

Exhibit No.: _____
Issue: 2 and 24
Witness: Saconna Blair
Type of Exhibit: Direct Testimony
Sponsoring Party: Charter Fiberlink-Missouri, LLC
Case No.: TO-2009-0037
Date Testimony: September 30, 2008
Prepared: _____

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Petition of Charter Fiberlink-)
Missouri, LLC for Arbitration of an Interconnection) Case No. TO-2009-0037
Agreement Between CenturyTel of Missouri, LLC)
And Charter Fiberlink-Missouri, LLC.)

**DIRECT TESTIMONY OF SACONNA BLAIR
ON BEHALF OF CHARTER FIBERLINK-MISSOURI, LLC**

September 30, 2008

Company _____ Exhibit No. 7
Case No(s). TO-2009-0037
Date 10-28-08 Rptr PF

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

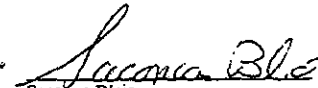
In the Matter of the Petition of Charter Fiberlink-)
Missouri, LLC for Arbitration of an Interconnection) Case No. TO-2009-0037
Agreement Between CenturyTel of Missouri, LLC)
And Charter Fiberlink-Missouri, LLC.)

AFFIDAVIT OF SACONNA BLAIR

STATE OF MISSOURI)
) ss.
COUNTY OF ST. LOUIS)

Saconna Blair, being first duly sworn on his oath, states:

1. My name is Saconna Blair. I am presently Vice President, Technical Operations for Charter Communications.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.


Saconna Blair

Subscribed and sworn before me this 30th day of September, 2008.


Notary Public for Prosser County, Colorado
My Commission expires: 3/31/2012

TABLE OF CONTENTS

	<u>Page</u>
I. Introduction.....	1
II. Purpose and Summary of Testimony	4
III. Background.....	5
IV. Charter Installation Procedures	9
V. Conclusion	14

I. INTRODUCTION

1
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3
4
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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Saconna Blair. My business address is 6399 S. Fiddler's Green Circle, Sixth Floor, Greenwood Village, CO 80111. I am filing this testimony on behalf of Charter.

Q. BY WHOM ARE YOU EMPLOYED, AND WHAT IS YOUR POSITION WITHIN THE COMPANY?

A. I am Vice President, Technical Operations, at Charter Communications, Inc., and its subsidiary Charter Fiberlink TX-CCO, LLC, the petitioner in this case (collectively "Charter").

Q. WHAT ARE YOUR DUTIES AS THE VICE PRESIDENT OF TECHNICAL OPERATIONS?

A. I am responsible for Multiple System Operator ("MSO") technical operation standards, specification, processes and procedures for installation, field customer service, and hybrid fiber/cable ("HFC") plant maintenance. My current areas of responsibility also include technical quality assurance, safety, and FCC compliance. I therefore have a basis to testify to the facts surrounding the disputed issues between Charter and CenturyTel that are addressed in this testimony.

1 **Q. WHAT IS THE RELATIONSHIP BETWEEN YOUR EMPLOYER,**
2 **CHARTER COMMUNICATIONS, AND CHARTER FIBERLINK TX-**
3 **CCO, LLC, THE PETITIONER IN THIS ARBITRATION DOCKET?**
4

5 A. Charter Communications, Inc. is a national MSO that provides cable television
6 and broadband internet services in various parts of the United States, including
7 parts of Texas. The Charter Fiberlink companies, of which Charter Fiberlink TX-
8 CCO, LLC is one, are wholly-owned subsidiaries of Charter Communications that
9 provide facilities-based local exchange services and resold interexchange services
10 to customers using facilities and services obtained from the Charter
11 Communications cable television companies. Charter Fiberlink offers voice
12 communications services primarily to residential customers and has recently
13 begun offering such services to small business customers in some of its service
14 areas. For the sake of brevity, I refer to Charter Communications and the Charter
15 Fiberlink companies, specifically including Charter Fiberlink TX-CCO, LLC,
16 which provides local exchange services in Texas, as "Charter" throughout my
17 testimony.

18

19 **Q. PRIOR TO BECOMING VICE PRESIDENT OF TECHNICAL**
20 **OPERATIONS AT CHARTER WHAT OTHER CHARTER POSITIONS**
21 **HAVE YOU HELD?**
22

23 A. Prior to my current Charter position I held a number of Senior Director and
24 Director positions at Charter including Director of Network Engineering
25 Operations where I was responsible for developing and implementing technical
26 operations quality management systems (using ISO 9001:2000 as model) to meet
27 business plans and service delivery expectations including technical development,

1 standards, training, measurements and benchmark analysis. I was also
2 responsible for FCC and OSHA compliance.
3

4 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE PRIOR TO JOINING**
5 **CHARTER.**
6

7 A. Prior to joining Charter, I was a Director of Network Integration Services for
8 Worldbridge Broadband Services. While at Worldbridge I was responsible for
9 engineering, bidding, planning, design, project management and workforce
10 allocation in building, turn-up, and the certification of telecommunication
11 processing centers (video, data, and telephony) as well as transport networks.
12 Prior to joining Worldbridge, I was a Director of Deployment for HSA (High
13 Speed Access) Corporation responsible for turnkey high speed data cable modem
14 deployments, including network design, material management, equipment
15 configuration, bandwidth capacity management, installation turn-up and network
16 alpha certification. Prior to joining HSA, I was a Director of Broadband Network
17 Management for Jones Intercable, Inc. responsible for developing and
18 implementing cost effective upgrade migration architecture for HFC broadband
19 networks to support advanced video services, data, and voice. Prior to becoming
20 the Director of Broadband Network Management at Jones, I held a number of
21 other positions at Jones where I dealt with service and safety issues, FCC
22 compliance and Quality assurance. Prior to joining Jones, I also held a number of
23 technical positions at Heritage Cablevision including service as a Chief
24 Technician with responsibility for technical and financial operations for multiple
25 CATV systems.

1

2 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY STATE**
3 **REGULATORY COMMISSION?**

4

5 **A.** No, I have not.

6

7

II. PURPOSE AND SUMMARY OF TESTIMONY

8

9

ISSUES 2 AND 24:

10

**ISSUE 2 - HOW SHOULD THE AGREEMENT DEFINE THE TERM
11 NETWORK INTERFACE DEVICE OR "NID"?**

12

13

**ISSUE 24 - SHOULD CHARTER HAVE ACCESS TO THE CUSTOMER
14 SIDE OF THE NETWORK INTERFACE DEVICE ("NID") WITHOUT
15 HAVING TO COMPENSATE CENTURYTEL FOR SUCH ACCESS?**

16

17

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY ON THESE ISSUES?

18

A. This testimony is offered to support Charter's position on disputed issues
19 numbered 2 and 24 of this arbitration.

20

21

Q. WHY HAVE YOU IDENTIFIED TWO ISSUES ABOVE?

22

23

A. Issues 2 and 24 deal with the Parties' responsibilities associated with the
24 demarcation point (generally referred to as the Network Interface Device or
25 "NID") between the carrier's network and the customer's inside wiring. Because
26 Charter believes that these issues are interrelated, it seems appropriate and
27 efficient to address them together.

28

29

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

30

31

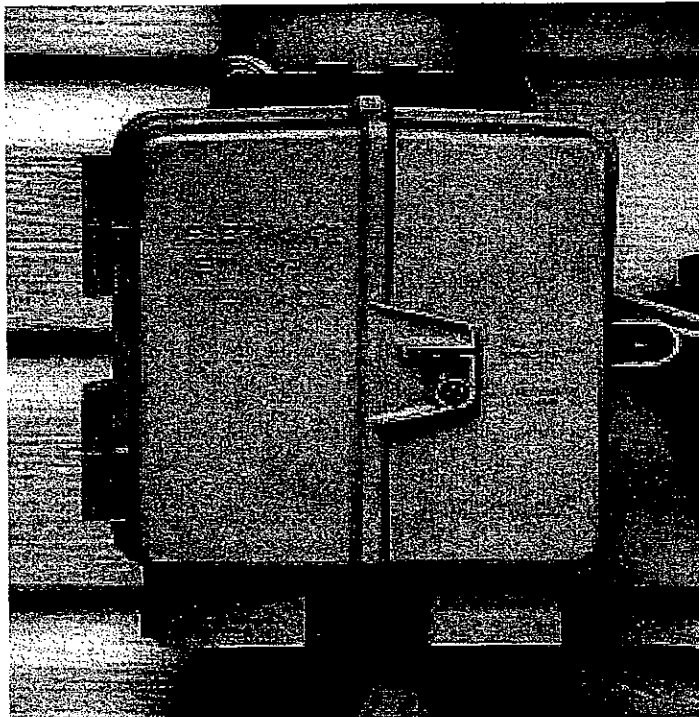
A. In my testimony I will briefly describe what a Network Interface Device ("NID")
32 is and how Charter technicians connect the inside wire contained in a local

1 telephone service end user customer residence to the Charter network after
2 Charter has acquired that customer from another local exchange carrier, typically
3 an incumbent local exchange carrier ("ILEC").

4
5 **III. BACKGROUND**

6 **Q. WHAT IS A NETWORK INTERFACE DEVICE ("NID")?**

7 A. For the issues relevant in this case, NIDs are typically small gray boxes, about the
8 size of a shoe-box, placed on the side of single family dwellings. A NID
9 generally contains two compartments. One compartment is generally referred to
10 as the "network side" of the NID. The other compartment is generally referred to
11 as the "customer side" of the NID. (A picture of a typical residential NID is set
12 forth below.)



1

2 **Q. PLEASE EXPLAIN THE BASIC USE OF THE NID.**

3 **A.** A traditional telephone carrier such as CenturyTel brings a copper loop serving
4 the residence into the "network side" (also known as the Telco side) of the NID,
5 which typically contains important electrical grounding capability (called the
6 "protector") and often contains loop testing circuitry as well. These parts of the
7 NID are sealed off from customer access. The NID also contains a compartment,
8 the "customer side," that is fully accessible to the customer/premises owner. In
9 that compartment, the typical NID contains a standard telephone jack for each line
10 serving the home. The customer side of the NID also has copper posts to which
11 wiring from inside the house is connected. A short telephone cord, with a standard
12 telephone plug at the end, runs from the copper posts serving a line in the home
13 and plugs into the jack.

14

15 **Q. DO YOU HAVE A DIAGRAM TO ILLUSTRATE THIS EXAMPLE?**

16 **A.** Yes. A simple diagram identifying the customer side and the Telco/network side
17 of the NID is provided below. (See Diagram 1 below).

18

19

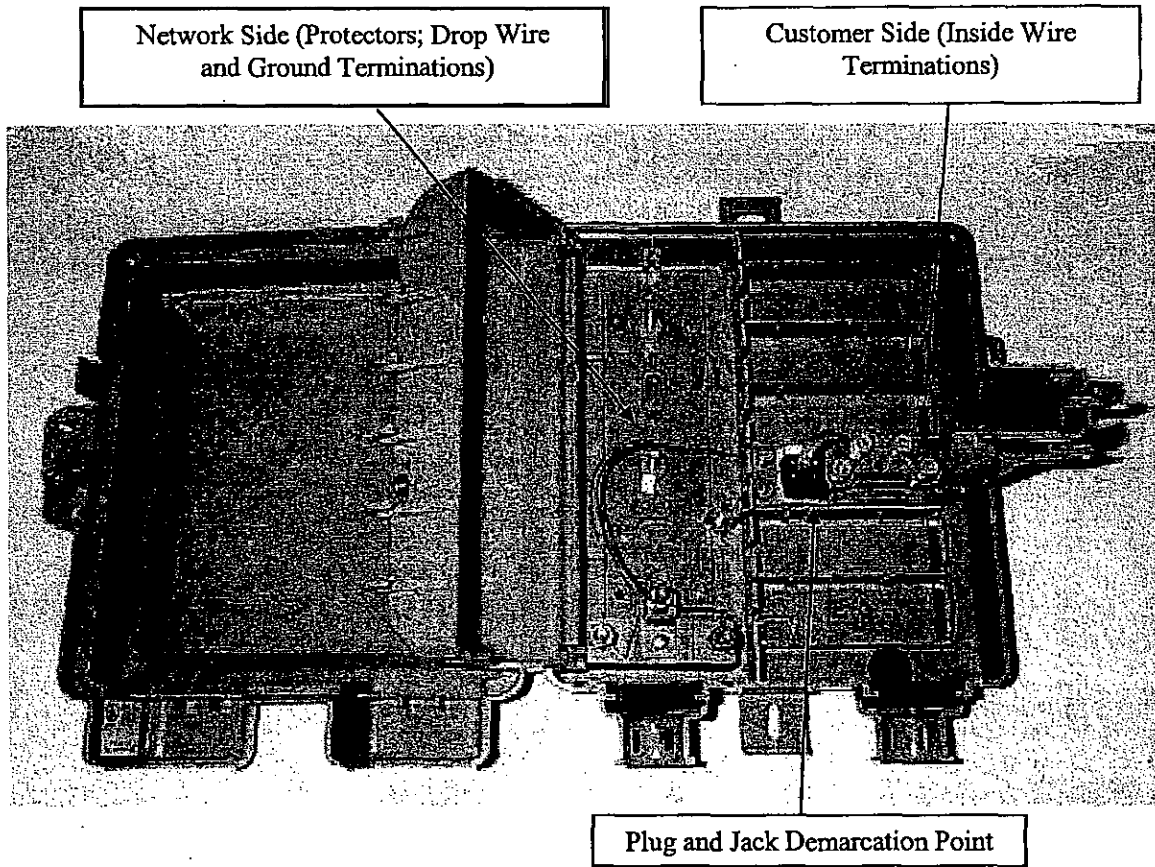
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23

Diagram 1: "Network" and "Customer" Sides of NID



Q. WHAT FUNCTIONALITY IS PROVIDED ON THE NETWORK SIDE OF THE NID?

A. A traditional telephone carrier or Incumbent Local Exchange Carrier ("ILEC") such as CenturyTel will bring a copper loop serving the residence into the network side of the NID, which typically contains important electrical grounding capability (called the "protector") and often contains loop testing circuitry as well. These parts of the NID are sealed off from customer access.

1 **Q. WHAT FUNCTIONALITY IS PROVIDED ON THE CUSTOMER SIDE OF**
2 **THE NID?**

3
4 **A.** The customer side of the NID is fully accessible to the customer/premises owner.
5 The customer side of the NID generally contains a standard telephone jack for
6 each line serving the home.¹ The customer side of the NID also has copper posts
7 to which wiring from inside the house is connected. A short telephone cord, with
8 a standard telephone plug at the end (commonly referred to as an RJ11
9 connector), runs from the copper posts serving a line in the home and plugs into
10 the jack. By plugging and unplugging this telephone cord, the customer can
11 connect and disconnect his premises from the carrier's loop.

12

13 **Q. WHY WOULD A CUSTOMER WANT TO DISCONNECT HIS PREMISES**
14 **FROM THE CARRIER'S LOOP?**

15
16 **A.** Disconnecting the premise from the carrier's loop allows the customer to test
17 whether a service problem is in the loop or in his premises wiring, as well as to
18 keep the line disconnected (to avoid electric shocks) when he is adding to,
19 removing, or rearranging his inside wiring.

20

21 **Q. DOES CHARTER'S TELEPHONE SERVICE USE COPPER LOOPS?**

22 **A.** No, it does not. Charter's telephone service is embedded in the signaling carried
23 by Charter's affiliated cable systems. As a result, Charter has no need for, and
24 does not use, the protection and line testing capabilities of the network side of the
25 NID. Instead, to provide telephone service, Charter uses coaxial cable to connect

1 a small device called a "Multimedia Terminal Adapter", or MTA, to a standard
2 cable outlet in the home. The MTA electrically extracts the telephone signals
3 from the cable system. The customer side of the MTA has a standard telephone
4 jack into which the customer can plug a telephone cord.

5
6 **IV. CHARTER INSTALLATION PROCEDURES**

7 **Q. DOES CHARTER REQUIRE ACCESS TO THE CUSTOMER SIDE OF**
8 **THE NID IN ORDER TO CONNECT TO THE RESIDENTIAL**
9 **CUSTOMER'S INSIDE WIRING?**

10
11 **A.** Yes. When Charter ports an end user customer away from an ILEC such as
12 CenturyTel, Charter must find a way to connect to that customer's inside wire.
13 Since that inside wire is connected to the NID, Charter must access the NID to
14 disconnect the ILEC network from the NID and connect its telephone service to
15 that preexisting inside wire in that residence.

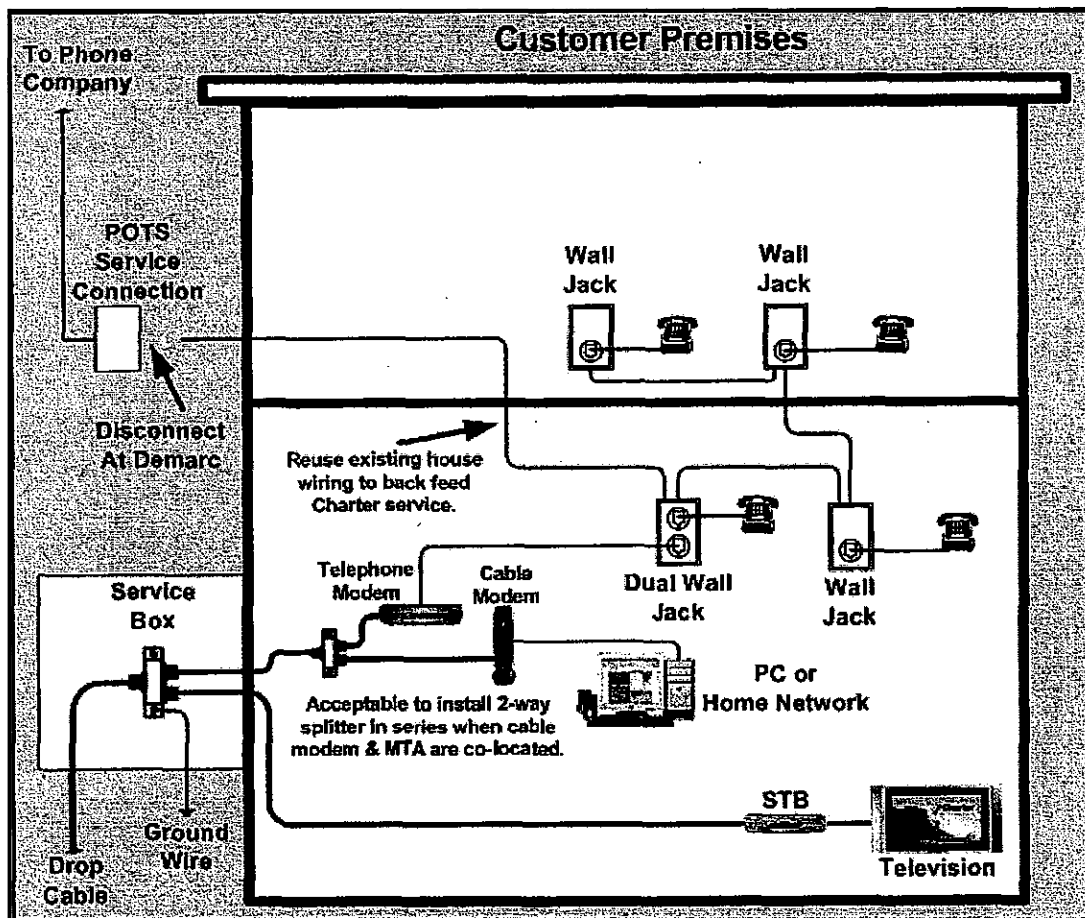
16
17 **Q. HOW DOES CHARTER CONNECT ITS TELEPHONE SERVICE TO**
18 **THE PRE-EXISTING INSIDE WIRING IN THE HOME?**

19
20 **A.** Charter procedures are dependent on the type of telephone wiring system utilized
21 in a particular residence. There are two basic types of residential telephone
22 wiring systems. The first is called a "serial" telephone wiring network commonly
23 found in older residences. In a serial network one wall jack is connected to
24 another, which is connected to another, and so on. (See diagram 2 below.)

25

¹ A typical single-family home might have a NID capable of handling two, four, or perhaps a few more lines; different NIDs are capable of handling different number of lines. The basic arrangement described in this testimony, however, is the same for each line.

Diagram 2: Serial Wiring Telephone Network



Q. HOW DOES A CHARTER TECHNICIAN CONNECT THE CHARTER MTA TO THE CUSTOMER'S INSIDE WIRE IN A SERIAL WIRING TELEPHONE NETWORK?

A. In a serial wiring telephone network the Charter technician will disconnect the ILEC loop by unplugging the RJ11 customer test socket. If there is no RJ11 connector and the connection is hard wired, the technician will remove the tip and ring wires on the customer's side by "scotchlocking" like colors and ensuring they are isolated from the ILEC's service wiring. The term "scotchlocking" refers to a process whereby Charter scotchlocks the wires together using a small plastic gel-

1 filled connector commonly referred to in the industry as a "Scotchlock." The
2 technician will then install the MTA and connect it to the customer's nearest
3 available dual wall jack and will install a new dual wall jack if required.
4

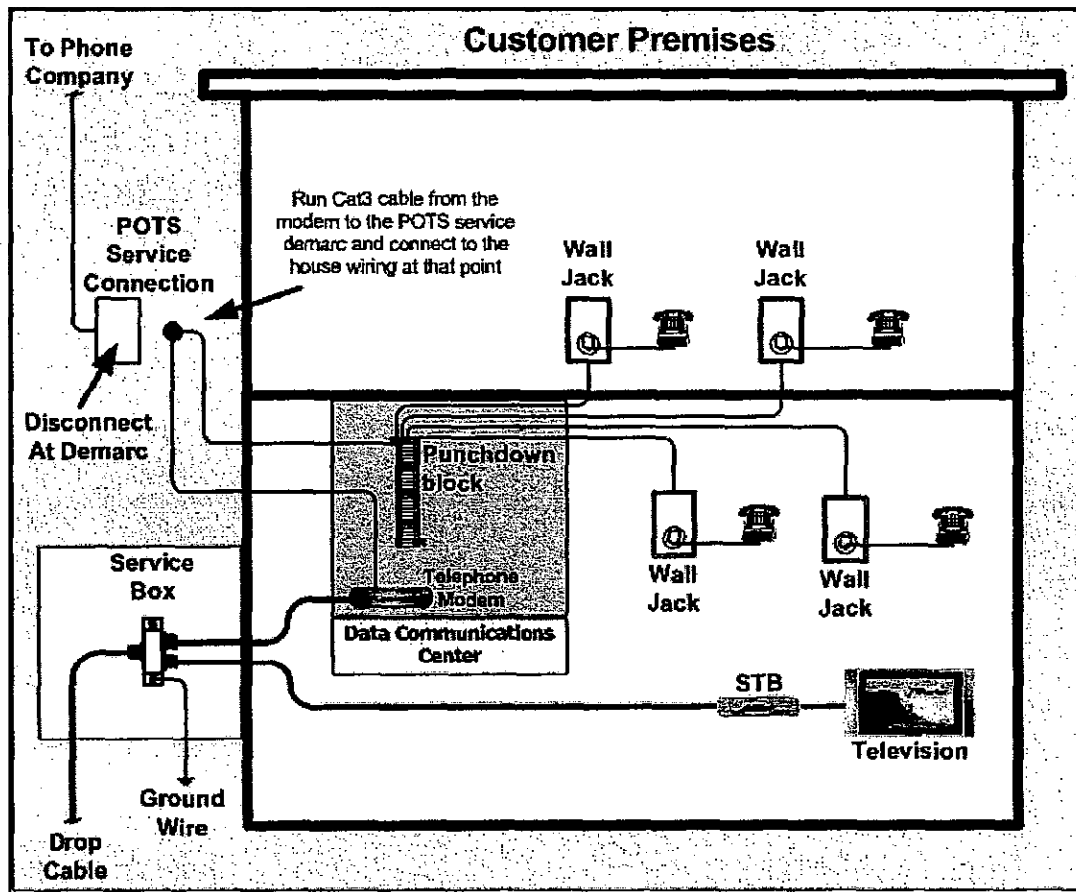
5 **Q. IS THE CUSTOMER SIDE OF THE NID IMPACTED WHEN CHARTER**
6 **CONNECTS TO A CUSTOMER'S SERIAL WIRING NETWORK?**
7

8 **A.** No, it is not. In a serial wiring network Charter simply disconnects the ILEC loop
9 from the inside wiring either by unplugging the RJ11 jack or by disconnecting the
10 wires from the terminals and scotchlocking them.
11

12 **Q. WHAT IS THE SECOND BASIC TYPE OF RESIDENTIAL TELEPHONE**
13 **WIRING SYSTEM?**
14

15 The second basic type of system is commonly called a "home run" or "star"
16 telephone wiring network and is commonly found in more modern residences. In
17 a star network each connection to a wall jack is pulled all the way back to a
18 punch-down block or junction box located in a data communication center. (See
19 diagram 3 below).
20
21
22
23
24
25
26

Diagram 3: Star Wiring Telephone Network



Q. HOW DOES A CHARTER TECHNICIAN CONNECT THE CHARTER MTA TO A CUSTOMER'S STAR TELEPHONE NETWORK?

A. Under this scenario the Charter technician, to avoid having to touch jack locations or the punch-down block, will generally run a line from the MTA to the outside of the home. This line is then scotchlocked with the inside wiring which has been disconnected from the terminal posts on the customer side of the NID.

1 **Q. IS THE CUSTOMER SIDE OF THE NID IMPACTED WHEN CHARTER**
2 **CONNECTS TO A CUSTOMER'S STAR WIRING NETWORK?**

3
4 **A.** No, it is not. Once the Charter technician has made the appropriate connection it
5 is simply left inside the customer side of the NID.

6
7 **Q. WHY IS THE NEW CHARTER CONNECTION LEFT INSIDE OF THE**
8 **NID?**

9
10 **A.** The Charter connection is left inside of the NID to make it easier for the next
11 local service provider (be that the ILEC or some other local service provider) to
12 connect to the end user's customer wiring.

13
14 **Q. HOW DOES CHARTER PROPOSE TO DEFINE A NID IN THE**
15 **PROPOSED INTERCONNECTION AGREEMENT?**

16
17 **A.** Charter proposes to define a NID as a "means of interconnecting Inside Wiring to
18 CenturyTel's distribution plant, such as a cross-connect device used for that
19 purpose. The NID houses the protector."

20
21 **Q. WOULD YOU AGREE THAT CHARTER'S PROPOSED NID**
22 **DEFINITION SIMPLY AND ACCURATELY DEFINES A NID FROM A**
23 **TECHNICAL PERSPECTIVE?**

24
25 **A.** Yes. My earlier description of a NID provided some technical detail about the
26 common components of a NID. Charter's definition encompasses this detailed
27 description by simply stating that a NID is used to cross-connect Inside Wiring to
28 CenturyTel's distribution plant and houses the protector. This is an unambiguous
29 definition that Charter believes is consistent with FCC rulings.

30

1 Q. IS CHARTER REQUIRED TO ACCESS THE NID IN ORDER TO
2 PROVIDE TELEPHONE SERVICE TO END USER CUSTOMERS THAT
3 IT HAS PORTED FROM CENTURYTEL?

5 A. Yes. As described above, a Charter technician must have access to the NID in
6 order to disconnect the ILEC loop from the inside wire and in order to connect the
7 Charter MTA to that same end user's inside wire.

9 V. CONCLUSION

10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

11 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by facsimile, hand-delivery, or electronic mail, on the 30th day of September, 2008, on the following:

Thomas J. Moorman
WOODS & AITKEN LLP
2154 Wisconsin Avenue, NW
Suite 200
Washington, DC 20007

Becky Owenson Kilpatrick
Manager Government Relations
CenturyTel – Missouri
220 Madison Street
Jefferson City, MO 65101

Paul M. Schudel
James A. Overcash
WOODS & AITKEN LLP
301 South 13th Street
Suite 500
Lincoln, Nebraska 68508

Larry W. Dority
Fischer & Dority
101 Madison, Suite 400
Jefferson City, MO 65101

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

_____/s/
Gina Lee