

**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 C. WHITE

I, James C. White, of lawful age, being duly sworn, depose and state:

1. My name is James C. White. I am presently Area Manager Special Services Testing for Southwestern Bell Telephone Company ("SWBT"). My business address is 530 McCullough, 3-L-5, San Antonio, Texas 78215.

2. My responsibilities include network operations testing support of designed services for installation and maintenance (I/M). I provide support to center operations through clarification, modification and training of existing methods and procedures as well as introduction of new methods and procedures.

I participate on product teams, identifying network I/M operational testing needs (requirements, OSS integration, functionality, costs, objectives, time frames, etc.), provide data required for business case creation, and negotiate with test-head vendors for network OSS compatible equipment. I prepare operational test plans, assist with testing in lab and field environments, identify network operational flows, prepare operational procedures for test center forces and assist central office forces with testing of new products and services.

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Reporter X5

I also work to reduce our testing time which includes the activities such as measuring receipt and analysis of service order and repair work requests times, the time to establish cross connect terminations and placement of plug-ins (electronic circuit cards) in our central offices. Test center technicians interface with our network and our operating support systems (OSS) and perform circuit and equipment turn-up and acceptance testing. They analyze, isolate and repair trouble reports, communicate with and perform end to end testing with customers or their agents when appropriate and technology changes. If there are problems with the established methods and procedures then I work to resolve the problem.

3. I have been an employee of SWBT since 1973 after receiving a BS degree in mathematics. I began my career handling central office frame activities. Thereafter, I moved to outside Plant responsibilities and performed many varied I/M activities. I have a broad background in network operations, with multi-level management experience in both line and staff positions. My experience includes management of forces responsible for designed and non-designed services associated with cable repair, maintenance center operations (local, special and toll), frame control center, switching machines, pair gain and loop electronics equipment, fiber optics, high capacity services, data, PBX, key systems, and CPE. In my current position, I work to lessen service installation and maintenance times for our special service center in five states. Our overall performance clearance times for DS1 and DS0 service is best of all the other RBOCs according to the FCC for the last three years.

Throughout my career, I have attended technical and administrative training courses to maintain current knowledge of leading edge technology. I am considered a Subject Matter Expert (SME) for network operations.

4. I assisted in the gathering of data for designed and non-designed services that was used in Kansas, Arkansas, Missouri, Oklahoma and Texas to develop nonrecurring cost studies for Special Access Services.

5. The cost studies organization requested assistance in verifying previously collected time estimates for a nonrecurring UNE cost study. The data request was distributed to test center and central office representatives from our different market areas to complete and return.

6. The managers that received the data request each had various years of experience with SWBT within network operations. Their backgrounds covered many areas of network operations, but all having experience with designed network operations. The supervisors that completed the data requests all had direct responsibility for the types of services being studied.

7. I have participated in similar cost studies from a staff position since 1990. I have also participated in similar cost studies as a field manager on four other occasions. I have done time and motion studies with a stop watch in tracking times on test center and central office personnel in Kansas, Arkansas, Texas and Missouri.

8. Cost study personnel requested time estimates for specific UNE facility types and services, specifically those on the "sub-task lists". The data necessary for the study was formatted, and forwarded to my group, which made a request to have the test center and central office technical forces with the appropriate base knowledge, complete and return the provided data forms.

9. The time estimates are developed to be reflective of an "average skill level" of the technicians who will do the work. The work force in Southwestern Bell is made up of employees with varying levels of experience and time on the job. Time estimates are reflective of that variance and are targeted for an average work time.

10. Testing on the part of the ILEC is required to properly install services consistently and provide a consistent degree of test quality for the services we provide. This is necessary because certain services interfere with other services and the ILEC needs to monitor interferers and define/know what services are put on what pairs. unless complete cable counts are given to CLEC and they manage specific guidelines.

11. I have reviewed the times provided by AT&T in its non-recurring cost model and do not agree with its claim concerning national averages which, based on my personal experience, are exceptionally low. I have reviewed those times and conclude based on my experience that they do not reflect expected activity in Missouri or anywhere in the SWBT operating areas.

A. For example, AT&T model times do not take in full consideration of the total time to complete a order. The required acceptance time to test an DS1 service according to Bellcore and the National Operational Forum (NOF) is 31 minutes of testing for B8ZS (see Attachment 1), but the AT&T model only shows 5 minutes. The assumption by AT&T that we would have four or more activities at a location each time per trip is invalid since we must comply with short provisioning intervals and shorter maintenance times to service our customers. We travel to many locations to provide timely service while performing only one activity. Step #69 of AT&T's Non-Recurring Cost Model reflects that a technician's travel time to a customer's premise is 20 minutes. I have personally traveled with numerous technicians and this is quite low even for city standards. The average time to travel between work activities is 45 minutes. We do have some work activities that require us to travel two (2) hours or more to perform a work activity.

B. According to the AT&T Non-Recurring Cost Model step #147, it is stated that a DDS test is performed in 15 minutes. The industry standard requirements tests takes 17 minutes to perform. The actual time reflected in the cost study is 12 minutes and 18 seconds, which is lower than the industry standard requirement time and AT&T's cost projection. This came about due to this service lending itself to increase plug improvements, reduced equipment options and production testing of DDS services. All services will not lend themselves to this type of improvements due to movement of the services and technological limitation associated with costs. We do try to find service improvements and cost efficient ways to reduce our testing and installation costs where practical.

C. According to AT&T's Non Recurring Cost Model step #'s 164, 165, and 166, it states it takes ten (10) minutes to provision a DS3 circuit. This is well short of the 160 minutes that is the actual time required for the turn up of a DS3 service. The complexity of the service requires SWBT to do the following:

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| * Office Wiring | 15 min. |
| * Fiber Optic Terminal | 60 min. |
| * Plug in placement | |
| * Option verification (setting) | |
| * Alarm Testing for Maintenance assistance | |
| * Cross – Office Testing | 30 min. |
| * DS3 Acceptance Testing (Described Below) | 40 min. |
| * Circuit Order Processing | 15 min. |

D. According to AT&T's Non-Recurring Cost Model step #172, it states that a DS3 test be performed in five (5) minutes. The industry standard requirement is a

Quasi Random signal test of no less than forty (40) minutes and must meet acceptance limits. If the test limit is exceeded then a second forty (40) minute test is run. If the circuit still does not meet the requirements, the circuit must be repaired and the acceptance test is then repeated.

E. It is true that sometimes a technician may be able to work on additional circuits during the wait time for some tests to complete but this is already accounted for in the time estimates. With circuits that have dribbling errors or random errors, the technicians are normally working with other central office and/or field technicians repeating isolation tests. This allows the technician to narrow the points of failure(s) and make adjustments to equipment; this does not afford them time to work on other circuits before going to the next circuit to test. AT&T's non-recurring averages as they apply to Southwestern Bell Telephone Company are thus incomplete and inaccurate.

12. The guidelines used for time estimates are derived from standards by Bellcore, National Operations Forum and local field timed averages. These are applied uniformly throughout Southwestern Bell Telephone Company's five state territory. When SWBT does gather cost data, it defines the work activity by functions and delivers requests to each state in SWBT.

The cost data from each state is looked at for completeness, reasonableness and any gleaming differences from state to state. If differences are significant, we go back and question the process and examine how the functions and time test were done. If re-tests are needed, we get them done. After getting comparable data, it is then averaged and used company wide. The recommended way of performing time estimates is observer-timed, production monitoring and utilizing work samples.

13. Supervisors are chosen to do the estimating because they have a number of technicians reporting to them that are trained to do the installation, testing and maintenance activities associated with this study daily. The supervisors know if some technicians are farther along in their training development than others and how to gather an average time estimate based on the personnel they manage. Most of the managers have physically done or can do the job their technicians are doing. They gain the skills from doing the job before they were promoted. Also many were trained in formal school and further picked up a clear understanding of the activities by working with their people on work reviews, time reviews and job appraisals.

14. Central office locations to which we have to travel could have an order with five or more activities at times, but normally branch site activities involving only one or two in order to manage due date appointments. The activities that would be performed include service order wiring, equipment installation and office routines.

Further, affiant sayeth not.

James White
James White

STATE OF CALIFORNIA)

)SS

CITY OF Contra Costa)

Subscribed and sworn to before me this 30 day of August, 1998.

Cate Holley Levine
Notary Public

My commission expires:

8/5/01

