STATE OF Georgia

COUNTY OF Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Thomas G. Williams, BellSouth Telecommunications, Inc., being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in "Investigation Concerning the Propriety of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996," KY PSC Case No. 2001-105, and if present before the Commission and duly sworn, his direct testimony would be set forth in the annexed transcript consisting of 22 pages and 20 exhibit(s).

Thomas G. Williams

SWORN TO AND SUBSCRIBED BEFORE ME this
15th day of May, 2001.

NOTARY PUBLIC

MICHEALE F. HOLCOMB
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2001

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF THOMAS G. WILLIAMS

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

CASE NO. 2001-105

May 18, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS ADDRESS.

A. My name is Thomas G. Williams. I am employed by BellSouth as Product Manager for Line-Sharing for the nine-state BellSouth region. My business address is 3535 Colonnade Parkway, Suite E511, Birmingham, Alabama, 35242.

Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND?

A. My career at BellSouth spans over 14 years and includes positions in various product management positions. I also have seventeen years service with AT&T and Southern Bell, during which I held various positions in sales, marketing, and operations. I have a bachelor's degree in Marketing.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I previously testified before the Georgia and Louisiana Public Service

Commissions and the Public Service Commission of South Carolina, and have filed testimony with the Kentucky, and Florida Public Service Commissions and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is twofold. First, I will demonstrate that BellSouth provides nondiscriminatory access to the high frequency portion of the loop in compliance with requirements of the Federal Communications Commission's (FCC) *Line-sharing Order* and *Line-sharing Reconsideration Order*.[1] Second, I will demonstrate that a single competing carrier, or two separate competing carriers acting together, can provide voice and data services over a single unbundled loop obtained from BellSouth (the FCC refers to the latter arrangement as "line splitting.").[2]

Q. WHAT IS LINE-SHARING?

A. Line-sharing allows a Competitive Local Exchange Carrier (CLEC) to provide high-speed data services to BellSouth voice customers. The CLEC's data service is provisioned over the high frequency portion of a copper loop. The high frequency portion of the loop is the frequency range above the voice band on a copper loop facility that is being used to carry analog circuit switched

[1] *Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of Local Competition Provisions of the Telecommunications Act of 1996,* Third Report and Order CC Docket No. 98-147 and Fourth Report and Order CC Docket No. 96-98, 14 FCC Rcd 20,912 (1999)("*Line-sharing Order");* Deployment of Wireline Services Offering Advanced Telecommunications Capability, Order on Remand, CC Docket Nos. 98-147, 98-11, 98-26, 98-32, 98-78, 98-91 (1999)(*"Line-sharing Reconsideration Order").*

[2] *Line-sharing Reconsideration Order*, ¶ 16-18.

voice band transmissions.[3] The data signal typically is split off from the voice signal by a splitter and then delivered to a digital subscriber line access multiplexer (DSLAM) located in the CLEC's network at its collocation space. The DSLAM converts the data signal into packets for transmission over the CLEC's network.

BellSouth developed its line-sharing product in conformance with the obligations set forth in the FCC's *Line-sharing Order* and the *Line-sharing Reconsideration Order*. In these Orders, the FCC created a new Unbundled Network Element ("UNE") that consists of the high frequency portion of the copper loop over which the Incumbent Local Exchange Carrier ("ILEC") provides analog voice service to the end user. According to the FCC, line-sharing consists of the following:

- Two carriers - one voice provider (ILEC) and one data provider (Data LEC) serving a customer at a single address, i.e., one customer per loop. (*Line-sharing Order,* 14 FCC Rcd at 20,948, ¶ 74);

- xDSL technologies that do not use the frequencies immediately above the voice band, (i.e. ADSL), preserving a "buffer" zone to ensure the integrity of the voice band traffic (*Id.*, at 14 FCC Rcd at 20,943-44, ¶64);

[3] 47 C.F.R. §51.319(h)(1).

- xDSL technologies that do not interfere with analog voice band transmission. (*Id*. at 14 FCC Rcd at 20,946-47, ¶¶ 70-71); and

- Lines that carry traditional Plain Old Telephone Service (POTS) analog voice band services provided by the ILEC. If the ILEC's retail POTS service is disconnected, the Data LEC must purchase the entire stand-alone loop if it wishes to continue providing xDSL to the customer. Similarly, ILECs are not required to provide line-sharing to a requesting carrier when the CLEC purchases a combination of network elements known as the UNE platform. (*Id.*, at 14 FCC Rcd at 20,947-48, ¶¶ 72-73).

BellSouth offers line-sharing in accordance with FCC rules. Specifically, line-sharing is available to a single requesting carrier, on loops that carry BellSouth's POTS, so long as the xDSL technology deployed by the requesting carrier does not interfere with the analog voice band transmissions. BellSouth allows line-sharing CLECs to deploy any version of xDSL that is presumed acceptable for shared-line deployment in accordance with FCC rules and that will not significantly degrade analog voice service. To facilitate line-sharing, BellSouth will perform Unbundled Loop Modification (line conditioning) at the request of a CLEC on any loop, regardless of loop length, unless such conditioning would significantly degrade the customer's analog voice service provided by BellSouth.

Q. HOW WAS BELLSOUTH'S LINE-SHARING OFFERING DEVELOPED?

A. In accordance with the suggestion in the FCC's *Line-sharing Order*,[4] BellSouth developed its line-sharing product through a collaborative process with all interested CLECs. BellSouth invited CLECs to a collaborative line-sharing meeting in Atlanta on January 26, 2000. Twelve CLECs participated in the meeting. The participants agreed to form several working teams to develop, test, and refine the procedures for use by CLECs and BellSouth to implement line-sharing successfully. The first meeting of the working teams was held on February 2, 2000. The participants jointly decided to have two sub-committees: a technical sub-committee and a systems/process sub-committee. Each sub-committee would meet one day each week. The technical sub-committee worked on technical issues, such as systems/network architecture and testing. The systems/process sub-committee focused on the pre-ordering, ordering, provisioning, maintenance, and billing issues associated with line-sharing. Each sub-committee listed and prioritized issues and action items. The sub-committees addressed and resolved issues essential to the development of the architecture and operations plan for the line-sharing product. Beginning April 12, 2000, the collaborative consolidated the two sub-committees and conducted the collaborative meetings on one full day each week.

Q. WHAT WAS THE GOAL OF THE COLLABORATIVE MEETINGS?

A. The primary goal of the collaborative meetings was to jointly develop procedures and operations plans to implement central office-based line-sharing. Attached to my testimony are several exhibits that the participants

[4] *Line-sharing Order,* 14 FCC Rcd at 20,971-72, ¶ 128.

developed in the collaborative to assist in the development of the line-sharing product. Exhibit TGW-1 demonstrates the order flow for the ordering and provisioning of line-sharing splitters. Exhibit TGW-2 details the ordering and provisioning process for end user line-sharing orders. Exhibit TGW-3 is the Line-Sharing Ordering Document ("LSOD") that CLECs use for ordering splitters or making changes in splitters. Exhibit TGW-3A is the Line-sharing LSR Field Information. Exhibit TGW-4 is a document entitled "Job Aid for Loop Qualification System (LQS),"which assists the CLECs in qualifying loops for xDSL services. Exhibit TGW-5 is the "BellSouth Business Rules for Local Orders" to assist CLECs in preparing line-sharing LSRs. Exhibit TGW-6 is a jointly developed maintenance flow that shows how troubles are reported and handled both for voice and data over line-shared loops. Exhibit TGW-7 is a document that was provided to the CLECs at the collaborative meeting and that explains how CLECs can access BellSouth's Trouble Administration and Facilitation Interface ("TAFI") to report troubles, check the status of a reported trouble, or to run a mechanized loop test ("MLT") for line-shared loops. This exhibit is an extract from the CLEC TAFI documentation on the BellSouth Interconnection web site. Exhibit TGW-8 shows the Trouble Receipt Process Flow for CLECs to report line-sharing data troubles to BellSouth and shows how the CLEC uses BellSouth's TAFI for line-sharing.

Six companies regularly participated in the joint CLEC/BellSouth meetings for central office-based line-sharing: BellSouth, Covad, NorthPoint, Rhythms, NewEdge, and DuroCommunications. Other companies also participated in the meetings, although less actively. They include AT&T, MCIWorldCom, BlueStar, NetworkTelephone, and Sprint.

Beginning June 28, 2000, the collaborative formed two additional teams. One team is addressing the development of the CLEC-owned splitter option for central office-based line-sharing. Exhibit TGW-9 is the charter for this collaborative team. Active participants for this collaborative team are the "owners" listed in the charter: BellSouth, Covad, DuroCommunications, NewEdge, Rhythms, and Sprint. NorthPoint was a monitoring member. The second new collaborative team is developing the architecture and procedures for remote-site line-sharing. Covad, Rhythms, DuroCommunications, NewEdge, and Sprint have been regular participants for the Remote Site Line-sharing Collaborative. The charter for this collaborative is Exhibit 10. These new collaborative teams meet on alternate weeks for one half day. The CLEC-owned splitter arrangement and remote-site line-sharing are discussed in more detail later in my testimony.

One important part of the line-sharing collaborative was the joint test of line-sharing procedures which was, in essence, an extensive carrier-to-carrier test of the product. BellSouth and the CLECs jointly created the Atlanta Line-sharing Pilot (the "Pilot") to test and refine the line-sharing procedures for end user service so that BellSouth and the CLECs could successfully implement line-sharing on June 6, 2000. The specific pilot objectives included various aspects of the line-sharing ordering and provisioning process including qualification of loops for line-sharing, and ordering and provisioning of access to the high frequency portion of the loop for the CLEC to provide data service. All parties agreed to work cooperatively to identify and resolve key ordering, provisioning, maintenance, and repair procedures.

Covad, NorthPoint, and Rhythms participated in the Pilot with BellSouth. These parties all agreed that the results of the Pilot would be shared with all of the participants in the collaborative.

BellSouth equipped eight Atlanta central offices (Marietta, Roswell, Buckhead, Peachtree Place, Duluth, Sandy Springs, Chamblee, and Toco Hills) with splitters for the Pilot. The CLECs selected and prioritized these pilot sites.

The Pilot was completed successfully in the second quarter of 2000. During the Pilot, the participants tested the procedures for provisioning of end user line-sharing service. Throughout the Pilot, the participants collectively analyzed the line-sharing processes and procedures that had been developed, and then made necessary adjustments to assure a successful line-sharing commercial launch. At each step, BellSouth and the CLEC participants shared the decisions and results of the Pilot with their respective internal implementation organizations responsible for development of the necessary processes and OSS enhancements.

Q. WHAT STEPS DID BELLSOUTH TAKE TO INSURE IT COULD BEGIN OFFERING LINE-SHARING END USER SERVICE WHEN THE FCC INTENDED?

A. To ensure that CLECs could avail themselves of the line-sharing product on June 6, 2000, BellSouth permitted CLECs to order splitters in advance of the implementation deadline. In Georgia, CLECs began ordering splitter systems on March 26, 2000. In other states, including Kentucky, ordering began on

April 6, 2000. On June 6, 2000, BellSouth began accepting end user line-sharing orders from CLECs. BellSouth provisioned these orders in accordance with the procedures developed in the CLEC/BellSouth Collaborative Meetings and in the Pilot.

Q. HAS BELLSOUTH ENTERED INTO INTERCONNECTION AGREEMENTS FOR LINE-SHARING WITH CLECS IN KENTUCKY?

A. Yes. BellSouth has entered into region-wide interconnection agreements with CLECs such as Covad, NewEdge, BlueStar, NorthPoint, and Rhythms for the ordering and provisioning of line-sharing in the BellSouth region. Copies of these line-sharing agreements are attached as Exhibits TGW-11, TGW-12, TGW-13, TGW-14, and TGW-15 to my testimony. These agreements are current and in effect in Kentucky. Many of the general provisions and operational terms and conditions found in these agreements were worked out in the weekly collaborative meetings. Specific language for each CLEC was negotiated to satisfy the needs of that CLEC. These agreements contain interim rates, subject to true up from the individual state regulatory bodies, including the Kentucky Public Service Commission. BellSouth's proposed rates for line-sharing are currently being considered in Docket No. AC-382. The use of interim rates allowed CLECs to engage in line-sharing by the FCC's June 6, 2000 implementation deadline.

BellSouth also offers line-sharing in its Revised Kentucky Statement of Generally Available Terms and Conditions (SGAT). *See* Exhibit JAR-5 attached to Mr. Ruscilli's testimony. Proposed rates for line-sharing are set

forth in Attachment A to the SGAT and are supported by cost studies filed with the Commission in Docket No. AC-382. The current version of BellSouth's standard terms and conditions for line-sharing offered to CLECs is attached to my testimony as Exhibit TGW -16.

Q. WHAT ARCHITECTURE IS BELLSOUTH USING TO DEPLOY LINE-SHARING?

A. Attached to this testimony, as Exhibit TGW-17 is a diagram that illustrates the splitter arrangement for the BellSouth-owned splitter in the central office. BellSouth allows CLECs to order splitters in three different increments: full shelf (96 line units); one-fourth of a shelf (24 line units); or an 8-port option, currently under development. Under these options, BellSouth purchases, installs, inventories, leases, and maintains the splitters. BellSouth installs a splitter in its equipment space or in a common area close to the CLEC's collocation area. BellSouth will provide to requesting carriers loop and splitter functionality that is compatible with any transmission technology that the requesting carrier seeks to deploy using the high frequency portion of the loop, provided that such transmission technology is deployable pursuant to Section 51.230 of the FCC rules. BellSouth provides a bantam jack at the splitter so the CLEC can test the high frequency portion of the loop.

Under either of these three options, a group of splitter ports is assigned to a specific CLEC. The splitter is connected to BellSouth's frame via cabling. One cable is connected to the splitter carrying the shared voice and data signal from the frame to the splitter. A second cable carries the voice traffic from the

splitter back to the frame. A third cable carries the data traffic from the splitter to the frame. After the cables are run between the splitter and the frame, the technician performs a "streaker card" test. This test insures appropriate connectivity between the splitter and the BellSouth frame and that the splitter is ready to support end user line-sharing orders.

When wiring the end user line-sharing service, collocation cross-connections are used to connect the loop carrying the shared voice and data traffic to the splitter termination on the frame. A second cross-connection carries the voice traffic from the splitter termination to the BellSouth voice switch. The data traffic is then carried to the CLEC collocation space by a cross connection. After the wiring is completed for the end user line service, BellSouth tests the voice service and also the cross-connections necessary to provide end user data service. In order to verify that the data cross-connections are correct, BellSouth recently completed work with a supplier who developed a Line-sharing Verification Transmitter test set. BellSouth technicians use this test set to ensure that the data portion of the circuit is wired correctly for the end user service.

Q. DOES BELLSOUTH ASSIST CLECS IN DETERMINING IF LOOPS QUALIFY FOR THE CLEC'S DATA SERVICE?

A. Yes. BellSouth provides its loop make-up information via the Loop Make Up service that CLEcs may use to help determine if a loop can support the CLEC's data service. Loop make-up information for a particular loop is the same whether the CLEC intends to purchase a stand-along xDSL-capable loop

or engage in line-sharing. Thus, there is no difference in the process for obtaining loop make-up information between the two offerings. CLECs can submit requests for loop make-up information manually as described in the testimony of Wiley (Jerry) G. Latham, or the can use the Local Exchange Navigation System (LENS) and Telecommunications Access Gateway (TAG) electronic interfaces described in the OSS testimony of Ron Pate. CLECs may obtain certain pre-qualification information regarding a loop by accessing the Loop Qualification System described in Exhibit TGW-4, and as further explained in Mr. Pate's testimony.

Q. WHAT ARE THE CLEC'S OPTIONS IF THE LOOP IS DETERMINED TO BE UNSUITABLE FOR THE CLEC'S DATA SERVICE?

A. The CLEC may request that BellSouth modify the loop with BellSouth's Unbundled Loop Modification (ULM) offering. ULM allows the CLEC to order removal of load coils or excessive bridged tap. ULM for line-sharing is the same process described in the testimony of Wiley (Jerry) G. Latham.

If the CLEC determines that a loop cannot be used or conditioned to provide data service on the high frequency spectrum, the CLEC can attempt to identify alternative loops via the Loop Make-Up process (LMU). If unloaded copper loops are available, the CLEC can reserve the facility for 96 hours. The LMU process will provide the CLEC a facility reservation number (FRN). The CLEC may place the FRN on the line-sharing LSR to have high frequency spectrum provisioned on the reserved loop.

If modifying a loop will significantly degrade the voice services BellSouth currently is providing over the loop, and if the CLEC is unable to locate another loop that satisfies the technical requirements of the CLEC, the CLEC will not be allowed to offer data service on a loop shared with BellSouth. If necessary, BellSouth will make a showing to the state commission that the existing voice service will be degraded and that no alternative loops are available.

Q. HOW DOES THE CLEC ORDER LINE-SHARING?

A. Local Service Request ("LSR") for line-sharing is generally the same as an LSR for an unbundled xDSL-capable loop. The only difference is that an LSR for line-sharing requires some additional information, namely a splitter assignment. The purpose of the splitter assignment on the LSR is to direct BellSouth technicians to the correct splitter port for the order. A CLEC LSR for line-sharing specifies the splitter assignment by specifying the CLEC ACNA, central office floor, isle number, relay rack, splitter shelf, and slot. The LSR also specifies the CLEC cable ID and cable pair to access the high frequency portion of the loop. Exhibit TGW-3A to my testimony specifies the fields required on the line-sharing LSR. The process flow for an end user line-sharing order is shown in Exhibit TGW-2.

Q. CAN YOU DESCRIBE BELLSOUTH'S PROCESS FOR PROVISIONING LINE-SHARING SERVICE?

A. BellSouth provisions line-sharing under terms and conditions established with the CLECs during the collaborative process described above. These terms and conditions regarding provisioning of line-sharing are contained in interconnection agreements and BellSouth's Revised SGAT. Exhibits TGW-1 and TGW-2 to my testimony demonstrate the ordering and provisioning processes for line-sharing splitters and end user line-sharing orders.

As with any new product offering, BellSouth has experienced some isolated difficulties in the provisioning process. For example, BellSouth experienced problems in the installation of the splitters that necessitated certain network-related remedial actions and additional training. BellSouth is committed to addressing these issues on an ongoing basis through the collaborative process and via one-on-one communications with CLECs. For instance, BellSouth conducted "streaker card tests" for all central offices where line-sharing splitters are installed. A streaker card test determines if the splitter is correctly cabled to the frame. BellSouth has corrected every service-affecting condition that this streaker card test revealed. Moreover, the streaker card test is now part of BellSouth's installation procedures and will be performed on all new line-sharing splitters. In addition, in December 2000, BellSouth enhanced its Mechanized Loop Test (MLT) System such that MLT has the capability to detect the presence of a line-sharing splitter. This capability will allow CLECs to access MLT through CLEC TAFI to verify that the splitter is in place prior to dispatching its technician.

Q. HOW CAN CLECS DETERMINE IF THEIR LINE-SHARING INSTALLATION ORDERS ARE COMPLETED?

A. There are two ways. BellSouth's CLEC Service Order Tracking System (CSOTS) provides CLECs with the status of their line-sharing billing orders. On April 27, 2001, BellSouth provided an enhancement to let the data LECs view the status of their provisioning orders. BellSouth will continue to provide CLECs with a "line-sharing COSMOS report" that provides the status of the BellSouth line-sharing work order. The data LEC simply has to check either of these reports and it will be advised as to the current status of its order.

Q. WHAT PROCESS DOES BELLSOUTH USE FOR MAINTENANCE AND REPAIR OF LINE-SHARING SERVICE?

A. As with stand-alone xDSL-capable loops, CLECs can report troubles with line-sharing manually or by using one of the maintenance and repair interfaces described in Mr. Pate's testimony. BellSouth provides, on a nondiscriminatory basis, physical test access points to a requesting carrier through a standardized interface commonly referred to as a "bantam test jack" for the purpose of loop testing, maintenance and repair activities. In order to test the voice portion of the loop, CLECs can access MLT through TAFI. In addition, BellSouth has developed interim Line-sharing Joint Meet Procedures that allow BellSouth and CLEC technicians to meet in a central office, when standard trouble reporting procedures do not resolve a trouble. BellSouth expects to discontinue use of this process once it is determined to no longer be necessary.

Q. WHAT IS BELLSOUTH'S POSITION CONCERNING TESTING DATA CONTINUITY?

A. As described under provisioning, BellSouth is willing to test continuity of the data circuit wiring. In January 2001, BellSouth advised to the line-sharing collaborative that BellSouth would begin using a new Line-sharing Verification Transmitter (LSVT) to test the wiring of the loops for line-sharing. The device is now being deployed and use of this device has been included in procedures for installation and maintenance of line-sharing service.

Q. HAS BELLSOUTH PROVISIONED LINE-SHARING SERVICE IN KENTUCKY?

A. Yes. As of April 30, 2001, BellSouth has provisioned line-sharing on 172 lines in Kentucky and on 2,765 lines region-wide.

Q. IS BELLSOUTH WILLING TO CONSIDER ANY OTHER ARCHITECTURES FOR PROVIDING LINE-SHARING?

A. During the initial meetings of the collaborative, several CLECs requested the option of providing line-sharing via a CLEC-owned splitter located in the CLEC's collocation space. BellSouth agreed to investigate a CLEC-owned splitter option in the collaborative meetings following the successful commercial launch of the BellSouth-owned splitter product on June 6, 2000. As described earlier, the parties established an additional collaborative to serve as a vehicle for these discussions. Again, Exhibit TGW-9 to my testimony is the charter for this initiative. The goal of this collaborative team was to "support the development of, with the mutual agreement to, the processes and procedures required to jointly implement line-sharing utilizing CLEC-owned

splitters collocated in the central office…." *See* Exhibit TGW-9. This collaborative developed processes and procedures that enable CLECs to engage in line-sharing by means of a CLEC-owned splitter. Rates for line-sharing via a CLEC-owned splitter are set forth in Attachment A to BellSouth's Revised SGAT. A diagram for the CLEC-owned splitter option for line-sharing in the central office is Exhibit TGW-18 to my testimony.

Despite the initial enthusiasm for a CLEC-owned splitter arrangement, to date no CLEC has installed its own splitter. Sprint committed to test the option beginning in January 2001, but then withdrew. No other CLEC has agreed even to test this option with BellSouth. BellSouth remains committed to testing its offer of line-sharing via a CLEC-owned splitter.

In the line-sharing collaborative, BellSouth and the CLECs jointly agreed to a schedule for development of methods and procedures for the various requirements of the *Line-sharing Order*. Exhibit TGW-10 to my testimony is the charter for the remote terminal collaborative team. The stated goal of this collaborative "is to support the development of, with the mutual agreement to, the processes and procedures required to jointly implement line-sharing utilizing splitters located in the remote terminal as one of the options to meet the requirements of the FCC line-sharing order." *See* Exhibit TGW-10**.** BellSouth has developed the RT Line-sharing option and performed internal testing. Because no CLEC had collocated a DSLAM in a remote terminal, nor demonstrated interest in ordering the RT line-sharing option, however, the RT line-sharing effort has been suspended.

Notwithstanding the schedule developed by the collaborative and the apparent lack of CLEC interest, BellSouth stands ready to provide line-sharing from the remote terminal, if requested. BellSouth provides line-sharing from the remote terminal in its SGAT. BellSouth will work independently with any interested CLEC to provide this service. To provide line-sharing from the remote terminal, the CLEC must collocate in the remote terminal and place a DSLAM in its collocation space. The CLEC may then purchase the high frequency portion of the copper subloop from the remote terminal to the end user customer. To date, however, no CLEC has requested line-sharing from the remote terminal or line-sharing over the copper portion of the loop from the remote terminal to the customer premises.

Q. WHAT IS LINE SPLITTING?

A. Line splitting occurs when a CLEC provides voice service and a Data LEC provides data service to the same end user over the same loop and, neither of the carriers is BellSouth. BellSouth will allow CLECs (either one CLEC or two CLECs working together) to offer both voice and data over a single unbundled loop. *See* SGAT, §IV.B9.

Q. HOW DOES BELLSOUTH PLAN TO OFFER LINE SPLITTING?

A. BellSouth offers the same arrangement to CLECs as that described by the FCC in the Texas 271 Order and the *Line-sharing Reconsideration Order*. Specifically, BellSouth facilitates line splitting by CLECs by cross-connecting an xDSL-capable loop and a port to the collocation space of either the Voice

CLEC or the Data CLEC. These carriers may then connect the loop and the port to a CLEC-owned splitter, thereby splitting the line themselves.

Q. IF BELLSOUTH IS CURRENTLY THE VOICE PROVIDER AND A PROVIDER OF DATA SERVICES (A "DATA CLEC") IS THE ADVANCED SERVICES PROVIDER, AND THE END USER SUBSEQUENTLY CHOOSES A CLEC FOR VOICE SERVICE (A "VOICE CLEC"), HOW WOULD LINE SPLITTING OCCUR?

A. If the original line-sharing arrangement was established with a Data LEC-owned splitter, then BellSouth would not be involved with the splitter provisioning and, accordingly, any decisions regarding use of the splitter would be left up to the Data CLEC. If, however, the original line-sharing arrangement were established with a BellSouth-owned splitter, then BellSouth would allow the Data LEC to continue leasing the BellSouth splitter under the following conditions:

- The existing Data LEC remains the end user's advanced services provider, and
- The Data LEC has an agreement with the Voice CLEC to use the upper frequency spectrum of the loop to continue providing the advanced services.

Q. WHAT PLANS DOES BELLSOUTH HAVE TO PROVIDE LINE SPLITTING OTHR THAN CONVERTING FROM LINE-SHARING?

A. Where a line-sharing arrangement does not already exist, BellSouth will work cooperatively with Voice CLEC and Data LECs to develop methods and procedures whereby a Voice CLEC and Data LEC may provide services over the same loop. Under this process, BellSouth will deliver a loop and port to the collocation space of either the Voice CLEC or the Data LEC. As specified in the *Line-Sharing Reconsideration* Order, the loop and the port cannot be a loop and port combination (i.e. UNE-P), but must be individual stand-alone network elements. The Voice CLEC or the Data LEC shall be responsible for connecting the loop and port to a CLEC-owned splitter. BellSouth shall not own or maintain the splitter used for this purpose.

To participate in line splitting, either the voice provider, the data provider, or both the voice and data providers will need a collocation agreement with BellSouth and will need an interconnection agreement to order cross-connections, loops, and ports. If more than one CLEC is involved, the second CLEC will need an agreement to share the CLEC of record's loop. This arrangement would provide a UNE loop and UNE port to provide the CLEC's end user with voice service. The high frequency portion of the loop would be available for data because of the CLEC-provided splitter, which is accessed via a cross-connection from the frame to the CLEC's collocation space. A second cross-connection would return the voice signal from the splitter in the collocation space to the BellSouth voice switch port. BellSouth would bill the CLEC that purchases the loop and the purchaser of the loop will be responsible for all charges associated with the line splitting UNE arrangement. Where the Data LEC is different than the Voice CLEC, the purchaser of the loop may authorize the other party to act on their behalf. For example, the Voice CLEC

and data LEC may need an arrangement between themselves for the Data LEC to report data troubles.

Q. WHAT PLANS DOES BELLSOUTH HAVE FOR A LINE SPLITTING COLLABORTATIVE?

A. April 19, 2001, BellSouth held a "kick-off" meeting in Atlanta to discuss Line Splitting and to initiate a Line Splitting Collaborative. Eight Voice CLECs and Data LECs attended the kick-off and indicated an interest in participating in the collaborative. The first line splitting industry collaborative was held May 3, 2001. Notwithstanding the Collaborative Schedule, however, BellSouth stands ready to provide line splitting, if requested. BellSouth will work independently with any interested CLEC to provide this service.

Q. WHAT CHARGES DOES BELLSOUTH BELIEVE ARE APPROPRIATE FOR LINE SPLITTING?

A. The applicable recurring charges to be paid by the Voice CLEC for this tline splitting arrangement will be for the unbundled loop, the unbundled port, and two collocation cross-connections, as shown on Exhibit TGW-19. The applicable nonrecurring charges to be paid by the Voice CLEC for this line splitting arrangement will be the nonrecurring rate for the loop-port combination (switch-with-change to add the two cross connections).

The rates for line splitting are not independent rates, but rather are comprised of cost-based rates already set forth in Attachment A to BellSouth's SGAT and in various interconnection agreements.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

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