

**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

**VERIZON MASSACHUSETTS
THIRD SET OF INFORMATION REQUESTS TO AT&T AND WORLDCOM**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that AT&T Communications of New England, Inc. ("AT&T") and WorldCom, Inc. ("WorldCom") respond to the following information requests addressed to them or their witnesses. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if AT&T and WorldCom, or their witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If AT&T and WorldCom feel that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

DEFINITION AND INSTRUCTIONS

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, "AT&T" means AT&T Communications of New England, Inc., and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. In these Information Requests, "WorldCom" means WorldCom, Inc. and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

4. "Verizon" means Verizon New England Inc. d/b/a Verizon Massachusetts.

5. "Document" and "documentation" are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. "Document" and "documentation" shall also mean copies of documents, notwithstanding that the originals thereof are not in your possession, custody or control, and all attachments to any document.

6. If AT&T and WorldCom cannot answer a request in full, answer to the extent possible and state why they cannot answer the request in full.

7. If AT&T and WorldCom refuse 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.

8. Please serve a copy of the responses to these requests on Verizon MA's attorney, Bruce P. Beausejour, 185 Franklin Street, 13th Floor, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1. Please provide a complete copy of the switch contract executed between AT&T and Lucent, as well as any other accompanying materials, submitted in response to Verizon-Virginia's interrogatory VZ-VA 1-1 in CC Docket No. 00-218 before the Federal Communications Commission.
2. Referring to page 5 of Ms. Pitts' Testimony, please provide all documentation, studies, data, workpapers, surveys and any other material supporting Ms. Pitts' statement that "switching vendors allow telephone companies to buy growth equipment for a new switch at new switch prices for a period of time, which is usually between one and three years." In addition to providing the foregoing documents, please explain the basis for Ms. Pitts' statement that "I chose a mid-point of 1 1/2 years of growth as being purchased at new prices, because it is the most reasonable approximation of the actual manner in which new switch prices are applied by the vendors."
3. Referring to page 6 of Ms. Pitts' Testimony, describing her selection of an annual line growth rate of 1.5%, please identify and provide the information and analysis that Ms. Pitts relied upon in selecting 1.5%, beyond that given in her statement that "on the basis of Verizon's forecast, I assumed 1.5% annual line growth." Considering the fact that Verizon MA's 1.5% growth rate is based on a three year growth cycle, please discuss why Ms. Pitts has not considered the use of a higher annual line growth rate given her use of a much longer twelve year time horizon.
4. Referring to page 7 of Ms. Pitts' Testimony, please provide all documents that Ms. Pitts is aware of that discuss or refer to the "actual practice" mentioned in her testimony.
5. Referring to page 10 of Ms. Pitts' Testimony, please enumerate those "costs" referred to by Ms. Pitts in her statement that "Verizon's competitive bid data demonstrates that this \$36 per line investment is too high because it includes costs that already are accounted for in other parts of the Verizon cost study."
6. Please provide the basis for Ms. Pitts' statement on page 11 of her Testimony that "it appears that the \$36 per line includes the costs of software and features which already have been included in Verizon's cost study separate from the SCIS inputs."
7. Referring to footnote 4 of Mr. Turner's Testimony, please explain how the weighting in cell D76 of Mass Part CA, Workpaper 5.0 shows the cabling costs from the power plant to BDFBs to be included in the DC Power Consumption element.
8. Referring to pages 7 and 8 of Mr. Turner's Testimony, in which rate element (i.e., Power Consumption or Power Distribution) does Mr. Turner believe cabling costs

are included in those situations where “the CLEC actually cables directly back to the Verizon power distribution panel bypassing the Verizon BDFB”?

9. Please provide all documentation supporting the assertion that, in Verizon California central offices, “BDFBs normally are placed near columns at the end of telecommunications equipment rows and are placed approximately every three rows throughout the central office.”
10. Referring to the assertion on page 10 of Mr. Turner’s Testimony that his “engineering experience [is] informed by being in numerous telecommunications central offices, including those of . . . Verizon,” please provide the number and location of all Verizon California central offices in which Mr. Turner has seen equipment rows and associated BDFBs.
11. Please provide all documentation supporting the assertion on page 14 of Mr. Turner’s Testimony that, in Texas, 2-20 Amp DC power distribution feeds have a nonrecurring cost of \$369.03 and 2-50 Amp DC power distribution feeds have a nonrecurring cost of \$643.12. In particular, please provide the cost studies supporting these numbers and explain all costs reflected in those studies.
12. Apart from testimony presented in this proceeding (D.T.E. 01-20), has Mr. Turner performed an analysis of any other incumbent local exchange carrier’s cabling costs? If so, please provide all such analyses and supporting documentation.

October 4, 2002