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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Local Exchange Carriers' Rates	)	CC Docket No. 94-97, Phase II
Terms, and Conditions for	)	
Expanded Interconnection Through	)	
Virtual Collocation for Special Access	)	
and Switched Transport	)	

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DIRECT CASE OF GTE

GTE Service Corporation, on behalf of
its affiliated telephone operating
companies

Gail L. Polivy
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036
(202) 463-5214

October 19, 1995

THEIR ATTORNEY

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SUMMARY

GTE justifies in this Direct Case recovery of costs associated with virtual expanded interconnection service ("EIS") through a direct assignment methodology. LECs typically recover DS1 and DS3 costs through various loadings applied to the gross investment of their DS1 and DS3 services. Because GTE has no investment in the interconnector-designated equipment, it is reasonable and necessary to use a cost recovery mechanism different than that used for services such as DS1 and DS3 which use GTE-owned equipment. GTE believes that the direct assignment of costs is the most reasonable and appropriate alternative.

GTE responds to the issues raised against the GTOCs. In addition, the data requested in Appendix C of the *Phase II Designation Order* is provided to the Commission.

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DIRECT CASE OF GTE

GTE Service Corporation, on behalf of its affiliated GTE telephone operating companies ("the GTOCs"), (collectively, "GTE") respectfully submits its Direct Case in the above-captioned tariff investigation with regard to the GTOCs' virtual expanded interconnection service ("EIS"). In the second phase of this tariff investigation, by the *Order Designating Issues for Investigation ("Phase II Designation Order")*, the Commission ordered the Local Exchange Carriers ("LECs") including the GTOCs, to respond to issues with regard to virtual EIS rates, cost components, rate structures, terms and conditions.

The GTOCs respond below only to those issues raised against the GTOCs. The numbers correspond to the numbers in the *Phase II Designation Order*.

Issue A. Are the direct cost components of the LECs' virtual collocation rates justified?

Many of the issues designated by the Commission in the *Phase II Designation Order* examine the level of direct costs of virtual EIS and require the LECs to justify differences in cost recovery methodologies between EIS services and DS1 and DS3 services. Specifically, the Commission asks the LECs to justify recovering DS1 and DS3 costs through overhead loadings while recovering EIS costs through a direct assignment to particular rate elements. Because GTE has not purchased the interconnector-designated equipment as its own investment, GTE believes that it is necessary and appropriate to recover the costs in a different way.

LECs typically recover DS1 and DS3 costs through various loadings applied to the gross investment of their DS1 and DS3 services. Costs incurred, for example, to maintain equipment are tracked by account throughout the year. These costs are then divided by the applicable gross plant in order to determine annual charge factors ("ACF") by account. These factors are updated annually so that cost studies can be performed using more current data.

As noted in the *Phase II Designation Order*, most LECs , including the GTOCs, have adopted a $1 sale and repurchase arrangement allowing the interconnector to use its own designated equipment. In this arrangement, the interconnector makes the capital investment by purchasing the equipment. The equipment cost to the GTOCs is only $1. Thus, the GTOCs have no capital

investment in the interconnector designated equipment on which to apply various loadings, as there is for the equipment used to provide DS1 and DS3 service.

While the cost of the equipment's gross investment is normally multiplied by the ACF in determining the annual cost, the artificial investment amount used with this interconnector designated equipment arrangement has no relation to the actual equipment and, therefore, would be inappropriate for determining, for example, the cost of maintaining that equipment. Because GTE has no investment in this equipment, it is reasonable and necessary to use another cost recovery mechanism. GTE believes that the direct assignment of costs is the most reasonable and appropriate alternative.

2. Charges for Installation of Interconnector-Designated Equipment

26. **Information Requirement.** The Bureau requires Ameritech, Bell Atlantic, BellSouth, GTE, and SWB to provide the following information in their direct cases.

(a) Ameritech, Bell Atlantic, and GTE, which tariffed nonrecurring charges for installation of interconnector-designated equipment, must identify the components of the installation costs recovered by these nonrecurring charges. The LECs must state whether the costs of equipment installation vary depending on the type of equipment designated by the interconnector. If so, LECs must explain these differences.

GTE RESPONSE:

GTE has two non-recurring charges associated with the installation of interconnector-designated equipment. The first charge, Engineering/Installation Fee per base module, recovers the labor hours required for GTE personnel to engineer and install the base fiber optic terminal. Because both the engineering and installation functions would always be performed together, the two functions

are bundled in this rate element. The second charge, Engineering/ Installation Fee per card installed, recovers the labor hours required for GTE personnel to engineer and install either a DS0, DS1 or DS3 card into the base module. Again, these functions are bundled within the rate element since both functions would always be perform together.

GTE has tariffed the following types of base modules: OC1, 90Mbps, OC3, OC12, OC24, OC48 and Next Generation Digital Loop Carrier("NGDLC"). The proposed Nonrecurring Charge ("NRC") is the same for a particular type of interconnector-designated equipment regardless of the vendor. Thus, GTE's NRCs are the same for each type of module, under the assumption that the hours required to install a Fujitsu OC12 are equivalent to the hours of a ATT OC12. Based upon its experience, GTE believes that this assumption is sound and reasonable.

> (b) Ameritech, Bell Atlantic, and GTE must describe the components of the equipment installation costs recovered in their rates for their comparable DS1 and DS3 services. To the extent that these LECs' recovery of equipment installation costs differs from their recovery of the costs of installing interconnector-designated equipment, LECs must explain any differences.

GTE RESPONSE:

Comparable DS1 and DS3 services using lowest overhead loadings were determined using information from Appendix C to the *Virtual Collocation Tariff Suspension Order*. These services can be broken down basically into two categories: 1) Special Access Line ("SALs"), Circuit Terminations, Entrance

Facilities and 2) Transport Facilities, Transport Terminations, Circuit Mileage - Fixed, Circuit Mileage - Per Mile.

Category 1 components of circuit equipment installation costs include items such as DSX-1, DSX-3, CO repeaters, line repeaters, CDL span interfaces, FO systems (including cards), and FO panels (both CO and CDL). Outside plant installation costs represent cable and related outside plant support costs used between the customer's premises and the central office.

Category 2 components of circuit equipment installation costs include such items as DSX-1, DSX-3, CO repeaters, M1-1 MUX, FO systems, FO panels and pass thru panels. Outside plant installation costs represent per mile cable and related outside plant costs.

Installation and engineering costs for both EIS and DS1 and DS3 are recovered through a direct assignment methodology. For EIS, equipment installation and engineering costs are recovered through a nonrecurring charge based on the estimated number of hours times the labor rate. DS1 and DS3 costs are also directly assigned, and the cost is also based on the estimated number of hours times the labor rate hours. The cost, however, is recovered partially through an nonrecurring charge and partially through the monthly recurring charges.

3. Charges for Maintenance and Repair of Interconnector-Designated Equipment

30. **Information Requirement**. The Bureau requires Ameritech, GTE, and SWB to provide the following information in their direct cases:

(a) The LECs typically develop the direct costs of maintenance by applying the appropriate ACFs to direct investment. For LECs that adopted the $1 sale and repurchase arrangement, however, it is unclear how direct investment in interconnector-designated equipment was derived. These LECs, therefore, must explain how they derived their direct investment (*e.g.,* interconnector's invoice price, average investment in equipment).

GTE RESPONSE:

GTE has proposed to recover all maintenance related costs within a monthly recurring rate element, Maintenance per base module. While the cost of the equipment is normally considered in determining the maintenance factor loading, the artificial cost used in this arrangement has no relation to the actual equipment and, therefore, would be inappropriate for determining the cost of maintaining that equipment.

Instead of estimating the cost of the equipment or using averaged costs, GTE estimated the number of labor hours which would be required each month to maintain the fiber optic base modules. These estimated hours multiplied by the labor rate by jurisdiction were used in calculating the monthly maintenance charge proposed. By estimating the labor cost, this method reasonably projects the cost of maintaining equipment for which GTE has incurred no real capital investment.

Moreover, maintenance associated with the equipment is only one component of the maintenance. The second component is an allocation of labor and investment of the alarm equipment that is used to connect the customer's terminal to GTE's alarm network. The alarm function is an essential element of any maintenance program. Since each base module is provided a port into the

alarm network, it is reasonable and appropriate to allocate that cost to this rate element.

> (b) These LECs must identify and justify any differences between their recovery of the costs of maintenance and repair of interconnector-designated equipment and their recovery of the costs of maintenance and repair of equipment used to provide their comparable DS1 and DS3 services. LECs must reference applicable sections of their special access and switched transport tariffs.

GTE RESPONSE:

As discussed in the previous response, GTE developed an estimate of the hours required to maintain the interconnector's equipment multiplied by the applicable labor rate. Therefore, a separate, identifiable maintenance rate was developed for EIS customers. For comparable services such as DS1 and DS3, GTE applies a maintenance annual charge factor to the capital investment required to provide the service, thereby recovering the maintenance as part of the monthly recurring charge developed for the service. Thus, there is no separate rate element.

> (c) These LECs must clarify the costs they recover in their monthly recurring charges for maintenance.

GTE RESPONSE:

See response under 30a. The Maintenance per base module monthly recurring charge includes maintenance expense and an allocation of labor and investment of the alarm equipment connecting the interconnector's terminal to GTE's alarm network.

4. Charges for Cable Installation and Cable Support

34. **Information Requirement.** The Bureau requires Ameritech, Bell Atlantic, BellSouth, GTE, SWB, and US West to provide the following information in their direct cases:

(a) These LECs must specify whether their virtual collocation cable installation charges recover costs associated with labor, cabling support structures, testing equipment, and engineering. These LECs must discuss whether they recover the same types of costs in the rates for their comparable DS1 and DS3 services, and explain any differences. In addition, these LECs must explain any differences between their recovery of cable installation costs in their virtual collocation rates and their recovery of cable installation costs in their rates for their comparable DS1 and DS3 services. These LECs must reference the applicable sections of their special access and switched transport tariffs.

GTE RESPONSE:

For virtual collocation, GTE has two rate elements associated with cable installation and support, a non-recurring Cable Pull charge and a monthly recurring Cable Space charge. The Cable Pull element recovers the labor cost to pull the customer's fiber from the GTE manhole into the central office. The cable is spliced in the vault and then delivered to the customer's terminating equipment. The Cable Space element recovers an investment allocation of space that the cable occupies within the manhole, vault and central office.

The model and method used to calculate these costs is the same module and method used in the development of cable installation costs for comparable DS1 and DS3 services. However, the input parameter to the model will vary. For virtual EIS, an estimated number of fibers (12) and estimated distance (number of feet) from the manhole to the termination point in the central office is used.

For the comparable DS1 and DS3 services, these costs are recovered through a plant support factor applied to the outside plant investment (*i.e.*, poles, cables, repeaters). Since there is no comparable investment for virtual collocation, it is reasonable and appropriate to recover the cable installation and support costs in the manner discussed above.

6. Provisioning Charges

> 42. **Information Requirement.** The Bureau requires the LECs subject to this investigation to provide the following information in their direct cases:
>
> (a) The LECs must compare their virtual collocation provisioning charges (*e.g.*, charges for service order processing and design engineering) with any provisioning charges they impose on customers of their comparable DS1 and DS3 services. If the virtual collocation provisioning charges exceed those imposed on customers of the LECs' comparable DS1 and DS3 services, the LECs must justify the additional charges assessed for virtual collocation service.

GTE RESPONSE:

Service is ordered and processed through an Access Service Request ("ASR"). As noted above, for virtual EIS, design engineering costs are recovered through the Engineering and Installation Fee per base module and per card installed. Specific provisioning costs for comparable DS1 and DS3 services, such as engineering, are included as part of the investment and recovered partially through the non-recurring charge and partially through a monthly recurring charge. *See* response to 26 (a) and (b) *supra* of design and engineering.

Service order processing costs for virtual EIS service orders are recovered in a similar manner to other switched or special access services. Switched services, including DS1, DS3 and EIS, have a separate non-recurring ASR ordering charge that is applied for each ASR order. However, special access services, including DS1, DS3 and EIS, have no specific ASR ordering charge.

> (b) The LECs must specify whether they recover provisioning costs associated with their comparable DS1 and DS3 services through overhead loadings or through direct assignment to particular rate elements. In their responses, the LECs must reference the applicable sections of their special access and switched transport tariffs.

GTE RESPONSE:

As stated above, switched access DS1 and DS3 service processing costs are recovered through a separate NRC. *See* GTOC FCC Tariff No 1. Section 4.6.1(b) (Switched Access Ordering Charge - per ASR); GSTC FCC Tariff No 1. Section 6.6.1(n)-33(n) (ASR Ordering Charge). There is no separate ASR charge for special access service processing.

7. Charges for Power to Interconnector-Designated Equipment

> 46. **Information Requirement.** The Bureau requires the LECs subject to this investigation to provide the following information in their direct cases:
>
> (a) The LECs that recover the costs of providing power to interconnector-designated equipment in their rates for virtual collocation service must identify and describe the particular power costs recovered in each nonrecurring and recurring virtual collocation rate elements. LECs must specify whether they recover these power costs through overhead loadings and/or through direct assignment to particular virtual collocation rate elements.

GTE RESPONSE:

GTE has proposed to recover the cost of providing power to the interconnector-designated equipment in its virtual EIS rates. GTE directly assigned the power costs to the appropriate virtual EIS rate elements. Since the interconnector, not GTE, is making the capital investment for the purchase of the fiber optic terminal, it would not be appropriate for GTE to apply an overhead loading to estimate a power charge. Thus, GTE has proposed to recover labor costs in a non-recurring Power Equipment Installation charge. The material costs are to be recovered in a monthly recurring Power Equipment element.

> (b) The LECs required to respond to (a), above, must explain whether they recover power costs in their rates for comparable DS1 and DS3 services. If so, the LECs must specify whether they recover these costs through overhead loadings or through direct assignment to the rate elements for the comparable DS1 and DS3 services. LECs must reference the applicable sections of their special access and switched transport tariffs.

GTE RESPONSE:

For comparable DS1 and DS3 services, power costs are recovered through the difference between the monthly DS1 and DS3 tariffed rates and the direct cost.

> (c) LECs that established separate power rate elements for virtual collocation service, but not for their comparable DS1 and DS3 services, must explain why this is reasonable. In addition, any LECs that bundle power costs into other rate elements for virtual collocation service, but not for their comparable DS1 and DS3 services, must explain why this is reasonable.

GTE RESPONSE:

The direct assignment method used for virtual EIS properly apportions the necessary power charges in an arrangement in which the equipment is not owned by the GTOCs. Under these circumstances, it is reasonable and appropriate for GTE to recover this cost by directly assigning costs within a separate power element.

> (d) GTE must explain why it charges interconnectors both a recurring power equipment charge and a nonrecurring power equipment installation charge. In addition, GTE must describe its methodology for "determining which of the components of its physical collocation power rate elements would apply to virtual collocation."

GTE RESPONSE:

As previously stated, GTE recovers labor costs through a non-recurring charge and material costs through a monthly recurring charge. Both of these elements are based on a per 20 amp increment. GTE grouped Power Equipment costs into three distinct components: Cable, Power Supply and DC Power. Estimated costs of each of these components was originally developed for a physical arrangement and modified for the virtual rate elements. The methodology is described below for each component:

Cable - GTE originally determined the cost of power cable required to extend power from the power plant to the collocator's caged area in a physical configuration. This cost included a distribution bay, relay rack, fuse panel and cabling. For virtual collocation, since a caged area is not required, the interconnector's equipment is placed in racks

along side GTE's equipment bay. Therefore, it was determined that half of the originally developed cost would apply for virtual (shorter cable run and common use of distribution bay).

Power Supply - GTE estimated the cost to provide power for a central office on a per amp basis. The cost was then multiplied by the amperage required for the configuration. GTE estimated a collocator would require 100 amps for the various types of equipment that would be installed in physical collocation. For virtual collocation, GTE priced power in 20 amp increments and assigned 20 amps of cost to the rate element. It is reasonable for GTE to assume the different level of amps within physical versus virtual arrangements. In a physical arrangement, the interconnector installed equipment within a 100 square foot cage at their own discretion. In a virtual arrangement, GTE will engineer and install the equipment and therefore can better equate amperage requirements as configurations grow. Nonetheless, the cost methodology to determine the per amp cost is the same for both arrangements.

DC Power - GTE also estimated the monthly expense amount that the interconnector's equipment would draw from the power plant. This cost was estimated on a per amp basis. Like power supply, a requirement of 100 amps was originally estimated for physical, with increments of 20 amps for virtual. Again the methodology for the calculation of the per amp cost was the same for both types.

DC Power has only monthly recurring costs while Power Supply and Power Cable have associated labor and material costs. One other cost component, an assignment of floor space, is also bundled in the power rate element. That cost is discussed in the next section.

8. Charges for Floor Space

> 47. **Information Requirement.** The Bureau requires all LECs subject to this investigation to provide the following information in their direct cases:
>
> (a) BellSouth, Ameritech, CBT, and any other LEC that recovers the costs of floor space in its rates for virtual collocation service, must describe the particular floor space costs recovered in their nonrecurring and recurring virtual collocation rate elements. These LECs must specify whether they recover these floor space costs through overhead loadings or through direct assignment to particular virtual collocation rate elements.

GTE RESPONSE:

GTE recovered six square feet of floor space within its virtual rate structure. This cost is a directly assignable cost that is recovered as part of the monthly recurring Power Equipment rate element. Rack space within the central office must be dedicated to the interconnector's use. GTE has estimated that six square feet of floor space would be needed. Since GTE is dedicating rack space within the central office for the connection to the virtual interconnection equipment, it is reasonable and appropriate to recover this cost from the interconnector.

> (b) The LECs required to respond to (a), above, must explain whether they recover the costs of floor space in their rates for their comparable DS1 and DS3 services. If so, the LECs must specify whether they recover floor space costs through overhead loadings or through direct

assignment to the rate elements for their comparable DS1 and DS3 services. The LECs must reference the applicable sections of their special access and switched transport tariffs.

GTE RESPONSE:

For comparable DS1 and DS3 services, floor space costs are recovered through the difference between the monthly DS1 and DS3 tariffed rates and the direct cost.

9. Cost of Money Factors

55. **Information Requirement**. The Bureau requires the LECs subject to this investigation to provide the cost of money factor used for their virtual collocation services and for the comparable DS1 and DS3 services with the lowest overhead loadings. The LECs must justify any differences in these cost of money factors. In their responses, the LECs must include the interest rate, depreciable life, and time period (in years) for computing the present discounted value.

GTE RESPONSE:

Exhibits 1 and 2 show the components used in developing the cost of money factors for EIS, DS1 and DS3. Any differences between comparable DS1 and DS3 services and expanded interconnection service can be explained by the timing of the cost study and the different accounts attributable to these different services.

ISSUE B: Are the rate structures established in the virtual collocation tariffs justified?

2. Charges for Training

> 70. **Information Requirement.** The Bureau requires the LECs subject to this investigation to provide the following information in their direct cases:
>
> (b) A number of LECs charge training expenses to interconnectors based directly on ticket stubs and other receipts. These LECs must comment on whether this direct "pass through" to interconnectors is reasonable and whether it is reasonable to permit interconnectors to pay third parties directly for airline and other training expenses.

GTE RESPONSE:

GTE has proposed to charge the interconnector training expenses based directly on ticket stubs and other receipts. Interconnectors who chose to use non-standard equipment should pay for the training of the LEC's employees who must install and maintain this non-standard equipment. In many cases, the interconnector is sending some of its own personnel to the same training class. The interconnectors may chose to pay third parties directly for airline and other training expenses of GTE's employees. GTE's tariff does not preclude the interconnector paying these expenses directly. If the interconnector does not pay directly, the tariff reasonably allows GTE to collect for these out-of-pocket expenses.

> (c) The LECs should comment on whether it is reasonable to tariff rate structures that will avoid double recovery of training costs if a subsequent interconnector requests the same equipment, or if the LEC subsequently acquires the interconnector-designated equipment for use in its own network.

GTE RESPONSE:

GTE will not double recover training costs in this manner. Once GTE personnel are trained on a particular type of equipment at the central office, that equipment would be considered standard interconnector equipment for that central office. A subsequent interconnector requesting the same equipment will not have to pay additional training expenses. Likewise, if GTE acquires the equipment for use in its own network, subsequent training charges would not apply.

> 71. **Information Requirement.** The Bureau requires the LECs subject to this investigation to provide the following information in their direct cases:
>
> (a) All LECs must identify any provisions in their virtual collocation tariffs describing types of equipment to which training charges do not apply because the LECs use such equipment in their own networks. Any LEC that does not currently have such provision or a procedure for identifying such equipment must explain why its approach is reasonable.

GTE RESPONSE:

GTE serves over 4000 central offices in 28 states. It is not administratively reasonable to require GTE to state in its tariff the types of equipment from multiple vendors that are standard within each central office. GTE has advised interconnectors that, as a general rule, AT&T termination equipment is standard within each area. GTE will provide a list of standard equipment for a specific end office if requested by an interconnector. GTE has responded quickly to such requests and has found that this approach is reasonable and has worked well.

(b) All LECs must specify the minimum number of technicians that must be trained to maintain and repair interconnector-designated equipment in each central office, and explain why it is reasonable to train this number of technicians.

GTE RESPONSE:

An average number of technicians to be trained to maintain and repair interconnector-designated equipment would range from four to six individuals. This number of trained personnel is required to support the equipment seven days a week, 24 hours per day. GTE's technicians may serve a specific geographic area with multiple exchanges and each technician would be trained on numerous equipment types.

(c) All LECs must describe their policies regarding training of LEC personnel to maintain and repair interconnector-designated equipment. LECs must discuss the initial training to maintain and repair interconnector-designated equipment, and any subsequent training that is required.

GTE RESPONSE:

GTE has proposed to train personnel to maintain and repair interconnector-designated equipment in the same manner GTE trains personnel maintaining and repairing GTE-owned equipment. Initial training is provided by the vendor or in-house by GTE personnel. For particular equipment, vendor training classes are conducted either at the vendor's training facility or at GTE's facility where the equipment is being installed, usually by the vendor's instructors. The on-site training is usually done prior to the equipment activation to permit hands on training. In some cases, GTE's internal education and

training department works with the particular vendor to develop an in-house training program for GTE personnel. This training is then placed in GTE's curriculum offering.

Subsequent training is dependent upon need or changes to the equipment. If the platform is being changed completely, additional vendor training may be required. If the changes are minor in nature (*i.e.*, card change-out, command changes), the training process is handled through vendor bulletins explaining the changes and on-site briefing sessions by the technicians' supervisors. If the trained employee leaves or is reassigned, GTE will bear the cost of re-training other technicians.

Issue C: Are the terms and conditions in the virtual collocation tariffs reasonable?

2. Use of Outside Contractors for Installation, Maintenance, and Repair of Interconnector-Designated Equipment.

> 88. **Information Requirement.** The Bureau requires the LECs subject to this investigation to provide the following information in their direct cases:
>
> (a) All LECs must specify the circumstances under which they use outside contractors for installation, maintenance, or repair. In addition, LECs must describe the particular functions performed by these outside contractors.

GTE RESPONSE:

As a general rule, GTE uses either its own personnel or vendor-provided personnel to perform installation services and uses its own personnel to perform maintenance and repair services on terminating equipment. Several factors are

used in determining who performs the required services: the type of equipment, the nature of work required, the current work load of internal resources and the past performance of vendor-related work. Due to the number of jurisdictions in which it provides service, GTE must be flexible to adapt to the requirements within each area. GTE has and will continue to work closely with the interconnector in satisfying its needs for installation, maintenance and repair service.

> (b) All LECs must discuss whether they permit interconnectors to choose from a list of certified contractors available to install, maintain, or repair the interconnector-designated equipment. All LECs must specify how they notify interconnectors of these contractors. Any LEC that does not permit the interconnector to choose from a list of certified contractors must explain the reason for its policy.

GTE RESPONSE:

GTE permits an interconnector to choose from a list of certified contractors available to install, maintain or repair the interconnector-designated equipment. GTE provides the list of certified contractors upon request after a collocation request is received.

> (c) All LECs must state whether they will honor an interconnector's request that the LEC add to its list a contractor that meets the LEC's certification requirements. Any LEC that will not honor such requests must explain the reason for its policy. The LECs should reference the applicable provisions of their virtual collocation tariffs.

GTE RESPONSE:

GTE will accept applications from any contractor desiring certification. However, GTE will not process and certify an applicant unless GTE either has a

need for that particular service or a need for an additional party to perform such services for GTE's network. GTE will determine at its own discretion what services are required on a contractual basis and which parties are eligible to perform such services. However, if the interconnector wants to use a contractor not already certified by GTE and that contractor meets GTE's insurance, safety, security, financial and technical standards, the contractor will be added to GTE's list of approved contractors. While this is not expressly stated in GTE's tariffs, interconnector's will be advised and it will be part of GTE's practices

3. Installation, Maintenance and Repair Intervals

> 91. **Information Requirement.** The Bureau requires the LECs subject to this investigation to provide the following information in their direct cases:
>
> (a) The LECs must explain how their installation intervals for interconnector-designated equipment comply with the Commission's requirement that, at a minimum, the LECs install interconnector-designated equipment under the same time intervals that apply to installation of comparable LEC equipment.

GTE RESPONSE:

GTE has standard internal guidelines for installation of termination equipment. GTE would use these same standards when determining installation schedules for interconnector-designated equipment. Once an interconnector's request is received, GTE meets with the interconnector to discuss all relevant information regarding the configuration and implementation of the requested service. GTE would provide the interconnector with an estimate, based on comparable intervals, of the time required for installation at these meetings.

(b) The LECs must discuss whether it would be reasonable to notify interconnectors of the LECs' specific maintenance and repair intervals by including appropriate language in their tariffs. In particular, LECs must comment on whether it would benefit interconnectors, without being unduly burdensome to LECs, to state in their tariffs:

(1) The frequency with which they will perform maintenance and repair of interconnector-designated equipment;

(2) The maximum response time to intermittent service outages; and

(3) The restoration priorities if a LEC's wire center is inoperative.

GTE RESPONSE:

GTE's serving territory encompasses many different environments. One serving area could include metropolitan, urban and rural territories. Restoration intervals vary depending on the area served. GTE uses vendor recommendations and its own procedures for performing routine maintenance intervals. In a repair situation, GTE will respond based on the severity of the alarm condition. GTE treats the interconnectors' alarm conditions in the same manner as it does its own internal alarms.

GTE does not believe that these intervals should be tariffed. Additional notification in the tariffs would be unduly burdensome, especially considering the many differences in serving areas within multiple jurisdictions. GTE's priority to restore service complies with the Telecommunication Service Priority ("TSP") so that circuits are repaired according to the assigned restoration priority. GTE has internal escalation contact procedures to track service affecting conditions and to communicate with affected parties to resolve problems which may arise. GTE