

**DECLARATION OF NANCY GILLIGAN**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

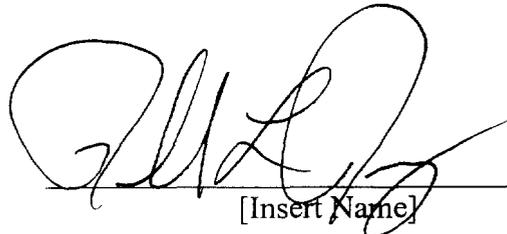
Executed this 30<sup>th</sup> day of July, 2001.

*Nancy Gilligan*  
\_\_\_\_\_  
Nancy Gilligan

**Declaration of Richard L. Rousey**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 27 day of July, 2001.

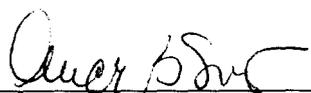


[Insert Name]

**Declaration of Aice B. Shocket**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 26 day of July, 2001.



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Alice B. Shocket



**CURRICULA VITAE FOR UNBUNDLED NETWORK ELEMENTS PANELISTS**

**I. MARGARET DETCH**

Before working for Verizon, Ms. Detch was employed as a Market Analyst/Consultant for a small private research firm. She specialized in analyzing the consumer market for wireless devices (*i.e.*, cellular, paging, vehicle location devices, etc.) and consulting with the manufacturers and vendors of such devices. Ms. Detch has been employed by Verizon and its predecessor companies since 1993, when she was assigned to Verizon Mobile to provide market analysis and support for a number of pricing, product and service initiatives. I joined the Wholesale marketing organization in May 1995.

**II. SUSAN FOX**

Ms. Fox has 18 years of experience in telecommunications, as an employee of Verizon and its predecessor companies, including AT&T and Bell Communications Research, Inc. ("Bellcore"). She joined Bell Atlantic Network Services in 1987. Prior to assuming her current position in February 2000, Ms. Fox was the Product Manager for Interstate Switched Access from 1995 through 1999.

**III. STEVE GABRIELLI**

Mr. Gabrielli has more than 23 years experience in the telecommunications industry in a variety of data processing, ordering, billing, and Product Management positions working for Contel, GTE and now Verizon. Prior to the merger he was responsible for UNE

Product ordering and billing implementation for all UNE products for the former GTE company. Mr. Gabrielli assumed my current position in October 2000.

### **III. NANCY GILLIGAN**

Ms. Gilligan has more than 22 years experience in the telecommunications industry. During that time she has held positions of increasing responsibility in Outside Plant Engineering, Network Planning and Access Services Product Management. Ms. Gilligan received a Bachelor of Arts degree in Mathematics and Economics from Boston College in 1978, and a Master of Business Administration degree from Boston College in 1985.

### **IV. RICHARD ROUSEY**

Mr. Rousey has over 25 years of experience with former GTE and Verizon. He has been developing CLEC-oriented products in Wholesale Service Marketing since 1996 and have helped introduce such products as Interim Number Portability, Local Number Portability, Unbundled Loops, Unbundled Sub-Loops, Line Sharing, Exhanced Extended Links, Unbundled Network Interface Devices and Remote Terminal Collocation. Prior to his present position, Mr. Rousey had held various positions with increasing responsibility within the Wholesale Organization as well as both the Consumer and Business Organizations.

### **V. ALICE SHOCKET**

Ms. Shocket has been employed by Verizon and its predecessors for more than thirty years. During that time she has held various jobs in the customer service, regulatory and marketing departments. Ms. Shocket assumed my current position as Product Manager in

Exhibit UNE-1

Wholesale Markets in 1996 where she has been responsible for all aspect of the deployment and implementation of Local Number Portability.



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

**RECEIVED**

**JUL 31 2001**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	
	)	
In the Matter of	)	CC Docket No. 00-249
Petition of Cox Virginia Telecom, Inc., etc.	)	
	)	
In the Matter of	)	CC Docket No. 00-251
Petition of AT&T Communications of	)	
Virginia Inc., etc.	)	
	)	

**VERIZON VA'S DIRECT TESTIMONY ON NON-MEDIATION ISSUES**

(CATEGORIES I AND III THROUGH VII)

**ADVANCED SERVICES**

- ROSMARIE CLAYTON
- PAUL RICHARD
- RICHARD ROUSEY
- JOHN WHITE

JULY 31, 2001

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1                   **I. WITNESS IDENTIFICATION AND BACKGROUND**

2   **A. ROSEMARIE CLAYTON**

3           **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4           A. My name is Rosemarie Clayton. My business address is 2107 Wilson Blvd.  
5                   Arlington, Virginia 22201.

6           **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

7           A. I am employed by Verizon Services Corp. (“Verizon”)<sup>1</sup> as Product Manager for  
8                   xDSLs and Line Sharing. I am responsible for product roll-out and life cycle  
9                   management to ensure that digital unbundled network elements (UNEs) are  
10                  provided in accordance with the requirements of the Telecommunications Act of  
11                  1996 (the “Act”) and in accordance with the requirements of the Commission’s  
12                  December 1999 *Line Sharing Order* and its progeny. My responsibilities also  
13                  include CLEC contract negotiations and testifying on related policy issues before  
14                  regulatory bodies.

15          **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
16          **EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.**

17          A. My educational background and experience are described in my curriculum vitae  
18                  attached as Exhibit ASP-1.

19          **Q. HAVE YOU EVER TESTIFIED BEFORE ANY REGULATORY**  
20          **COMMISSION?**

---

<sup>1</sup> As used in this testimony, “Verizon” refers to Verizon Services Corp., and “Verizon VA” refers to Verizon Virginia Inc., the party to this arbitration.

1 A. Yes. I have testified before Commissions in Massachusetts, Washington, D.C.,  
2 Texas, California, and Pennsylvania.

3 **B. PAUL RICHARD**

4 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

5 A. My name is Paul Richard. My business address is 500 Summit Lake Drive,  
6 Valhalla, NY.

7 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

8 A. I employed by Verizon as a Senior Specialist in the Wholesale Services  
9 Marketing Organization. I am responsible for Product Development and  
10 Management of new advanced data services for use by Verizon's CLEC  
11 customers. I have been responsible for developing CLEC-oriented products in  
12 Wholesale Services Marketing since 1996, and have introduced such products as  
13 Unbundled Local Switching, Unbundled Sub-loops and Remote Terminal (RT)  
14 Collocation.

15 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
16 **EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.**

17 A. My educational background and experience are described in my curriculum vitae  
18 attached as Exhibit ASP-1.

19 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY OTHER**  
20 **REGULATORY COMMISSIONS?**

21 A. Yes, I have previously testified in New York, Maryland, Pennsylvania,  
22 Massachusetts, and California.

1 **C. RICHARD ROUSEY**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Richard Rousey. My business address is 600 Hidden Ridge Blvd.  
4 Irving, Texas.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Verizon as a Senior Specialist in the Wholesale Services  
7 Organization. I am currently responsible for product development and  
8 management of new advanced service for use by Verizon's CLEC customers.

9 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
10 **EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.**

11 A. My educational background and experience is described in my curriculum vitae  
12 attached as Exhibit ASP-1.

13 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY OTHER**  
14 **REGULATORY COMMISSIONS?**

15 A. Yes. I have testified in California.

16 **D. JOHN WHITE**

17 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

18 A. My name is John White and my business address is 1095 Avenue of the  
19 Americas, New York, New York 10036.

20 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

1 A. I am an Executive Director within Verizon's Wholesale Services organization,  
2 reporting to the Network Services Department. I am responsible for technical  
3 support of wholesale services with a focus on the digital offerings such as xDSL,  
4 Line Sharing, and Line Splitting for both existing and proposed products. This  
5 support includes issues involving technology standards, planning, engineering,  
6 preorder, provisioning, and maintenance.

7 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
8 **EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.**

9 A. My educational background and experience is described in my curriculum vitae  
10 attached as Exhibit ASP-1.

11 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY OTHER**  
12 **REGULATORY COMMISSIONS?**

13 A. Yes. I have previously testified in various dockets in Maryland, New York,  
14 Massachusetts, and Pennsylvania.

15 **II. PURPOSE AND OVERVIEW OF PANEL TESTIMONY**

16 **Q. WHAT IS THE PURPOSE OF THE ADVANCED SERVICES PANEL**  
17 **TESTIMONY IN THIS PROCEEDING?**

18 A. The purpose of the panel's testimony is to:

19 (1) State Verizon Virginia's ("Verizon VA") position on Issue III-10 relating  
20 to line sharing and line splitting and Issues V-6 and IV-28 relating to  
21 access to loops where Next Generation Digital Loop Carrier (NGDLC) or  
22 Integrated Digital Loop Carrier (IDLC) has been deployed;

- 1 (2) Demonstrate why the Commission should adopt the contract language  
2 proposed by Verizon VA regarding line sharing and line splitting over  
3 copper loops and access to the High Frequency Portion of the Loop  
4 (HFPL) where the loop is served by fiber;
- 5 (3) Explain why Verizon VA’s current network cannot support AT&T’s and  
6 WorldCom’s requests for “line sharing” over fiber-fed loops and access to  
7 loops where NGDLC has been deployed;
- 8 (4) Discuss deficiencies in AT&T and WorldCom’s proposed contract  
9 language for line sharing and line splitting over copper loops, “line  
10 sharing” over fiber-fed loops, and access to loops where NGDLC has been  
11 deployed; and
- 12 (5) Explain the operational and technical efficiency problems associated with  
13 CLEC-provided line cards (a/k/a “plug and play”) sought by AT&T and  
14 WorldCom.

15 The Panel also sponsors the following Exhibits:

- 16 • Exhibit ASP-1 - Curriculum Vitae of Panel
- 17 • Exhibit ASP-2 - Verizon Line Sharing Over Copper Option 1
- 18 • Exhibit ASP-3 - Verizon Line Sharing Over Copper Option 2
- 19 • Exhibit ASP-4 - Line Splitting Over Copper: Current View
- 20 • Exhibit ASP-5 - Line Splitting Over Copper: Future View – DLEC Line  
21 Sharing Converts to VLEC w/ DLEC Data
- 22 • Exhibit ASP-6 - Line Splitting Over Copper: Future View – VLEC Migrates  
23 UNEP to Add DLEC Data
- 24 • Exhibit ASP-7 - Generic Digital Loop Carrier Design
- 25 • Exhibit ASP-8 - Typical Remote Terminal Architecture
- 26 • Exhibit ASP-9 - NGDLC With Separate Voice and Data Transport
- 27 • Exhibit ASP-10 - Sub-loop Interconnection Arrangement
- 28

1           **Q.     PLEASE PROVIDE AN OVERVIEW OF THE ADVANCED SERVICES**  
2           **ISSUES.**

3           A.     With respect to issue III-10, the issues are as follows:

- 4           •     Verizon VA's proposed contract language to both AT&T and WorldCom  
5           implements line sharing and line splitting over all copper loops in a  
6           nondiscriminatory and commercially reasonable manner consistent with its  
7           requirements under the *UNE Remand, Line Sharing and Line Sharing*  
8           *Reconsideration Orders*. Verizon VA's line splitting proposal is the result of  
9           an industry-wide collaborative initiated by the New York Commission in  
10          which both AT&T and WorldCom participate. Both parties are also currently  
11          participating in an implementation pilot in New York. This Commission has  
12          already approved of Verizon VA's line sharing and line splitting proposals,  
13          and thus those same proposals should be adopted in the AT&T and  
14          WorldCom interconnection agreements.
  
- 16          •     The Commission has twice found that Verizon VA's proposed language  
17          provides nondiscriminatory access to OSS pre-ordering functions associated  
18          with determining whether a loop is capable of supporting xDSL technologies,  
19          and thus should be adopted. Verizon VA agrees that AT&T should not be  
20          required to pre-qualify a loop that has already been pre-qualified for the same  
21          advanced data service in the same time period (*i.e.* the loop has been in  
22          continuous use for the same service). Pre-qualification for one type of  
23          advanced data service, however, does not automatically pre-qualify that loop

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for another type of advanced data service or guarantee that the same loop will still be qualified sometime later if the original service has been discontinued, because the network might have been upgraded or changed in the interim. Thus, pre-qualification of loops already providing advanced services is necessary, just and reasonable.

- Verizon VA is not now—and should never be—required to purchase splitters on behalf of AT&T and WorldCom. Purchasing is not a UNE; AT&T and WorldCom each have their own purchasing departments and are perfectly capable of buying their own equipment.
- As a matter of law, CLECs cannot require an ILEC to place splitters in any particular place. Under federal law, the ILEC, not the CLEC, has the right to determine where equipment is collocated in the ILEC’s facilities.
- Verizon VA and AT&T have reached agreement on the provisioning interval for line sharing. The parties are still negotiating the intervals for collocation augments necessary to support line sharing, and may be able to resolve this issue.
- Cross-connects between CLECs are not necessary for access to UNEs or interconnection. The Commission already has sought comment on whether there is any basis for re-establishing its vacated cross-connect rule and it

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would be wasteful to consider that issue in this arbitration proceeding.  
Section 224 of the Act does not provide independent authority for CLEC-to-CLEC cross connects. While not required to do so, Verizon VA has agreed to permit CLEC-to-CLEC cross connections in collocation space pending the Commission’s ruling on remand.

- The method proposed by AT&T and WorldCom to access the HFPL where Verizon VA has deployed fiber goes beyond the Act and the Commission’s requirements. Moreover, their proposals raise a number of serious technical and operational issues that must be evaluated before the proposals could be implemented. Verizon VA’s contract language provides access to the HFPL where fiber has been deployed in a manner that satisfies the requirements of the Commission rules. While the Commission has recognized that there may be other ways in which “line sharing” might be implemented where there is fiber in the loop, it has not mandated any particular method. Instead, the Commission initiated further proceedings to address the various methods by which CLECs can access the unbundled high frequency portion of the loop where an ILEC has deployed fiber in the loop (*e.g.*, where the loop is served through a fiber-fed digital loop carrier (DLC) at a remote terminal). Because AT&T and WorldCom’s proposals would have an industry-wide impact, principles of administrative efficiency and fair process dictate that this issue should be litigated in the pending rulemaking, not in the context of an interconnection agreement arbitration involving only four parties.

1 With respect to Issue V-6, AT&T seeks to impose unbundling requirements for  
2 fiber-fed loops beyond those of the Act and Commission rules. The term “Next  
3 Generation Digital Loop Carrier,” has various meaning, and it is unclear to  
4 Verizon VA precisely to what AT&T seeks access. The Commission should  
5 reject AT&T’s attempt to bypass current rules and the Commission’s newly  
6 initiated rulemaking proceeding on this very issue. AT&T’s attempts to require  
7 Verizon VA to deploy a new architecture under certain circumstances (and  
8 thereby subsidize its business plans) are inconsistent with the Act, and must be  
9 rejected. AT&T likewise seeks to expand the definition of a loop beyond that  
10 adopted by the Commission.

11  
12 Similarly, in Issue IV-28, WorldCom seeks the ability to collocate “DSLAMs or  
13 other DSL equipment” at the RT where IDLC (a type of NGDLC) has been  
14 deployed. Issues IV-28 and V-6 provide another example of both WorldCom and  
15 AT&T’s attempts to implement a particular method of getting access to the HFPL  
16 served by fiber-fed digital loop carrier immediately, ignoring the technical and  
17 operational implications of their proposals and pre-judging the results of the  
18 Commission’s further proceedings to address the various methods by which  
19 CLECs may be able to access the HFPL where an ILEC has deployed fiber in the  
20 loop. Verizon VA’s contract language permits AT&T and WorldCom to access  
21 the HFPL served by DLC equipment in compliance with the Commission’s rules.  
22 Rather than predetermining the outcome of various rulemaking addressing these  
23 issues, the Commission should reject the language proposed by AT&T and

1 WorldCom relating to unbundled access to loops served by NGDLC. Under  
2 Verizon VA's proposed language, AT&T and WorldCom will automatically get  
3 the benefit of the Commission's consideration of these issues—they will just not  
4 be able to preempt it.

5 **III. LINE SHARING OVER COPPER**

6 **(Issue III-10)**

7 **Q. PLEASE DESCRIBE VERIZON VA'S UNBUNDLED LINE SHARING**  
8 **PRODUCT OFFERING.**

9 A. Unbundled Line Sharing provides CLECs access to and use of the high frequency  
10 portion of an existing loop to transport data over that same line using xDSL  
11 technologies that have been deemed to be acceptable by the Commission, while  
12 the ILEC provides voice services on the low frequency portion of the same  
13 physical loop.

14  
15 In accordance with Commission requirements, Verizon VA's proposed contract  
16 language<sup>2</sup> provides unbundled access to the HFPL to only a single requesting  
17 DLEC, for use over the same physical loop as the analog voice service (POTS)  
18 provided by Verizon VA. Verizon VA offers two line sharing splitter  
19 arrangements for line sharing over copper loops. Option 1 (*see* Exhibit ASP-2)  
20 provides a CLEC with the ability to install, own, and maintain the splitter in its  
21 own collocation space within the customer's serving end office. In this scenario,  
22 the CLEC provides two cables: a cable for data connection and a cable for voice

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<sup>2</sup> See Verizon-proposed interconnection agreement to AT&T § 11.2.17; Verizon-proposed interconnection agreement to WorldCom § 4 of UNE Attachment.

1 and data. Verizon VA provides a loop with Voice and Data capabilities to the  
2 CLEC splitter. Upon leaving the splitter, the voice traffic will be passed back to  
3 the main distribution frame (MDF) so that Verizon VA may provide voice service  
4 to the end user. From that point, data traffic is passed from the DLEC to the  
5 DLEC's customer (an ISP or end user).

6  
7 The CLEC splitter may be installed as part of an initial or subsequent physical  
8 collocation application. When the splitter is to be installed as part of an initial  
9 physical collocation implementation, the cable termination may be ordered as part  
10 of the initial physical collocation application. When a splitter and associated  
11 cable and frame termination are to be installed as part of an existing physical  
12 collocation arrangement, augments are required and the cable terminations may be  
13 ordered through a physical collocation augment application. The CLEC must  
14 provide Verizon VA with the required cables. Standard collocation application  
15 and augment procedures and rates apply.

16  
17 In Option 2 (*see* Exhibit ASP-3), Verizon installs a CLEC-owned splitter in  
18 Verizon VA space. Verizon VA maintains this splitter. In this scenario, the  
19 Verizon VA installed splitter will be placed in a relay rack in a virtual collocation  
20 arrangement with connections to the MDF. The splitters are placed within the  
21 Central Office at a location determined by engineers by taking into account  
22 optimum space utilization. Three cables are required for this scenario. First, a  
23 cable is routed for data from the splitter shelf to the CLEC's digital subscriber line

1 access multiplexer (DSLAM). A second cable connects from the splitter to the  
2 MDF which carries voice and data traffic to the splitter. Finally, a third cable  
3 connects from the splitter to the MDF so that voice traffic may be returned to  
4 Verizon VA after it leaves the CLEC splitter, so that Verizon VA may provide the  
5 voice service. The CLEC must provide Verizon VA with approved splitters,  
6 splitter shelves, and cables. The splitter shelf and components are installed on a  
7 shelf-at-a-time basis. The CLEC does not have physical access to the installed  
8 splitters or to the MDF.

9  
10 These two arrangements satisfy Verizon VA's obligations to provide  
11 nondiscriminatory access to the HFPL.

12  
13 Verizon VA has established terms and conditions for making this UNE available  
14 through the two described splitter scenarios at rates and charges which are  
15 intended to enable Verizon VA to recover the incremental costs of installing and  
16 maintaining Line Sharing as a UNE.

#### 17 **IV. LINE SPLITTING OVER COPPER**

18 **(Issue III-10)**

19 **Q. DO CLECS CURRENTLY HAVE THE ABILITY TO ENGAGE IN LINE**  
20 **SPLITTING IN VERIZON VA TERRITORY?**

21 **A.** Yes. As depicted in Exhibit ASP-4, CLECs can currently provide line splitting  
22 utilizing existing Commission defined UNEs—that is, where the CLEC purchases  
23 the entire xDSL-capable loop and provides its own splitter. This scenario is  
24 available today and does not require any operations support systems (OSS)

1 modifications by Verizon VA. CLECs may utilize existing supporting OSS to  
2 order and combine in a line splitting configuration an unbundled xDSL capable  
3 loop terminated to an appropriately collocated splitter and DSLAM equipment  
4 provided by a participating CLEC, and unbundled switching terminated to its  
5 collocation arrangement combined with shared transport, collocator-to-locator  
6 connections (if required), and available cross-connects, under terms and  
7 conditions and rates set forth in Verizon VA's proposed interconnection  
8 agreements. The CLECs must provide any splitters used in a line splitting  
9 configuration. Existing rate elements for Unbundled xDSL loops, Unbundled  
10 switch ports, switch usage, and shared transport apply to this line splitting  
11 configuration. Verizon VA's proposed contract language reflects this currently  
12 available line splitting scenario.<sup>3</sup>

13 **Q. HAS VERIZON VA ALWAYS PERMITTED LINE SPLITTING IN THIS**  
14 **MANNER?**

15 A. Yes. Verizon VA has never precluded AT&T or WorldCom from creating a  
16 combination of an xDSL compatible loop terminated on a splitter provided by  
17 AT&T, WorldCom or another CLEC on behalf of AT&T or WorldCom and a  
18 UNE switch port in order to create line splitting that has the same voice capability  
19 as a UNE-P. Verizon VA clarified its position in a formal policy statement issued  
20 on February 14, 2001 to all CLECs, including AT&T and WorldCom. Verizon  
21 VA also has included the February 14<sup>th</sup> policy in the contract itself.<sup>4</sup>

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<sup>3</sup> See Verizon-proposed interconnection agreement to AT&T § 11.2.18.1; Verizon-proposed Line Splitting Addendum to WorldCom.

<sup>4</sup> See *id.*

1           **Q.    DESPITE THE LINE SPLITTING SCENARIO BEING AVAILABLE**  
2           **TODAY, DOES VERIZON VA HAVE PLANS TO IMPLEMENT LINE**  
3           **SPLITTING OSS ENHANCEMENTS TO FURTHER FACILITATE LINE**  
4           **SPLITTING IN THE STATE OF VIRGINIA?**

5           A.    Yes. These modifications will further mechanize and facilitate the ordering  
6           process and migrations for certain enhanced line splitting arrangements and  
7           migrations from line sharing to line splitting. Additional charges to recover OSS  
8           development costs may be applicable in the future after Verizon has completed its  
9           OSS development and has done a cost analysis.

10          **Q.    HOW IS THE VERIZON VA LINE SPLITTING PRODUCT BEING**  
11          **DEFINED?**

12          A.    The nationwide service description for Verizon’s Line Splitting product is being  
13          developed based on the New York Collaborative efforts (which includes a pilot),  
14          allowing for local jurisdictional and OSS differences. The New York Public  
15          Service Commission and the CLECs are actively participating in this  
16          collaborative effort. Verizon’s commitment to implement a standardized line  
17          splitting product throughout the Verizon footprint, including Virginia, will be  
18          consistent with the timeframe, terms, conditions, and guidelines agreed upon in  
19          the New York Collaborative, which are incorporated by reference in Verizon  
20          VA’s proposed contract language.<sup>5</sup> Exhibits ASP-5 and 6, Line Splitting on All  
21          Copper Loops Future View depicts this future arrangement.

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<sup>5</sup>        *See id.*

1           **Q.     WOULD YOU PLEASE EXPLAIN THE HISTORY OF THE NEW YORK**  
2           **DSL COLLABORATIVE?**

3           A.     Yes. Even before release of the *Line Sharing Reconsideration Order* in January  
4           2001, Verizon was working with CLECs in the New York DSL Collaborative to  
5           define the business relationships, rules and practices that provide the requirements  
6           for DSL capable unbundled loops, line sharing, and more recently, the  
7           development of OSS capabilities for line splitting. The DSL Collaborative has  
8           been an active working group for over two years, and consists of representatives  
9           from the New York Public Service Commission, the CLEC community—  
10          including AT&T and WorldCom—and Verizon.

11  
12          Unlike line sharing, in a line splitting arrangement Verizon VA itself controls  
13          neither the voice nor data portion of the loop. Therefore, issues concerning  
14          relationships and practices between the voice and data CLECs needed to be  
15          defined by an industry forum such as the New York Collaborative before system  
16          requirements and subsequent development and implementation in Verizon's OSS  
17          can be accomplished. Once these new OSS capabilities are in place, voice and  
18          data CLECs will be able to submit newly developed line splitting orders that  
19          support the business scenarios defined by the New York Collaborative. Verizon  
20          VA will implement any line splitting operational arrangements that are agreed  
21          upon by the parties to the New York Collaborative, subject to local regulatory  
22          approval and local OSS differences.

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