

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

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

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) **Docket No. UT-003013**
) **Part B**
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REBUTTAL TESTIMONY OF

ROBERT J. HUBBARD

QWEST COMMUNICATIONS

February 28, 2001

I. IDENTIFICATION OF WITNESS

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

A. My name is Robert J. Hubbard. I am employed by Qwest Corporation, as a Director in the Local Network Organization. My business address is 700 West Mineral, Littleton, Colorado, 80102.

Q. BRIEFLY OUTLINE YOUR EMPLOYMENT BACKGROUND.

A. I am a Director of Technical Support in Qwest's Interconnection Strategies Group, the group responsible for the development of strategies to implement the unbundling of Qwest's network as required by the Telecommunications Act of 1996 ("the Act"). I provide technical support regarding unbundling issues to the Qwest Network and Public Policy departments.

I have over 33 years experience with two Regional Bell Operating Companies, Qwest and Indiana Bell Telephone Co., in their network departments. I worked for over 11 years at Indiana Bell and Qwest as a cable splicer and as a cable repairman involved in all aspects of splicing and repairing copper cables. At Qwest, I eventually moved from splicing and repairing into the engineering department as a design engineer for outside plant, designing copper and fiber facilities, and Analog and Digital Carrier Systems. I then went into the planning department as an outside plant planner, in which I planned for future jobs involving fiber cable placement and upgrades to the existing outside plant

1 network. In 1997, I moved into my present job as a Director in the
2 Interconnection Planning Department.

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4 I have had substantial involvement in Qwest's preparation for line sharing. For
5 example, I studied possible network architectures in advance of Qwest's response
6 to the FCC's First Report and Order and Further Notice of Proposed Rulemaking
7 in Docket No. 98-147 ("Line Sharing Order"). Also, in Minnesota, I participated
8 in the technical trials -- both the Lab and Field Tests -- that were ordered by the
9 Minnesota Commission last year. During both the Lab and Field Tests, I
10 provided technical and engineering input, and evaluated the outcome of the tests.

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12 **II. PURPOSE OF REBUTTAL TESTIMONY**

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14 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

15 A. The purpose of my rebuttal testimony is to address the issues raised by David A.
16 England and Ron Stanker, both of whom filed testimony on behalf of AT&T
17 Communications of the Pacific Northwest, Inc. in regards to line splitting

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1 **Q. DOES THE ARCHITECTURE THAT MR. STANKER AND DR.**
2 **ENGLAND REFER TO MATCH THAT OF QWEST'S LINE SPLITTING?**

3 A. No. The architecture that both Dr. England and Mr. Stanker refer to is not line
4 splitting over UNE-P, which is what the parties have previously addressed, but,
5 what is referred to as loop splitting.

6

7 **Q. WOULD YOU PLEASE EXPLAIN THE DIFFERENCE BETWEEN LINE**
8 **SPLITTING AND LOOP SPLITTING?**

9 A. Line Splitting is where the CLEC is providing the voice service through the
10 leasing of the UNE-P from Qwest or another ILEC, and a DLEC will provide the
11 xDSL through an arrangement with the CLEC. Loop Splitting is where a CLEC
12 will lease an unbundled loop from the ILEC, to provide voice, and then have an
13 arrangement with a DLEC to provide xDSL on the same unbundled loop. Loop
14 splitting is the type of architecture that AT&T is proposing in their testimony.
15 The difference is that with loop splitting, the CLEC has not leased the entire
16 combination of UNEs from the ILEC, and is providing some elements itself, such
17 as switching.

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1 **Q. ON PAGE 3, LINE 4 OF DR. ENGLAND’S TESTIMONY, HE STATES**
2 **THAT “QWEST’S PROPOSAL FORCES CLECS EMPLOYING A**
3 **QWEST-OWNED SPLITTER TO CONNECT VIA AN ICDF.” PLEASE**
4 **RESPOND TO THIS STATEMENT.**

5 A. Dr. England is mistaken in his assumption that Qwest owns the splitter. Qwest
6 does not own the splitter. The DLEC that is providing the data side of the line
7 will own the splitter, as has been described in Part A of this Docket on line
8 sharing. The Commission, in Part A of this Docket has already determined that
9 use of an ICDF is one appropriate architecture to make cross-connects for line
10 sharing. Because it is the same design for both line sharing and for line splitting,
11 an ICDF is also appropriate to make cross-connects to connect to the splitter. The
12 FCC’s recent order on Line Splitting indicates that the FCC in fact contemplates
13 identical physical arrangements for line sharing and line splitting. The FCC,
14 discussing the ordering process for migrations from line sharing to line splitting,
15 noted that “no central office wiring changes are necessary in a conversion from
16 line sharing to line splitting . . .”¹ Thus, line splitting and line sharing are
17 provided through the same physical architecture.

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¹ See In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order On Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98, Third Further Notice of Proposed Rulemaking in CC Docket No. 98-147, Sixth Further Notice Of Proposed Rulemaking in CC Docket No. 96-98, FCC 01-26 ¶22 (rel. Jan. 19, 2001) (Line Sharing Reconsideration Order).

1 **Q WOULD YOU PLEASE COMPARE MR. STANKER’S EXHIBIT RGS-2**
2 **WITH YOUR EXHIBIT RJH-7.**

3 A. Yes. I have reviewed Mr. Stanker’s Exhibit RGS-2, and have concluded that it
4 does not depict line splitting over UNE-P. I have provided an Exhibit, RJH-7,
5 which shows Qwest’s proposal for Line Splitting. This illustrates a CLEC
6 providing the voice over UNE-P, which utilizes a Qwest Switch. The combined
7 voice and data traffic is then routed through an ICDF to a CLEC provided splitter.
8 Another CLEC/DLEC will provide the xDSL over the same line, which is defined
9 by the FCC as line splitting. Mr. Stanker however, has a CLEC providing the
10 voice from a CLEC Network and does not utilize a Qwest Switch. He shows a
11 different CLEC (a DLEC, although Mr. Stanker refers to this provider as
12 “CLEC1”) providing the xDSL through a Qwest owned splitter. However, as
13 described by Ms. Barbara Brohl in her Rebuttal Testimony, Qwest does not
14 provide the splitter, the DLEC does.

15
16 The type of architecture described by AT&T is properly called Loop Splitting and
17 Qwest does not believe that it was at issue in this proceeding. In this
18 arrangement, one of the CLECs (usually the CLEC providing the voice) will lease
19 an entire unbundled loop to be delivered to their collocation area through a
20 normal collocation arrangement, and then have an agreement with another CLEC
21 (DLEC) for them to provide the xDSL through an arrangement that the two
22 CLECs have agreed upon. Therefore, what both Dr. England and Mr. Stanker

1 have addressed in their testimonies is not line splitting but in fact loop splitting
2 and should not be included in Part B of this Docket.

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4 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

5 **A. Yes it does.**