COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts	D.T.E. 01-20

AT&T's TWELFTH SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc., hereby submits the following information requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

The references in the following questions are to the hard copy of the direct case filing that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

Please provide a list of software packages, prices paid for each, the functions and features each software package provides, the unit of measure that the prices are based upon (e.g., per switch, per line, etc.) and the effective/applicable period (number of years that software can be used) for each software package included in the RTU software investments for years 1999, 2000, and the portion of 2001 identified as purchases (the Software Budget-2001 & 2002+ page). See Part G-9: Right to Use Factor Study Workpaper 1 of 3.

Please provide an explanation of the process of how the forecasted RTU fees for digital switching were developed, including the Verizon organizations responsible for developing the forecast and the organizations which provided input to the forecast. Please provide the details of the quantification of the forecast, including all documentation and calculations used by the organizations providing input and the organization responsible for developing the forecast. See Workpaper Page 1 of 3 in Part G-9.

Please explain precisely how the region-wide RTU fees were allocated to Massachusetts in Verizon's cost study filing.

Referencing Part G-9, page Software Budget-2001- & 2002+, please define the following rows, explain why they are included in a cost study for UNEs, and explain how the numbers were derived (include all documents and calculations):

(a) Row 2 labeled 'Growth';

(b) Rows 3-6 labeled Projects: Network Services, Enterprise Solutions, Retail Markets; and

(c) Row 8 Adjustment for 2001.

Referencing Part G-9, page Software Budget-2001- & 2002+, please explain the assumption behind the 2002+ and compare it to the 2001 forecast.

Please explain why the Lucent switch discount input used by Verizon in SCIS for its Massachusetts filing in this docket is different than: (a) the Lucent switch discount inputs for all of the other New England states; and (b) the SCIS system discount input.

Please provide a description of the equipment referenced by the Product ID codes in the Lucent switch material purchases. See Workpaper Part C-P2.

Please provide a list of switch features that are available, but not included in the Verizon cost study either as a port additive or as a feature that is purported to be in the local switch usage. How does Verizon propose to provision and price a feature to a CLEC that is available, but not included in the Verizon cost study?

Please provide the SCIS/MO inputs used by Verizon in this docket in an uploadable Excel file.

Please explain the difference between the UNE switching terminating MOU and the reciprocal compensation terminating MOU. If there is more than one reason, please list, describe and quantify each one that contributes to the difference between the two costs.

Please explain the difference between the UNE tandem switching MOU and the reciprocal compensation tandem MOU. If there is more than one reason, please list, describe and quantify each one that contributes to the difference between the two costs.

Please provide the Call Setup Analysis referenced in Column B of Workpaper Part C-3, Section 6, page 1 of 1.

Please explain why ISDN lines were not included in the Non-Conversation Time Adjustments on Workpaper Part C-3, Section 6, page 1 of 1.

Please provide the effective utilization on trunks in Verizon's filing, given the CCS per trunk inputs to SCIS, the trunk fill factor entered into SCIS, and the utilization factor adjustments made on Workpaper C-1, Section 38, Page 4 of 4.

Please provide documentation for all feature SCIS/IN inputs used in Verizon's cost study. If documentation is not available, please identify the source for the inputs. Please explain the rationale for each input and include supporting analysis and calculations.

Please identify which feature port additives have had a usage study performed to determine SCIS/IN usage inputs for Verizon's cost study. Please provide the usage study.

Please provide the SCIS/IN database so that the Verizon feature investments can be replicated. The information requested includes, but is not limited to, the set-up parameters for SCIS/IN, the identification of the model office studies used to produce the feature investments, identification of the SCIS/IN features used, and the individual feature inputs.

Please list the number of lines (or trunks, as appropriate) and penetration ratios (lines with feature compared to total lines) for each feature included in Verizon's cost study. Please also identify the lines and penetration ratios by switch technology (Lucent vs. Nortel).

Please list each entire new switch (*cf.* Verizon's direct panel testimony at page 139) purchased by Verizon since January 1, 2000, for use anywhere in Verizon's service

territory, and for each such switch, list the switch maker, the switch model number, the switch size in terms of number of lines to be served by the switch, the total list price for the switch, the total net price paid for the switch, and the total price of the switch per line to be served by the switch.

If on July 1, 2001, Verizon were to buy an entire new switch (*cf.* Verizon's direct panel testimony at page 139) for use in Massachusetts, what is the "contractual new-switch discounted price" (*cf.* Verizon's direct panel testimony at page 140) that Verizon would have to pay for each size switch that it could purchase from: (a) Lucent; or (b) Nortel? What discounts from list prices would each vendor provide? Please provide all documentation showing such price or prices.

If on July 1, 2001, Verizon were to buy switching equipment components to upgrade and expand its switching network in Massachusetts, what price or prices would Verizon would have to pay to, and what price discount or discounts would Verizon receive from (a) Lucent, or (b) Nortel, for such purchases (*cf.* Verizon's direct panel testimony at page 139)? Please provide all documentation showing such prices and price discounts.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its attorneys,

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May 25, 2001