

1 A. No. As I explained in my direct testimony on rehearing, Attachment JEK-3 to
2 that testimony is a letter from the Alcatel that outlines the current capabilities of the
3 Alcatel Litespan platform being deployed by Ameritech Illinois.

4
5 **Q. MS. CARTER ALSO ASSERTS THAT AN ATM QUALITY OF SERVICE**
6 **SHE REFERS TO AS “MINIMUM DESIRED CELL RATE (MDCR)” SHOULD**
7 **BE OFFERED BY AMERITECH ILLINOIS. IS MDCR A STANDARD ATM**
8 **QoS?**

9
10 A. No. Minimum Desired Cell Rate (MDCR) is not a standard ATM QoS as
11 recognized by the ATM Forum. ATM QoS must conform to a set of standards so the
12 network can properly handle the traffic. New features that are deployed by Ameritech
13 Illinois on the Project Pronto equipment will meet accepted standards to allow standard
14 handoff to the CLECs of the Broadband Service.

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16
17 **Q. CAN THE ALCATEL LITESPAN EQUIPMENT PROVIDE THE VBR-**
18 **NRT AND VBR-RT THAT MS. CARTER REFERS TO IN HER DIRECT**
19 **TESTIMONY ON REHEARING?**

20
21 A. No. The Litespan equipment is not currently capable of providing the VBR QoS.
22

1 **Q. DOES AMERITECH ILLINOIS PLAN ON OFFERING ANY OTHER**
2 **ATM QoS OVER THE ALCATEL LITESPAN EQUIPMENT?**

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4 A. Yes. Currently, Ameritech Illinois offers the UBR QoS class for maximum
5 efficiency and utilization of the Litespan and to facilitate rapid deployment of ADSL
6 service. In addition, as agreed to in its Voluntary Commitments and as the FCC
7 incorporated in its Project Pronto Order issued on September 8, 2000, Ameritech Illinois
8 is currently reviewing a CBR class of service. Ameritech Illinois is working with the
9 CLECs in the quarterly collaboratives to target an initial roll out of the CBR class of
10 service starting in March 2001.

11

12 **Q. MR. CLAUSEN DISCUSSES A UBR PLUS MDCR ATM QOS AND**
13 **DESCRIBES IT AS A QOS CURRENTLY NOT OFFERED BY AMERITECH**
14 **(PG 9). IS THIS A STANDARD ATM QOS?**

15

16 A. No. The ATM Forum defines the QoSs used in ATM transport. What Mr.
17 Clausen discusses is a non-standard QoS. In order for an ATM transport system to
18 handle any QoS, certain parameters have to be specified in order for the network to
19 properly handle the traffic. These parameters must be standard across Ameritech Illinois'
20 network as well as the CLECs' networks. Without this standard set of parameters, DSL
21 traffic is subject to being dropped or rejected. Neither the Litespan nor the OCD
22 equipment being deployed by Ameritech Illinois will recognize a QoS of UBR+MDCR.

23

1 **Q. MS. CARTER IN HER DIRECT TESTIMONY ON REHEARING**
2 **STATES: “MY UNDERSTANDING IS THAT THE SYSTEM ALSO CAN BE**
3 **CONFIGURED TO PUT DATA AND VOICE SIGNALS ON THE SAME**
4 **PHYSICAL FIBER” (PG 24). MR. CLAUSEN ALSO ASSERTS IT IS**
5 **TECHNICALLY FEASIBLE TO PUT VOICE AND DATA OVER THE SAME**
6 **STRAND OF FIBER USING WAVELENGTH DIVISION MULTIPLEXING (PG**
7 **6). DO YOU AGREE WITH THEIR STATEMENTS?**

8 A. With the Litespan equipment, this cannot be done without adding additional
9 equipment at both the remote terminal and central office. I should reiterate that the vast
10 preponderance of NGDLCs being deployed by Ameritech Illinois as part of Project
11 Pronto will be the Alcatel Litespan equipment. In my direct testimony on rehearing at
12 pages 15-16, I explain that Wave Division Multiplexing (WDM) and Dense Wave
13 Division Multiplexing (DWDM) cannot be achieved on the Litespan equipment by
14 simply changing out common cards. Moreover, Mr. Lube explains in his direct and
15 rebuttal testimonies on rehearing, WDM and DWDM are not line sharing. As the last
16 letter of the acronyms state, this is a multiplexing function.

17
18 **Q. MS. CARTER FURTHER ASSERTS THAT SBC MADE A BUSINESS**
19 **DECISION TO UTILIZE A SEPARATE FIBER FOR VOICE AND A SEPARATE**
20 **FIBER FOR DATA (PG 24). IS THIS TRUE OR ARE THERE TECHNICAL**
21 **REASONS FOR HAVING SEPARATE VOICE AND DATA FIBERS WITH THE**
22 **LITESPAN EQUIPMENT?**

23

1 A. There are both business and technical reasons for Ameritech Illinois' deployment.
2 First, it is a legitimate business decision for Ameritech Illinois to make the most
3 economic deployment of NGDLC in its network. Mr. Clausen's direct testimony on
4 rehearing (page 6) agrees. Regarding the technical reasons, Ms. Carter's assertion
5 indicates a lack of understanding of the Alcatel Litespan equipment. As I describe in my
6 direct testimony on rehearing at pages 3 and 5, the Litespan equipment is designed by the
7 manufacturer with a separate OC3c for the DSL signals and an OC3 for the TDM traffic.
8 As I further describe at pages 15-16 of my direct testimony on rehearing, the Litespan
9 system common cards cannot be changed out to allow one fiber facility to transport both
10 the DSL and TDM signals. As I explained above, additional equipment would have to be
11 added to achieve what Ms. Carter suggests.

12

13 **Q. MR. CLAUSEN ASSERTS THAT CLEC OWNERSHIP OF THE LINE**
14 **CARD WILL ALLOW A MORE FLEXIBLE NETWORK (PG 4). DO YOU**
15 **AGREE WITH HIS ASSESSMENT?**

16

17 A. No. As I explained in my direct testimony on rehearing at pages 5-11, the
18 operational issues associated with CLEC ownership or designation of the line card are
19 extensive and serious. Rather than creating a more "flexible network architecture", just
20 the opposite would occur. Because CLECs would own or designate line cards that served
21 specific geographic areas and most likely one end user customer per area initially, other
22 pairs associated with the card slot would go unused. In addition, since end user
23 customers move and change service providers, the number of trips to rearrange the cards

1 at the NGDLC or replace one CLEC's card with another CLEC's card would create less
2 flexibility in the network. In addition to creating a less flexible network, this
3 arrangement would likely increase network troubles, as Ameritech Illinois would have to
4 add cards for CLECs as often as end user customers change their data service providers.
5 This churn would also negatively impact the capacity of the NGDLC, as I've explained in
6 the my direct testimony on rehearing at pages 6-8.

7

8 **Q. MR. CLAUSEN ASSERTS "LINE CARDS THAT PLUG INTO NEXT**
9 **GENERATION DIGITAL LOOP CARRIER ("NGDLC") SYSTEMS AT THE RT**
10 **ARE PERFORMING THE FUNCTIONS THAT A DSLAM AND A SPLITTER**
11 **PERFORM AT THE CENTRAL OFFICE" (PG 5). DO YOU AGREE WITH**
12 **THIS ASSERTION?**

13

14 **A.** No. As I stated in my direct testimony on rehearing at page 12, the line card is
15 only a sub-component of the NGDLC. In a stand-alone arrangement, the line card cannot
16 perform or terminate a service. It is only functional when it is in the NGDLC shelf and
17 has the NGDLC common software and hardware to support it. In addition, as Mr. Lube
18 explains in his direct testimony on rehearing at page 45, the FCC has concluded that the
19 line card is only one component of the NGDLC.

20

21 **Q. MR. CLAUSEN ALSO ASSERTS "IF CLECS DO NOT HAVE THE**
22 **ABILITY TO SPECIFY THE LINE CARDS AT THE REMOTE TERMINAL,**

1 **THEY DO NOT HAVE THE SAME OPTIONS AS IN TRADITIONAL LINE**
2 **SHARING SITUATIONS” (PG 5). DO YOU AGREE WITH THIS ASSERTION?**

3
4 A. No. If by “traditional” situations Mr. Clausen means CLECs owning a DSLAM
5 and accessing copper, that option is now and will continue to be available to CLECs.
6 Under this option, CLECs have to place stand-alone DSLAM equipment at or near
7 remote terminals and lease subloops. The NGDLCs being deployed by Ameritech
8 Illinois as part of Project Pronto, and Ameritech Illinois’ accompanying Broadband
9 Service offering, provides an additional option for the CLECs.

10
11 **Q. MR. CLAUSEN ASSERTS THAT THE COMMISSION SHOULD**
12 **DECLARE THE FIBER PORTION BETWEEN THE NGDLC RT AND THE**
13 **OPTICAL CONCENTRATION DEVICE (“OCD”) AN UNBUNDLED NETWORK**
14 **ELEMENT (PG 7). DO YOU AGREE WITH THIS ASSERTION?**

15
16 A. No. Taken literally, unbundling the fiber between the NGDLC and the OCD
17 would mean removing an integral component of the overall NGDLC technology and
18 giving it to CLECs. The fiber between the NGDLC and the OCD is critical to the overall
19 operation of the equipment. The NGDLC cannot perform its intended function unless it
20 is connected to these facilities. In addition, there is no physical way to connect the fiber
21 to the line card, contrary to what Mr. Clausen suggests in his direct testimony on
22 rehearing. Furthermore, the operational problems created by this arrangement would be
23 enormous. Today, there is only one pair of fibers between the CO and the NGDLC

1 system at the RT for DSL. It is imperative for Ameritech Illinois to maintain control of
2 that fiber for capacity management reasons.
3 Even if Mr. Clausen is not suggesting the physical unbundling of this fiber, but instead is
4 suggesting "virtual" unbundling, I disagree with his proposal. The DSL signals that
5 transit the fibers do not occupy any specific timeslot on the fiber. The virtual circuit is
6 set up and is packetized on the fiber without regards to any spccific timeslot. This is
7 different from a TDM facility, where a circuit is assigned a specific timeslot uniquely
8 identified by the system.

9

10 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY ON**
11 **REHEARING?**

12

13 **A. Yes.**

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