

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the)	
)	DOCKET NO. UT-003013
)	
Continued Costing and Pricing of Unbundled)	Part B
Elements, Transport, and Termination.)	

REBUTTAL TESTIMONY OF JING Y. ROTH

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

February 7, 2001

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

A. My name is Jing Y. Roth. I am employed by the Washington Utilities and Transportation Commission. My business address is P.O. Box 47250, Olympia, Washington 98504.

Q. IN WHAT CAPACITY ARE YOU EMPLOYED?

A. I am employed as a Regulatory Consultant in the Telecommunications section.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS CASE?

A. Yes. I previously filed responsive testimony on October 23, 2000 to provide Staff's review and analysis of cost studies and pricing proposals filed by Verizon and Qwest.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of this testimony is to review and analyze the revised costs of loop conditioning submitted by Verizon witness Larry Richter.

Q. WHAT REVISIONS HAS VERIZON MADE FOR THE LOOP CONDITIONING COST STUDY SUBMITTED IN MR. RICHTER'S TESTIMONY FILED ON DECEMBER 22, 2000?

A. According to Verizon, three revisions are made: column headings, the method of

calculating the percents of load pair in the network, and the method of calculating the percent of cable type for bridge tap removal. Ex. ____ (LR-1T) at 21 (Richter Phase B Direct, Dec. 22, 2000).

Q. DO THESE REVISIONS ADDRESS THE CONCERNS NOTED IN STAFF'S PREVIOUSLY SUBMITTED RESPONSIVE TESTIMONY?

A. No. Staff's major concern lies with the inflated time estimates for construction and engineering required for loop conditioning. In this new submission, Verizon has made no change to reflect Staff's concerns. Verizon's revisions increase and decrease the proposed costs and charges compared to its original filings. But as the table below shows, both the original and the new costs and charges are still much higher than the Commission-approved Qwest rates.

Categories of charges	Verizon's original non-recurring cost study for loop conditioning (4-WA 10)	Verizon's revised non-recurring cost study for loop conditioning (p. 6)	Qwest's Charges (Qwest tariff WN U-42, section 3, original sheet 10)
<i>Bridge Tap removal (One Occurrence)</i>	\$**	\$**	\$147.37
<i>Load Coil Removal</i>	\$**	\$**	\$304.12 (25 Pairs)
<i>Bridge Tap (one) and Load Coil</i>	\$**	\$**	\$304.12

Q. WHAT IS STAFF'S RECOMMENDATION?

A. Staff recommends that the Commission require Verizon to recalculate its costs and charges based on the time estimates for loop conditioning as ordered by the Commission for Qwest. (Cite). There is no solid basis for Verizon's high estimates of this type of costs, and it would be inappropriate to treat Verizon differently from Qwest on this issue.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.