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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-1 Please answer the following questions using the table provided. Add written comments to explain your answers if needed. If the answer is unknown, please indicate with "UNK" in the applicable space and provide a written response as to why Verizon is unable to provide the information requested.

a. Please list the technologies that would be considered substitutes for the services in the top row.
b. Please provide the number of companies in Massachusetts that are currently offering the services found in the top row (i.e., "actual competitors").
c. Please provide the number of companies in Massachusetts that are currently operating in Massachusetts (but are not currently providing the services in the top row) that could offer the services in top row within one year (i.e., "potential competitors").

	Residential local exchange service	small business local exchange service	Small business data/ Internet service	high speed voice and data systems (med-lg business)	high speed services for telecom, internet and data providers	collocation services
a. substitute technologies						
b. number of current actual competitors						
c. number of current potential competitors						

REPLY: In completing the Massachusetts Competitive Profile, the Company did not differentiate between small and large business customers and thus cannot provide the degree of specificity requested. (In fact, CLECs do not differentiate in their tariffs between large and small business customers.) Thus, the categories used in completing the table were altered slightly as follows:

- Residential Local Exchange Service – no changes to this category.
- Small Business Local Exchange Service – has been changed to count CLECs offering local exchange service to any business customer regardless of size. The category is called Business Local Exchange Service.
- Small Business Data / Internet – has been changed to determine the CLECs that offer Internet services to any customer. The category is called Internet Services.
- High Speed Voice and Data Systems (Medium – Large Business) – has been changed to count CLECs who offer high speed voice and data systems to any business customer, regardless of size. The category is called Business High Speed Voice and Data.
- High Speed Services for Telecom, Internet and Data Providers – no changes to this category.
- Collocation Services – no changes to this category.

a. Please see the table below.

b. Please see the table below. The information used to complete this section of the table is contained in Part C of the Massachusetts Competitive Profile. The number of providers of high speed services to Telecom, Internet and Data customers does not include other companies that may be offering these services through a federal tariff or on market based terms and conditions. (Some examples of these companies would be dark fiber providers such NEESCom or high capacity data providers such as Giant Loop.)

c. Please see the table below. The Company believes all current competitors could be providing the indicated services within one year. In addition, with the absence of barriers to entry within the Massachusetts marketplace, potential competitors could include many other firms that are not currently in Massachusetts. Verizon MA is not in a position to evaluate the physical space being utilized by other providers and, thus, can not estimate the potential number of collocation providers.

	Res. Local Exchange	Bus. Local Exchange	Internet Services	Bus. High Speed Voice & Data	Telecom High Speed Voice & Data	Collocation
a. Substitute Technologies	Twisted copper, fiber optics, microwave, satellite, coaxial cable, fixed wireless			Twisted copper, fiber optics, microwave, satellite, coaxial cable		
b. No. of Current Actual Competitors	41	66	44	44	44	10
c. No. of Current Potential Competitors	All	All	All	All	All	UNK

VZ # 191

Verizon New England Inc.
D/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Paula L. Brown
Title: Vice President – Regulatory

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-2 Are advanced data services included in Verizon's Alternative Regulation Plan? If so, please give examples of those services and state under which part of the Plan they are included.

REPLY: Yes.

The current services included in Verizon MA's proposed plan are identified in Appendix A of the MA Alternative Regulation Plan. The current Digital Services identified in Appendix A under Paragraph J include:

- DIGIPATH® Digital Service (DDS)
- SUPERPATH® 1.544 Mbps Digital Service
- SWITCHWAY® switched 56 Kbps Service
- INFOPATH® Packet Switching Service
- Digital PBX Services
- SUPERPATH® Fractional T-1 Digital Service
- DOVPATH® Service
- DIGIPATH® Digital Service II (DDSII)
- Integrated Services Digital Network (ISDN) Services
- Network Reconfiguration Service (NRS)
- Digital Automatic Call Distribution (ACD) from DMS 10

The rates for the services in Paragraph J will be based upon market conditions.

Verizon MA's plan provides for all New Services to be subject to the pricing rules set forth in Paragraph J. Therefore, if Verizon MA were to offer services such as frame relay, then that service would be included in the Plan under Paragraph J.

Also see the response to D.T.E. #3-1.

VZ # 192

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-3 Please provide the number of Massachusetts exchanges that have:

a. Less than five percent of lines provided by CLECs;
b. Between five and ten percent of lines provided by CLECs;
c. Between ten and twenty percent of lines provided by CLECs; and
d. Over twenty percent of lines provided by CLECs.

Please dis-aggregate business and residential lines in your answer.

REPLY: Verizon MA does not have precise data that would include all lines provided by competitors. Therefore, the table below was developed using data provided in the Massachusetts Competitive Profile, and does not represent precise market share calculations. The Profile is Verizon MA's estimate of the number of CLEC provided lines in the state. In assembling the Massachusetts Competitive Profile, Verizon MA was able to quantify the number of CLEC resold and UNE-P services through use of its internal sources. E911 data was used in the profile as a surrogate to estimate the number of CLEC facility based switched lines.

The table provides the number of offices that fall into each category requested and the percentage of all lines served by those offices. For example, 78.3% of all business lines in the state are located in the 104 offices where the Profile shows that CLECs serve more than 20% of the business lines.

May 2001	**Business**		**Residence**	
	# of Central Offices	% of All Business Lines	# of Central Offices	% of All Residence Lines
Less than 5% CLEC Lines	5	0.1%	191	54.3%
Between 5% and 10% CLEC Lines	37	2.1%	21	13.6%
Between 10% and 20% CLEC Lines	126	19.5%	44	22.6%
Over 20% CLEC Lines	104	78.3%	16	9.4%
Total	272	100%	272	100%

VZ# 193

Verizon New England Inc.
D/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-4 Please provide a separate color-coded exchange map for business and residential CLEC line density, which indicates the geographic distribution of the above data in the following format:

Red:	Over twenty percent
Blue:	Ten to twenty percent
Yellow:	Five to ten percent
White:	zero to five percent

REPLY: Please see the attached maps. The maps were generated using the data provided in DTE-VZ 4-3.

VZ # 194

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-5 Please describe all the services (i.e., voice; data; 1 voice/data line, 24 voice/data lines; advanced calling features; switched; non-switched; etc.) which could be provided on the following digital communications services found in Section C of Verizon's M.D.T.E. Tariff No. 10:

a. DIGIPATH® Digital Service (DDS)
b. SUPERPATH® 1.544 Mbps Digital Service
c. SWITCHWAY® switched 56 Kbps Service
d. INFOPATH® Packet Switching Service
e. Digital PBX Services
f. SUPERPATH® Fractional T-1 Digital Service
g. DOVPATH® Service
h. DIGIPATH® Digital Service II (DDSII)
i. Integrated Services Digital Network (ISDN) Services
j. Network Reconfiguration Service (NRS)
k. Digital Automatic Call Distribution (ACD) from DMS 10

REPLY:

a. DIGIPATH® Digital Service (DDS)
DDS is a service for the transmission of digital signals using only digital transmission facilities. DDS is a non-switched data service that provides for the simultaneous two-way transmission of digital signals of 2.4, 4.8, 9.6 or 56 kilobits per second (kbps).

b. SUPERPATH® 1.544 Mbps Digital Service
Superpath consists of two-point digital channels and equipment which provide for simultaneous two-way transmission of digital signals at a transmission speed of 1.544 Mbps. Superpath is a non-switched service which can be used for any combination of 24 voice/data lines.

REPLY: DTE 4-5 (cont'd)

c. SWITCHWAY® switched 56 Kbps Service
Switchway is a digital end-to-end public switched 56 kbps service that provides full duplex, synchronous information transport via a specially equipped measured access line. Switchway is a switched data service.

d. INFOPATH® Packet Switching Service
Infopath provides synchronous and asynchronous network transport of data through the network which usually involves relatively short bursts of data. Infopath is a packet switched data service.

e. Digital PBX Services
Flexpath digital PBX service provides a digital path from a central office to a customer's digital PBX, allowing access to and from the exchange and toll network via exchange trunk lines. Flexpath can provide a maximum of 24 trunk circuits.

f. SUPERPATH® Fractional T-1 Digital Service
Superpath Fractional T-1 is a digital private line that has the capacity of eight or twelve two-point digital channels, and consists of equipment which provides for simultaneous two-way transmission of digital signals at a transmission rate of 56 kbps per channel. Superpath Fractional T-1 Service is a non-switched service which can be used for a maximum of either 8 of 12 voice/data lines.

g. DOVPATH® Service
Dov (data over voice) Path service provides point-to-point transport of low to medium speed data operating concurrent with single-party analog voice service. Dov Path operates at speeds up to 9.6 kbps.

h. DIGIPATH® Digital Service II (DDSII)
DDS II is a digital private line service which provides for the simultaneous transmission of digital signals at synchronous speeds of 2.4, 4.8, 9.6, 19.2 or 56 kilobits per second (kbps).

i. Integrated Services Digital Network (ISDN) Services
ISDN Basic allows for the integration of voice and non-voice (data) transmission on a single telephone access line. ISDN Basic

REPLY: DTE 4-5 (cont'd)

consists of basic service capabilities, optional features and optional feature packages, and circuit switched data local usage packages.

ISDN Primary provides access to the Telephone Company's voice and circuit switched data transport services via a 1.544 Mbps digital path between ISDN compatible customer premises equipment and an ISDN equipped central office. ISDN Primary includes Direct Inward Dialing (DID). ISDN is a voice and data service that may include a maximum of 24 lines.

j. Network Reconfiguration Service (NRS)
NRS provides business customers with the ability to access, manage and reconfigure specific digital private line services connected to a Digital Cross Connect System (DCS). NRS is typically used to reconfigure the voice and data lines associated with SUPERPATH® 1.544 Mbps Digital Service and SUPERPATH® Fractional T-1 Digital Service.

k. Digital Automatic Call Distribution (ACD) from DMS 10
Digital ACD provides an even distribution of the call workload to a customer's agents. Basic features provided by Digital ACD are considered optional features of Intellipath of Intellipath II Digital Centrex service.

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-6 Is a collocation hotel the only competitive segment of the collocation industry? Explain.

REPLY: No, collocation hotels are only one possible form of collocation competition. There are other competitive alternatives for providing telecommunications conditioned space to house the equipment of competitive carriers.

There are fiber providers offering transport facilities to circumvent the need for a competitive telecommunications provider to collocate at a Verizon MA premises. For instance, Metromedia Fiber Network's web page and recent press release of November 19, 2001 proclaim that Knight Securities will utilize MFN's fully redundant infrastructure and co-location services. See URL: http://www.mfn.com/news/pr/20011119_Knight_Securities.shtm .

These fiber providers also offer competitive telecommunications providers with direct access to their fiber networks within a Verizon MA central office. The tariffed offering, Competitive Alternative Transport Terminal (CATT), allows a third party to terminate fiber facilities at a Verizon MA central office.

In addition, most of the large Interexchange Telecommunications providers (IXC's) offer collocation space at facilities owned and leased by the IXC's.

Competitive telecommunications providers also have the options of leasing space from any tenant that has office space available, and

REPLY: DTE 4-6 (cont'd)

deploying their own facilities (copper or fiber) to end user customer premises by constructing a network infrastructure or utilizing network infrastructures of other telecommunications providers.

In the Summary of Competitors' Service Offerings of Verizon MA's Competitive Profile (Section C), the following companies have been identified as offering collocation arrangements: ARBROS Communications, Conversent, Focal Communications, Level 3 Communications, Looking Glass Networks, Network Access Solutions, North American Telecom, PAETEC Communications, Williams Local Network, and WorldCom.

VZ # 196

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-7 To interconnect with Verizon's network or UNEs, please explain the alternatives to CLEC collocation at Verizon central offices.

REPLY: CLECs can interconnect with Verizon MA's network via midspan meets or entrance facilities. CLECs may also obtain combinations of network elements, as permitted by applicable law, without collocating at a Verizon central office.

CLECs can interconnect and/or access UNEs via another collocator's collocation arrangement at a Verizon MA central office if they have a Letter of Authorization (LOA) from the collocating telecommunications carrier.

VZ # 197

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William E. Taylor
Title: Senior Vice President, NERA

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-8 See p. 2, lines 2-4: Please explain why measures for market share are limited in their usefulness for firms that "inherited high market share?" In the context of being applied along with the elasticity of supply of fringe firms and the market demand elasticity in order to estimate the incumbent's price elasticity of demand, why is this not a useful measure?

REPLY: If a high market share is "inherited" then it is not the result of a current exercise of market power, does not represent a measure pertinent to the firm's profit-maximizing price and output level, and thus, is not relevant for the purpose of an evaluation of market power as discussed by Landes and Posner and relied upon by Dr. Mayo. Inherited market power is thus irrelevant as a measure of the firm's ability to control price on a forward-looking basis.

To borrow language from Dr. Mayo [Is AT&T "Dominant"? An Assessment of the Evidence at 12], the level and time path of an incumbent's market share reflect not only normal market place developments but also the fact that incumbent firms are endowed with a very high market share. Also, see page 5, lines 20 to 27, of Dr. Taylor's Reply to Surrebuttal Testimony for more comments from Dr. Mayo about the usefulness of market share in such circumstances.

Importantly, as discussed on page 6 of Dr. Taylor's Reply to Surrebuttal Testimony, "the value of a market share measure in the Landes and Posner approach to evaluating market power requires knowledge of the market share at the firm's profit-maximizing price and output level. Virtually nothing is known about such a measure that pertains to regulated telephone services." This emphasizes the first

REPLY: DTE 4-8 (cont'd)

point, i.e., if the market share is "inherited" it can not represent what market share would be at profit-maximizing price and output levels.

Finally, this is precisely why Landes and Posner require that a firm's market share *at its profit-maximizing output* be used. There is no measure of such a market share to be used in this proceeding.

VZ # 198

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William E. Taylor
Title: Senior Vice President, NERA

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-9 See p. 2, line 7: According to Dr. Taylor's testimony, "Bright line tests can be devised and have been implemented by the FCC." Please describe the bright line tests referred to in this statement and when and how they have been implemented by the FCC.

REPLY: Please see page 6, line 27 to page 7, line 7 of Dr. Taylor's Reply to Surrebuttal Testimony. The discussion pertains to the FCC's reliance on a bright-line trigger to assess the degree of pricing flexibility to allow ILECs when pricing interstate special access and dedicated transport.

The implementation of the tests is described in the Fifth Report and Order and Further Notice of Proposed Rulemaking, CC Docket Nos. 96-262, 93-1, 98-63, 98-157, FCC 99-206, Adopted August 5, 1999. The following excerpts from the Memorandum Opinion and Order, CCB/CPB Nos. 00-24, 00-28, Adopted March 13, 2001 (at 5 and 7) provide a description of the bright line tests and evidence a recent application of the test for Verizon.

Phase I Pricing Flexibility:
A price cap LEC that obtains Phase I relief is allowed to offer, on one day's notice, contract tariffs and volume and term discounts for those services for which it makes a specific competitive showing, so long as the services provided pursuant to contract are removed from price caps.

To obtain Phase I relief, a price cap LEC must meet triggers designed to demonstrate that competitors have made irreversible, sunk

REPLY: DTE 4-9 (cont'd)

investments in the facilities needed to provide the services at issue. In particular, to receive pricing flexibility for dedicated transport and special access services other than channel terminations, a price cap LEC must demonstrate that unaffiliated competitors have collocated in at least 15 percent of the LEC's wire centers within an MSA or collocated in wire centers accounting for 30 percent of the LEC's revenues from these services within an MSA. In both cases, the price cap LEC also must show, with respect to each wire center, that at least one collocator is relying on transport facilities provided by a transport provider other than the incumbent LEC.

Phase II Pricing Flexibility:

A price cap LEC that receives Phase II relief is allowed to offer dedicated transport and special access services free from the Commission's Part 69 rate structure and Part 61 price cap rules. The LEC, however, is required to file, on one day's notice, generally available tariffs for those services for which they receive Phase II relief.

To obtain Phase II relief, a price cap LEC must meet triggers designed to demonstrate that competition for the services at issue within the MSA is sufficient to preclude the incumbent from exploiting any individual market power over a sustained period. To obtain Phase II relief for dedicated transport and special access services other than channel terminations, a price cap LEC must demonstrate that unaffiliated competitors have collocated in at least 50 percent of the LEC's wire centers within an MSA or collocated in wire centers accounting for 65 percent of the LEC's revenues from these services within an MSA. Again, higher thresholds apply for obtaining Phase II pricing flexibility relief for channel terminations between a LEC end office and an end user customer. To obtain such relief, a price cap LEC must demonstrate that unaffiliated competitors have collocated in at least 65 percent of the LEC's wire centers within an MSA or collocated in wire centers accounting for 85 percent of the LEC's revenues from these services within an MSA. For the reasons discussed with respect to Phase I pricing flexibility, a price cap LEC seeking pricing flexibility for channel terminations between a LEC serving wire center and an IXC POP must demonstrate that unaffiliated competitors have collocated in at least 50 percent of the LEC's wire centers within an MSA or collocated in wire centers accounting for 65 percent of the LEC's revenues from these services within an MSA.

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William E. Taylor
Title: Senior Vice President, NERA

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-10 See p. 3, line 25: According to Dr. Taylor's testimony, Dr. Taylor suggests that Dr. Mayo's recommendation for a market power inquiry requires "18,000 separate market power studies." Dr Mayo has responded that this impression arises from improperly defined relevant markets. How does Dr. Taylor define the relevant markets?

REPLY: Responding to the question requires a further discussion of Dr. Taylor's testimony. Dr. Taylor's testimony addresses Dr. Mayo's assertion that a stand-alone analysis of competition must be conducted for 68 services which Dr. Selwyn asserts must be carried out in 272 wire centers. Specifically, Dr. Mayo testified that a formal analysis of market power "must necessarily consist of a stand-alone analysis of the extent of competition in business local exchange services that are classified as noncompetitive" which he counts (at 27) as 68 services. Dr. Selwyn testified that market power analysis should be done at the "wire center level (which is the relevant market for a customer making purchasing decisions)." The product of 68 and 272 exceeds 18,000.

Following conventional economic usage, Dr. Taylor would define a relevant product market for a market power study as the smallest group of products such that a hypothetical firm that was the only present and future seller of those products (a "monopolist") could profitably impose a small but significant and nontransitory increase in price. Similarly, a relevant geographic market for a market power study is the smallest geographic area such that a hypothetical firm that was the only present or future producer or seller of the relevant product in that area could profitably impose a small but significant and nontransitory

REPLY: DTE 4-10 (cont'd)

increase in price. Dr. Taylor's testimony does not define a relevant market because—as outlined in his rebuttal testimony at 2-12— he does not believe that conventional market power studies are effective mechanisms for regulators to use in proceedings to classify services as competitive.

VZ # 200

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William E. Taylor
Title: Senior Vice President, NERA

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-11 See p. 19, line 7 through p.20, line 7: Please define the term "efficient price" as used in this portion of Dr. Taylor's testimony.

REPLY: "Efficient price" is defined at p. 19, lines 24-25 of Dr. Taylor's Rebuttal Testimony as the level to which the price of a service would converge in a competitive market.

VZ # 201

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-12 See p. 10, lines 3-5: Please explain which "other" carriers are successfully expanding fixed wireless operations in Massachusetts.

REPLY: There are several examples of companies actively using fixed wireless technology in Massachusetts to serve customers. As referenced in Mr. Mudge's testimony, a partnership of Equal Access and Global Crossings, which uses fixed wireless technology to provide high-speed access in rural markets, was selected by Franklin-Hampshire Connect to provide services to business customers in that region. Earlier this year, Galaxy Internet Services announced a $20 million fixed wireless network in Massachusetts, offering high-speed Internet and telecommunications services in the Greater Boston area. TowerStream, a Rhode Island-based provider of fixed wireless networks, reported its network expanded to include sites in Burlington, Needham, Quincy, Boston and Waltham. In addition, at a wireless conference held in Boston this summer, MCIWorldCom confirmed that the company has begun trials of its MMDS wireless service in Greater Boston, but would not disclose deployment plans.

VZ # 202

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-13 See p. 4, line 17: According to Mr. Mudge's testimony, "[C]ustomers in every city and town throughout the state do have alternative for their local phone service, and as the most recent numbers show, those customers are choosing such alternatives." Please define the term "local phone service" as used here.

REPLY: As used in the statement above, local phone service means local exchange service, *i.e.*, dial tone service that allows an end user to make and receive local telephone calls.

VZ # 203

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-14 Are CLEC switch providers counted as collocators in any of Mr. Mudge's testimony, testimony exhibits, or responses to information requests? If so, please explain where and why.

REPLY: Collocators are counted in Mr. Mudge's testimony, exhibits and responses only if they have an actual collocation arrangement in place in a given central office (or offices).

CLEC facility based switch providers are counted in Mr. Mudge's testimony, exhibits, and responses only if the E911 data indicates that they are providing service in a given central office (or offices).

CLEC facility based switch providers that are providing service in a given central office and that also maintain a collocation arrangement in that office would be counted as both a collocator and switch provider in Mr. Mudge's testimony, exhibits and responses.

VZ # 204

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-15 Please explain why resold lines and UNE-P lines are not in the E911 database. Explain what information is contained within the E911 database.

REPLY: Listings associated with resold and UNE-P lines are included in the E911 database. In assembling the Massachusetts Competitive Profile, Verizon MA used its own internal sources to quantify the number of resold and UNE-P services. Therefore, Verizon MA did not use data from the E911 database associated with resold and UNE-P lines in assembling the Profile.

Verizon MA utilized E911 data in assembling the Profile as a surrogate to estimate the number of CLEC facility based switch lines.

The Introduction section of the Massachusetts Competitive Profile details the information contained in the E911 database.

VZ # 205

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-16 Please explain why some carriers are listed as collocators or resellers in certain exchanges but are not listed as offering services in those exchanges.

REPLY: Please see the Company reply to DTE-VZ 4-14. In the Massachusetts Competitive Profile, a CLEC is designated as a collocator if it had a collocation arrangement installed within a specific central office in May 2001. Once a collocation arrangement is installed, CLECs are able to offer many different services to end user customers such as local exchange service, access services, data services, DSL services, internet services and others. The Profile includes collocators because their presence within a central office allows them to gain easy access to end user customers. The Profile, however, makes no assumption as to the types of services a specific collocator may be providing.

The specific service providers listed in the Part B of the Profile (Resellers, UNE-P and CLEC Switch providers) are those that were actually providing service within the given central office serving area. Verizon MA does not know (and, thus, can not quantify) the specific services that CLECs are actually providing.

The Service Provider Matrices contained in Part B of the Profile display those CLECs that were actually providing service as of May 2001 in that specific exchange and the services they offer as described in their tariff or website. This list of services offered was developed from Part C of the Profile and includes information only if Verizon MA had access to specific tariff and/or internet information which detailed the services offered by that CLEC.

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: John Conroy
Title: Vice President Regulatory, Massachusetts

REQUEST: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-17 See Verizon's response to ATT-3-1: Does Verizon use the terms "UNE-P providers" and "facilities-based UNE-P providers" interchangeably in the Massachusetts Competitive Profile?

REPLY: Yes, the terms "UNE-P providers" and "facilities-based UNE-P providers" can be used interchangeably.

VZ # 207

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: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-18 See p. 11, line 15 through p. 12, line 3: Please define the term "facilities-based" as used in this portion of Mr. Doane's testimony.

REPLY: The term "facilities-based" as used in this and other portions of Mr. Doane's testimony refers to certain of the data presented in Exhibits MJD-2 and MJD-3. These exhibits summarize Verizon MA wire-center data and are more fully described in the rebuttal testimony of Mr. Mudge. Mr. Doane's testimony reports these data as presented by Verizon MA and thus conforms to the nomenclature used in the Verizon MA data. Mr. Doane's understanding is that the term "facilities-based," as used in these Verizon MA data, is intended to identify all CLEC lines other than those provided via resale of Verizon MA services.

VZ # 208

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: Department of Telecommunications and Energy, Set #4

DATED: November 20, 2001

ITEM: DTE 4-19 See Exh. MJD-3: Are CLEC switch providers counted as collocators in this exhibit to Mr. Doane's testimony?

REPLY: Exhibit MJD-3 summarizes Verizon MA's wire center data, which are discussed more fully in the rebuttal testimony of Mr. Mudge. Please see the Company's reply to DTE-VZ 4-14.

VZ # 209