

AFFIDAVIT

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 A. Wayne Gray, who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in Case No. 2003-00379, Review of Federal Communications Commission's Triennial Review Order Regarding Unbundling Requirements for Individual Network Elements, and if present before the Commission and duly sworn, his testimony would be set forth in the annexed testimony consisting of 6 pages and 0 exhibits.


A. Wayne Gray

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 9th DAY OF FEBRUARY, 2004

 Notary Public

MICHEALE F. BIXLER
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2005

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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF A. WAYNE GRAY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION
DOCKET NO. 2003-00379
FEBRUARY 11, 2004

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

A. My name is A. Wayne Gray. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Regional Planning and Engineering Center in the Network Planning and support organization.

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Tech in 1979, with a Bachelor of Electrical Engineering degree. In 1992, I received a Master of Business Administration degree from Emory University. I began working for Southern Bell in 1979, in the Equipment Engineering organization in Miami, Florida. Over the course of my 24-year career with BellSouth, I have held various line and staff positions in Equipment Engineering, Traffic Engineering (Capacity Management), Infrastructure Planning and Project Management. In November 1999, I became Director-Collocation in the Network Planning and Support organization. In

1 December 2001, my scope of responsibility was expanded and my title was
2 changed to Director – Regional Planning and Engineering Center. In this
3 position, I am responsible for ensuring that BellSouth provisions collocation
4 arrangements in the timeframes established by contractual agreements and
5 governmental mandates. I am also responsible for managing the planning and
6 engineering of BellSouth’s Advanced Intelligent Network, Common Channel
7 Signaling Network, Link Monitoring System, Public Packet Switching
8 Network, MemoryCall® Service platform, Pooled Internet Access Platforms,
9 and corporate transport network. My responsibilities also include the activities
10 performed by BellSouth’s Numbering and Technology Forecasting groups. In
11 addition, I direct all switch software upgrades and contract administration for
12 the purchase of network technologies.

13

14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15

16 A. My testimony will address BellSouth’s performance in the areas of availability
17 of collocation, provisioning of collocation, and availability of Co-carrier
18 Cross-Connects (“CCXCs”). BellSouth’s performance is exemplary, as I will
19 prove by performance measurements and actual usage.

20

21 Q. PLEASE DISCUSS THE AVAILABILITY OF COLLOCATION SPACE IN
22 BELLSOUTH’S CENTRAL OFFICES.

23

24 A. Space is available for Competitive Local Exchange Carriers (“CLECs”) to
25 collocate equipment in all of BellSouth’s Kentucky central offices. If space

1 was not available, the CLEC would know by viewing the Space Exhaust List
2 located on the following BellSouth website:
3 http://interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91081451
4 [-C.pdf](#)

5
6 Q. ARE THERE ALTERNATIVES TO PHYSICAL COLLOCATION IN THE
7 CENTRAL OFFICE, ASSUMING RARE CIRCUMSTANCES WHERE
8 PHYSICAL COLLOCATION MAY NOT BE AVAILABLE IN THE
9 FUTURE?

10

11 A. Yes. CLECs may elect virtual collocation, or in the event that there is no
12 virtual collocation available in the central office, then the CLECs may request
13 adjacent collocation.

14

15 Q. IS BELLSOUTH PROVIDING PHYSICAL COLLOCATION TO CLECS
16 TODAY?

17

18 A. Yes. CLECs currently lease approximately 10,989 square feet of collocation
19 space within 29 of BellSouth's Kentucky central offices.

20

21 Q. DOES BELLSOUTH PROVIDE COLLOCATION SPACE TO CLECS IN A
22 TIMELY MANNER FOLLOWING CLECS' REQUESTS FOR SPACE?

23 A. Yes. As Mr. Varner discusses in his testimony, over the past year, BellSouth
24 has achieved outstanding performance in meeting the collocation provisioning
25 intervals established by this Commission.

1

2 Q. ARE THERE MEASURES IN PLACE TO ASSURE THAT BELLSOUTH'S
3 LEVEL OF PERFORMANCE REGARDING COLLOCATION DOES NOT
4 DIMINISH?

5

6 A. Yes. This Commission has ordered Performance Measurements that are in
7 place today to monitor BellSouth's collocation performance, as Mr. Varner
8 explains. Should BellSouth fail to meet certain of these metrics, BellSouth
9 would be subject to penalty payments under the Self Effectuating Enforcement
10 Measurement ("SEEMs") Plan.

11

12 Q. IS A CLEC'S ABILITY TO OBTAIN COLLOCATION A BARRIER TO
13 CLEC ENTRY IN BELLSOUTH'S MARKETS?

14

15 A. Absolutely not, as I have testified above.

16

17 Q. TURNING TO THE ISSUE OF CROSS-CONNECTS, WHAT IS A
18 "COMPETITIVE LEC-TO-COMPETITIVE LEC CROSS-CONNECT"?

19

20 A. A "Competitive LEC-to-Competitive LEC Cross-Connect" is commonly
21 referred to as a Co-Carrier Cross Connect ("CCXC"). A CCXC is a
22 connection between two CLECs' equipment and/or facilities located within the
23 same BellSouth premises. A CCXC must be provisioned using cabling
24 facilities owned by the ordering carrier that is placed over BellSouth's
25 common cable support structure, unless the CLEC's equipment for facilities

1 are located in contiguous collocation arrangements within the central office.
2 The CLECs must also contract with a BellSouth Certified Supplier to place the
3 cabling facilities for the provision of the CCXC.

4

5 Q. WHY WOULD TWO COLLOCATORS USE CO-CARRIER CROSS-
6 CONNECTS?

7

8 A. There are a couple of potential uses. A CLEC might use CCXCs to share
9 facilities and/or equipment or exchange interstate or interexchange traffic.

10

11 Q. DOES BELLSOUTH PERMIT CO-CARRIER CROSS-CONNECTS
12 TODAY?

13

14 A. Yes, and BellSouth has done so for several years. Today, a CLEC can connect
15 its collocation arrangement to another CLEC's collocation arrangement by
16 enlisting a certified installation vendor from the list of BellSouth Certified
17 Suppliers to place the cabling necessary to make the connections between the
18 two CLECs' arrangements. As of January 9, 2004, BellSouth provides another
19 means for CLECs to obtain CCXCs. BellSouth makes CCXCs available
20 pursuant to its FCC No. 1 Tariff, whereby BellSouth (rather than a third-party
21 vendor) will provide a CCXC for both CLECs at the collocation demarcation
22 point.

23

24 Q. ARE THERE CLECS WHO HAVE CO-CARRIER CROSS-CONNECTS IN
25 SERVICE TODAY IN BELLSOUTH'S KENTUCKY CENTRAL OFFICES?

1

2 A. No. CLECs have not requested this in BellSouth's Kentucky central offices.
3 However, in other states in BellSouth's region, there are 234 existing
4 arrangements.

5

6 Q. IS THE ABILITY OF CLECS TO OBTAIN CO-CARRIER CROSS-
7 CONNECTS IN BELLSOUTH'S CENTRAL OFFICES ON A TIMELY
8 BASIS A BARRIER TO CLEC ENTRY IN BELLSOUTH'S MARKETS?

9

10 A. Absolutely not, as I have testified above. .

11

12 Q: PLEASE SUMMARIZE YOUR TESTIMONY.

13

14 A. As my testimony demonstrates, CLECs are not impaired since collocation
15 space is available in all BellSouth central offices in Kentucky. Should space
16 become exhausted in a central office, other options are available to CLECs.
17 There are also multiple options available to CLECs to obtain CCXCs for the
18 purposes of connecting to other carriers' collocation spaces. BellSouth's
19 continued high level of performance is assured by the presence of SEEMs
20 penalties, should performance slip. For these reasons, a finding of impairment
21 is not warranted.

22

23 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

24

25 A. Yes.