COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-1 On page 3 of its testimony, ALLEGIANCE acknowledges that Verizon MA's various physical collocation arrangements (*e.g.*, caged, SCOPE, etc.) "are currently located in segregated and secured areas of the central offices," and that separate entrances are generally used by ALLEGIANCE (CLEC) personnel to enter Verizon MA's collocated central offices. Would ALLEGIANCE consider Verizon MA's continuation of this existing procedure as an appropriate collocation security measure?

Response: The existing procedures seem to have been effective and are preferable to Verizon's proposals to limit the availability of physical colocation.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-2 On page 8 of its testimony, ALLEGIANCE states that if "critical offices" are declared as virtual collocation only, Verizon "would be well on its way to eliminating physical collocation entirely." If ALLEGIANCE could be assured that the Department would apply this restriction in only limited cases (*e.g.*, a handful of central offices, as Verizon MA suggests), would this mitigate some of ALLEGIANCE's concerns?

Response: No. Even if physical colocation were eliminated in only a "handful" of central offices, Allegiance would be adversely affected if those offices included any in which Allegiance is currently colocated or may wish to colocate in the future.

Further, such a "restriction" would violate the plain language of the Act, which would cause concerns about the future of physical colocation in Massachusetts that could not be mitigated.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-3 Referring to page 9 of its testimony, has ALLEGIANCE ever had virtual collocation arrangements in Massachusetts?

Response: No.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-4 Please state whether it is possible for ALLEGIANCE to secure the equipment and facilities in its collocation arrangements in Massachusetts by utilizing locked cabinets, wire mesh partitioning, or covered cages. Also, please indicate in which Verizon MA central offices ALLEGIANCE has utilized such measures for each of its existing collocation arrangements, and indicate whether any relocation of ALLEGIANCE's equipment was required and, if so, why it was required.

Response: Allegiance has not used locked cabinets or covered cages in any of its collocations in Massachusetts. The topless cages Allegiance has in Massachusetts were provided by Verizon as part of the original colocation builds. Allegiance looked into obtaining locked cabinets for its SCOPE bays but was unable to locate any standard sized cabinet that would both house its equipment and fit into the Verizon required dimensions for SCOPE bays. Allegiance has found custom-sized and custom-built cabinets to be cost prohibitive.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-5 Please indicate whether ALLEGIANCE places any of its equipment or facilities at non-ILEC locations in Massachusetts or elsewhere. If yes, please identify all telecommunications services that ALLEGIANCE provides that are not related to any collocation arrangements located at Verizon premises.

Response: Allegiance does not place equipment or facilities at non-ILEC locations in Massachusetts.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Thomas Colston

VZ-AL-1-6 Please indicate whether ALLEGIANCE returns identification badges, card access or keys issued by Verizon to ALLEGIANCE personnel in Massachusetts once they are no longer employed by ALLEGIANCE, in accordance with Verizon MA's requirements. If ALLEGIANCE has not done so, please explain why. If ALLEGIANCE has done so, please provide any and all documentation listing the names of all former ALLEGIANCE employees for whom ALLEGIANCE has returned the above to Verizon and the associated dates.

Response: Allegiance destroys ID badges and cuts up access cards issued by Verizon to Allegiance personnel who are no longer employed by Allegiance. Because Verizon generally issues only two keys per colocation to Allegiance, Allegiance maintains the keys issued by Verizon to personnel who are no longer employed by Allegiance.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott and Thomas Colston

VZ-AL-1-7 Please describe ALLEGIANCE's procedures for disciplining its employees when they have violated Verizon MA's collocation procedures. This should include, but not be limited to, such violations as accessing Verizon MA's central offices without proper authorization, loaning electronic access cards or locked door keys to other ALLEGIANCE personnel, theft of or damage to another's equipment, and roaming outside of collocated areas and into the vicinity of Verizon's facilities and equipment within the central office.

Response: Allegiance is unaware of any serious violations of Verizon's colocation procedures by its employees. In instances where Allegiance has been informed of minor infractions, such as parking issues, both the employee and the employee's supervisor are advised and the proper rules of conduct are reviewed with the employee.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-8 Please identify the number of ALLEGIANCE's virtual collocation arrangements provided by Verizon outside of Massachusetts, by state.

Response: Allegiance has eight virtual collocations provided by Verizon in Pennsylvania, eight in New York, three in Maryland, two in Virginia and one in New Jersey.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-11 Referring to page 9-10 of its testimony, ALLEGIANCE indicated that "it has had very poor experiences with virtual builds in Verizon territory in New York, New Jersey and Pennsylvania." Please identify the specific time period of ALLEGIANCE's alleged experiences for each of these states.

Response: Allegiance built and lit the majority of its virtual colocations between September 1998 and December 1999. Allegiance has had persistent Connecting Facility Assignment ("CFA") code issues that have affected all of its virtual colocation builds, especially those in the Verizon South region. Without notice to Allegiance, Verizon changed the tenth character of all virtual colocation codes to a "V" in its records systems, but supplied Allegiance with CFA codes that showed a "C" in the tenth position. As a result, Verizon rejected numerous Allegiance orders due to invalid CFA codes. After extensive escalation of this problem through several layers of Verizon's hierarchy, Allegiance was notified that Verizon would accept both the "C" and the "V" designation on orders. Two years after that notice, however, Verizon still rejects Allegiance orders due to invalid CFA codes that show a "C" rather than a "V" on virtual colocation identifiers, the most recent example occurring with respect to an order placed for a customer served by our virtual colocation in Gaithersburg, Maryland.

Allegiance notes that it has experienced poor maintenance and repair at its virtual colocations from the outset of these colocations.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-12 Has ALLEGIANCE removed any virtual collocation arrangements in Massachusetts or elsewhere in Verizon territory? If yes, please explain the circumstances for that removal (e.g., ALLEGIANCE opted for physical collocation that subsequently became available in that central office; ALLEGIANCE vacated that central office entirely, etc.).

Response: No.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-13 Referring to page 9 of its testimony, ALLEGIANCE states that in the case of virtual collocation arrangements, Verizon "cannot guarantee that there will be contiguous space available and the space designated for our new equipment may be across the building or across the aisle." Is it ALLEGIANCE's understanding that Verizon also cannot guarantee contiguous space in the case of subsequent physical collocation requests?

Response: Allegiance does understand that there is also no guarantee of contiguous space in the case of subsequent physical colocation requests. However, Allegiance's colocation growth usually requires the addition of IDLCs and CACs. Adding such equipment is more easily achieved in a caged physical colocation environment. To save on transport costs, Allegiance frequently lights an additional IDLC with the existing DS3 facility. It is impossible to do this in a virtual colocation arrangement.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF
VERIZON MASSACHUSETTS
TO ALLEGIANCE TELECOM OF MASSACHUSETTS, INC.
D.T.E. 02-8

Date: June 11, 2002

Witness Responsible: Wendy Perrott

VZ-AL-1-14 Referring to page 9-10 of ALLEGIANCE's testimony, please describe in details the type of work that Verizon required to be performed by a list of vendors in connection with ALLEGIANCE's virtual collocation arrangements in New York, Pennsylvania and New Jersey. If the type of work differs by state, please specify.

Response: A Verizon certified vendor must be used for all virtual colocation builds in all states. Only a Verizon certified vendor can access the Verizon Infobank System for termination assignments. Infobank is what drives the creation of Verizon CFAs. Without CFAs, Allegiance cannot light or use any of its virtual collocations. Problems with Verizon's Infobank System often slow the virtual colocation build and cause rework. For example, Allegiance added one DS3 and 84 DS1 terminations to its existing virtual colocation in the Paoli Central Office in Pennsylvania. The Verizon certified vendor selected CFAs that were shown as available in Infobank, but were actually already in use by another CLEC. It took three weeks to get the CFAs corrected and the vendor had to rewire the terminations, which cost Allegiance time and money. A similar situation occurred in Allegiance's virtual colocation arrangement in the Columbia Central Office in Maryland, which delayed turn up.

Verizon certified vendors must be used to add CAC multiplexers needed to add DS3s and IDLCs to expand DS0 capability. Allegiance has found that the Verizon certified vendors often do not know how to provision either the CAC multiplexer or the Litespan IDLC. Both of these NEBs compliant pieces of equipment are used in the Verizon network.

Verizon certified vendors must be used to install metallic loop test equipment to virtual colocation arrangements. Such equipment is necessary for Allegiance to do remote testing of its equipment.

Verizon certified vendors also must be used to do wiring rearrangements. Such rearrangements are often necessary to reduce the number of DS1 SLs dedicated to the Litespan so that they may be used for customers.