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By Telecopier

Robert N. Werlin
Keegan, Werlin & Pabian
21 Custom House Street, Suite 440
Boston, MA 02110

Re: DTE 01-20 -- Response to ATT-VZ 4-29

Dear Bob:

I write because Verizon has not yet provided a fully responsive answer to discovery request ATT-VZ 4-29. This discovery request by AT&T reads as follows:

Verizon's direct panel testimony states at pages 132-133 that, in developing inputs for SCIS, "the current number of lines and trunks per switch were adjusted based on the Verizon MA's access line growth forecast, and the averages CCS per line and trunk were adjusted based on current CCS growth trends."

Please provide the access line forecasts and CCS growth trends used by Verizon to adjust the line inputs to SCIS. Provide all supporting documentation and calculations. Please identify the Verizon organization that developed the forecasts and trends. If Verizon has other line forecasts or trends used by the marketing, engineering, or strategic planning organizations, please provide them.

In its supplemental reply, Verizon states as follows:

Verizon MA has one official forecast that is based on input from various sources. Verizon MA has previously provided this information in its response to Information Request CC 2-49, and has updated this forecast in its Supplemental response to Information Request CC 2-49.

This supplemental reply is deficient in at least three ways.

First, Verizon has failed to "provide all supporting documentation and calculations" for the "official forecast" recently provided in response to request CC-VZ 2-49. I ask that you do so immediately.

Second, Verizon has failed to “identify the Verizon organization that developed the forecasts and trends.” Verizon’s statement that this “official forecast … is based on input from various sources” does not answer this part of the question. Please let us know what sources provided input, what input they provided, and who was responsible for developing the final “official forecast.”

Third, Verizon has failed to provide all “other line forecasts or trends used by the marketing, engineering, or strategic planning organizations.” Verizon’s deliberate use of the qualifier “official” in its phrase “official forecast” makes clear that this is not the only access line growth forecast, but rather is the only “official” one. But AT&T’s request encompasses both “official” and “unofficial” forecasts. Please provide the missing information.

The Department stated that it granted AT&T’s motion to compel a response to ATT-VZ 4-29 and other questions “to ensure [that] Verizon’s supplemental answers are fully responsive and avoid any further motions to compel.” The supplemental response provided by Verizon to date is not “fully responsive,” for the reasons discussed above. Please provide a further supplemental response, one that truly is fully responsive, immediately. Thank you.

Very truly yours,

Kenneth W. Salinger

pc: Service List (by e-mail)