a month, and region-wide from 102
7 to 802 received in a month. These volumes require Qwest to spend substantial
8 efforts planning and coordinating its efforts to provide timely collocation feasibility
9 studies, quotes and installations. Forecasts are central to these efforts. Exhibit
10 MSB-37 provides the volumes of collocation applications received by Qwest for
11 Washington and region-wide.

12 One of the reasons that Qwest is so adamant about the use of collocation
13 forecasts is because, in some instances, Qwest must complete major structural
14 changes in order to provision the requested collocation. For example, Qwest may
15 have to add, among other things, (a) DC Power Plants, (b) AC Standby
16 Generators, (c) heating, ventilation or air conditioning (HVAC) when Qwest is
17 converting administrative space into additional space for equipment, or (d) when
18 Qwest must remove its own obsolete and unused equipment from the premises.
19 These tasks take longer than 150 days to complete. For example, parties have

1 already acknowledged that it takes approximately 180 days to install an additional
2 power plant in a central office.⁸

3 **Q. HOW DOES QWEST USE COLLOCATION FORECASTS?**

4 A. Qwest has not generally received collocation forecasts from CLECs.
5 Unfortunately, as a result, Qwest does not have any significant experience in using
6 CLEC collocation forecasts.

7 However, given the FCC's recent Order and Amended Order that implemented
8 new national rules for collocation intervals, and a specific waiver that permits
9 Qwest to establish forecasts as a precondition for the 90 day intervals, Qwest
10 expects that it should begin receiving forecasts from CLECs.

11 Qwest intends to use these forecasts for several purposes.

12 **Engineering** -- Qwest will use the forecast to estimate the number of engineers
13 and related personnel that must be available to process collocation applications,
14 including the completion of feasibility studies in the required 10 calendar days, and
15 the completion of quotations in 25 calendar days. Qwest's experience is that the
16 volume of collocation applications varies widely from week to week and is most
17 difficult to predict. This is illustrated in the attached Exhibit MSB-37 which shows

⁸ Six State Collaborative Workshop, Salt Lake City, Utah, Workshop 1, October 5, 2000, Tr. generally at pages 171-178; Colorado Workshop 2, September 20, 2000, Tr. page 95; Colorado Workshop 2, September 21, 2000, Tr. at pages 11 and 14.

1 the quantity of applications processed by Qwest in each month over the past
2 twenty-four month period for region-wide and the Washington.

3 Qwest expects that CLEC forecasts will allow Qwest to ensure it has sufficient
4 engineering personnel trained, and available, to process CLEC collocation
5 applications in a timely manner, as required by the FCC's rules.

6 **Installation Personnel** -- Qwest will use the forecast to estimate the number of
7 installation technicians and/or installation contractors and related personnel that
8 must be available to install the CLECs' collocation applications. This is particularly
9 critical, given the fact that Qwest must complete the installation of a CLEC's
10 arrangement within a very narrow 48 day period after the CLEC has reviewed the
11 quotation, decided to proceed with the collocation arrangement, and submitted the
12 50 percent down payment to Qwest.⁹

13 Qwest expects that CLEC forecasts will allow Qwest to ensure it has sufficient
14 installation technicians, or commitments for sufficient additional resources from
15 installation vendors, to install CLEC collocation arrangements in a timely manner,
16 as required by the FCC's rules.

17 **Cabling and Associated Hardware** – Qwest will also use the collocation
18 forecasts to ensure it has sufficient power cabling, tie cables, cable racking, and

⁹ The FCC's 90 day interval typically will result in a 10 day feasibility study, a 25 day period for developing the quotation, a seven day period for the CLEC to accept the quotation, leaving only 48 days for installation.

1 other common hardware required for a typical collocation installation available in
2 Qwest warehouses to avoid delays in installation. Qwest will also use the
3 collocation forecasts to ensure it has sufficient space for terminations on other
4 infrastructure equipment such as the COSMIC frames. The FCC's shorter
5 installation intervals, which require installations to be completed roughly 55 days
6 after engineering has been completed,¹⁰ simply do not provide sufficient time for
7 Qwest to order such cabling, frames, and other hardware from vendors. Instead,
8 Qwest will order such supplies based upon the forecasted volumes provided by
9 CLEC collocation forecasts.

10 **Q. WHY DOES QWEST REQUIRE COLLOCATION FORECASTS ON A**
11 **QUARTERLY BASIS?**

12 A. Qwest proposes that forecasts be updated on a quarterly basis to ensure the
13 accuracy of the forecasts. This allows the CLEC to reflect its most current plans in
14 a rapidly changing market.

15 **Q. DOES QWEST CONSTRUCT FACILITIES IN RESPONSE TO A COLLOCATION**
16 **FORECAST?**

17 A. Major infrastructure additions can include DC Power Plants, Standby AC
18 Generators, Reconditioning of Space, and upgrades to Heating, Ventilation, and
19 Air Conditioning (HVAC). Qwest will not automatically construct such additions
20 based exclusively upon CLEC forecasts. Instead, Qwest will use its best

¹⁰ Engineering is generally completed at the time the quotation is completed. The CLEC then has seven days to accept the quotation, and the installation interval is 48 days, or a total of 55 days.

1 judgement to evaluate the reliability of the totality of forecasts for a given premise
2 before proceeding with such construction. In addition, when the totality of
3 forecasts suggests the need for infrastructure improvements, Qwest may also
4 contact the CLECs to request the submission of Reservations or Applications to
5 provide the funding and commitment necessary to support the necessary
6 infrastructure additions.

7 **IV. CONCLUSION**

8 **Q. PLEASE SUMMARIZE YOUR SUPPLEMENTAL TESTIMONY REGARDING**
9 **CHECKLIST ITEM NO. 1 – COLLOCATION FORECASTING.**

10 A. Collocation forecasting, as described in this testimony gives Qwest a
11 comprehensive picture of CLECs' future collocation needs. This allows Qwest to
12 plan its resources – Qwest engineering and installation personnel; commitments
13 from vendors for installation technicians; warehousing of sufficient cabling and
14 other common hardware necessary for collocation installation; and, space
15 planning. Forecasting is essential for Qwest to be prepared for CLECs' future
16 ordering of collocation and meet its commitments.

17 **Q. DOES THAT CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

18 A. Yes it does.

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EXHIBITS

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MAY 16, 2001

INDEX OF EXHIBITS

DESCRIPTION

EXHIBIT

Qwest 14 State Region and Washington Collocation Applications Submitted

MSB-37