

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In The Matter Of The Continued Costing)
And Pricing For Interconnection,) **DOCKET NO. UT-003013**
Unbundled Elements, Transport And) **PART B**
Termination And Resale)

PHASE B SUPPLEMENTAL REBUTTAL TESTIMONY

OF

R. KIRK LEE

SENIOR MARKETING MANAGER

ON BEHALF OF

VERIZON NORTHWEST INC.

SUBJECT: UNE-P/LINE SPLITTING ARRANGEMENTS

FEBRUARY 28, 2001

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

2 A. My name is R. Kirk Lee. My business address is 600 Hidden Ridge, Irving, Texas 75038.

3

4 **Q. ARE YOU THE SAME R. KIRK LEE WHO PREVIOUSLY SUBMITTED**
5 **DIRECT, SUPPLEMENTAL DIRECT, RESPONSIVE DIRECT,**
6 **SUPPLEMENTAL RESPONSIVE, REBUTTAL AND 2ND SUPPLEMENTAL**
7 **DIRECT TESTIMONY ON BEHALF OF VERIZON NORTHWEST IN PART B**
8 **OF THIS PROCEEDING?**

9 A. Yes, I am.

10

11 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL**
12 **TESTIMONY?**

13 A. The purpose of my testimony is to respond to Line Splitting issues in the February 7,
14 2001 testimony of Commission Staff witness Jing Roth, Worldcom witness Roy Lathrop,
15 and AT&T witness Joseph Gillan.

16

17 **Q. MS. ROTH RECOMMENDS THAT THE ILECS PROVIDE CLECS ACCESS TO**
18 **LINE SPLITTING. (REF. ROTH AT PAGE 5 LINE 1-6) DO CLECS**
19 **CURRENTLY HAVE THE ABILITY TO ENGAGE IN LINE SPLITTING IN**
20 **WASHINGTON IN VERIZON TERRITORY?**

21 A. Yes. As noted in my 2nd Supplemental Direct Testimony dated January 8, 2001,
22 Competitive Local Exchange Carriers (“CLECs”) can currently provide line splitting

1 utilizing existing FCC defined UNEs -- that is, where the CLECs purchase the entire
2 xDSL-capable loop and provide their own splitters. This scenario is available today and
3 does not require system modifications by Verizon.
4

5 **Q. DESPITE THE LINE SPLITTING SCENARIO BEING AVAILABLE TODAY,**
6 **DOES VERIZON HAVE PLANS TO IMPLEMENT LINE SPLITTING**
7 **OPERATIONAL SUPPORT SYSTEMS (“OSS”) ENHANCEMENTS IN THE**
8 **STATE OF WASHINGTON?**

9 A. Yes.
10

11 **Q. HOW IS THE VERIZON LINE SPLITTING PRODUCT BEING DEFINED?**

12 A. The nationwide service description for Verizon's Line Splitting product is being
13 developed based on the New York Collaborative efforts, allowing for local jurisdictional
14 and OSS differences.¹ Verizon's commitment to implement a standardized line splitting
15 product throughout the Verizon footprint, including Washington, will be consistent with
16 the timeframe, terms, conditions and guidelines agreed upon in the New York
17 Collaborative. This policy was communicated in a letter sent to CLECs on February 14,
18 2001. Attached, as Exhibit RKL-11, is a copy of that letter as it appears on Verizon's
19 website.
20
21

¹Please refer to Revised Exhibit RKL-3 attached to my Part B Second Supplemental Direct

1 **Q. ON WHAT TIMELINE DOES VERIZON PLAN TO IMPLEMENT LINE**
2 **SPLITTING?**

3 A. Verizon plans to implement line splitting OSS enhancements in Washington consistent
4 with the schedule set forth in the New York Collaborative proceeding.² The New York
5 PSC adopted Verizon's proposed schedule to support full commercial availability of line
6 splitting no later than October 2001. Verizon also anticipates making Line Splitting
7 available in Washington in October 2001, coincident with the release and implementation
8 of version 5 of the Local Service Ordering Guide (“LSOG5”). Based on industry
9 standards, the LSOG defines how CLECs do business with Verizon through its OSS.
10 LSOG5 is already under development to cover updates unrelated to Line Splitting, and
11 Verizon intends to build on this effort to roll out its Line Splitting offering nationwide,
12 based on the results of the New York collaborative.

13
14 **Q. SHOULD A SEPARATE COLLABORATIVE EFFORT BE COMMENCED IN**
15 **WASHINGTON FOR LINE SPLITTING?**

16 A. No. Ms. Roth's suggestion that a separate collaborative for Washington be established is
17 unwarranted and would be duplicative of efforts already underway. Verizon is doing just
18 as the FCC has requested in its Order on Reconsideration³ - participating in an industry-
19 wide generic proceeding to address the complex technical issue of line splitting, namely

Testimony filed on January 8, 2001 for the most recent Line Splitting service description.

²NYPSC Case 00-C-0127, Order Granting Clarification, Granting Reconsideration in Part and Denying Reconsideration in Part, and Adopting Schedule. Issued and Effective January 29, 2001.

³FCC Order 01-26, Released and Adopted January 19, 2001, ¶21.

1 the New York Collaborative. Worldcom, AT&T, and other CLECs and Data LECs
2 (“DLECs”) are willing and active participants in that proceeding, and certainly recognize
3 the benefits of the collaborative process. To replicate this process in Washington from
4 scratch would not be an efficient use of the parties’ or the Commission’s resources. The
5 Commission should not ignore the progress already made in the New York Collaborative
6 proceeding, and should permit Verizon to use the results of the New York Collaborative
7 as a starting point in developing a uniform nationwide service description and the
8 associated terms and conditions for line splitting. As I recommended in previous
9 testimony, the Commission should defer any decisions on costing and pricing until these
10 product descriptions are finalized and costs can be identified and quantified. Verizon
11 witness Larry Richter addresses in his Part B Supplemental Rebuttal Testimony the
12 requirements necessary for completing this cost study. In the interim, the Commission
13 should adopt rates based on the cost study Verizon previously filed.

14
15 **Q. SHOULD VERIZON BE REQUIRED TO OWN SPLITTERS IN A LINE**
16 **SPLITTING ARRANGEMENT?**

17 A. No. The Commission has already addressed this issue relative to Line Sharing in its 13th
18 Supplemental Order in Part A of this proceeding. In that order, the Commission
19 concluded that Verizon is not required to own splitters in a Line Sharing arrangement⁴, a
20 situation where Verizon is still using the line to provide voice service. There is no valid

⁴13th Supplemental Order in UT-003013, January 31, 2001, ¶196.

1 reason that this policy should vary for Line Splitting arrangements, where Verizon is not
2 using the line at all.

3
4 **Q. MR. LATHROP RECOMMENDS THAT OPERATIONAL READINESS**
5 **TESTING BE CONDUCTED TO ENSURE THAT VERIZON’S OSS WILL**
6 **OPERATE IN A NONDISCRIMINATORY FASHION IN COMMERCIAL**
7 **MARKET CONDITIONS (PG. 7). SHOULD THE COMMISSION ADOPT THIS**
8 **RECOMMENDATION?**

9 A. No. Mr. Lathrop is suggesting that the Commission address an issue that was not
10 previously identified for resolution in this proceeding. Even if this were an appropriate
11 issue within the scope of this proceeding, the "OSS testing" to which Mr. Lathrop appears
12 to be referring has already been addressed by Verizon’s FCC merger conditions.⁵ Under
13 those conditions, Verizon is required to implement by July 2001 the change management
14 process originally developed in New York, for each state in which it operates. “Change
15 management process” refers to the documented process Verizon and the CLECs will
16 follow to facilitate communication about OSS changes, new interfaces, and retirement of
17 old interfaces, as well as the implementation timeframes. These timeframes include,
18 among other things, the new entrant and new release testing processes. As a result, Mr.
19 Lathrop’s concern with operational readiness testing is a moot issue for Verizon.

20

⁵FCC Order approving the GTE/Bell Atlantic Merger, CC Docket No. 98-184, released June 16, 2000, Appendix D, ¶20.

1 **Q. PLEASE RESPOND TO MR. LATHROP'S SUGGESTION THAT OSS**
2 **PERFORMANCE MEASUREMENTS BE DEVELOPED TO TRACK THE**
3 **ILECS' SERVICE TO CLECS (PG. 7).**

4 A. The Commission should reject Mr. Lathrop's recommendation to develop OSS
5 performance measurements as part of this proceeding for two reasons. First, the purpose
6 of this proceeding is to address UNE costing and pricing issues. OSS performance
7 measures are not a UNE costing/pricing issue and are, therefore, beyond the scope of this
8 proceeding. Second, the Commission recently addressed carrier-to-carrier OSS issues in
9 Docket UT-990261. On September 21, 2000 the Commission terminated its inquiry into
10 possible rules governing carrier-to-carrier OSS issues. The Commission ruled that these
11 inter-company issues are sufficiently covered by other requirements and arrangements,
12 including performance standards flowing from the mergers affecting Verizon and Qwest,
13 the conditions attendant to authorizing Qwest to enter the interLATA long distance
14 business in this state, and collaborative industry efforts under way in other states on OSS
15 performance issues. There is no justification for using this proceeding as a back door to
16 readdress OSS performance measurements.

17

18 **Q. DOES THIS CONCLUDE YOUR PART B SUPPLEMENTAL REBUTTAL**
19 **TESTIMONY?**

20 A. Yes.