

**March 30, 2001 ERRATA TO
REBUTTAL TESTIMONY OF DENNIS B. TRIMBLE (February 7, 2001)**

Strike the following Testimony (Page 25, Lines 1-6):

- A. Yes. Verizon offers to enter into a trial arrangement with CLECS in Washington to establish methods and procedures and to determine actual costs upon identification of specific locations that require access to house and riser or intra-building network cable. These locations would necessarily be limited to complexes where it is determined that Verizon owns and retains control of the cabling to the NID.

Replace with the following:

- A. Verizon proposal for a BFR process was premised on the reality that Verizon does not own much of these facilities. Thus, the BFR process seems to be the most appropriate manner for determining prices for facilities that are likely to be very customer specific. But, as an alternative, Verizon is willing to accept the proposal presented by AT&T's witness, Ms. Baker, with some clarifying verbage.

Verizon is willing to accept, on an interim basis, the MRC and NRC rates the Commission has already established for access to Verizon's NID as proxy rates for house and riser cable. The Commission would then establish a separate path in this docket to specifically address all the issues surrounding the access to any Company owned house and riser cable. The interim price sets would remain in effect until conclusion of the proposed separate proceeding.

The specific prices that Verizon would use as proxy rates for house and riser cable are:¹

House and Riser Cable: Rate Element	Interim Rate
MRC per pair	\$0.84
NRCs:	
- Service Order (Electronic): Engineered, Initial Service – NID	\$ 31.14
- Service Order (Electronic): Non-Engineered, Initial Service – NID	\$ 24.80
- Service Order (Manual): Engineered, Initial Service - NID	\$ 43.54
- Service Order (Manual): Non-Engineered, Initial Service - NID	\$ 37.05
- Outside Facility Connect – Unbundled NID	\$ 42.96
- Miscellaneous NRCs may apply as appropriate (e.g., expedite charges, coordinated conversion charges)	

As is Verizon’s policy, the CLEC is responsible for locating a compatible terminal block within cross connect distance of the MPOE and only Verizon personnel shall perform installation work on Verizon equipment.

Strike the following Testimony (Page 25, Lines 8-18):

Q. WOULD VERIZON’S PROPOSED TRIAL ADDRESS MR. KLINK’S ADDITIONAL CONCERNS THAT COST STUDIES SHOULD ADDRESS THE EXISTENCE OF MULTIPLE CARRIERS, EXISTENCE OF A SINGLE POINT OF INTERCONNECTION, AND POTENTIALLY UNNECESSARY CHARGES FOR ADDITIONAL EQUIPMENT AND TECHNICAL DISPATCH?

¹ Source: Verizon’s Unbundled Network Elements Tariff, WN U-21. This tariff was approved by the Washington Commission in its 30th Supplemental Order (Corrected) dated December 19, 2000 in Docket No. UT-960369 et al. On February 21, 2001, Verizon filed Advice No. 970 in compliance with the 13th Supplemental Order in Docket UT-003013 (Part A) that includes adjustment to the NID ordering rates to reflect the permanent OSS and NOMC shared fixed cost rates adopted by the Commission in this

A. Yes, because the UNE costs developed as a result of Verizon's proposed trial would be approved by the Commission, and the Commission's cost study evaluation would necessarily take these concerns into consideration. The trial and its resultant cost analysis are also superior to the interim proxy methodology proposed by AT&T witness Baker.

Strike the following Testimony (Page 28, Lines 4-12):

Q. PLEASE COMMENT ON WITNESS BAKER'S CLAIM THAT VERIZON-NEW JERSEY'S BFR PROPOSAL IS UNREASONABLE, ANTI-COMPETITIVE, AND DISCRIMINATORY FROM THE POINT OF VIEW OF A FACILITIES-BASED COMPETITOR.

A. I am not aware of the BFR proposal referenced by Ms. Baker. Verizon does not utilize a BFR process in New Jersey for house and riser cable. House and riser cable is a UNE in New Jersey and is available where technically feasible and only where Verizon owns and retains operational control of the cable. Rates for house and riser cable are tariffed.

Strike the following Testimony (Page 31, Lines 4-11):

Q. MS. BAKER RECOMMENDS THAT THE COMMISSION ESTABLISH A SEPARATE TRACK WITHIN THIS DOCKET TO ADDRESS THIS ISSUE BECAUSE THIS IS A MATTER OF CRITICAL IMPORTANCE

Order. If the Commission adopts Verizon's compliance filing as filed, the NID ordering charges noted above will change accordingly.

TO THE DEVELOPMENT OF FACILITIES BASED COMPETITION. DO YOU CONCUR WITH HER RECOMMENDATION?

- A. If the Commission is amenable to the establishment of a separate track for this issue and if this action would facilitate adoption of Verizon's proposed trial arrangement, then AT&T's recommendation should be adopted.

Strike the following Testimony (Page 33, Lines 5-7):

- (5) Verizon's proposal for sub-loop unbundling of inside wiring / riser cable is in concert with the FCC's "Best Practices Presumption" and should also be adopted by this Commission

Replace with the following (Changes noted in bold type):

- (5) Verizon's proposal for sub-loop unbundling of inside wiring / riser cable is in concert with the FCC's "Best Practices Presumption" and should also be adopted by this Commission **on an interim basis.**