

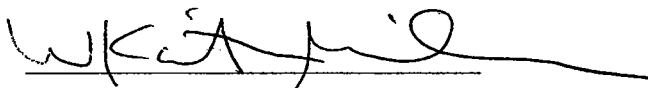
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STATE OF GEORGIA

COUNTY OF FULTON

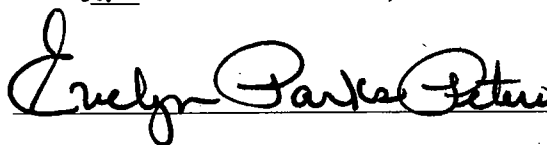
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared W. Keith Milner, who, being by me first duly sworn deposed and said that:

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 15 pages and 0 exhibits.



W. Keith Milner

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS 29<sup>th</sup> DAY OF MARCH, 2004

 Notary Public

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

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF W. KEITH MILNER  
3 BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION  
4 DOCKET NO. 2003-00379  
5 MARCH 31, 2004  
6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR  
8 POSITION WITH BELL SOUTH TELECOMMUNICATIONS, INC.  
9 ("BELL SOUTH").  
10

11 A. My name is W. Keith Milner. My business address is 675 West Peachtree Street,  
12 Atlanta, Georgia 30375. I am Assistant Vice President - Interconnection  
13 Operations for BellSouth.  
14

15 Q. ARE YOU THE SAME W. KEITH MILNER THAT FILED DIRECT TESTIMONY  
16 IN THIS PROCEEDING?  
17

18 A. Yes.  
19

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

22 A. My testimony provides rebuttal to the direct testimony of Mr. Jay M. Bradbury and  
23 Mr. Steven E. Turner on behalf of AT&T Communications of the Southern States,  
24 LLC.  
25

1 Q. ALL PARTIES HAVE DIRECTED THIS COMMISSION TO VARIOUS  
2 PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR  
3 POSITIONS IN THEIR DIRECT TESTIMONY. WHAT IS THE IMPACT OF THE  
4 D.C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS  
5 PROCEEDING?

6  
7 A. Currently the impact of the DC Circuit Court's opinion is unclear. At the time of  
8 filing this testimony, the DC Court had vacated large portions of the rules  
9 promulgated as a result of the TRO, but stayed the effective date of the opinion  
10 for at least sixty days. Therefore my understanding is that the TRO remains  
11 intact for now, but its content, and the rules adopted thereto, must be suspect in  
12 light of the court's harsh condemnation of large portions of the order.  
13 Accordingly, I will reserve judgment, and the right to supplement my testimony as  
14 circumstances dictate, with regard to the ultimate impact of the DC Court's order  
15 on this case.

16

17 **Rebuttal to Mr. Bradbury**

18 Q. ON PAGE 7 OF HIS TESTIMONY, MR. BRADBURY CONTENDS "THE  
19 LEGACY ILEC NETWORK ARCHITECTURE PROVIDES AN INEFFICIENT  
20 AND UNECONOMIC MEANS FOR A CLEC THAT TRIES TO CONNECT  
21 THOSE SAME LOOPS TO ITS SWITCH THAT IS ALWAYS REMOTELY  
22 LOCATED FROM THE ILEC CENTRAL OFFICE WHERE THESE LOOPS  
23 TERMINATE." [Emphasis added] HOW DO YOU RESPOND?

24

25 A. Despite Mr. Bradbury's characterization to the contrary, there is no requirement

1 that Competitive Local Exchange Carriers (“CLECs”) install their local switch at  
2 some location other than the Incumbent Local Exchange Carrier’s (“ILEC’s”)   
3 central office building. CLECs have the option to place switches in their  
4 collocation arrangements in BellSouth’s central offices – an option Mr. Bradbury  
5 has overlooked.

6  
7 Q. ON PAGE 8 OF HIS TESTIMONY, MR. BRADBURY QUOTES THE FEDERAL  
8 COMMUNICATIONS COMMISSION (“FCC”) AS SAYING “THE NEED TO  
9 BACKHAUL THE CIRCUIT DERIVES FROM THE USE OF A SWITCH  
10 LOCATED IN A LOCATION RELATIVELY FAR FROM THE END USER’S  
11 PREMISES, WHICH EFFECTIVELY REQUIRES COMPETITORS TO DEPLOY  
12 MUCH LONGER LOOPS THAN THE INCUMBENT.” PLEASE RESPOND.

13  
14 A. Mr. Bradbury correctly quotes the FCC. However, I disagree with the assertion  
15 that a CLEC’s switch will be “relatively far” from the end user’s premises. The  
16 CLEC could, for example, house its switch in a building directly across the street  
17 from the ILEC’s central office, assuming it elected not to put the switch in its  
18 collocation arrangement in that ILEC central office. In such a case, the loop  
19 would not be “much longer.” More importantly, however, the Commission should  
20 recall that during recent proceedings regarding the CLECs’ eligibility for  
21 reciprocal compensation for tandem switching, CLECs uniformly argued that: (1)  
22 their switches covered very large stretches of geography; and (2) the CLEC’s  
23 architecture of choice featuring fewer switches and shorter loops as compared to  
24 incumbents’ networks yielded significant benefits. In my direct testimony in this  
25 proceeding, I cited the testimony of Mr. Gregory Follensbee, on behalf of AT&T,

1 in which he explained the long “reach” of AT&T’s switches in Kentucky. I find it  
2 somewhat ironic that the network characteristic that this CLEC touted as  
3 advantageous in order to obtain greater compensation from BellSouth now  
4 suddenly constitutes grounds for CLEC claims of “impairment.”  
5

6 Q. ON PAGE 8 OF HIS TESTIMONY, MR. BRADBURY STATES “THE CLEC  
7 BACKHAUL COSTS INCLUDE THE NON-RECURRING COSTS NECESSARY  
8 TO ESTABLISH A COLLOCATION ARRANGEMENT IN EVERY ILEC WIRE  
9 CENTER IN WHICH THE CLEC WISHES TO OFFER MASS MARKET  
10 SERVICES...” [Emphasis added] HOW DO YOU RESPOND?  
11

12 A. Apparently, AT&T has chosen to assume that collocation in each wire center is  
13 required. However, as I noted in my direct testimony in this proceeding,  
14 BellSouth’s Analysis of Competitive Entry (“BACE”) model accommodates the  
15 assumption that the CLEC may collocate in every ILEC central office in order to  
16 serve mass market customers. BellSouth’s BACE model also allows the CLEC  
17 to collocate in some, but not all, ILEC central offices and use the so-called  
18 Enhanced Extended Link (“EEL”) to serve those mass market customers whose  
19 loops terminate in ILEC central offices in which the CLEC is not collocated.  
20

21 Q. ON PAGE 9 OF HIS TESTIMONY, MR. BRADBURY INSISTS THAT THE CLEC  
22 “MUST PAY EXORBITANT CHARGES TO THE ILEC FOR TRANSFERRING  
23 LOOPS FROM THE ILEC SWITCH TO A CLEC COLLOCATION FACILITY, OR  
24 FROM ONE CLEC TO ANOTHER.” TO WHAT CHARGES DOES MR.  
25 BRADBURY REFER?

1 A. Apparently, Mr. Bradbury refers to the rates set by this Commission for the  
2 ordering and provisioning of unbundled loops. I disagree with Mr. Bradbury that  
3 the charges are “exorbitant,” and he does not explain the basis for his claim. To  
4 my knowledge, AT&T has not challenged the “hot cut” rates established by the  
5 Commission to disconnect a loop from BellSouth’s switch and then re-connect  
6 that same loop to the CLEC’s facilities. One would expect AT&T to do so if it  
7 truly believed that such rates were “exorbitant,” as Mr. Bradbury now claims.  
8

9 Q. ON PAGE 9 OF HIS TESTIMONY, MR. BRADBURY TAKES ISSUE WITH THE  
10 TRANSFER PROCESS, CONTENDING THAT THE PROCESS IS INFERIOR IN  
11 COMPARISON TO UNE-P CHANGES OR THE PRIMARY INTEREXCHANGE  
12 CARRIER (“PIC”) CHANGE PROCESS. ARE THESE COMPARISONS VALID?  
13

14 A. No. The two (2) processes which Mr. Bradbury prefers (that is, use of UNE-P or  
15 the use of PIC change capabilities) are billing changes that are effectuated  
16 without the need to make physical changes to the ILEC’s network. The hot cut  
17 process, on the other hand, requires physical work within the ILEC’s network to  
18 remove the loop from the ILEC’s switch and then to re-connect that loop to the  
19 CLEC’s facilities including the CLEC’s switch. There are profound dissimilarities  
20 between the processes Mr. Bradbury apparently wishes could be used for “hot  
21 cuts” and the processes that are actually used. Most importantly, he offers no  
22 replacement for or improvements to the “hot cut” process that AT&T and  
23 BellSouth jointly developed and which is in use daily across BellSouth’s nine-  
24 state region.  
25

1 Q. ON PAGE 15 OF HIS TESTIMONY, MR. BRADBURY QUOTES THE FCC AS  
2 SAYING “NO PARTY SERIOUSLY ASSERTS THAT COMPETITIVE LECs ARE  
3 SELF-DEPLOYING COPPER LOOPS TO PROVIDE TELECOMMUNICATIONS  
4 SERVICES TO THE MASS MARKET.” PLEASE RESPOND.

5

6 A. While Mr. Bradbury accurately quotes the FCC, in the referenced passage, the  
7 FCC merely pointed out that CLECs were not deploying copper cables over  
8 which services are or will be provided. BellSouth concurs that CLECs generally  
9 do not place copper loop facilities. Nonetheless, CLECs are deploying  
10 analogous network facilities over which loops are transported, namely fiber optic-  
11 based transmission systems.

12

13 Q. ON PAGE 21 OF HIS TESTIMONY, MR. BRADBURY ASSERTS CLECs MUST  
14 “INSTALL AND MAINTAIN THE EQUIPMENT NECESSARY TO DIGITIZE AND,  
15 USING CONCENTRATION AND MULTIPLEXING TECHNIQUES, AGGREGATE  
16 THE TRAFFIC ON THOSE LOOPS TO PERMIT CONNECTIONS TO THE  
17 CLEC’S SWITCH AT ACCEPTABLE QUALITY LEVELS...” DO YOU AGREE?

18

19 A. No. CLECs need not perform this function for themselves, as Mr. Bradbury  
20 apparently believes. To the contrary, BellSouth’s Unbundled Loop Concentration  
21 (“ULC”) offer aggregates and digitizes the loops in a given BellSouth central  
22 office for delivery to the CLEC’s collocation arrangement. Please see  
23 BellSouth’s Interconnection website (<http://www.interconnection.bellsouth.com/>)  
24 for details of BellSouth’s offer.

25

1 Q. ON PAGE 26 OF HIS TESTIMONY, MR. BRADBURY DISCUSSES A CLEC'S  
2 USE OF DIGITAL LOOP CARRIER ("DLC") EQUIPMENT WITHIN THE CLEC'S  
3 COLLOCATION ARRANGEMENT AND STATES "WHILE THIS DLC  
4 EQUIPMENT IS ABSOLUTELY MANDATORY FOR THE CLEC, IT IS NOT  
5 REQUIRED FOR THE ILEC WHEN SERVING THE SAME CUSTOMERS."  
6 PLEASE RESPOND.

7

8 A. While I agree that CLECs will use DLC equipment (either self-provided or via  
9 BellSouth's ULC offer I discussed earlier), DLC equipment is useful not for  
10 differences in transmission quality alluded to by Mr. Bradbury, but rather by the  
11 economics achieved as a result of concentrating individual loops for conveyance  
12 to the CLEC's switch which, under Mr. Bradbury's assumption, is housed  
13 somewhere other than within BellSouth's central office.

14

15 Q. ON PAGE 28 OF HIS TESTIMONY, MR. BRADBURY STATES "DLC  
16 EQUIPMENT IS NOT DESIGNED TO, AND THEREFORE CANNOT, SCALE  
17 PRECISELY WITH THE LEVEL OF DEMAND (OR NUMBER OF LINES)  
18 SERVED IN A WIRE CENTER." PLEASE ELABORATE ON THIS POINT.

19

20 A. Mr. Bradbury is correct to a certain point. What he fails to point out, however, is  
21 that few, if any, electronic devices used in a modern telecommunications network  
22 are smoothly scalable. Instead, to improve the cost efficiency of their products,  
23 manufacturers offer devices with stated levels of capacity. Once the devices are  
24 installed, the service provider (whether the CLEC or the ILEC) need not augment  
25 network capacity simply to provide service to one more customer. Indeed, most



1 products (from a loaf of bread to airplane seats) are offered in capacity units,  
2 which the producer believes to be proper increments. Contrary to Mr. Bradbury's  
3 assertion that DLC investment is very "lumpy", I would point out that Mr.  
4 Bradbury has chosen to support his example with DLC equipment in the very  
5 largest increment commercially available (that is, the Alcatel LiteSpan 2000).  
6 There are numerous providers of DLC equipment with "start up" levels far smaller  
7 than that of the LiteSpan 2000. In fact, the AT&T model allows a choice from  
8 three (3) sizes of DLC, the LiteSpan being the largest, but CLECs may also place  
9 smaller DLC to scale to offices with smaller demand. See Turner Exhibit SET-2,  
10 Section II.B.1.a, page 13.

11  
12 Q. ON PAGE 29 OF HIS TESTIMONY, MR. BRADBURY DISCUSSES DIGITAL  
13 CROSS CONNECTION ("DSX") EQUIPMENT AND ATTRIBUTES IT WITH THE  
14 SAME LUMPINESS AS FOR DLC EQUIPMENT. WHAT IS YOUR REACTION?

15  
16 A. Here again, although DSX equipment is available in various capacity increments,  
17 Mr. Bradbury chooses to support his example using a piece of equipment (that is,  
18 the DSX-3) that provides the greatest amount of capacity rather than choosing  
19 some smaller device such as the DSX-1. If the CLEC has a smaller amount of  
20 expected demand, it could use the smaller device, notwithstanding Mr.  
21 Bradbury's suggestion to the contrary.

22  
23 Q. ON PAGE 32 OF HIS TESTIMONY, MR. BRADBURY DESCRIBES THE WORK  
24 STEPS IN THE TRANSFER OF A WORKING LOOP FROM THE ILEC's  
25 SWITCH TO THE CLEC's SWITCH. IS HIS DESCRIPTION ACCURATE?

1 A. While Mr. Bradbury has correctly noted the work steps involved, it is ironic that  
2 earlier in his testimony (see page 9 of Mr. Bradbury's testimony) he decries this  
3 process as insufficient compared to processes that do not involve these physical  
4 work steps (the UNE-P transfer or a PIC change). Further, a "hot cut" process  
5 with accompanying physical work steps is likewise required whenever BellSouth  
6 "win backs" a customer previously served by a CLEC. Thus, any acquisition  
7 costs related to "hot cuts" are appropriately considered a cost of doing business  
8 for both ILECs and CLECs.

9  
10 Q. ON PAGE 37 OF HIS TESTIMONY, MR. BRADBURY DISCUSSES LOOPS  
11 SERVED BY INTEGRATED DIGITAL LOOP CARRIER ("IDLC") EQUIPMENT  
12 AND STATES "FOR EXAMPLE, IF THE ILEC'S DATABASE DOES NOT  
13 REVEAL THE PRESENCE OF IDLC BEFORE A CONVERSION DATE IS  
14 COMMITTED TO THE CUSTOMER, THE CLEC MUST NEGOTIATE A NEW  
15 DATE WITH THAT CUSTOMER, WHICH OF COURSE MAKES A NEGATIVE  
16 IMPRESSION." PLEASE RESPOND.

17  
18 A. BellSouth's database (that is, Loop Facilities Assignment and Control System or  
19 "LFACS") includes indicators as to whether a given loop is provided via IDLC  
20 equipment. Through the loop makeup process, the CLEC can readily determine  
21 the presence of IDLC in a given instance and negotiate due dates with the  
22 CLEC's customer accordingly. See the testimony of BellSouth witness Ronald  
23 Pate for a fuller discussion of this topic.

24  
25 Q. ON PAGE 37 OF HIS TESTIMONY, MR. BRADBURY DISCUSSES IDLC

1 ARRANGEMENTS AND DIGITAL SUBSCRIBER LINE (“DSL”) SERVICE. HE  
2 STATES “ADDITIONALLY, EXCEPT WHEN THE IDLC SERVED CUSTOMER  
3 CAN BE PLACED ON A COPPER LOOP LESS THAN 18,000 FEET IN  
4 LENGTH, CLECs ARE DENIED THE CAPABILITY OF PROVIDING DSL  
5 SERVICES TO THEIR CUSTOMERS.” IS THAT A CORRECT STATEMENT?  
6

7 A. No. As Mr. Bradbury himself points out, even BellSouth must make alternative  
8 arrangements to provide DSL service to those of its customers served by DLC.  
9 In such a case, BellSouth must place its Digital Subscriber Line Access  
10 Multiplexer (“DSLAM”) in the remote terminal rather than in the central office. A  
11 CLEC that sought to provide DSL service to its customers could likewise  
12 collocate its DSLAM at the remote terminal.  
13

14 Q. ON PAGE 38 OF HIS TESTIMONY, MR. BRADBURY STATES “...BECAUSE  
15 THE CLEC DOES NOT HAVE THE ECONOMIES OF SCALE TO DIRECT  
16 CONNECT ITS SWITCH WITH EFFICIENT INTER-OFFICE TRUNK GROUPS  
17 TO EACH OF THE ILEC’S LOCAL SWITCHES, THE CLEC WILL BE MORE  
18 RELIANT ON THE ILEC’S TANDEM NETWORK FOR THE EXCHANGE OF  
19 TRAFFIC.” WHAT IS YOUR RESPONSE?  
20

21 A. Whether or not it is economical to have direct trunks between a particular pair of  
22 local switches in a local calling area is a function of the amount of traffic to be  
23 handled and the distance between those two switches. Although Mr. Bradbury’s  
24 testimony would lead one to believe that CLECs must interconnect at a tandem  
25 for all their local traffic, that simply is not true. BellSouth allows (and some

1 CLECs have elected) the interconnection directly between the BellSouth end  
2 office switch and the CLEC's switch rather than at the tandem. Those same  
3 factors affect BellSouth's decision whether to have direct trunking between  
4 certain of its end office switches, and it is not uncommon for the traffic between  
5 two BellSouth end offices in a given local calling area to be handled solely via  
6 tandem switching connecting the two end offices. Thus, BellSouth faces exactly  
7 the same challenges regarding cost efficiency and customer services, as does  
8 the CLEC in such cases.

9  
10 **Rebuttal to Mr. Turner**

11 Q. ON PAGES 4-5 OF HIS TESTIMONY, MR. TURNER STATES "...IN THE  
12 ABSENCE OF UNBUNDLED LOCAL SWITCHING, CLECs FACE  
13 PRACTICALLY INSURMOUNTABLE COST DISADVANTAGES RELATIVE TO  
14 THE INCUMBENT LOCAL EXCHANGE CARRIERS ("ILECs") IF UNBUNDLED  
15 NETWORK ELEMENT LOOPS ("UNE-Ls") USED IN CONJUNCTION WITH  
16 THEIR OWN (OR A THIRD PARTY PROVIDER'S) SWITCHING IS THE SOLE  
17 OPTION FOR PROVIDING LOCAL SERVICES TO MASS MARKET  
18 CUSTOMERS." DO YOU AGREE WITH MR. TURNER'S CONCLUSION IN  
19 THIS REGARD?  
20

21 A. No. The cost analysis that accompanies Mr. Turner's testimony is fatally flawed  
22 in several respects. Once corrections are made to the assumptions underpinning  
23 Mr. Turner's analysis, it is clear that any cost "disadvantage", to use Mr. Turner's  
24 phrasing, is much smaller than he predicts and thus does not impair a CLEC's  
25 ability to compete.

1 Q. IN WHAT WAYS IS MR. TURNER'S ANALYSIS FLAWED?

2

3 A. Mr. Turner's analysis hinges on determining costs that a CLEC would incur in  
4 acquiring and servicing a customer that an ILEC allegedly would not also incur.  
5 This is the basis of his determination of an "absolute cost disadvantage." As the  
6 following paragraphs will make clear, however, the assumption underlying Mr.  
7 Turner's analysis about costs that he attributes to CLECs but not to ILECs is  
8 simply incorrect. Briefly, Mr. Turner's analysis is wrong for the following reasons:

9 • Mr. Turner attributes "hot cut" costs to each and every customer that  
10 might choose service from a CLEC. While Mr. Turner is correct that  
11 the CLEC will incur costs associated with the hot cut to disconnect the  
12 loop serving the customer from BellSouth's switch and then re-connect  
13 the loop to the CLEC's switch, he ignores the fact that in cases where  
14 a customer chooses to return to the ILEC, those same work steps and  
15 the related costs (disconnection of the serving loop from the CLEC's  
16 switch and re-connecting the loop to the ILEC's switch) and associated  
17 costs will likewise be incurred by the ILEC.

18 • Mr. Turner attributes costs to perform Local Number Porting ("LNP")  
19 activities to the CLEC but does not likewise attribute those same costs  
20 to ILECs in cases where the customer chooses to return to the ILEC.  
21 In other words, the work steps required to "port" the telephone number  
22 from BellSouth's network to the CLEC's network are required to "port"  
23 the telephone number from the CLEC's network to BellSouth's  
24 network.

25 • Mr. Turner's analysis assumes that an efficient CLEC will collocate in

1 every ILEC end office in which the CLEC has or will have mass market  
2 customers. For reasons Mr. Turner does not explain in his testimony,  
3 he assumes that CLECs will not make use of so-called Enhanced  
4 Extended Links (“EELs”), which reduce the quantity of collocation  
5 arrangements in a given Local Access Transport Area (“LATA”) to as  
6 few as one.

- 7 • Mr. Turner’s Facility Ring Processor (“FRP”) tool used in his analysis  
8 does not reduce the total facility costs by the amount of the capacity  
9 required to handle that portion of the capacity used that is not for  
10 “backhauling” loops and that is not used for “enterprise” customer  
11 traffic, but instead is used to carry interconnection traffic (that is, voice  
12 calls between the CLEC’s customers and the customers of other local  
13 service providers including but not limited to other CLECs and ILECs).  
14 Here again, both ILECs and CLECs incur costs of transporting calls  
15 between and among the networks of various local service providers.  
16 However, Mr. Turner incorrectly leaves those costs in as part of his  
17 “absolute disadvantage” calculation.

18  
19 Q. WHAT CORRECTIONS SHOULD BE MADE TO THE ASSUMPTIONS  
20 UNDERLYING MR. TURNER’S ANALYSIS?

21  
22 A. Corrections should be made to each of the areas I discussed above. Once the  
23 following corrections are made, the “absolute disadvantage” costs he attempts to  
24 calculate is reduced:

- 25 • Hot cut costs should be eliminated from Mr. Turner’s model as those

1 costs are incurred by both CLECs and ILECs as part of customer  
2 acquisition or reacquisition. Mr. Turner suggests that perhaps as much  
3 as 5% customer churn between local service providers per year might  
4 occur. Taking this churn into account leads to the conclusion that all  
5 local service providers using their own or a third party's switches will  
6 incur hot cut costs.

- 7 • LNP costs should be eliminated from Mr. Turner's model as those  
8 costs are incurred by both CLECs and ILECs as part of customer  
9 acquisition or reacquisition.
- 10 • "Backhaul" costs should be reduced from the levels shown in Mr.  
11 Turner's model to account for the use of EELs instead of collocation in  
12 certain ILEC central offices. The use of EELs assumes that UNE  
13 transport is available for the interoffice transport portion of the EEL.  
14 Even if BellSouth were to receive relief from providing transport in  
15 certain instances, the CLEC could then use commingled UNE loops  
16 and special access transport.
- 17 • "Backhaul" costs should be reduced from the levels shown in Mr.  
18 Turner's model to eliminate costs associated with conveying  
19 interconnection traffic from the CLEC's network to the networks of  
20 other local service providers.

21  
22 Q. ARE THE ADJUSTMENTS YOU DESCRIBE ABOVE THE ONLY  
23 ADJUSTMENTS YOU BELIEVE SHOULD BE MADE?

24  
25 A. No. There is one other adjustment that should be made that will reduce even

1 further Mr. Turner's "absolute disadvantage". That adjustment addresses Mr.  
2 Turner's suggestion that ILECs may assess a minimum square footage charge  
3 for collocation. In accordance with the FCC's rules, BellSouth offers cageless  
4 collocation without any minimum square footage requirement. Instead, the CLEC  
5 can acquire floor space amounts as small as that required for a single equipment  
6 bay, which Mr. Turner's analysis ignores.

7  
8 Q. DOES THAT CONCLUDE YOUR REBUTTAL TESTIMONY?

9  
10 A. Yes.