

Exhibit No.:
Issues: Loop Qualification, Loop Conditioning
Witness: Shawnee Claiborn-Pinto
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: TO-2000-322

FILED³

JAN 28 2000

Missouri Public
Service Commission

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

SHAWNEE CLAIBORN-PINTO

CASE NO.

TO-2000-322

**In the Matter of the Petition of DIECA Communications d/b/a Covad
Communications for Arbitration of Interconnection Rates, Terms, and
Related Arrangements with Southwestern Bell Telephone Company**

**Jefferson City, Missouri
January 28, 2000**

****Denotes Highly Confidential Information****

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Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to the direct testimony of Mr. James Smallwood and Mr. Jarrod Latham, of Southwestern Bell Telephone Company (SWBT), and Mr. John Donavan, representing DIECA Communications, Inc. d/b/a Covad Communications (Covad). My rebuttal testimony provides cost estimates that differ from the cost estimates provided by Mr. Smallwood in his direct testimony. I will also provide the prices for loop conditioning and loop qualification supported by the Telecommunications Department Staff of the Missouri Public Service Commission (Staff).

Q. HOW DID YOU ARRIVE AT THE ESTIMATES OF THE COSTS FOR UNBUNDLED LOOP QUALIFICATION?

A. I followed the costing approach presented in Mr. Smallwood's direct testimony. In this approach, the cost for the qualification of the loop is equal to the cost of manually completing the process, multiplied by the estimated percentage of time the process is completed manually.

Q. HOW DID YOU ARRIVE AT THE PROPOSED PRICE FOR LOOP QUALIFICATION?

A. The proposed price for loop qualification is simply the cost estimate for loop qualification, provided by SWBT, rounded to the nearest whole dollar value. This estimate includes the costs for a "partially mechanized" system.

1 **Q. WHAT IS STAFF'S PROPOSED PRICE FOR UNBUNDLED LOOP**
2 **QUALIFICATION?**

3 Staff's proposed price for unbundled loop qualification is \$13.00. The calculation is
4 contained in Schedule 1.

5
6 **Q. HOW DOES STAFF'S PROPOSED PRICE FOR LOOP QUALIFICATION**
7 **DIFFER FROM THE ESTIMATE OF SWBT?**

8 A. Staff's proposed price eliminates the uniform allocation of joint and common costs
9 (16.47%), included in Mr. Latham's proposed price (Latham Direct Testimony, p. 5).
10 The elimination of the joint and common cost factor is addressed in Staff witness Mr.
11 Anthony Clark's rebuttal testimony.

12
13 **Q. HOW DID YOU ARRIVE AT THE ESTIMATES OF THE COSTS FOR**
14 **CONDITIONING THE LOOP (REMOVAL OF LOAD COILS, BRIDGED TAP**
15 **AND REPEATERS)?**

16 A. I followed the same formula used by SWBT in its cost studies. This costing approach
17 was presented in Mr. Smallwood's direct testimony. The cost studies of Staff (presented
18 in Schedule 2) differ only by reductions in the amount of time spent performing certain
19 tasks, and the elimination of bridged tap restoration being included in the cost of bridge
20 tap removal. By reducing the time required to complete certain tasks, some conditioning
21 costs are reduced. The reductions in the amount of time to complete tasks are fully
22 explained in Staff witness Mr. Myron Couch's rebuttal testimony. The rationale for not

including the restoration of bridged tap is addressed in the direct testimony of Mr. Donavan and the rebuttal testimony of Mr. Couch.

Q. WHAT IS STAFF'S PROPOSED PRICE FOR LOOP CONDITIONING?

A. The schedule below includes proposed prices for the removal of load coils, bridged tap and repeaters in loops under 17,500 feet, and removal of additional interferors after 17,500 feet. The schedule also includes combined charges for removing load coils and bridged taps on the same loop (on the same order) as well as proposed prices for the removal of repeaters and bridged taps on the same loop (on the same order).

The schedule of proposed prices for conditioning are the same as Staff's estimates of SWBT's costs to condition. Cost estimates are contained in Schedule 2.

Loops 12- 17.5Kft	Initial	Additional Same Location/Cable	Additional Same Location Different Cable
Removal of Load Coils (3)	\$499.06	\$19.76	\$97.24
Removal of Bridge Taps (2)	\$382.84	\$19.76	\$68.19
Removal of Repeaters (1)	\$191.42	\$14.72	\$34.09
Removal of Bridge Tap and Load Coil	\$849.33	\$39.53	\$165.43
Removal of Bridge Tap and Repeater	\$541.69	\$34.49	\$102.28

Loops greater than 17.5Kft	Initial	Additional Same Location/Cable	Additional Same Location Different Cable
Removal of 1 Load Coil (3)	\$166.35	\$6.26	\$32.41
Removal of 1 Bridge Taps (2)	\$191.42	\$9.88	\$34.09
Removal of 1 Repeater (1)	\$191.42	\$14.72	\$34.09
Removal of Bridge Tap and Load Coil	\$344.20	\$16.15	\$66.51
Removal of Bridge Tap and Repeater	\$358.42	\$24.61	\$68.19

*These charges apply in addition to the charge above (loops between 12 and 17.5Kft).

1 **Q. HOW DO STAFF'S PROPOSED PRICES FOR CONDITIONING COMPARE**
2 **WITH SWBT'S PROPOSED PRICES?**

3 A. Where Staff and SWBT disagree on the amount of time spent, the prices differ.
4 Additionally, SWBT includes a 19.2% discount and a shared cost factor of 16.47% in its
5 proposed prices. Staff's proposed prices eliminate the 19.2% discount¹ and the addition
6 of a shared cost factor².

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

9 A. Yes it does.
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¹ The Commission ordered a 19.2% discount in Case Number TO-99-370, In the Matter of the Petition of Broadspan Communications, Inc. for the Arbitration of Unresolved Interconnection Issues Regarding ADSL with Southwestern Bell Telephone Company. Since Staff has re-addressed SWBT's costs in the current case, staff did not discount the proposed prices.

² The 16.47% shared cost factor is included in SWBT's proposed prices for loop conditioning (Latham, Direct Testimony, p. 12). The elimination of this factor is discussed in Mr. Clark's rebuttal testimony.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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Interconnection Rates, Terms, and Related
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Case No. TO-2000-322

AFFIDAVIT OF SHAWNEE CLAIBORN-PINTO

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Shawnee Claiborn-Pinto, of lawful age, on oath states: that she has participated in the preparation of the foregoing written testimony in question and answer form, consisting of 5 pages of testimony to be presented in the above case, that the answers in the attached written testimony were given by her ; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.

Shawnee Claiborn-Pinto

Subscribed and sworn to before me this 28th day of , January 2000.

Sharon S Wiles

Notary Public

My commission expires _____

SHARON S WILES
NOTARY PUBLIC STATE OF MISSOURI
COLE COUNTY
MY COMMISSION EXP. AUG. 23, 2002

**SCHEDULE 1
IS DEEMED TO BE
HIGHLY
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INFORMATION

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**SCHEDULE 2
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