

SWB PERMANENT RATE PROCEEDINGS

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CONDENSED TRANSCRIPT

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1 A (Turner) I cannot remember right now
 2 what that value is.
 3 Q Well, if Southwestern Bell told you it
 4 was a quarter of a volt or .25, would you have
 5 any reason to disagree?
 6 A (Turner) That's the value that I was
 7 generally remembering, but I'm not certain of
 8 that. But I don't have any reason right now to
 9 disagree with it.
 10 Q Okay. Let's take the wheel, if we
 11 would, and we will notice that it has lots of
 12 numbers, and it has an inside wheel that turns.
 13 It has a plastic, clear plastic, piece that
 14 swings around it. It has a red line on it. Do
 15 you see that?
 16 A (Turner) Yes.
 17 Q Let's start with your 40 amps at
 18 35 feet. Okay?
 19 Now --
 20 A (Turner) Well -- go ahead and let's do
 21 the 40 amps.
 22 Q I'm sorry?
 23 A (Turner) Go ahead.
 24 Q Let's try 40 amps and see where it
 25 takes us. Okay? And if we find the voltage

1 would it not?
 2 A (Turner) Yes. I believe that's
 3 correct.
 4 Q Okay. Now -- but as we indicated,
 5 you're using six gauge. Why is it you are using
 6 six gauge instead of two gauge -- well, let me
 7 ask first. Would you agree that two-gauge wire
 8 is larger and has a higher power or amperage
 9 carrying capability than a six-gauge wire?
 10 A (Turner) Yes.
 11 Q Why is it you're using six gauge when
 12 our power wheel tells us that if we want to be
 13 carrying 40 amps of power for 35 feet, we should
 14 be using a two gauge?
 15 A (Turner) Because we are not running 40
 16 amps of power across the wire.
 17 Q Not running 40 amps, what are we
 18 running?
 19 A (Turner) The way the collocation cost
 20 model is set up is that when you order 40 amps
 21 of power, you get it in two 20 amp feeds, 20 amp
 22 feed on the A side and 20 amp feeds on the B
 23 side over 35 feet and -- so that would be --
 24 that would be the problem that you are having in
 25 your analysis. When you are trying to figure

1 drop that we are looking for, which is the .25,
 2 it is .250, do you see that?
 3 A (Turner) Yes, I do.
 4 Q Okay. Now, if we find -- that's on the
 5 inner wheel. Now, if we take the wheel and we
 6 want to find the distance -- I'm sorry, the
 7 amperage. We want to find the 40 amps that we
 8 are looking for. So we take the little arrow at
 9 the .250, and we run it out to where we see the
 10 40. Do you see that?
 11 A (Turner) Yes.
 12 Q Okay. And now we take the clear
 13 plastic piece that swings around, and we want to
 14 find 35 feet.
 15 So if we look on the inside track of
 16 the inner wheel, you will see there is links in
 17 there?
 18 A (Turner) Uh-huh.
 19 Q Find 35. Do you see that?
 20 A (Turner) Yes.
 21 Q And you will see it equates to a number
 22 on the outside track of the outer wheel. It
 23 looks like we are in the same place, and that's
 24 a two.
 25 Now, that would be two-gauge wire,

1 out if my wire gauge is incorrect, you would
 2 have to also take into account that we are
 3 really running -- when you run those four wires,
 4 you are running two 20 amp feeds from A and B to
 5 get the four wires.
 6 Q Well, let me ask you to start with:
 7 Wouldn't you agree with me that if you order 40
 8 amps of power in a Southwestern Bell office --
 9 first off, Southwestern Bell is going to provide
 10 what's called redundant power, redundant power
 11 leads?
 12 A (Turner) That's exactly what I just
 13 defined.
 14 Q And redundant power leads, though,
 15 means if you order 40 amps you get two power
 16 leads each with 40 amps. So if the A lead
 17 fails, you still have 40 amps being delivered to
 18 you on the B lead?
 19 A (Turner) It depends on exactly the
 20 configuration of how you are setting up your
 21 power. I'm as happy as a lark to go into all
 22 the details if you would like for me to.
 23 Q Well, would you agree if -- what you
 24 are doing as far as costing in your collocation
 25 cost model is -- it calls for 40 amps. What you

1 are doing is you're providing two leads of 20
2 amps each, an A lead of 20 amps and a B lead of
3 20 amps? And I guess you are running it in a
4 series type arrangement in order to give you 40
5 amps of power?

6 A (Turner) No, that's not correct.
7 Normally what you'll have is you'll have a load
8 on your equipment that's needed, and it depends
9 on the time of equipment. There are two
10 different types of power configurations used
11 typically in the industry.

12 But typically what would happen is if
13 you had a 40-amp load on a piece of equipment,
14 you would feed that off of two fuses so that you
15 would have redundant power, and you would feed
16 part of the load to that equipment of A side and
17 part off of B.

18 So if you needed 40 amps of power, you
19 would only require to put 20 amps on each side,
20 and so that's the way we cost it out in the
21 model.

22 Q Right. But would you agree with me
23 that the Southwestern Bell inputs to the model
24 cost out providing the full 40 amps on both the
25 A side and the B side?

1 A (Turner) Again, it depends on the type
2 of equipment. But if it is a traditional
3 telecommunications equipment, normally what
4 you'll have is you'll have like a zero
5 controller and a one controller. The zero
6 controller and the one controller can both
7 handle all the packs in the frame.

8 So that if the A side failed -- oh, and
9 by the way the zero controller and the one
10 controller would each be powered independently
11 off the A and the B feed.

12 So, for instance, if the A side failed,
13 the B side would continue to control one of the
14 controllers. So the frame would still operate
15 but then the termination cards, for instance, in
16 the frame some of -- half of those would fail if
17 you are in that configuration.

18 There is another configuration called
19 an OR-Gate power configuration, which I am in
20 another proceeding right now where we are trying
21 to deal with the complications that come from
22 that type of equipment. But it's a similar
23 environment except that the equipment never
24 completely fails.

25 Q Would you agree with me that the higher

1 A (Turner) It does, but then you are
2 really buying 80 amps of power from Southwestern
3 Bell, not 40.

4 Q And if one side of the power fails, if
5 the A side fails for some reason, you still --
6 if you have power requirements of 40 amps, you
7 still have 40 amps of power being delivered from
8 the B side?

9 A (Turner) See, that depends on the time
10 of equipment that you have set up. If you have
11 it set up in traditional telecommunications
12 equipment and you are feeding 20 amps into A and
13 20 amps into B and A fails, you will still only
14 draw 20 amps from B.

15 Q Well, I understand that. But if you
16 have 40 amps --

17 A (Turner) Well, there's other types of
18 configurations. I didn't know if you were
19 talking about --

20 Q If you had equipment that requires 40
21 amps of power and you feed it with two 20 amp
22 feeds, would you agree with me that if one of
23 the two feeds fail, that what's going to happen
24 is your equipment is not going to get the power
25 it needs and will either underperform or fail?

1 the power that's being delivered -- the higher
2 the amperage, the larger the power cable needs
3 to be in order to carry the amperage?

4 A (Turner) Oh, I agree. The problem
5 here is that the longer the distance, the larger
6 the cable has to be.

7 Q But apples to apples for just a moment.

8 A (Turner) Okay.

9 Q If -- using the analysis that you are
10 using, if you wanted to compare 40 amps of
11 collocation cost model power to 40 amps of power
12 provided by Southwestern Bell's cost model,
13 really what you would do is you would look at 20
14 amps of Southwestern Bell power to 40 amps of
15 collocation cost model?

16 A (Turner) If that's, in fact, how you
17 use the cost model. It's not -- you haven't --
18 it's not clear to me that that's exactly what
19 you have done. And what we are now blending
20 over into is a terms and conditions issue.

21 I think the terms and conditions for
22 ordering power are clear, and I believe that the
23 way that the collocation cost model calculates
24 the cost for power delivery is consistent with
25 what happens in the terms and conditions. 49