## 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 Alfred 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 surrebuttal testimony would be set forth in the annexed testimony consisting of $\qquad$ pages and $\qquad$
$\qquad$ exhibits.


SWORN TO AND SUBSCRIBED BEFORE ME THIS は2゙ $\underbrace{\text { h }}$ DAY OF APRIL, 2004


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

# BELLSOUTH TELECOMMUNICATIONS, INC. SURREBUTTAL TESTIMONY OF ALFRED A. HEARTLEY BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY 

DOCKET NO. 2003-00379
April 13, 2004
Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").
A. My name is Alfred A. Heartley. My business address is 754 Peachtree Street, Atlanta, Georgia 30308. My title is General Manager - Wholesale Performance and Regional Centers for BellSouth.
Q. ARE YOU THE SAME ALFRED HEARTLEY WHO EARLIER FILED DIRECT AND REBUTTAL TESTIMONY IN THIS DOCKET?
A. Yes.
Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY BEING FILED TODAY?
A. I will respond to portions of the rebuttal testimony of Mr. Mark David Van de Water on behalf of AT\&T regarding the batch hot cut process.

## Q. MR. VAN DE WATER, ON PAGE 24 OF HIS REBUTTAL TESTIMONY, STATES THAT IT IS UNCLEAR IF AND HOW BELLSOUTH ACCOUNTED FOR CERTAIN ITEMS IN ITS FORECAST. CAN YOU ADDRESS THOSE ITEMS?

A. Yes. First, Mr. Van de Water claimed that BellSouth did not include travel time to unmanned central offices. BellSouth does not have employees report to work daily at each and every central office simply for the reason that there are some central offices in which there would be no work to be performed. Instead, for those offices with a low volume of work, technicians are dispatched as needed to work the pending load, daily if required. These tend to be small offices and therefore would not have large numbers of UNE-P lines to convert. Technicians would report to work in those offices when the cutovers are required and in most cases the technician would travel on his own time directly to the office as a first assignment. The force model accounts for the work to be performed in the office.

Second, Mr. Van de Water claimed BellSouth did not consider the number of shifts worked per day per central office. While BellSouth did not explicitly address this point, it was not necessary to do so because BellSouth has the capability to handle a worst-case scenario load projection. To highlight this point we have run a different version of our force model to include the number of technicians that can work safely and efficiently on the frame in each of the central offices. These numbers are based on BellSouth's response to Interrogatory $\mathbf{- 4 5}$. BellSouth increased the cutover load in the model to address the 1000 hot cut conversions per day that Mr. Van de Water recommended in his direct testimony and referred to again on page 22 of his rebuttal testimony. The results showed
that BellSouth would have to work 2 shifts in 8 to 9 of the 144 central offices in Kentucky to handle the increased load. BellSouth would have to work 3 shifts in only 4 central offices in Kentucky. The load exceeded 3 shifts in only two central offices in Kentucky.

We considered the load if a central office technician cut 10 lines per day or 12 lines per day. I have included a revised force model, Exhibit AH-2, which shows the available technicians and number of shifts required for all central offices in Kentucky. We increased the churn in the model to $27 \%$ per month or $324 \%$ per year to reach the 1000 hot cuts required per day that Mr. Van de Water recommended. The revised force model demonstrates that BellSouth can handle this increased load by working more than one shift in some of its central offices. It also indicated that BellSouth would have to increase its incremental force from 119 to 144 in Kentucky.

Third, Mr. Van de Water questioned whether BellSouth considered all lines after the first one in the batch as additional lines for purposes of staffing. We considered all hot cuts as if they were the first line to keep the model simple and to demonstrate the worse case scenario. The actual hot cuts will go faster than the model predicts.

Fourth, Mr. Van de Water questioned whether the ratio of supervision to employees was applied evenly across BellSouth territory or accounted for the geographic dispersion of the central offices. The ratio of supervision to
employees was applied to the total technicians required. The supervision will be dispersed along with the technicians. In large metro areas, we anticipate that technicians will be grouped for this particular project and will gain expertise from the daily hot cut repetition. However, in some dispersed areas, technicians may be added to existing groups. We will staff the areas where the hot cuts are required with the appropriate technicians and supervisors.
Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?
A. Yes.




