

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY AT THIS TIME?**

2 A. My purpose is to respond to the Rebuttal Testimony of Dick Buckley filed on  
3 behalf of Qwest on February 7, 2001. At pages 8-10 of his rebuttal testimony, Mr.  
4 Buckley takes issue with my testimony on the use of copper cable in certain parts of the  
5 network.

6 **Q. MR. WEISS, PLEASE BRIEFLY DESCRIBE YOUR POSITION TO WHICH MR. BUCKLEY IS RESPONDING.**

7 A. At pages 4 through 6 of my Part B Supplemental Testimony on Behalf of Joint  
8 Intervenors, filed on October 31, 2001, I argue that the investment costs of DS1 Capable  
9 Loops should not reflect network architectures which employ copper cable, and that DS1  
10 Capable Loop investment costs should reflect deployment only of fiber cable  
11 architectures.

12 **Q. WHAT DO YOU UNDERSTAND TO BE MR. BUCKLEY'S POSITION IN REBUTTAL TO YOU ON THIS ISSUE?**

13 A. In his rebuttal testimony, Mr. Buckley argues that, under proper demand  
14 conditions, copper cable is still an economically efficient and forward looking  
15 technology, the costs of which should continue to be reflected in the investment costs of  
16 DS1 Capable Loops.

17 **Q. IS MR. BUCKLEY CORRECT IN HIS ASSERTIONS?**

18 A. Yes. Under demand conditions as described by Mr. Buckley at page 9, lines 17  
19 and 18 of his Rebuttal Testimony, copper cable based DS1 loop architectures are  
20 economically efficient and they do comport with the regulatory definition of forward-  
21 looking technology.

22 **Q. IN YOUR TESTIMONY, YOU OBSERVED THAT COPPER FEEDER TECHNOLOGY WAS "OBSOLETE" AND THAT IT WAS MORE EXPENSIVE TO MAINTAIN THAN FIBER TECHNOLOGY. DO YOU WISH TO MODIFY THOSE STATEMENTS AT THIS TIME?**

23 A. Yes. After considering Mr. Buckley's testimony in the light of the FCC's  
24 definition of forward-looking economic cost, I believe that copper feeder cable is  
25 forward looking and not obsolete. Furthermore, under suitable conditions, copper feeder  
26 cable should be no more expensive to maintain than the combination of fiber feeder  
27 cable and electronic digital loop carrier equipment.

28 **Q. DOES THE MIX OF DS1 CAPABLE LOOP ARCHITECTURES, INCLUDING THE USE OF METALLIC CABLE-BASED FEEDER TECHNOLOGY, AS REFLECTED IN QWEST'S DS1 CAPABLE LOOP COST ANALYSIS, COMPLY WITH THE FCC'S DEFINITION OF FORWARD-LOOKING ECONOMIC COST?**

29 A. Yes. At paragraph 685 of its First Report and Order in CC Docket No. 96-98, the  
30 FCC concluded that its forward-looking pricing methodology should be based on costs  
31 that assume that wire centers will be placed at the incumbent LEC's current wire center  
32 locations, but that the reconstructed local network will employ the most efficient  
33 technology for reasonably foreseeable capacity requirements. The mix of DS1 capable  
34 loop architectures proposed by Qwest and addressed by Mr. Buckley in his testimony

1 clearly complies with that definition. Accordingly, I recommend that the rates for DS1  
2 capable loops be based on the full mix of architectures used by Qwest in its DS1 capable  
loop analyses.

3 **Q. IN LIGHT OF THIS TESTIMONY, HAVE YOU RE-COMPUTED THE**  
4 **INVESTMENT COSTS FOR DS1 CAPABLE LOOPS TO REPLACE THE**  
5 **FIGURES THAT APPEAR AT TABLE NO. 2 OF YOUR SUPPLEMENTAL**  
6 **RESPONSE TESTIMONY?**

7 A. Yes, I have. Table No. 1, below, shows the results of my re-computations.

8 **Table No. 1**  
9 **Revised Adjusted DS1 Capable Loop Investments, by FRC**

FRC	Account Description	Adjusted Investment		
		Category 1	Category 2	Total
357C	CCT, Digital	\$ 238.74	\$ 0.00	\$ 238.74
257C	CCT, Digital	1,612.37	46.37	1,658.74
1C	Poles	4.38	0.00	4.38
3C	Wire	0.21	0.00	0.21
4C	Conduit	152.97	0.00	152.97
5C	UG Metallic Cable	89.27	0.00	89.27
35C	Buried Drop	18.05	0.00	18.05
42C	Aerial Drop	3.10	0.00	3.10
45C	Buried Metallic Cable	205.96	0.00	205.96
52C	Aerial Metallic Cable	7.46	0.00	7.46
62C	Intrabuilding Cable	46.24	0.00	48.24
85C	UG Fiber Cable	44.84	0.00	44.84
845C	Buried Fiber Cable	89.17	0.00	89.17
862C	Intrabuilding Fiber	0.96	0.00	0.96
	<b>TOTALS</b>	\$ 2,513.72	\$ 46.37	\$ 2,560.09

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

25 A. Yes, it does.  
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