

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set 4

DATED: October 3, 2001

ITEM: AG-VZ 4-4 Please refer to Mr. Mudge's rebuttal testimony, Attachment 1.

- a. Please identify by name, title, and corporate affiliation (department) the individuals who prepared the "Massachusetts Competitive Profile" that was provided as Attachment 1 to Mr. Mudge's rebuttal testimony.
- b. Please state the dates over which this document was prepared, *i.e.*, the start date and the end date for the project.
- c. Please identify by name, title, and corporate affiliation (department) the Verizon MA individuals and outside consultants who have been furnished access to the "Massachusetts Competitive Profile" to date.
- d. Please indicate whether Verizon MA has prepared other "Massachusetts Competitive Profiles" or their equivalent within the past six years. If the answer is anything other than an unqualified negative, please provide the dates on which all such prior or other "Massachusetts Competitive Profile" documents were prepared, the names, times and corporate affiliation (department) of the individual(s) who prepared the documents, the names, titles and corporation affiliation (department) of the individuals who requested that such documents be prepared, and a detailed description of the contents of each such document.

REPLY: a. The individuals who assisted Mr. Mudge in preparing the Massachusetts Competitive Profile were:

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(cont'd)

- ?? Ms. Sandra Casale – Senior Staff Manager, State Regulatory Planning (Verizon)
 - ?? Ms. Sheila Gorman – Senior Staff Manager, State Regulatory Planning (Verizon)
 - ?? Mr. Thomas MacNabb – Senior Staff Manager, MA Regulatory (Verizon)
 - ?? Ms. Karen McMurtry – Senior Staff Manager, State Regulatory Planning (Verizon)
 - ?? Mr. Patrick Murphy – Senior Staff Manager, State Regulatory Planning (Verizon)
 - ?? Mr. John Conroy – Director, MA Regulatory (Verizon)
 - ?? Mr. Arthur Silvia – Director, State Regulatory Planning (Verizon)
 - ?? Ms. Paula Brown – Vice President, State Regulatory Planning (Verizon)
- b. Certain data contained in Attachment 1 to Mr. Mudge's testimony were compiled beginning in February 2001 with updated data compiled thereafter. The attachment to Mr. Mudge's testimony was completed on or about September 20, 2001.
- c. Beyond the individuals who helped in preparing the Massachusetts Competitive Profile, the following people have had access to it:
- ?? Mr. Bruce Beausejour – Vice President and General Counsel (Verizon)
 - ?? Mr. Victor Del Vecchio – Senior Regulatory Counsel (Verizon)
 - ?? Mr. Robert Werlin – Counsel (Keegan, Werlin & Pabian)
 - ?? Dr. William E. Taylor – Senior Vice President (National Economic Research Associates, Inc.)
 - ?? Mr. Michael J. Doane – President (PM Industrial Economics)
 - ?? Ms. Barbara Landry – Specialist, State Regulatory Planning (Verizon)
 - ?? Mr. Charles Zarkadas – Vice President (National Economic Research Associates, Inc.)
 - ?? Mr. Gary Stahlberg – Vice President (PM Industrial Economics)

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- d. Verizon MA has not previously prepared a Massachusetts Competitive Profile.

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**Verizon New England Inc.
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D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set 4

DATED: October 3, 2001

ITEM: AG-VZ 4-3 Please refer to Mr. Mudge's rebuttal testimony, Attachment 2.

- a. Please provide all details as to how the "original ASR submitted by the carrier was not complete."
- b. Please identify by name the "Verizon MA representative" and "the carrier" described in Attachment 2 and provide all details of the communication between the Verizon MA representative and the carrier in which the carrier allegedly was advised "that there were incorrect assignments provided on the ASR on April 27th, May 4th and May 7th." Please also provide the "additional information" that was furnished to Verizon MA by the carrier on May 4th, May 8th and May 9th.
- c. Please provide copies of all notes and other documentation in Verizon MA's possession pertaining to the ETI service that is discussed in Mr. Mudge's rebuttal testimony, Attachment 2.
- d. Please identify by name the individuals who assisted Mr. Mudge in preparing Attachment 2 and provide copies of all documents upon which Mr. Mudge relied in preparing Attachment 2.
- e. Please indicate whether Verizon MA is in possession of the New Jersey Division of the Ratepayer Advocate's response to Verizon New Jersey interrogatory VNJ-RPA-90 in New Jersey Board of Public Utilities Docket No. TO01020095, in which the Ratepayer Advocate provided Verizon New Jersey with a copy of ETI's detailed notes regarding its interactions with AT&T

ITEM: AG-VZ 4-3
(cont'd)

and Verizon relative to the T-1 service at Two Center Plaza.

- f. Please identify by name and provide a copy of all notes taken by "Verizon MA's local service engineer" pertaining to his site visit to ETI's premises at Two Center Plaza on May 22, 2001.
- g. Please provide all written guidelines, policies or practices supporting the contention allegedly made by "Verizon MA's engineer ... that Verizon MA's regular practice is to provision T1 service via fiber and electronics whenever possible."
- h. Please provide copies of any and all cost studies, engineering economic analyses, and underlying data comparing the cost of a fiber optic vs. a copper provisioning arrangement where the customer requirement is for a single T1 line only and where the distance between the customer and the serving wire center is in the range of 500 feet or less.
- i. Please identify by name, title and organizational affiliation within Verizon all individuals with whom Mr. Mudge conferred in preparing Attachment 2. For each such conversation, provide the date at which it occurred, the name(s) of all persons present, and the nature of the subjects discussed. Indicate what steps, if any, Mr. Mudge undertook to verify the accuracy of the information furnished to him.

REPLY:

- a. The original ASR had an incorrect Connecting Facility Assignment (CFA). The CFA identifies the customer carrier system and channel assignment to be used in handing off the requested service to the customer. The CFA is provided by the carrier. The original CFA provided on the ASR in question was already in use for another circuit.
- b. Several different representatives worked on this request; the representative who issued the original service order was Mr. M. Brucato. Dr. Selwyn, on behalf of the Attorney General, has represented that the carrier was AT&T. Attached are copies of the system notes identifying the relevant carrier and detailing the communications between Verizon MA and the carrier, the facilities to be provided and the nature of the information

REPLY: AG-VZ 4-3
(cont'd)

provided on May 4th, 8th and 9th. Verizon considers the requested information to be confidential and proprietary communications between Verizon and the customer of record. Neither the Attorney General nor ETI is the customer of record. The information is, accordingly, being provided only to the Department and to those parties to whom the customer of record authorizes disclosure. As the Attorney General's witness has represented that the carrier was AT&T, no hardship arises in the Attorney General's seeking such authorization.

- c. Please see parts (b) and (f).
- d. Please see parts (b) and (f) for attachments. The individuals who assisted Mr. Mudge in preparing Attachment 2 were:
 - ?? Mr. John Conroy – Director, MA Regulatory
 - ?? Ms. Allison Hallissey – Manager, Carrier/CLEC Services
 - ?? Mr. Thomas MacNabb – Senior Staff Manager, MA Regulatory
 - ?? Mr. Evan Mcsorley – Engineer, Network Engineering
 - ?? Mr. Christopher Parker – Manager, Network Engineering
- e. Yes.
- f. The local service engineer that visited ETI's location on May 22, 2001 was Mr. Evan Mcsorley. Attached are copies of Mr. Mcsorley's work notes and system notes. Verizon MA considers the requested information to be proprietary. The documents set forth Verizon MA's engineering design that relates to a carrier specific request for service. The information is, accordingly, being provided only to the Department and to those parties to whom the customer of record authorizes disclosure. As the Attorney General's witness has represented that the carrier was AT&T, no hardship arises in the Attorney General's seeking such authorization.
- g. Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

REPLY: AG-VZ 4-3
(cont'd)

- h. Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.
- i. Please see part (d). In conferring with these individuals, Mr. Mudge reviewed the information provided and found it to be accurate. Verizon MA is unable to identify with specificity the remaining information.

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**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William Taylor
Title: Senior Vice President, NERA
Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set 4

DATED: October 3, 2001

ITEM: AG-VZ 4-11S Please refer to Verizon's response in AG-VZ-1-8(a) and AG-VZ-2-2(e).

- a. Please give the edition number, page number, and paragraph reference in the CLEC 2001 Study for each RCN reference described in Verizon MA's response to AG-VZ-1-8(a). Please note that this is our second request for this information.
- b. Please provide copies of the pages referenced above.

**SUPPLEMENTAL
REPLY:**

- a. The CLEC Report 2001 is produced by New Paradigm Resources Group, Inc. The semi-annual report was issued in the fall of 2000 (13th Edition) and the spring of 2001 (14th Edition). The responses to AG-VZ 1-8a and AG-VZ 2-2e were based upon the latest available information, which was the 13th Edition. In response to this request, the Company is providing cites for the 13th Edition, and the more current 14th Edition.

The requested data can be found in the 12 page "Company Snapshot" devoted to RCN in Chapter 9 of the 13th Edition. The data can also be found in the 15 page "Company Snapshot" in Chapter 13 and on page 1 of 5 in Chapter 2 of the 14th Edition.

Specific references include the following.

"Single source provider of residential services" can be found on

**SUPPLEMENTAL
REPLY: AG-VZ 4-11S
(cont'd)**

- page 3 of 12 of the 'Company Snapshot' in the 13th Edition, or on page 1 of 5 of Chapter 2 in the 14th edition.
- ?? "Has more than 32,000 miles of fiber cable in place" can be found in the Company Snapshot on page 1 of 12 of the 13th Edition. In the 14th Edition, there were 450,000 miles of fiber in-place as shown on page 1 of 15 of the Company Snapshot.
- ?? "Has a Lucent 5ESS switch in Boston" is shown in the Company Snapshot on page 7 of 12 of the 13th Edition and page 10 of 15 in the 14th Edition.
- ?? "Has entered a joint venture with Boston Edison" is in the Company Snapshot on page 3 of 12 in the 13th Edition and on page 3 of 15 in the 14th Edition.
- ?? "Serves the residence market in Allston, Belmont, Boston, Brookline, Brighton, Burlington, Dedham, Framingham, Hyde Park, Lexington, Needham, Newton, Norwood, Quincy, Randolph, Somerville, Wakefield, Waltham, Watertown, and Woburn" is shown in the Company Snapshot on pages 7 and 8 of 12 of the 13th Edition and on pages 10 and 11 of 15 in the 14th Edition.
- b. As stated in the response to AG-VZ-2-2(e), the information requested is protected by copyright laws. It cannot be duplicated but will be made available for inspection at Verizon MA's offices at a mutually convenient time.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: AT&T Communications of New England, Set 2

DATED: October 3, 2001

ITEM: ATT-VZ 2-3 Please provide the names and positions of all individuals who provided input, documentation and/or comment on the “Massachusetts Competitive Profile”, as well as the names and positions of those individuals who compiled the “Massachusetts Competitive Profile.”

REPLY: Please see the Company’s reply to AG-VZ 4-4.

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**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: AT&T Communications of New England, Set 2

DATED: October 3, 2001

ITEM: ATT-VZ 2-10 Please provide all support and documentation for Mr. Mudge's statement on page 8, lines 12-13, of his rebuttal testimony that "in three of these area codes (508, 781, and 978) CLECs hold at least one half of all possible three digit exchange or 'NXX' codes. In area code 617, CLECs hold about 35% of all possible exchange codes."

REPLY: The number of NXX codes provided to CLECs in each area code is listed below. The maximum number of NXX codes in any area code is 792.

Area Code	Number of CLEC NXX Codes	% of Maximum Number of Codes
508	442	58%
781	402	51%
978	375	47%
Total	1219	51%
617	269	34%

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Michael J. Doane
Title: President, PM Industrial
Economics

REQUEST: AT&T Communications of New England, Set 2

DATED: October 3, 2001

ITEM: ATT-VZ 2-11 Please provide all support and documentation for Michael Doane's statement on page 21, line 17, of his rebuttal testimony that "there are 161 rival firms in the market today."

REPLY: Please see page 25 of the Department's 2000 Annual Report. Per the Annual Report, as of November 2000, there were 161 CLECs authorized to provide local telecommunications services in Massachusetts. The statistics, which summarize the current condition of the Massachusetts telecommunications industry, were developed using the most recent data available from the DTE's records, the FCC, and the common carriers.