

DECLARATION OF DONALD E. ALBERT

Donald E. Albert, hereby declare as follows:

1. I am Network Services Director of Competing Local Exchange Carrier (“CLEC”) Implementation for Bell Atlantic Network Services, Inc. In that position, I am directly involved with the negotiation of CLEC interconnection agreements and the network implementation of co-carrier, unbundling, interconnection and collocation arrangements throughout the Bell Atlantic region. I am responsible for many of the network engineering and operational aspects of implementing the Telecommunications Act of 1996 (Act) and the Commission’s orders in CC Docket No. 96-98 – the Local Competition proceeding.

2. I am familiar with the Commission’s Notice of Proposed Rulemaking in CC Docket No. 98-147, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*. In that proceeding, the Commission suggests “cageless” physical collocation as a means of expanding the number of available central offices in which physical collocation can be accommodated and increasing the number of physical collocators in a given office. Although the Commission does not define “cageless” collocation, I have previously testified in several state proceedings in which one or more CLECs have introduced cageless collocation proposals. These proposals, which no Bell Atlantic state has adopted, would allow the CLECs to place equipment in the portion of Bell Atlantic’s central offices which Bell Atlantic uses to provide local telephone service, exchange access, and other services to its customers, including to other carriers. This is in contrast to the present physical collocation arrangements in which competitors’ equipment is

placed in separate cages in a separate, secured portion of the central office. Under these existing arrangements, competitors' employees are not afforded access to other areas of the central office.

3. In my view, allowing multiple carriers to place multiple pieces of equipment throughout Bell Atlantic's central offices would create serious security, network reliability, operational, and accountability problems. In our current telecommunications environment, CLECs, Competitive Access Providers, and interexchange carriers all collocate equipment in incumbent local exchange carriers' central offices. A single Bell Atlantic central office may have six or more collocating carriers. This number will continue to grow as additional carriers request collocation as permitted by the Act for interconnection and access to unbundled network elements.

4. The ability of an unspecified number of employees, from a number of companies, to have access to portions of Bell Atlantic's central offices that houses Bell Atlantic's equipment creates service quality accountability problems and will substantially increase the potential for network outages. Located in Bell Atlantic's central offices is telecommunications equipment that can affect millions of Bell Atlantic's customers (e.g. The Signal Transfer Points of Bell Atlantic's Signaling System Seven Network), equipment that provides E911 services, fiber optic systems carrying thousands of individual circuits, switches providing dial tone to 50,000 or more end users, and critical high capacity data services.

5. Bell Atlantic and other carriers generally use the same or similar equipment to perform similar network functions. Although specific items of equipment may be different, or may be of different vintages or have different modifications (including plug-ins), much of this equipment looks the same. Even if CLECs employ well-trained, conscientious technicians, human errors will happen. A commingled cageless environment is a ticking time bomb where a competitor's

technician could mistakenly open the wrong equipment cabinet and begin to remove plug-ins, thereby adversely affecting Bell Atlantic's customer service. Or a competitor's technician could mistakenly open a Bell Atlantic cabinet on a type of equipment where the technician needs to be grounded with a grounding strap, and the resulting static discharge would affect Bell Atlantic equipment and service. Bell Atlantic spends millions of dollars on equipment and labor to minimize the potential of major service failures and disruptions. Allowing a wide-open cageless collocation environment would increase the risks and inevitable occurrence of human error network failures.

6. Commingling of different companies' equipment also increases the possibility of loss of property. Although on the surface it may sound like crying wolf, human beings are still human beings, and commingled cageless collocation will significantly increase the quantity of people, from a number of companies, that have unrestricted access throughout Bell Atlantic's central offices. A number of Bell Atlantic's central office buildings are "unmanned", or only have full time employees assigned during the day. There are many non-secured areas of Bell Atlantic's central offices which contain certain equipment such as portable test sets and thousands of plug-in equipment cards, ranging in value up to \$25,000 per card. While this equipment is readily available to Bell Atlantic's technicians for use on Bell Atlantic's equipment, unrestricted access by the CLEC's technicians would make this equipment accessible to them as well. Conversely, the CLEC's technicians may leave behind similar equipment that could become commingled with Bell Atlantic's equipment creating the potential for confusion. In addition, since collocated carriers use much of the same equipment as Bell Atlantic, it is possible that a technician who discovers a defective plug-in card in their equipment, could remove a bad card from their equipment and swap

it with a good card from Bell Atlantic's (or another carrier's) equipment. This situation has occurred on customer premises where equipment from multiple carriers is often not secured.

7. Allowing CLECs to locate equipment in close proximity to Bell Atlantic equipment may also increase the risk to the integrity of the central office and personnel working in that office. A case in point is a recent incident involving collocated equipment that had not yet been certified as complying with Network Equipment and Building Specifications (NEBS) standards, despite assurances from the manufacturer that it would meet NEBS tests. Soon after it was installed, but before it was activated, it failed fire-retardant tests and nearly caused the personnel conducting the tests to be overcome by smoke. If that equipment had been activated and subjected to fire or high heat, Bell Atlantic equipment in close proximity could have been severely damaged and Bell Atlantic's customers could have lost service. In addition, personnel working in the office could have been injured. Before it could be used, the manufacturer had to engage in major re-design of the equipment to meet NEBS standards.

8. In another instance, a collocator placed equipment in its cage that had not yet been NEBS tested without informing Bell Atlantic. When asked to deactivate the equipment, the collocator refused, and both the collocator and manufacturer claimed that it was unlikely that the equipment would fail the NEBS tests. In fact, when tested, the units failed to meet NEBS emissions standards. The collocator needed to turn off the units and replace them with redesigned equipment that met those standards. If they had not been replaced, significant harm to Bell Atlantic's own equipment and its customer's services could have occurred.

9. Bell Atlantic is responsible for the levels of customer service provided to all users of Bell Atlantic's network, including financial and contractual obligations to CLECs and some large business customers. Unrestricted access by the employees of multiple carriers throughout Bell

Atlantic's central offices will not only create the very real potential for more network failures, often it will not be possible to tell which employee of which company caused a failure to occur.

10. Video surveillance cameras and card key access, which some competitors have proposed in state proceedings, are inadequate in a multi-carrier environment, because they are reactive types of security that may identify the responsible party only after an incident has occurred. Cameras are not proactive and do not provide the same assured security that is accomplished by segregated physical access. Cameras will not prevent human errors that could occur if technicians work on the wrong equipment. With video surveillance, the horse is already out of the barn, and Bell Atlantic's obligation is to prevent service problems, not to view outages as they occur or assess the blame after the fact. Commingling ignores Bell Atlantic's right to protect its network, a right that under these proposals would continue to be enjoyed by all carriers except the incumbent local exchange carriers that have the carrier of last resort obligations. Bell Atlantic requires a prevention scheme rather than a detection or recovery system to ensure that accidents and/or malicious destruction is avoided. This requirement ensures the provision of service quality to our customers. A recovery system is secondary to the primary goal of service assurance.

11. For carriers that prefer not to place equipment in physically separate areas of the central office, Bell Atlantic makes virtual collocation available in all central offices, including those in which it also provides physical arrangements. Virtual collocation has been used in Bell Atlantic since 1994. Bell Atlantic now has over 320 virtual collocation arrangements completed or under construction. In many cases, collocators have decided to use virtual collocation in central offices where physical collocation is also available. In addition, there are two CLECs who so far have found it cost effective to use only virtual collocation to deploy their equipment. A number

of the carriers using virtual collocation are gaining access to unbundled local loops through the arrangement.

12. Virtual collocation does not require any more resources than non-secure cageless collocation. Under the latter, the collocator would be required to provide personnel to install and maintain its own equipment. Under virtual collocation, fewer collocator resources are required because Bell Atlantic's technicians will maintain the hardware virtually collocated in the central office. Besides the direct costs, however, non-secure cageless collocation will create large costs both for Bell Atlantic and for all telecommunications users, as the risks of network disruption unnecessarily rise.

13. Implementing non-secure cageless collocation in a given central office will take just as long as implementing virtual collocation in the same central office. There are no equipment or operational installation differences, and no differences in required work activities between the two arrangements.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September __, 1998

Donald E. Albert