

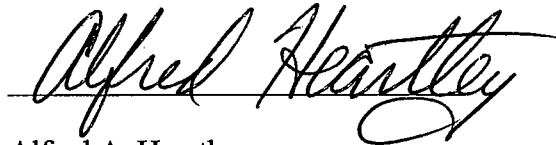
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STATE OF GEORGIA

COUNTY OF FULTON

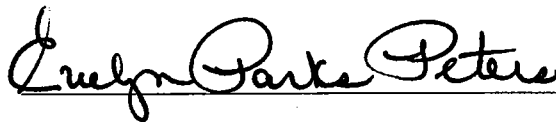
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Alfred A. Heartley, who, being by me first duly sworn deposed and said that:

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 rebuttal testimony would be set forth in the annexed testimony consisting of 5 pages and 0 exhibits.



Alfred A. Heartley

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 21st DAY OF MARCH, 2004

 Notary Public

Evelyn Parks Peters
Notary Public, Newton County, Georgia
My Commission Expires May 12, 2007

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF ALFRED A. HEARTLEY
3 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
4 DOCKET NO. 2003-00379
5 MARCH 31, 2004

6
7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR
8 POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.
9 ("BELLSOUTH").

10
11 A. My name is Alfred A. Heartley. My business address is 754
12 Peachtree Street, Atlanta, Georgia 30308. My title is
13 General Manager - Wholesale Performance and Regional
14 Centers for BellSouth.

15
16 Q. ARE YOU THE SAME ALFRED HEARTLEY WHO EARLIER FILED DIRECT
17 TESTIMONY IN THIS DOCKET?

18
19 A. Yes.

20
21 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED
22 TODAY?

23
24 A. I will respond to portions of the direct testimonies of Mr.
25 James D. Webber on behalf of MCI and Mr. Mark David Van de

1 Water on behalf of AT&T regarding the batch hot cut process.

2

3 Q. ON PAGE 18, MR. WEBBER DESCRIBES WHAT HE CALLS "THE
4 POTENTIALLY CHAOTIC SITUATION" THAT COULD RESULT WHEN
5 MULTIPLE TECHNICIANS WORK ON THE MDF. IS HIS SPECULATION
6 CREDIBLE?

7

8 A. No. Mr. Weber's speculation about a "potentially chaotic
9 situation" ignores that BellSouth will manage the
10 conversions. As part of this management process, BellSouth
11 has determined the number of technicians that can work
12 simultaneously on a frame. While too many technicians
13 working in a tight location can be cumbersome, our
14 technicians are trained to work efficiently and safely
15 together. In addition, BellSouth intends to schedule the
16 appropriate number of technicians on different shifts.
17 This may require 24 hour scheduling but BellSouth is
18 willing to do such scheduling. BellSouth will not permit a
19 "chaotic situation" to occur, as Mr. Webber speculates.

20

21 Q DO YOU AGREE WITH THE EXTRAPOLATION OF WORK TIMES MR. VAN
22 DE WATER DOES ON PAGE 35 OF HIS TESTIMONY?

23

24 A. No. Although Mr. Van de Water's analysis of the time
25 required to cutover a UNE-P to a UNE-L does not differ
26 substantially from BellSouth's, his conclusion that such

1 work times will preclude BellSouth from handling
2 anticipated volumes is incorrect.

3
4 Even taking BellSouth's more conservative view and assuming
5 a "worst case" scenario, BellSouth will still complete all
6 of the required conversions within 21 months.

7 BellSouth's analysis takes into consideration the different
8 times required to complete a conversion depending on the
9 type of service requested (SL1 or SL2) and the type
10 conversion requested for SL1 orders (Coordinated or Non-
11 Coordinated).

12
13 Beginning on page 35, Mr. Van de Water uses BellSouth data
14 in an attempt to prove that there is insufficient space on
15 the MDF in the West Hollywood, FL C.O. for enough
16 technicians to work simultaneously to complete enough
17 conversions to create "meaningful" UNE competition. Again,
18 while our analysis does not differ substantially, the
19 conclusion that Mr. Van de Water draws is incorrect. Mr.
20 Van de Water alleges that completing 104 hot cuts per day
21 cannot support competition. Notably, he does not put forth
22 a number of cuts that would, in his view, support
23 competition. Moreover, BellSouth's "worst-case" force
24 model assumes that only 126 cuts per day are required in
25 West Hollywood to handle the UNE-P to UNE-L migration as
26 well as normal growth within the 21-month timeframe. Based

1 on the information provided above, 126 cuts per day would
2 require approximately 12 technicians to complete. Eight
3 technicians can work on the West Hollywood frame
4 simultaneously without impacting productivity. Assuming
5 this work is done during the 2 available night shifts to
6 avoid interfering with any other activities, West Hollywood
7 can accommodate up to 16 technicians per day. Therefore,
8 BellSouth can work the required load in West Hollywood,
9 Louisville, and every other wire center in the BellSouth
10 region.

11
12 Q. HOW DO UNMANNED CENTRAL OFFICES AFFECT BELLSOUTH'S ABILITY
13 TO HANDLE ANTICIPATED VOLUMES OF UNE-L ORDERS? (VAN DE
14 WATER, AT 37)?

15
16 A. Mr. Van de Water's statements beginning on page 37, that
17 unmanned Central Offices and hot cuts involving IDLC will
18 limit BellSouth's capacity to work Hot Cuts in Kentucky are
19 incorrect. It is true that Bellsouth employees do not
20 report to work daily at every Central Office. For those
21 offices with a low volume of work, technicians are
22 dispatched as needed to work the pending load, daily if
23 required. However, while not all offices are manned daily
24 at the beginning of the workday, all BellSouth Central
25 Offices are manned if work is required. Our force model
26 includes hours for working conversions at all BellSouth

1 wire centers. Thus, BellSouth already has taken into
2 account any so-called "unmanned" offices.

3

4 Q. MR. VAN DE WATER DISCUSSES THE IMPACT OF IDLC DISPATCHES ON
5 HIS LOAD PRODUCTIONS AT PAGES 38-39 OF HIS TESTIMONY. DID
6 BELLSOUTH FACTOR THOSE DISPATCHES INTO ITS LOAD PROJECTION?

7

8 A. Yes. BellSouth's "worst-case" force model accounts
9 conservatively for dispatching outside technicians to handle
10 conversions involving IDLC. Unlike Mr. Van de Water's
11 analysis, BellSouth's force model bases the number of field
12 dispatches required on the %IDLC in every wire center. The
13 force model assumes that every conversion involving IDLC
14 will require a separate dispatch. In reality a technician
15 would be dispatched to work all of the conversions at a
16 single interface at one time. The assumption is therefore
17 conservative as it is unknown how many conversions will be
18 required at each field interface each day. Based on
19 regional estimates of 4,827 daily outside dispatches, well
20 over 2.2M dispatches could be required to complete the
21 conversions and handle growth. BellSouth took those
22 dispatches into account in its force model.

23

24 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

25

26 A. Yes.