BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE REVIEW OF	)	
UNBUNDLED LOOP AND SWITCHING	)	
RATES; THE DEAVERAGED ZONE	)	DOCKET NO. UT-023003
STRUCTURE; AND UNBUNDLED NETWORK	)	
ELEMENTS, TRANSPORT, AND	)	
TERMINATION	)	

SUPPLEMENTAL DIRECT TESTIMONY

OF

RICHARD J. BUCKLEY

ON BEHALF OF

QWEST CORPORATION

AUGUST 22, 2003

1   **I.   INTRODUCTION**

2   **Q.   PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3   A.   My name is Richard J. "Dick" Buckley. I am employed by Qwest Corporation as a Director in

4   Policy and Law. My business address is 1801 California St. #2040, Denver, Colorado.

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

6   A.   The purpose of my testimony is to provide revised investment values as developed by

7   LoopMod Version 3 and provide corrections to my Direct Testimony dated June 26, 2003 and

8   Exhibit RJB-2.

9   **Q.   WHY ARE THESE REVISIONS NECESSARY?**

10 A.   Subsequent to the filing of Qwest's direct testimony on June 26, 2003, we discovered certain

11   errors in formulas and labeling in the ICM loop module (LoopMod3.xls). We also discovered

12   that the customer location data did not include one of the Washington wire centers. Correcting

13   the formula errors and adding the customer location data for the missing wire center results in

14   changes to the various loop investments and affects the cost results provided in Ms. Million's

15   Exhibit TKM-2. Because the updates affect the ICM results, Ms. Million is providing a CD

16   with the updated modules and results.

17

1 **Q. PLEASE PROVIDE A DESCRIPTION OF EACH OF THE FORMULA CHANGES.**

2 A. We have made four formula changes within LoopMod3. The first corrects the application of

3   structure sharing for feeder pullbox investments. This change is in cells Q95 – Q103 of the

4   Variables tab. The existing formula failed to apply the underground sharing percentage to the

5   pullbox investment. The second change corrects the calculation of the effective copper feeder

6   fill. This formula is in column EM of the Feeder tab. The existing formula used the pairs

7   demand after the application of the cable sizing factor. This would overstate the effective fill, but

8   would not affect the investment. The third formula change corrects the calculation of the DS1

9   channel unit investment in the Digital Loop Carrier (DLC) remote terminals. The existing

10   formula only counted the channel units located in maximum size remote terminals. This formula

11   is located in column DH of the Feeder tab.   The formula was modified to include the DS1

12   channel unit counts in both columns BU and BV in the Feeder tab, rather than only column BU.

13   The fourth change eliminated aerial strand from the structure investments for aerial fiber. This

14   formula is in column AT of the Feeder tab.

15   In addition to the changes to the formulas within LoopMod we have also corrected the aerial

16   copper cable inputs. The field inputs included a double counting of the cable support strand.

17   The corrected input values are shown in the electronic file "Exhibit RJB-2 Revised.doc." The

18   changes are in the tables on page 5 in Section 7 and page 9 in Section 12. The reduced costs

19   are shown in the column labeled "Aerial." The actual formulas, as originally filed and corrected,

20   are shown in Exhibit RJB-6.

1   **Q.**   **PLEASE PROVIDE A DESCRIPTION OF EACH OF THE LABEL CHANGES.**

2   A.   There are two locations within the Variables tab of LoopMod where labels were corrected.

3   The first is cell L215 in the Variables tab. That cell should read as "Weighted UG Placement

4   Costs," not "Weighted Buried Placement Costs." The second location is at rows 131 and 132.

5   The labels there should read as "Fiber Feeder Cable Costs" and "Weighted Fiber Feeder

6   Cable Costs."

7   **Q.**   **WHAT CHANGES WERE MADE TO THE CUSTOMER LOCATION DATA?**

8   A.   The Data tab in LoopMod contains clustered customer location information. The data derived

9   from the FCC model did not contain information for the Seattle Elliot wire center. Qwest has

10   updated that data set to include the Seattle Elliot cluster data provided by AT&T and

11   WorldCom in their filing of HM5.3. The line counts were modified to match the vintage of line

12   counts used in the original Qwest filing.

13   **Q.**   **WHAT IS THE IMPACT OF THESE CHANGES ON THE AVERAGE LOOP**

14   **INVESTMENT?**

15   A.   The LoopMod filed with my Direct Testimony on June 26, 2003 produced an average

16   unbundled loop investment of $911.34. These changes reduce that investment by $13.90, to

17   $897.44.

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

2 A.   Yes it does.