

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

**NTS SERVICES CORP.**

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**GALLATIN RIVER COMMUNICATIONS**  
**L.L.C. D/B/A CENTURYLINK**

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**Docket No. 12-0116**

**DIRECT TESTIMONY OF**  
**JOHN FORDHAM**  
**ON BEHALF OF**  
**GALLATIN RIVER COMMUNICATIONS L.L.C. D/B/A CENTURYLINK**  
**CENTURYLINK EXHIBIT 4.0**

September 28, 2012

**DIRECT TESTIMONY OF  
JOHN FORDHAM  
GALLATIN RIVER COMMUNICATIONS L.L.C.**

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is John Fordham. My business address is 416 Margaret Street, Pekin, Illinois,  
4 61554.

5 **Q. On whose behalf are you submitting this opening testimony?**

6 A. I am submitting this Direct Testimony on behalf of Gallatin River Communications  
7 L.L.C. d/b/a CenturyLink (hereafter “CenturyLink”), the Illinois incumbent local  
8 exchange company (“ILEC”) of CenturyLink, Inc.

9 **Q. By whom are you employed and what is your position?**

10 A. I am currently employed by CenturyLink as the Manager of Area Operations for the  
11 Illinois Market Area. I have held this position since February 6, 2012.

12 **Q. What are your responsibilities as an Area Operations Manager?**

13 A. I am responsible for managing the day-to-day operations for CenturyLink’s Illinois  
14 exchange areas. This includes meeting customer service requirements, managing  
15 personnel issues, preparing and administering operating budgets, as well as various  
16 administrative duties. In addition, I am responsible for involvement within the Illinois  
17 Market Area in aspects of sales, marketing, engineering, regulatory, and public relations.

18 These activities, in terms of Company structure, report through other organizational  
19 channels at CenturyLink.

20 **Q. What positions did you hold before becoming an Area Operations Manager?**

21 A. Most recently, from February 1999 to February 2012, I was the Engineering and  
22 Construction Manager for CenturyLink and for predecessor companies. Prior to that time,  
23 I held various Operations Management, Sales, Business Office, and Operational Craft  
24 positions dating back to January of 1973.

25 **Q. What were your responsibilities as an Engineering and Construction Manager ?**

26 A. I was responsible for developing and administering the Capital budget for the Illinois  
27 Market Area. In addition, I supervised engineering and construction personnel, both  
28 internal engineering and construction employees, and contractor personnel. The  
29 contractor involvement included administering our Line Extension Contract, as well as  
30 placing project work out for bid if the scope of the project warranted. I was accountable  
31 for ensuring that construction projects were completed in a timely, efficient, and quality  
32 manner, and that construction-related invoices were processed accurately.

33 **Q. Please describe your experience in the telecommunications industry prior to  
34 becoming Engineering and Construction Manager.**

35 A. I have worked in the telecommunications industry in various capacities for over 39 years.  
36 I started my career in 1973 with Central Telephone Company of Illinois and held a  
37 variety of positions of increasing complexity and responsibility in the Customer Service,

38 Sales, Business Office, and Operations Management areas, until moving into  
39 Engineering and Construction in 1999.

40 **Q. Please describe your educational background.**

41 A. I obtained an Associate in Science degree in Business from Sauk Valley Community  
42 College, Dixon, Illinois, in 1987. In 2004, I earned a Bachelor's Degree in Business  
43 Administration from Midstate College in Peoria, Illinois.

44 **Q. Have you previously testified before any state commission?**

45 A. No

46 **Q. What is the purpose of your testimony?**

47 A. The purpose of my testimony is to respond to parts of the testimony submitted by Sue  
48 Scott on behalf of NTS Services Corp. ("NTS"). In particular, I will address  
49 CenturyLink's current practices concerning prequalification of loops, loop labeling, and  
50 notification of the resolution of trouble reports. In addition, I will address NTS's  
51 complaints regarding access to collocation space, failures of back-up power and alleged  
52 slamming of customers in connection with the Crescent Street copper retirement.

53

54

55 **II. REBUTTAL OF NTS's TESTIMONY**

56 **PREQUALIFICATION OF LOOPS**

57 **Q. Were you aware that CenturyLink had for a short period of time used MapQuest to**  
58 **determine loop distances for the purposes of prequalifying loops?**

59 A. Yes. It is my understanding that CenturyLink used MapQuest for a short period of time  
60 during 2009 to prequalify loops. CenturyLink has not used MapQuest in Illinois since  
61 then.

62 **Q. How did CenturyLink determine loop distances after it ceased using MapQuest?**

63 A. After CenturyLink made the decision to cease using MapQuest, it decided to use cable  
64 records to determine loop distances. This involved manually adding up the kilofeet  
65 measurements per access point that were recorded in the cable records. The reliability of  
66 this method depends entirely upon the accuracy and completeness of the records that  
67 were prepared and maintained by CenturyLink's predecessors. Today, if the  
68 characteristics of a loop are particularly important, a CLEC has the option of requesting a  
69 full cable verification of the loops, in which case CenturyLink will physically inspect  
70 loops to determine whether there are load coils and bridge taps and will conduct various  
71 tests to check for noise, power influence and circuit loss. CLECs rarely request this type  
72 of full inspection because most loops do not require this sort of enhanced testing and  
73 CLECs do not want to pay the additional charge.

74 **Q. Can one determine whether there are load coils or bridge taps on particular loops**  
75 **by examining physical cable records?**

76 A. That depends entirely upon whether, and to what extent, load coils and bridge taps were  
77 recorded in the cable records. As a general rule, load coils are only used for loops that  
78 are longer than 18,000 feet. Very few of the loops in the Pekin area are longer than  
79 18,000 feet.

80 **Q. Has NTS commonly requested prequalification of loops in your experience?**

81 A. No. I do not recall a single recent instance in which NTS has requested a prequalification  
82 of loops.

### 83 **TAGGING LOOPS**

84 **Q. What does tagging (or labeling) loops involve?**

85 A. Tagging a loop means placing a piece of heavy paper or tape, sometimes attached to a  
86 string, on the end of the physical loop to indicate that the loop is being used by a  
87 particular carrier. This is usually done at the NID.

88 **Q. Does CenturyLink tag loops in the process of provisioning loops to CLECs?**

89 A. Not unless a service technician is dispatched to the field as a result of a service order.  
90 Some service orders are provisioned by running a jumper wire in the central office. If the  
91 service order does not involve the dispatch of a technician, there is no occasion for the

92 loop to be tagged at the NID or any other location in the field. CenturyLink does not tag  
93 loops for its own purposes.

94 **Q. Will CenturyLink tag loops if tagging is requested in connection with the dispatch of**  
95 **a technician?**

96 A. Yes. If there is a specific request to tag a loop for a dispatched ticket, a CenturyLink  
97 technician will tag the loop.

98 **NOTIFICATION OF RESOLUTION OF TROUBLE REPORTS**

99 **Q. How does CenturyLink handle notification concerning the resolution of trouble**  
100 **reports?**

101 A. Trouble reports are processed at CenturyLink by a regional dispatch center, which has  
102 responsibility for the dispatch of technicians using an automated system. As a general  
103 practice, CenturyLink does not provide telephone notification of a particular trouble  
104 resolution unless specifically requested to do so by the reporting customer. This is true  
105 both for CLECs and CenturyLink's own customers. It is common practice within the  
106 telephone industry as well as other utility and television industries not to report the  
107 resolution of trouble reports via a follow-up telephone call. It is generally not necessary  
108 to report resolution of a trouble report because the customer knows when its service has  
109 been restored.

110

111 **ACCESS TO COLLOCATION SPACE**

112 **Q. At lines 595-630 of her direct testimony, Ms. Scott complains that as a result of a**  
113 **change in CenturyLink security systems during October, 2011, NTS's old security**  
114 **access cards did not allow NTS technicians access to its collocation sites on two**  
115 **occasions. Did CenturyLink in fact deny NTS access to its collocation sites?**

116 A. No. If building entry is not possible via a security access card, CLEC technicians know  
117 to contact a CenturyLink employee to obtain access. When NTS notified me (and to my  
118 knowledge any other employee at CenturyLink) that its technicians needed access to a  
119 collocation site and could not obtain access through their access cards, arrangements  
120 were immediately made to give the NTS technicians access.

121 **Q. Did CenturyLink change security systems in Illinois in the Fall of 2011?**

122 A. Yes. CenturyLink changed security systems from the Continental security system  
123 previously provided by SEICO Security Systems to a CenturyLink companywide security  
124 system known as "Lenel." The SEICO access cards were not compatible with the Lenel  
125 security system. As a result, everyone who needed access to CenturyLink properties in  
126 Illinois required a new photo/access card. In Illinois, there were approximately 80  
127 individuals including CenturyLink employees, contractors and collocating carriers that  
128 needed new access cards.

129

130 **Q. How was the change in access cards to be accomplished?**

131 A. The provision of new access cards was arranged by Physical Security at CenturyLink.  
132 Pam Ulibarri, a Senior Security Specialist in Physical Security, notified the Pekin Office  
133 by email on Monday, September 26, 2011 that the Continental security system would be  
134 converted to the companywide Lenel system at some point that week. Because this was a  
135 company-wide initiative, and the conversion schedule for Illinois locations depended on  
136 the completion of earlier scheduled locations, the specific date of the conversion was not  
137 provided.

138 Physical Security also notified the Pekin office that the change in access cards for  
139 contractors and collocators was to be handled in two steps. First, blank cards had been  
140 sent out to be distributed to contractors and collocators who were authorized to have  
141 access to space in CenturyLink central offices. Physical Security was not able to send out  
142 photo IDs to contractors and collocators because that Department was not able to retrieve  
143 identification photographs from the Continental security system. Physical Security  
144 requested that each time a blank card was given to a technician, the person distributing  
145 the card was to notify Physical Security of the name, address, telephone number,  
146 CenturyLink sponsor and card number provided to each individual. Second, the CLECs  
147 and contractors were required to submit photographs to CenturyLink that could be used  
148 by Physical Security to produce a photo skin for the cards. To give contractors and  
149 collocators time to submit photographs, the blank cards were initially activated for a two  
150 week period. Once it received the photographs, Physical Security would extend the  
151 deactivation date beyond the initial two weeks and send out the photo skins to be put on

152 the blank cards. The limited duration of the initial activation was a security precaution to  
153 prevent unauthorized access to CenturyLink facilities in the event that blank cards ended  
154 up in the wrong hands.

155 **Q. Can you determine from Sue Scott's testimony when or why precisely NTS was**  
156 **unable to use its security access cards to access collocation sites?**

157 A. No. Ms. Scott does not provide specific dates on which NTS's access cards did not work,  
158 the location or locations NTS was attempting to enter, the individuals at CenturyLink  
159 who NTS contacted when their cards did not work or any other specific details that I  
160 could use to investigate her claims. As a result, I have been unable to determine whether  
161 the process prescribed by Physical Security was precisely followed by NTS and  
162 CenturyLink. However, I do believe that the blank access cards were provided to NTS,  
163 that NTS did submit photos to be used to produce photo skins, and that NTS did receive  
164 the photo ID access cards.

165 **BACKUP POWER**

166 **Q. At lines 632 – 679 of her testimony, Ms. Scott complains about CenturyLink's**  
167 **testing of back-up power beginning in July, 2010. Why has CenturyLink tested**  
168 **back-up power during the day rather than at night?**

169 A. The testing of generators is a regular and routine event. There should be no outage  
170 caused by a generator test because it is a test of the backup generator and the transfer  
171 system to ensure that both are operable in the event of a commercial power outage.  
172 Because no outage is anticipated, there is no reason to test a generator during a night

173 maintenance window. Further, CenturyLink personnel are scheduled to be at the central  
174 office location during the day, not during the night, and it is therefore more cost effective  
175 to conduct the generator test during normal business hours. Although the regulations  
176 require that back-up power be tested at least once a month, CenturyLink policy is to test  
177 more frequently.

178 **Q. Please describe the power arrangements that have been in place for NTS during**  
179 **your tenure at CenturyLink?**

180 A. NTS has historically obtained both its primary and back-up power from CenturyLink.  
181 CenturyLink's primary power supply is provided by Ameren Illinois. For back-up  
182 power, CenturyLink has an onsite diesel generator to provide power in the event that  
183 power from Ameren Illinois is interrupted. When primary commercial power fails, the  
184 diesel generator automatically activates for both CenturyLink equipment and NTS  
185 equipment. NTS has historically maintained its own temporary back-up batteries that are  
186 intended to provide uninterrupted power during the momentary switch-over from  
187 commercial power to back-up power. However, as with an automobile battery, these  
188 batteries have a limited lifespan and their charge gets weaker over time, especially near  
189 the end of their lives.

190 **Q. What happens if back-up power is tested and NTS's back-up batteries are old and**  
191 **weakened?**

192 A. Under that circumstance, if the back-up batteries do not maintain sufficient power during  
193 the momentary switch-over from commercial power to back-up power, NTS's equipment

194 will shut-down and will have to be rebooted in order to provide service. As a result, there  
195 will be an interruption in service and it will last longer than the brief time that power is  
196 interrupted due to the switch-over from commercial power to back-up power. In my  
197 opinion, based on the little information supplied by NTS in its testimony, this was the  
198 most likely cause of the service interruptions that NTS experienced during the testing of  
199 back-up power during July, 2010.

200 **Q. Ms. Scott speculates that someone at CenturyLink must have had NTS power**  
201 **rerouted off of protected status? Have you investigated her assertion?**

202 A. Yes. I have investigated her assertion by talking with former General Manager Ty  
203 Lemaster and other individuals at CenturyLink and have found no evidence that anyone  
204 at CenturyLink made any such changes to the power supply that connects to NTS's  
205 equipment. I would add that Ms. Scott does not provide any facts to support her  
206 accusation.

207 **Q. What did CenturyLink propose to NTS after the July, 2010 interruptions to prevent**  
208 **future power interruptions during back-up power testing?**

209 A. CenturyLink recommended that NTS purchase a power augment, connection to  
210 CenturyLink's inverter, because CenturyLink believed this to be the most cost-effective  
211 solution. New batteries purchased by NTS would not have been as reliable as the power  
212 augment solution. In essence, an inverter converts direct current to alternating current  
213 that will provide power to NTS from a CenturyLink power source during testing of back-  
214 up power. With this equipment, there is no momentary interruption in power to NTS's

215 equipment during the switch-over from commercial power to back-up power. To my  
216 knowledge, since NTS connected to this equipment there have been no problems with the  
217 testing of back-up power. CenturyLink continues to test back-up power weekly as is its  
218 policy without further complaint by NTS.

219 **CRESCENT STREET DIGITAL LOOP CARRIER AND COPPER RETIREMENT**

220 **Q. At lines 707 to 719, Ms. Scott alleges that CenturyLink engaged in slamming by**  
221 **moving certain unidentified NTS customers off of copper loop facilities leased by**  
222 **NTS in the Crescent Street neighborhood. Do you know what she is referring to?**

223 A. I believe she is referring to customer migrations that took place as a result of the  
224 retirement of the copper feeder (Base cable 6) in the Crescent Street neighborhood.  
225 However, there was no slamming of these customers.

226 **Q. What caused the retirement of the copper feeder in the Crescent Street**  
227 **neighborhood?**

228 A. CenturyLink had to replace certain copper feeder cable, specifically Base cable 6, serving  
229 the Crescent Street neighborhood because it had deteriorated and was in danger of failing.  
230 On August 6, 2010 and again on December 14, 2010, I provided notices to NTS that the  
231 copper would have to be retired in the first quarter of 2011 and replaced with a fiber-fed  
232 Digital Loop Carrier. CenturyLink did not receive a response from NTS and ultimately  
233 postponed the Phase 1 work with respect to NTS's customers. Because we did need to  
234 rectify this situation, however, we filed a Short Term Notice of Network Changes with  
235 the FCC, pursuant to Sections 51.325 – 51.335 of the FCC's rules. This Notice indicated

236 that the retirement impacting NTS customers would commence on July 11, 2011. NTS  
237 filed an objection with the FCC requesting until December 31, 2011 for the copper to be  
238 retired so that NTS could explore alternative ways of serving its customers. CenturyLink  
239 agreed to postpone the work impacting NTS's customers until December 31, 2011.

240 **Q. Did NTS find a way to serve its DSL customers without the copper feeder that was**  
241 **to be retired?**

242 A. I don't know what steps, if any, NTS took prior to December 31, 2011 to notify its  
243 customers concerning the copper retirement, or to arrange to have the customers moved  
244 to an alternative service or provider. Based on my personal discussions with NTS and  
245 CenturyLink account management personnel, I do not believe NTS found an alternative  
246 way to serve the impacted DSL customers.

247 **Q. What happened after the December 31, 2011 deadline for NTS to move its**  
248 **customers off of the copper feeder?**

249 A. Although CenturyLink had followed all required rules and regulations regarding copper  
250 feeder retirement, and had the right to replace the failing copper feeder, CenturyLink was  
251 left in a position in which the copper feeder was still being used by NTS on January 1,  
252 2012 to serve its customers. CenturyLink therefore had the choice of either cutting off  
253 service to the customers or working with NTS to find alternative service arrangements for  
254 its customers. For the month following December 31, Account Manager Susan Smith  
255 and I worked with NTS to find alternative service arrangements so that the customers  
256 were not just cut off.

257 **Q. Did CenturyLink move any customers off of the UNE loops leased by NTS without**  
258 **the customer's permission prior to December 31, 2011?**

259 A. No. I am aware of one NTS customer that switched providers prior to December 31,  
260 2011. That customer was a car wash business that had requested service from  
261 CenturyLink.

262 **Q. Does this conclude your testimony?**

263 A. Yes, it does.

STATE OF ILLINOIS     )  
                                  )  
COUNTY OF TAZEWELL)

**VERIFICATION**

I, John Fordham, do on oath depose and state that the facts contained in the foregoing Direct Testimony of John Fordham on Behalf of Gallatin River Communications, L.L.C. d/b/a CenturyLink are true and correct to the best of my knowledge and belief.

John Fordham  
JOHN FORDHAM

SIGNED AND SWORN TO BEFORE ME THIS 26th day of  
September, 2012.

Rhonda R Dalton  
Notary Public

My Commission expires:

02-06-16

