BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of AT&T Communications of the |) | |
|--|---|--------------------|
| Southwest, Inc.'s Petition for Second Compulsory |) | |
| Arbitration Pursuant to Section 252(b) of the |) | |
| Telecommunications Act of 1996 to Establish an |) | Case No. TO-98-115 |
| Interconnection Agreement with Southwestern Bell |) | |
| Telephone Company. |) | |

AFFIDAVIT OF JAMES A. HEARST

- I, James A. Hearst, of lawful age, being duly swom, depose and state:
- 1. My name is James A. Hearst. I am presently Director Planning and Engineering for Southwestern Bell Telephone. Inc. My qualifications and work history are included (Hearst) Schedule 1, attached to this affidavit.

LOOP CROSS-CONNECTIONS

- 2. This affidavit contains a description of the various cross-connect arrangements that SWBT has offered the CLECs. It includes a discussion of the need for test access on unbundled loops. SWBT could provide a cross-connect that does not test access, but it would not be providing the same level of service that SWBT provides its end user customers.
- 3. AT&T claims that cross-connects are a functionality of interconnection and that no separate element is required. The AAS Report assumes that testing will not be included with the loop and cross connect.

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SWBT believes that since there are a number of different types of cross-connects required, and they have significantly different costs, there should be a set of separate cross connect elements.

4. SWBT defines a cross connect as follows:

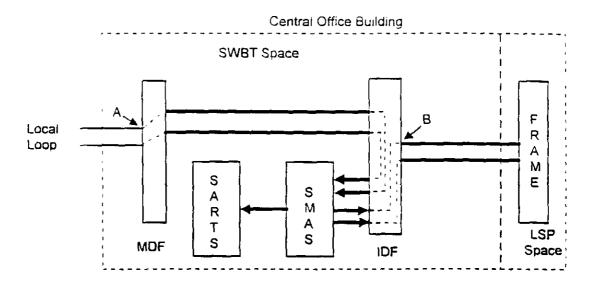
"Cross Connection" means a connection provided pursuant to Collocation at the Digital Signal Cross Connect, Main Distribution Frame or other suitable frame or panel between (i) the Collocating Party's equipment and (ii) the equipment or facilities of the Housing Party.

In this case the CLEC is the "Collocating Party" and SWBT is the "Housing Party."

In the real world, cross connections are wires or fibers that connect one piece of equipment to another on a semi-permanent basis. For instance, a copper local loop may be cross connected at the MDF to a switch port of the central office switch by a simple pair of copper wires called a jumper.

Different loop options require different types of cross connections. In fact, several cross connections may be required for many of the options.

The 2-wire analog and digital loops require the simplest cross connections. If a single pair of copper wires are to be connected to a CLEC's collocation equipment, it will be necessary to cross connect the local loop to a set of test access points and then to a tie cable connecting to the CLEC collocation equipment. The following diagram shows this arrangement.



SMAS = Switched Maintenance Access System
SARTS = Switched Access Remote Testing System

MDF = Main Distribution Frame IDF = Intermediate Distribution Frame

Figure 1

The analog local loop is terminated on the Main Distribution Frame (MDF). A cable connects the Main Distribution Frame to an Intermediate Distribution Frame (IDF) where the Switched Maintenance Access System (SMAS) test access points are also terminated. A series of two wire jumpers, consisting of pairs of copper wires are placed to connect the local loop on the MDF to the Intermediate Distribution Frame then to the input SMAS test points located on the IDF. A final jumper connects the SMAS output test points on the IDF to a pair of the copper cable that terminates on the frame in the Local Service Provider collocation area. These individual jumpers are shown as dotted lines in Figure 1.

5. The purpose of the SMAS test points is to allow SWBT, when SWBT provides service over a local loop, the ability to perform automatic mechanized testing of the loop through the central office switch. In an unbundled arrangement, it is necessary

to provide test access points by using the SMAS test points. The SMAS test points allow a SWBT test system (SARTS) to access the loop, separate the loop and the connection to the collocation equipment, and perform transmission test from a remote location, just as is done on loops that serve SWBT customers. This testing access is necessary for SWBT to be able to provide comparable levels of maintenance and repair services on loops serving the CLEC's customers to the levels that SWBT achieves on loops serving its own customers.

6. A 4-wire digital loop cross connect is performed in the following manner: digital circuits are terminated on a DSX after being demultiplexed. A special shielded multi-pair wire is used as a cross connection jumper to a cable between the SWBT DSX and the CLEC collocation area. Figure 2 illustrates this arrangement.

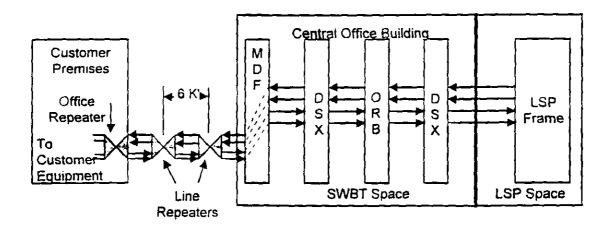


Figure 2

| | Ju | James Hearst |
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| STATE OF TEXAS |) | |
| CITY OF BELLAIRE |) | |
| Subscribed and sworn to b | efore me on this | 19th day of August 1998. |
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| P. J. SCHLOEME NOTARY PUBLIC. STATEOF MYCOMMASSION EXPIRI FEB. 17, 2000 | TEXAS (| |