

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

In the Matter of the

Proposed Revision to the Collocation
Tariffs to Eliminate Charges for DC Power
on a Per Kilowatt-hour Basis and to
Implement Charging on a Per Amp Basis

No. 05-0675

QWEST COMMUNICATIONS CORPORATION'S

INITIAL POST-HEARING BRIEF

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Qwest Communications Corporation (“QCC”), by its undersigned attorney, hereby submits its initial post-hearing brief pursuant to the revised procedural schedule set at the March 17, 2006 prehearing conference.

I. INTRODUCTION

While QCC fully expects that AT&T Illinois (hereinafter, “AT&T”), the Joint CLECs and Commission Staff will submit thorough briefs comprehensively addressing all issues raised and relevant to this proceeding, QCC offers a narrower focus concerning two issues arising out of AT&T’s proposed collocation tariff changes, as modified. QCC is concerned about many aspects of AT&T’s proposal, but will limit its briefing to this small subset of issues.

Notwithstanding its sworn testimony to the contrary, AT&T’s proposal (even as modified) is not a “usage-based” methodology (as is a requirement in Illinois, by AT&T’s admission) and will be far from cost-neutral from the perspective of collocators such as QCC. As a result, AT&T will enjoy a windfall – one that it refuses to acknowledge despite overwhelming record evidence to the contrary – far exceeding rectification of the 38% under-billing AT&T claims results from its use of return-side power metering units (“PMUs”).¹

In addition, as a component of AT&T’s proposed self-certification system, collocators would initially and semi-annually certify their DC power usage, and communicate their usage via a certification *sworn to by an officer* of the collocator. The requirement for officer certification is nowhere explained or justified by AT&T, and would prove to be an unreasonable administrative burden on collocators.

¹ *AT&T Ex. 4.0 (Muellner Direct), at 12 (“[O]n average, 38% of battery current used is not measured by the PMUs.”)*. In discovery, AT&T admitted the average leakage (under-billing) amount may be as low as 25.27%. *QCC Ex. 2, at 8-9 (AT&T response to QCC data request 2.19)*.

II. ISSUES PRESENTED

A. Is AT&T's modified proposal set forth in AT&T Schedule RAS-14 consistent with the usage-based standard AT&T admits applies in this case?

B. Has AT&T justified the requirement that a *corporate officer* of a collocator certify as to the collocator's DC power usage?

III. DISCUSSION

A. AT&T's Modified Proposal is Inconsistent with the ICC's "Usage-Based" Standard.

1. Applicable standard.

There is no debate in this case as to the applicable standard by which this Commission requires AT&T to bill collocators for DC power usage. As acknowledged by AT&T repeatedly, the ICC requires that collocators be billed for their actual usage of DC power, and not for any amount greater.² While QCC takes no position on whether a usage-based system is appropriate, it is beyond any dispute that the ICC requires an actual-usage methodology and that this standard is not being challenged in this case by AT&T.

While AT&T initially resisted the usage-based mandate in its direct testimony, it has since relented and now fully agrees that Illinois law requires a usage-based system. In his direct testimony, AT&T witness Roman Smith decried a usage-based standard. At lines 84-87, Mr. Smith testified that "there should be a close correlation between the DC power that a CLEC orders to meet its collocation requirements and the power charges that the CLEC incurs. This is not to say that charges should be on a usage basis, like residential usage. In fact, this would be completely inappropriate."³ At lines 105-106, Mr. Smith continued, "[a]ccordingly, it is entirely

² *Investigation into Forward Looking Cost Studies and Rates of Ameritech Illinois for Interconnection, Network Elements, Transport and Termination of Traffic, Consol. Docket No. 96-0569, Second Interim Order (Feb. 17, 1998), 1998 Ill. PUC LEXIS 109 ("1998 Order"), at *252-55 ("Staff suggested that the power consumption charges should be based on usage and not per-circuit capacity of the equipment located in the cage.... We direct Ameritech Illinois to recalculate the charges along the lines suggested by Staff.")*.

³ *AT&T Ex. 5.0 (Smith Direct), at 4.*

fair to charge a CLEC for the amount of power it orders, even if the CLEC does not use all of the power it orders at that time.”⁴

Following receipt of the other parties’ direct testimony – including Staff’s⁵ – reminding AT&T and the ICC of the usage-based standard, AT&T reversed field in its rebuttal testimony and now fully embraces that its methodology for charging for DC power must be usage-based. At lines 64-65 of his rebuttal testimony, Mr. Smith characterizes AT&T’s modified proposal as “effectively and efficiently [billing CLECs] for the actual DC power they use.”⁶ Mr. Smith is even more direct at lines 264-66, where he testifies, “AT&T Illinois’ proposal to charge based on DC power consumption as specified by the CLEC is ‘based on usage’ and therefore falls squarely within the Commission’s 1998 Order.”⁷ The operative question is, thus, not whether a usage-based standard applies, but instead whether AT&T’s proposal meets that standard. AT&T argues that it does, while the record evidence shows that it does not.

2. AT&T’s proposal is not strictly usage-based.

In at least two respects, AT&T’s modified proposal is not usage based, and thus violates ICC precedent.

a) The minimum amp requirement

Regardless of a collocator’s actual usage on a particular power delivery arrangement, AT&T proposes to assess a minimum DC power charge equal to 5 amps⁸ (or \$49.00 per month, at \$9.80 per amp) per power delivery arrangement.⁹ For collocators like QCC¹⁰ that use

⁴ *Id.*, at 5.

⁵ *Staff Ex. 1.0 (Stewart Direct)*, at *Ins. 422-23* (“I do not object as long as the CLEC continues to be billed for power consumed, not power ordered.”); *Staff Ex. 2.0 (Hanson Direct)*, *Ins. 76-80* (“I believe it is necessary for the Commission to adopt Staff witness Kathy Stewart’s recommendation that any alternative measurement to charge for DC power be usage based. This would mitigate the possibility of IBT collecting increased revenues by the process of changing or abandoning metering arrangements.”).

⁶ *AT&T Ex. 5.1 (Smith Rebuttal)*, at 5.

⁷ *Id.* at 14.

⁸ That minimum charge jumps to 51 amps if the collocator’s power delivery arrangements are provisioned from the main power board. *AT&T Ex. 3.1 (Nevels Rebuttal)*, at 24 (“CLECs fused at the main power board would continue to have a minimum of 51 amps.”).

⁹ AT&T has clarified that the 5 amp minimum charge is not per collocation arrangement, but per each individual power delivery arrangement serving a collocation arrangement. *AT&T Ex. 3.2 (Nevels Surrebuttal)*, at 9 (“I agree

multiple, separately-fused bays (and, thus, multiple power delivery arrangements) at each collocation arrangement, that 5 amp minimum is truly a 15 amp minimum (\$147.00 per month) if 3 bays or 20 amp minimum (\$196.00 per month) if 4 bays per collocation arrangement. If QCC is drawing less than 5 amps at a given power delivery arrangement, it is beyond reasonable dispute that, under AT&T's proposal, QCC will pay for power it is not actually consuming. The record reflects that, for QCC, this component of the AT&T proposal will increase QCC's DC power costs in Illinois by 911%.¹¹ Not only does the minimum amp requirement undermine AT&T's testimony that its proposal is usage based, but it even more strongly undermines AT&T's assertion that its proposal will be revenue-neutral to AT&T and cost-neutral to CLECs.¹² As a result, AT&T would recover far more than the 38% it is allegedly under-billing today as a result of its use of the return-side PMUs.

While AT&T stood steadfast to its claim (in rebuttal testimony) that its modified proposal presents a usage-based alternative to the PMU system, under pressure it has since acknowledged – first in testimony, later at hearing – that this aspect of its proposal is not usage based. AT&T's first retreat was in Mr. Smith's surrebuttal testimony, where he hedged his statement that the AT&T proposal “meets [Mr. Turner's] key objective, i.e., that the DC power charges to CLECs be usage-based” with an inconspicuous footnote stating, “Subject to the caveat that Mr. Turner disagrees with the 5 amp minimum issue addressed by Mr. Nevels.”¹³ At hearing, Mr. Smith (under cross examination by Staff) admitted that the “5 amp minimum is not

with Mr. Turner that the relevant question is the power drain of a 'power delivery arrangement' rather than a 'collocation arrangement', because the 5 amp minimum applies to each 'power delivery arrangement.' ”); see also Transcript of Proceedings (“Tr.”) 182 (Smith cross by QCC); QCC Ex. 2, at 13 (AT&T's response to QCC data request 3.4).

¹⁰ QCC (Confidential) Schedule VHB-1 (column B).

¹¹ QCC (Confidential) Cross Ex. 1 (column H). This calculation was acknowledged by AT&T at hearing as accurately reflecting changes to Mr. Smith's rebuttal exhibit (AT&T Schedule RAS-9). Tr. 189 (Smith cross by QCC).

¹² AT&T Ex. 2.0 (Brissenden Direct), at 7 (“There is no increased SBC Illinois cost being attributed to CLECs' power usage with this simple conversion proposal. Therefore, the conversion proposal will result in a neutral net effect, from a cost perspective, to both the CLECs and SBC Illinois.”).

¹³ AT&T Ex. 5.2 (Smith Surrebuttal), at 4.

based on the actual usage.”¹⁴ AT&T’s “revelation” is hardly controversial, and was already seized on by Staff, which opposes the minimum amp requirement.

I do not believe AT&T Illinois proposed 5 amp minimum is warranted. DC power charges are intended to insure that AT&T recovers costs for power consumed. That is why Ms. Stewart and I have consistently argued the charges should be usage based. The 5 amp minimum charge is inconsistent with this premise. If one of AT&T Illinois CLEC customers is using less than 5 amps, that is what they should be charged for. Although Mr. Nevels derides such a situation as “not really collocating but warehousing its equipment”, AT&T Illinois is being compensated by the CLEC for its costs of providing the space. AT&T Illinois should not be further compensated for power that is not being consumed. (footnote omitted)¹⁵

AT&T offers two reasons why the ICC should ignore that the 5 amp minimum requirement is inconsistent with a usage-based standard. Neither explanation is credible. AT&T first tries to deflect the issue by opining that a “CLEC that is realizing a power amount of less than 5 amps is not really maintaining an active, used collocation arrangement.”¹⁶ By this argument, AT&T suggests (but never explicitly states) that a collocater should be required to decommission a collocation arrangement if it is not drawing at least 5 amps at any moment in time. There are at least two problems with this suggestion. First, AT&T’s argument is inapposite. Whether as a matter of public policy AT&T is correct or incorrect that collocations that are not actively used should be decommissioned (and QCC takes no position on that issue), the bottom line for this case is that, under Illinois law, AT&T must still prove that its proposed methodology is usage based. If it is not, is at odds with the 1998 Decision that AT&T acknowledges is the law of this Commission and governs the ICC’s decision in this case.

Second, AT&T’s suggestion that a momentarily-inactive collocater must decommission

¹⁴ *Tr. 179 (Smith cross by Staff).*

¹⁵ *Staff Ex. 2.2 (Hanson Surrebuttal), at 2.*

¹⁶ *AT&T Ex. 3.1 (Nevels Rebuttal), at 25; see also AT&T Ex. 5.2 (Nevels Surrebuttal), at 11 (“I do not believe that an actively-used power delivery arrangement will draw less than 5 amps of power.”)..*

(or be penalized for such inactive status) is at odds with AT&T's own collocation tariffs, which (according to AT&T's wholesale tariff expert¹⁷) do not require collocators to draw at least 5 amps on a power delivery arrangement, do not require collocators to decommission upon becoming inactive and do not even require a collocator to connect to AT&T's DC power infrastructure at all.¹⁸ Finally, to the extent AT&T is suggesting that collocators should be required to decommission upon becoming inactive, AT&T has failed to present any evidence in this case of any shortage of collocation space or DC power plant in its Illinois central offices.

Next, AT&T attempts to deflect the ICC's attention by suggesting that, taken as a whole, the modified proposal is usage based. In Mr. Nevels' surrebuttal, he testifies as follows:

Even assuming that an active CLEC arrangement was drawing less than 5 amps, the Commission should not conclude that a 5 amp minimum would cause the "per amp" proposal to be anything other than usage-based because there are several features of the proposal that cause AT&T Illinois to under bill the CLECs. For example, if an audit shows that a CLEC is drawing more power than it certified, but the discrepancy is less than 10%, AT&T Illinois will not adjust that CLEC's bill. That CLEC will, accordingly, get *more* power than it pays for. Similarly, if an audit shows that a CLEC is drawing 25% more power than it certified, but the differential is less than 5 amps, AT&T Illinois will not adjust that CLEC's bill. Here again, the CLEC will get *more* power than it actually pays for. Given the operation of these audit provisions, I do not believe that Mr. Hanson could conclude that the 5 amp minimum will, on an overall basis, cause CLECs to pay for more power than they actually use.¹⁹

Clearly, this is an offset argument (that AT&T's over-billing by virtue of the minimum amp requirement will be offset by under-billings elsewhere), although Mr. Smith tried unconvincingly at hearing to characterize it as not being an offset argument.²⁰ AT&T fails to

¹⁷ *AT&T Ex 1.0 (Parker), at 2.*

¹⁸ *Tr. 460-61, 489-90 (Parker cross by Covad).*

¹⁹ *AT&T Ex. 3.2 (Nevels Surrebuttal), at 14.*

²⁰ *Tr. 206-07 (Smith cross by ALJ).*

support its offset argument with any factual or quantifiable analysis, and asks the ICC to look past the fact that (as the Administrative Law Judge recognized)²¹ its offset theory relies on under-billing offsets where they may well not equally (or ever) exist. AT&T offers no data demonstrating that the amount AT&T will over-bill will equal amounts AT&T will under-bill as a consequence of other components of the proposal. Further, as the ALJ suggested, while a collocator drawing fewer than 5 amps will always be charged for more power than it draws, there is no guarantee that collocators (let alone the same collocators) will be under-billed by virtue of the 10% buffer described by Mr. Nevels. As such, the ICC should give no weight to AT&T's offset argument.

b) Over-certification to create a buffer

In addition to the minimum amp requirement, the AT&T modified proposal is potentially inconsistent with the ICC's usage-based standard as a result of how some collocators may choose (by necessity) to certify their usage. As Joint CLECs have made clear, AT&T is unwilling to take the periodic measurements itself (even if reimbursed for such effort), but instead seeks to pass the burden and costs of the periodic measurements to collocators. If AT&T were willing to take those readings, the complexities of and consternation concerning the self-certification, audit and penalty provisions would all be rendered moot. Given AT&T's refusal to do so, collocators will be required to estimate – under threat of penalty, if their certifications prove low as of any future moment in time – their actual DC power draw. Many, if not all, collocators will in all likelihood over-certify (by reporting amounts higher than they think they will actually use) in order to create a buffer and, thus, avoid penalties by AT&T. To the extent collocators, in the exercise of prudence, over-certify to avoid penalties, they will *ipso facto* pay for DC power they do not actually consume.

Thus, both as a consequence of the minimum amp requirement and the prophylactic over-certification by collocators, the ICC should find that AT&T's modified proposal is not usage-

²¹ *Tr. 207-09 (Smith cross by ALJ).*

based, and is thus at odds with the 1998 Decision.

B. The Requirement for *Officers* to Execute the Self-Certifications is Unreasonable and Unjustified.

AT&T's modified proposal, as set forth in AT&T Schedule RAS-14, requires a *responsible officer* of the collocator to execute the initial (both for new and existing arrangements) and periodic certifications, attesting that "the Collocator is not exceeding the total load of power as reported on the Certification."²² AT&T offers no explanation why collocators should have to funnel the (potentially) hundreds of certifications through a corporate officer, when clearly that type of activity would occur at an operational (rather than executive) level of the company.²³

Under cross examination by counsel for McLeod, Mr. Smith admitted that AT&T's bills will not be accompanied by a statement of a responsible officer of AT&T attesting to the bill's accuracy, and, when AT&T serves a notice of audit on a collocator, said notice will not be accompanied by an AT&T officer's certification.²⁴ Given this lack of reciprocity (and QCC would not suggest that the appropriate result is for both sides to engage their officers to execute these bills, certifications and audit notifications) and the lack of any justification for imposing this burdensome requirement on collocators, the ICC should reject this aspect of AT&T's proposal. Assuming *arguendo* that the ICC orders that the PMU methodology be replaced by a self-certification process such as the one set out in AT&T Schedule RAS-14, the ICC should strike the requirement for a collocator's corporate officer to provide the certification. Having the collocator (the company) provide the certification is absolutely sufficient, and consistent with how AT&T and collocators regularly exchange information today.

²² AT&T Schedule RAS-14, ¶16A.

²³ Counsel for AT&T noted at hearing that the officer certification language was first suggested by Joint CLEC witness Turner. *Tr. 115-16*. Regardless of who first uttered this language, AT&T has adopted it as its own, and thus should be required to justify that the requirement is appropriate and not unreasonably burdensome.

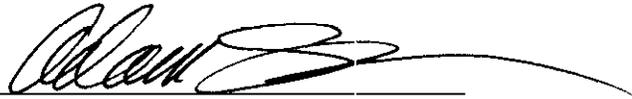
²⁴ *Tr. 108-10 (Smith cross by McLeod)*.

IV. CONCLUSION

Based on the foregoing, the ICC should find that AT&T's DC power proposal, as reflected in AT&T Schedule RAS-14, fails to meet this Commission's requirement that AT&T only bill collocators for DC power actually consumed. Instead, as designed by AT&T, the proposed methodology will result in a windfall to AT&T, with AT&T being far overcompensated for the 38% it claims it is under-billing to collocators by virtue of its return side PMU system. Further, and to the extent the ICC permits AT&T to convert to a self-certification system such as the one set out in AT&T Schedule RAS-14, collocators should not be required to have corporate officers execute the certification documents.

RESPECTFULLY SUBMITTED this 2nd day of May, 2006.

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CERTIFICATE OF SERVICE

I, Adam L. Sherr, an attorney, certify that I served a copy of Qwest Communications Corporation's Initial Post-Hearing Brief to all parties on the attached service list by e-mail and U.S. Mail on May 2, 2006.



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