

**BEFORE THE ILLINOIS COMMERCE COMMISSION
STATE OF ILLINOIS**

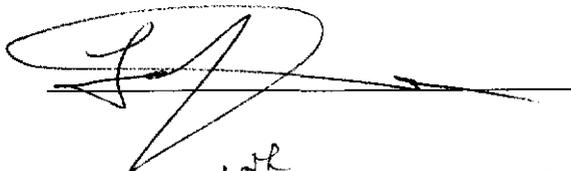
XO Illinois, Inc.)
) No. 02-
Application for Extension of Waiver)
of 911 Call Box Requirement under 83 Ill.)
Admin. Code Section 725.500(o) and 725.620(b))

AFFIDAVIT OF FRANK JOHNSON

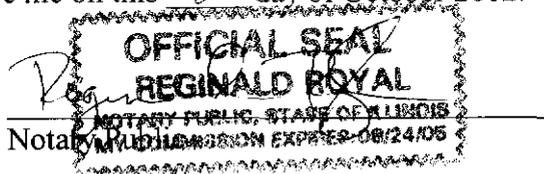
STATE OF ILLINOIS)
) SS.
COUNTY OF _____)

I, Frank Johnson, of lawful age, being duly sworn, depose and state as follows:

1. My name is Frank Johnson. I am Operations Manager for Switch Services for XO Illinois, Inc.
2. I am submitting this information for the second time and it is consistent with testimony previously filed by XO Illinois, Inc. f/k/a NEXTLINK Illinois, Inc.
3. I hereby swear and affirm that the statements contained in the XO Illinois, Inc., Exhibit 2.0 are true and correct to the best of my knowledge and belief.



Subscribed and sworn to before me on this 18th day of October 2002.



My commission expires:

1 Q. Please state your name and business address.

2

3 A. My name is Frank Johnson. My business address is 810 Jorie Boulevard, Suite 200, Oak
4 Brook, Illinois 60523.

5

6 Q. By whom are you employed and in what capacity?

7

8 A. I am employed by XO Illinois, Inc., as Operations Manager. My responsibilities include
9 managing the day to day operations for the switching centers in Illinois as well as all local
10 translations for the switches.

11

12 Q. Please provide a summary of your relevant educational and professional experience.

13

14 A. I am currently taking courses towards a Bachelors Degree in Management with the
15 University of Phoenix.

16 I began my career in the United States Air Force in 1982 where I provided technical
17 support for world wide analog and digital telecommunications networks. In 1988, I left the
18 military to work in the civilian arena where I have held various positions with increasing levels
19 of responsibility. I began my civilian career with Allnet Communications in 1988, as a Customer
20 Premise Technician. My responsibilities included the maintenance of a DMS-250 NT-40 switch.
21 In 1993, I joined Wiltel as a Switch Control Center Technician Level III. My responsibilities
22 were maintenance and surveillance of 10 DMS-250 Supernode switches and 4 DMS Signaling
23 Transfer Point switches. In 1995, I joined Concert as a CVNS Shift Engineer. My
24 responsibilities includes remote maintenance and surveillance of Network Switching Elements
25 Worldwide. In 1996, I joined Thrifty Call, Inc., as a Senior Site Tech/Network Patch
26 Administrator. In 1997, I joined U.S. South as a Switch Operations Manager.

27 In 1998, I joined XO's Atlanta affiliate as Switch Manager. In this role, I was responsible
28 for switch operations and translations for that market. In 2000, I was relocated to the Illinois

29

1 market as the Operations Manager for switch and translations. I currently manage two Northern
2 Telecom DMS-500 switch sites in the Illinois market.

3
4 Q. Are you familiar with the equipment that is known as a call box?

5
6 A. Yes.

7
8 Q. Are you familiar with XO's petition with the Illinois Commerce Commission
9 ("Commission") for an extension of a waiver of the Commission's rules that require a call box?

10
11 A. Yes.

12
13 Q. For what reason (technical or financial) is XO requesting an extension of waiver of the
14 rules that require call boxes?

15
16 A. There are both technical and financial reasons for requesting an extension of waiver. It is
17 my understanding that a call box is a device mounted on the outside wall of a switch that
18 provides a public service answering point ("PSAP") with emergency on site answering capability
19 so that it can receive 9-1-1 service calls in the event of an outage that otherwise prevents the
20 transmission of calls. The technical reason for requesting an extension of waiver is that for XO,
21 a competitive local exchange carrier ("CLEC"), a call box does not provide a solution for
22 transmitting 9-1-1 service calls to a PSAP in the event of an outage because there is no
23 geographic correlation between the XO switch and the PSAPs in XO's service areas. XO
24 currently has two switches which routes calls to multiple PSAPs. In the event of an outage,
25 which PSAP would use the call box? How would this be determined? For a CLEC, such as XO,
26 a call box simply does not provide a solution for completing 9-1-1 service calls to PSAPs in an
27 emergency situation. Therefore, if XO is denied the requested extension and is required to install
28 call boxes, those call boxes still would still not provide ubiquitous coverage to the PSAPs to
29 receive 9-1-1 service calls in the event of an outage at XO's switch.

1 In addition, because the call box does not provide a technical solution, there is no reason
2 to incur the economic costs associated with purchasing, installing and maintaining the
3 equipment.
4

5 Q. If the incumbent local exchange carriers are able to provision call boxes, why can't XO?
6

7 A. Comparing the ability of the incumbent local exchange carrier to provision for call boxes
8 to that of a CLEC is an apples to oranges comparison. An incumbent local exchange carrier
9 ("ILEC") has a much older network configuration with multiple switch locations that correspond
10 geographically to PSAPs. The ILEC can simply allow each PSAP access to the call box at the
11 corresponding switch that routes 9-1-1 service calls to that PSAP. As stated earlier, because XO
12 currently has only two switches and there is no geographic correlation to the multiple PSAPs in
13 XO's service areas, the call box does not permit all the PSAPs in its service area to receive 9-1-1
14 service calls during an outage.
15

16 Q. Does XO take any precautions to minimize any risks that a 9-1-1 call will not be
17 completed?
18

19 A. Yes. In particular, XO's network diversely routes 9-1-1 calls to Ameritech.
20

21 Q. Please provide an explanation regarding how the network is diversified.
22

23 A. Yes. The diagram attached as Exhibit A to this testimony details XO Illinois' network
24 configuration and diverse routing. XO's network takes advantage of electronic redundancy and
25 survivability as a result of diverse routing and SONET technology that did not exist even a few
26 years ago when the Commission's rule in question was promulgated. As Exhibit A indicates, XO
27 has established two separate call paths for 9-1-1 service traffic from its Nortel DMS-500
28 switches to each Ameritech central office. Ameritech delivers the 9-1-1 service traffic to the
29 PSAP. The separate call paths include separate electronics, are supported by SONET RING

1 topology (the OC-12 SONET network is completely diverse) and provide the highest level of
2 redundancy currently available.

3
4 Q. If an incident were to occur that would cause your central office to be isolated, what
5 would happen?

6
7 A. Even if there is an outage in which XO's switch were to be completely isolated, a call box
8 would not provide a solution to the provision of 9-1-1 service calls to PSAPs for the reasons I
9 stated above. Having said that, XO will initiate whatever emergency activities are needed to
10 correct the problem and will use its best efforts to notify all affected PSAPs within 15 minutes of
11 confirming the outage. In addition, XO will continue to maintain diverse routing and diverse
12 facilities to the maximum extent possible.

13 The reliability of its switch and network are crucial issues for XO. Not only do we have
14 to ensure that 9-1-1 service calls are terminated, but as a new entrant, it is imperative that our
15 network be of the highest quality. XO will do everything it can to ensure that it does not have
16 network failures, but if it does, it will take every practicable step to remedy the problem. In
17 addition to its obligation to provide its customers access to 9-1-1 service, XO's reputation with
18 those customers will largely be based on the quality of service its provides.

19
20 Q. What is the probability of an XO's switch being isolated?

21
22 A. The probability of an XO's switch being isolated is quite low. The Nortel DMS-500
23 switch is one of the most technically advanced switches available. XO's two DMS-500 switches
24 are and will be diligently maintained in accordance with all applicable specifications to ensure
25 proper functionality. Further, XO maintains around the clock on-call personnel, an emergency
26 generator and battery back up at its switch location to provide back up power in the event of a
27 commercial power failure.

1 Q. Has XO adopted practices in the event the switch is isolated to notify a primary point of
2 contact within each 9-1-1 system affected within 15 minutes after a confirmed outage?

3
4 A. XO has adopted and will continue its practices and use its best efforts in the event the
5 switch is isolated to notify a primary point of contact with each 9-1-1 system affected within 15
6 minutes of a confirmed outage.

7
8 Q. If granted an extension of waiver, will XO notify all present and future 9-1-1 systems
9 participating within your service area that your company has received this extension and that a
10 call box will not be provided?

11
12 A. Yes. XO notified all affected 9-1-1 systems following receipt of the waiver in 1998 and
13 an extension of waiver in 1999 that it had received a waiver/extension of waiver, respectively,
14 and that a call box will not be provided, and will, if required by the Commission, notify such 9-1-
15 1 systems again.

16
17 Q. In 1998, 1999 and 2000, XO was granted a waiver and/or an extension of waiver from the
18 requirement that it install a call box. Since the grant of those waivers, has the lack a of a call box
19 caused any problems with 9-1-1 service or with routing calls to PSAPs?

20
21 A. To my knowledge, the lack of a call box has not caused any problems with XO's
22 provision of 9-1-1 service or with routing calls to PSAPs.

23
24 Q. Does this conclude your testimony?

25
26 A. Yes.

27 2002

28

29

