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OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

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COMMISSIONER

September 17, 2001

VIA E-MAIL AND U.S. MAIL

Barbara Anne Sousa, Esq.
Bell Atlantic - Massachusetts
185 Franklin Street
Boston, MA 02110-1585

Re: D.T.E. 98-57-Phase III
D.T.E.'s Third Set of Information Requests to Verizon

Dear Ms. Sousa:

Enclosed please find the Department's Third Set of Information Requests to Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") issued in the above-captioned matter. Please submit Verizon's responses to the Department and the participants in hard copy and by e-mail on or before **5:00 p.m. September 25, 2001**. Should you have any questions please contact Jesse Reyes at (617) 305-3735 or Paula Foley at (617) 305-3608.

Very truly yours,

Jesse S. Reyes,
Hearing Officer

Paula Foley,
Hearing Officer

Encl.
cc: DTE 98-57-Phase III Service List (w/encl.)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

VERIZON NEW ENGLAND, INC.
D/B/A VERIZON MASSACHUSETTS, D.T.E. 98-57-PHASE III

THIRD SET OF INFORMATION REQUESTS
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON NEW ENGLAND, INC. D/B/A VERIZON MASSACHUSETTS

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") the following Information Requests.

INSTRUCTIONS

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and phase of the case and the name of the person responsible for the answer.

2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed, but **no later than 7 days of receipt of the request**.

3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term "provide complete and detailed documentation" means:

   Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officers so that the request may be clarified prior to the preparation of a written response.

7. Please serve one (1) copy of the responses on Mary Cottrell, Secretary of the Department and on all parties; also submit one (1) copy to all Department staff, two (2) copies of the responses to Paula Foley, Hearing Officer, and one (1) copy to Jesse Reyes, Hearing Officer.

THIRD SET OF INFORMATION REQUESTS TO VERIZON
D.T.E. 98-57-PHASE III
September 17, 2001

1. Notwithstanding Verizon's contractual obligation to use only Alcatel-licensed line cards with Litespan 2000 Remote Terminal equipment, does Alcatel have a process to certify other manufacturers' line cards for use with the remote terminal equipment that Verizon proposes to use? If so, please describe that procedure.

2. Is Verizon aware of any manufacturers' remote terminal equipment that is compatible with any other manufacturer's line cards on a "plug-and-play" basis?

3. Under the CLEC-Provided Line Card Option in Verizon's illustrative PARTS tariff, please discuss the feasibility of permitting CLECs to install Alcatel-developed line cards, as described in the Testimony of Larry Gindlesberger and Michael Clancy on Behalf of Covad Communications Company, at 13-14, in order to support services such as Symmetric DSL under the G.SHDSL standard, or ATM Quality of Service. Describe what provisioning activities are necessary and what additional equipment must be installed, if any.

4. Who develops the "software releases" for Litespan 2000 equipment?

5. For remote terminal locations in Massachusetts, please state:

   a. the total number of remote terminal locations;

   b. the total number of customers served by those remote terminal locations;

   c. the number of remote terminal locations where all-copper transports from the customer to the central office are alternatively available to customers currently served by remote terminals at those locations upon request by an CLEC;

   d. the number of remote terminal locations where dark fiber transport would be available from the remote terminal location to the corresponding central office upon request by a CLEC.

6. Refer to the pre-filed testimony of Paul Richard and Michael Nawrocki at 9 (May 22, 2001)("PARTS Testimony"). For remote terminal locations in Massachusetts, state:

a. the number of remote terminal locations equipped with a Litespan 2000 NGDLC bay;

b. the number of remote terminal locations where DSL-capable line cards ("ADLU") are deployed;

c. the number of remote terminal locations where ATM Bank Control Units ("ABCU") cards are deployed;

d. the number of remote terminal locations where Software Release 10.2.2 is deployed;

e. the number of remote terminal locations where spare fiber is available to provide the PARTS OC-3c data transport from the RT to the central office; and

f. the number of remote terminals locations that would require new or reconfigured RT structures in order to house NGDLC electronics. If not all locations have been surveyed, please provide the number of locations surveyed and the number that would require new or reconfigured RT structures.

7. Has Verizon tested or deployed DSLAMs at remote terminals? If so, where?

8. Can *x*DSL be provided to customers served by remote terminals that are not equipped with NGDLC equipment? If so, please describe the manner in which *x*DSL service can be provided.

9. Does Verizon claim any proprietary interest over the equipment, processes, or elements necessary to provision the services described in the illustrative PARTS tariff? If so, please describe that interest with specific reference to each equipment, process, or element claimed as proprietary.

10. If customers who currently are served by fiber-fed loops are migrated to all-copper loops between the central office and the customers' demarcation points:

(a) What types of *x*DSL connections are commercially feasible for a CLEC to provide to such customers?

(b) What are the maximum upstream and downstream transmission rates that could be provided over such all-copper loops? What factors affect those rates?

11. Refer to page 27 of Verizon's PARTS Testimony. Please state all facts upon which Verizon relies:

(a) to refer to the "competitive nature of the [broadband access] market," and

(b) to state that "facilities are available outside the incumbent's network," including in this answer to which specific facilities Verizon refers.

12. How much time would be required to convert a customer from a fiber-fed loop to provide *x*DSL access over an all-copper loop from the customer's demarcation point to the CLEC's collocation point when requested by the CLEC?

13. How much time would be required to provide access over dark fiber from a remote terminal location to the CLEC's collocation point when requested by a CLEC?

14. Please provide an estimate of:

(a) the cost of collocating a CLEC DSLAM at a remote terminal location; and

(b) the time required to collocate a CLEC DSLAM at a remote terminal location.

15. Describe the differences between the Operating Support Systems ("OSS") necessary to support packet switching in fiber-fed networks versus all-copper networks.

16. Is it technically feasible to provide PARTS as UNEs? If not, why not?

17. Does lack of access to PARTS as UNEs materially diminish a requesting carrier's ability to provide the service that they seek to offer? If not, discuss each of the five factors indicated in 47 C.F.R. § 51.317(b)(2) in your answer.

18. In answering the following questions, please include all facts upon which you rely:

(a) Will unbundling the PARTS network promote the rapid introduction of competition?

(b) Will unbundling the PARTS network promote facilities-based competition, investment, and innovation?

(c) Will unbundling the PARTS network promote reduced regulation?

(d) Will unbundling the PARTS network provide certainty to requesting carriers regarding the availability of packet switching at remote terminals?

(e) Will unbundling the PARTS network be administratively practical to apply?

19. Are line cards for the provision of *x*DSL-based services equipment "necessary" for the provision of advanced services? If not, why not?

20. Please address whether each of the four conditions of 47 C.F.R. § 51.319(c)(5)[1] specifically are met, stating all facts relied upon in providing your answer:

    (i) Has Verizon deployed digital loop carrier systems in Massachusetts, including but not limited to, integrated digital loop carrier or universal digital loop carrier systems, or any other system in which fiber optic facilities replace copper facilities in the distribution section (e.g., end office to remote terminal, pedestal or environmentally controlled vault)?

    (ii) Are spare copper loops available which are capable of supporting *x*DSL services that the requesting carriers seek to offer?

    (iii) Has Verizon not permitted a requesting carrier to deploy a Digital Subscriber Line Access mulltiplexer in the remote terminal, pedestal or environmentally controlled vault or other interconnection point? Has the requesting carrier not obtained a virtual collocation arrangement at subloop interconnection points as defined by 47 C.F.R. § 51.319(b)?

    (iv) Has Verizon deployed packet switching capability for its own use?

21. What percentage of Verizon's loops in Massachusetts are served by DLC technology?

22. What percentage of Verizon's lines are served by NGDLC? What percentage of these NGDLC are compatible with line card collocation?

23. Explain if the Department did not require Verizon to collocate CLEC line cards in RTs, whether CLECs would be precluded, as a practical, economic, or operational matter, from obtaining interconnection or access to UNEs necessary to provide DSL service to customers served by fiber fed loops.

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[1] This section is cited in the Department's previous 98-57 Phase III orders, as well as in the FCC's UNE Remand Order, as 47 C.F.R. § 51.319(c)(3)(B), but has since been promulgated as 47 C.F.R. § 51.319(c)(5).