

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Ross Riddles  
**Title:** Manager - Finance

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-93** On page 3 of the November 14, 2003 Testimony of William E. Taylor, Verizon states that its hot cut volumes are conservative because “some CLECs may, upon the elimination of UNE-P, migrate to non-UNE-L alternatives such as resale or (particularly in the case of cable companies) may choose to provide their own switching and loop facilities.” Please provide:

- (a) The number of UNE-P lines in Massachusetts that are currently being used by cable companies to provide retail service; and
- (b) Any analysis that Verizon has performed that demonstrates that a current UNE-P provider can move its mass market customer’s service to resale and be profitable.

**REPLY:**

- (a) Please see the attached. The response to this Information Request is proprietary, confidential and competitively sensitive and is being provided in accordance with the terms of the Department’s Protective Order.
- (b) Verizon MA objects to this Information Request on the grounds that it seeks information that is beyond the scope of this proceeding, seeks highly confidential information without sufficient justification, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to such objection, and without waiving it, Verizon MA states that it is not aware of any such studies.

VZ # 238

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Bruce Meacham  
**Title:** Group Manger – Service Costs

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-95** Please indicate if any conditions for which orders would be created manually by Verizon (as in NMC task #4) would cause any future LSRs to also fallout. In other words, are there conditions for which Verizon corrects the CLEC's LSR and creates the service order manually, and for which the CLEC is not notified about the error condition, which notification would have allowed the CLEC to avoid future fallout.

**REPLY:** As a rule, there are no conditions for which orders would be created manually by Verizon (as in NMC task #4) that would cause any future LSRs to also fallout. The CLEC is always notified by the NMC about any error(s), which cause a manual order to be generated.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-98**

In addition to the above question, please explain how the RCCC could analyze the order prior to its creation (RCCC task # 2) when the order hasn't been created yet (it falls out at the NMC automatically thus no auto creation)? In addition please explain how the CO FRAME could analyze the order when the order hasn't been created yet? Please explain and provide copies of the survey(s) which indicate that the RCCC would not use RCCC task #1 ("Negotiate Due Date And Fall Out Date's").

**REPLY:** As explained in Verizon MA's testimony, the RCCC and CO Frame must analyze the specifics of the order as presented by the NMC to determine whether the requested due date can be met.

Negotiation of due dates in the Project or Batch hot cut processes is done by the NMC.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Jim McLaughlin  
**Title:** Executive Director - Operations

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-103** On page 69 of Verizon's Initial Panel Testimony, Verizon states "incremental supervision requirements are accounted for by applying an associate/manager ratio to the incremental number of associates determined through the analysis described above." Please specify what the associate/manager ratio is that was used to arrive at the additional supervisory staff that will be needed.

**REPLY:** Please refer to FLM Model, Exhibit V-A-P filed with Verizon MA's Initial Panel Testimony (Hot Cuts). The ratios are based on current aggregate spans of control for the relevant disciplines in Massachusetts.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Jim McLaughlin  
**Title:** Executive Director - Operations

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-111** On page 74 of its Initial Panel Testimony, Verizon states:  
“Verizon has the ability to hire temporary workers for up to one year. Those workers can be terminated or converted to full-time employees at the end of the one-year period.” How many temporary employees will be hired in year 1, in year 2 and in year 3?

**REPLY:** Staffing requirements will be determined based on a number of business factors that may exist when UNE-P is eliminated. Temporary employees are an option when dealing with relatively fixed, programmable volumes that are expected with respect to migration of the embedded base.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-112** On page 9 of its Initial Panel Testimony, Verizon states:  
“Although the process used for such “winbacks” is similar in many ways to the standard Verizon-to-CLEC hot cut process, it also differs from it in one very significant respect. Specifically, in a winback cutover, little or no coordination is required between Verizon and the CLEC.” Explain in detail the tasks performed in the “coordination” that is required for a conversion from Verizon to a CLEC, that would not be required for a hot cut when it is a winback.

**REPLY:** Verizon MA objects to this request on the grounds that the request seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Tom Maguire

**Title:** Sr. Vice President – Wholesale  
Markets

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-117** Please provide the month and year Verizon began developing its WPTS process.

**REPLY:** October 1999.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Bruce Meacham

**Title:** Group Manager – Service Costs

**REQUEST:**

AT&T Communications of New England, Inc., Set #3

**DATED:**

January 6, 2004

**ITEM: AT&T 3-119**

Please provide Verizon's complete job function code ("JFC") manual which should address, but not be limited to, all the JFCs shown on Exhibit III-C filed with Verizon's Initial Panel Testimony.

**REPLY:**

Please see the attached Exhibit ATT-VZ 119. The attachment is proprietary, confidential and competitively sensitive and will be provided pursuant to the terms of the Department's Protective Order.



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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-131** For each year between 2002-2004, please provide the Verizon's pension plan actuarial assumptions (actual gains and expectations). For each year, please compare the pension credits with the pension costs and identify the experienced or anticipated net gain or net loss on Verizon's pension funding.

**REPLY:** Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:  
Title:**

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-132** If Verizon has purchased or contracted with any other organization to analyze how Verizon's wages, salaries and/or benefits compare to those of other companies, please provide the entirety of those studies as well as any correspondence with the organization.

**REPLY:** Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

VZ # 277

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:  
Title:**

**REQUEST:**

AT&T Communications of New England, Inc., Set #3

**DATED:**

January 6, 2004

**ITEM: AT&T 3-133**

Please provide any studies, correspondence or other information possessed by Verizon that compare Verizon's wages, salaries and/or benefits to other companies wages, salaries and/or benefits.

**REPLY:**

Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-135** After a batch hot cut, please explain in detail, whether, and to what extent, all data transfers are electronically handed off between billing, repair, and provisioning systems?

**REPLY:** After the completion of a Batch Hot Cut is entered into WPTS, all subsequent updates to Verizon's Provisioning, Maintenance and Billing systems are automatic. A Provisioning Completion Notification (PCN) is automatically transmitted to the CLEC following the automatic update to SOP (Service Order Provisioning system) and a Billing Completion Notification is automatically transmitted to the CLEC following the automatic update to CRIS (Customer Record Information System).

VZ # 280

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-136** Please explain in detail, the processes by which Verizon will perform a hot cut for the following situations:

- (a) Centrex
- (b) Foreign exchange lines
- (c) Line splitting
- (d) Change in Facilities
- (e) Conversion to EEL configuration

**REPLY:**

- a) “Centrex” service cannot be migrated to a CLEC utilizing its own switch, since Verizon Centrex service is a retail service provided out of Verizon’s switches. However, unbundled loops used to provision Centrex service to a Verizon customer can be hot cut to a CLEC in the same way as any other unbundled loop of the same type/capacity.
- (b) Foreign exchange service includes an inter-office transport component and therefore is ineligible for a hot cut.
- (c) It is not clear what scenario this question is referring to. The data service on a “split” loop is not migrated through a hot cut. Verizon is currently reviewing issues raised by requests to hot-cut the voice service on a split loop with no change in the data provider.

- (d) Verizon does not know what specific migration scenario this question is intended to refer to.
- (e) It is not clear what sort of customer migration scenario is being discussed here. The conversion of a special access arrangement to an EEL arrangement does not involve a hot cut.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-141** Is Verizon's batch hot cut process intended to be used to process a surge in basic hot cut orders? If not, how does Verizon intend to handle a surge in basic hot cut orders?

**REPLY:** No. The process used to handle a hot cut on a particular line will be governed by the eligibility criteria for each process and by the specific hot cut option specified in the CLEC's LSR (assuming that the line is eligible for such option). An order will not be converted from one option to another based on volume. If there was a surge in Basic Hot Cut orders, Verizon would shift existing resources to handle the demand, as it does today.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-142** For central offices in which Verizon has already installed automatic distributing frames, what is Verizon's proposed provisioning interval for performing hot cuts?

**REPLY:** Currently, no special intervals apply to such offices and Verizon has no immediate plans or proposals to differentiate offices on this basis for interval purposes.



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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-143** Please explain, for the batch hot cut process, at what time of day Verizon plans to schedule hot cuts, and whether (and how) these times may vary from one central office to another. Please also explain how a CLEC is to know the start time for processing of its hot cuts. Does Verizon plan to cut all the lines in that given day based on the start time? Please also explain whether the batch hot cut process is intended to accommodate end-users whose lines must be cut at specified periods of the day.

**REPLY:** An inherent part of Verizon MA's Batch Hot Cut proposal is Verizon's ability to determine, based on force management considerations, the precise time of day on the due date at which a particular line will be cut. Thus, there is no specific time of day at which Batch Hot Cuts will occur; the timing will vary from office to office and likely from day to day. No advance notification will be provided to the CLEC of the cutover time that is chosen. (The CLEC will, of course, receive notification through WPTS at the time the cut is completed.) Thus, the Batch Hot Cut process should not be utilized where a CLEC or its customer wants its lines to be cut over at a specified time. Such needs can be accommodated through one of the other hot cut processes.

VZ # 288

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-144** For the batch hot cut process, how many days before the date scheduled for a hot cut will Verizon complete the central office wiring? How long before the cut date does Verizon plan to check the quality of the central office wiring?

**REPLY:** As set forth in the Verizon MA's Initial Panel Testimony (Hot Cuts), Verizon intends to re-date the service order with a new due date six days before that new due date. This new due date will be the date when Verizon completes the central office wiring. Verizon does not commit to do pre-wiring before that date. However, in some cases Verizon may, at its discretion, pre-wire batch hot cuts before the due date to manage its force and work load.

For each line, the frame technician will check for dial tone on the CLEC's CFA before he or she begins the final wiring of the circuit. The frame technician will also check for dial tone on every line after he has completed the wiring, in order to ensure that the customer's dial tone is leaving the central office on the correct cable and pair.

VZ # 289

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-145** For the batch hot cut process, how many days, if any, before the cut date does Verizon plan to perform dial tone checks on lines scheduled for cut-over? How and when does Verizon plan to notify CLECs of no dial tone situations? If no dial tone check is to be performed, please so state.

**REPLY:** No dial tone check will be performed prior to the scheduled day of the cut. See response to ATT 3-144.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-147** Please provide the following information about batch hot cuts:

- (a) Is Verizon considering stratification of the minimum and maximum holding periods described at Initial Panel Testimony p. 32? If so, please provide details about what the revised minimum and maximum holding periods will be by central office type.
- (b) If Verizon does not reach the minimum number of lines for performing a batch hot cut in a particular central office within the maximum 35 business day holding period described at Initial Panel Testimony, p. 32, will Verizon nonetheless perform the requested cuts within the 35-day window? If so, will the rate for these cuts be the "batch" hot cut rate?
- (c) Is Verizon willing to aggregate orders from different CLECs in order to reach the minimum number of lines for a batch hot cut within the maximum holding period?
- (d) What is the basis for the 35-day maximum holding period? If it is based upon the presence of unstaffed central offices that are typically only visited once per month, please specify how many central offices Verizon has in Massachusetts that are only visited once per month.

**REPLY:** (a) The critical mass will be set by the manager(s) of each central office based on work force considerations and demand conditions experienced in that office, and may change from time to time, based on experience. At this

time, Verizon has not determined specific critical masses for each central office.

- (b) Please note, Verizon MA has modified its batch hot cut proposal such that the new maximum holding time is 26 business days. Verizon believes that the proposal of having different holding period ranges for different classes of central offices is worth consideration. However, a meaningful stratification proposal cannot be determined until the Batch Hot Cut process is put in place and a body of experience accumulates on demand and scheduling factors. Thus, Verizon proposes to review this issue at a later date.
- (c) Yes. The rate will be the Batch Hot cut rate.
- (d) All orders submitted as Batch Hot Cut orders, by any CLEC, will be taken into account in determining whether a “critical mass” has been reached in a particular central office, and all such orders will be processed within the 10- and 26-business-day limits referred to in the Initial Panel Testimony (Hot Cuts).

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-148** Please confirm that if Verizon approves a batch hot cut based on the combined orders of two CLECs and one CLEC does not agree to the project by DD-minus-3, the batch job will proceed for the other CLEC and that the batch hot cut rate will apply.

**REPLY:** Yes.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-149** Please state the maximum number of lines that a customer can have and still be eligible for inclusion in Verizon's batch hot cut process. Please also explain how, if customers with more than two lines may be included in this process, the process will work for such customers to ensure that all of the customer's lines will be cut in sequence (for example, to avoid interference with such service features as "hunting").

**REPLY:** There is no limit to the number of lines that a customer can have and still be eligible for inclusion in Verizon's Batch Hot Cut Process. However, there can be no assurance under that process that the customer's lines will be cut in sequence, although Verizon will endeavor to accommodate CLEC concerns where it is reasonably possible to do so, particularly where a small number of lines are involved. If such sequencing is critical to the customer or the CLEC, one of the other hot cut processes should be utilized.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-150** Please explain in detail why Verizon's batch hot cut process is "not available for UNE-L-to-UNE-L migrations" (p. 36 of Verizon's Initial Panel Testimony).

**REPLY:** A key part of the Batch Hot Cut process is Verizon's submission of the final port notification to NPAC. In order for Verizon to be able to do this in the context of a migration to UNE-L from UNE-P, resale, or Verizon retail, Verizon must submit a trigger order to NPAC and the UNE-L provider (i.e., the new local service provider) must create the initial port notification with NPAC. Further, the dates on the trigger order and on the initial port notification must be changed when notice of the new due date is given on DD- 6. Finally, Verizon will send NPAC the final port notification. In the case of a UNE-L to UNE-L migration, the trigger order would have to be created by the old local service provider, who would also have to change the date on the order on DD-6 and send the final port notification after the cutover is completed. Because the old local service provider may not have an incentive to cooperate with the Batch Hot Cut process, Verizon anticipates difficulties in applying the process to UNE-L to UNE-L migrations, including the potential for end-user out of service conditions. Accordingly, Verizon is proposing to exclude such migrations from the Batch process.



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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-151** Please state how long it takes for Verizon to migrate (1) a CLEC UNE-P customer to Verizon retail and (2) a CLEC UNE-L customer to Verizon retail.

**REPLY:** The same interval applies to a UNE-P to retail migration as applies to a retail to UNE-P migration. The interval for a UNE-L to retail migration through a reverse hot cut is the same as the interval for a retail to UNE-L hot cut migration. The interval for a UNE-L to retail migration that is accomplished by provisioning a new line is the same as the interval for provisioning a new line for a CLEC.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-154** After a CLEC submits an order to convert a current UNE-P (or "UNE-P like") customer to a UNE-L arrangement under the proposed batch hot cut process and before the hot cut occurs, will Verizon Retail have the ability to submit and complete a win-back order? If yes, does Verizon intend to subject such a customer to win-back activities during that period?

**REPLY:** No. The pending order on the customer's line will cause the Service Order to drop out. This is the same process for any CLEC that tried to acquire the customer during this timeframe.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-155** In Exhibit II-A to its Initial Panel Testimony, Verizon provides a Hot Cut Schematic for basic voice service. Can Verizon provide an additional schematic that would show the before and after condition of a hot cut on a shared loop service? If this can be accomplished please provide the additional schematic.

**REPLY:** Please see Exhibit ATT VZ 3-155, attached. Also, see Verizon MA's response to AT&T 3-157.

VZ # 300

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-156** Separately state, with respect to each of the three hot cut processes (basic, large job, and batch), answers to the following questions:

- (a) Is there an LSR that will support a hot cut when the existing service is Line Sharing?
- (b) Is there an LSR that will support a hot cut when the existing service is Line Splitting?
- (c) Please provide a web reference to the LSR that supports a hot cut when the existing service is Line Sharing.
- (d) Please provide a web reference to the LSR that supports a hot cut when the existing service is Line Splitting.

**REPLY:**

- (a) No
- (b) No
- (c) See response to part (a)
- (d) See response to part (b)

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-157**

Verizon, in describing The Basic Hot Cut Process, which is a building block for the “Batch” Hot Cut Process, refers to Exhibit II-C. On Exhibit II-C and on Exhibit II-E used to describe the Proposed Batch Hot Cut Process, under a heading “End user wants move,” there is a block that details CLEC interaction with the end user and reference to CSI to determine features and other information to facilitate negotiation with the end user.

- (a) If upon reviewing CSI and discussion with the end user a CLEC learns that the existing Verizon customer has Line Sharing or Line Splitting, and wants voice service from a facilities based voice provider, what “LSR complying with existing Business Rules,” should the CLEC utilize to effect this transaction with Verizon?
- (b) Will such a transaction be applicable to the Batch Hot Cut Process?

**REPLY:**

- (a) Initially, we note that a Verizon retail voice customer would not have his or her DSL service provided through “Line Splitting.” Also, we assume that the “facilities based voice provider,” as used in this information request, refers to a switch-based provider utilizing Verizon-provided UNE-L, rather than a carrier utilizing its own switching and loop facilities. With those clarifications, Verizon states that such a migration is currently handled through the following process: (1) the data service would have to be disconnected; (2) a standard hot cut LSR would be

submitted for the line; (3) after the hot cut, the facilities based voice provider would be free to install data service on the line. Verizon is currently investigating the feasibility of an alternative migration method for such lines that would not involve disconnecting the data service in situations in which the customer wishes to retain the same data provider and in which the data provider and the new voice provider are willing to enter into a line splitting arrangement.

- (b) The same process will be applicable to the Batch Hot Cut process.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-158** Verizon indicates that the “bulk” process is unnecessary in meeting its obligations should unbundled switching be eliminated as a UNE. Verizon indicates that it offers or will soon offer “a range of effective and efficient options” that will enable Verizon to meet its obligations under FCC Rules. Verizon indicates one of the efficiencies in place to meet its obligations is WPTS. In Exhibits II-C, II-D and II-E describing existing and proposed hot cut processes, Verizon references WPTS as a tool to manage the hot cuts and the tool that manages CLEC to Verizon and Verizon to CLEC communications.

- (a) Are Hot Cuts from Line Sharing to Facilities based Line Splitting supported in WPTS?
- (b) Are Hot Cuts from UNE-P Line Splitting to Facilities based Line Splitting supported in WPTS?
- (c) Please provide references describing WPTS support of hot cuts to facility based Line Splitting.

**REPLY:** (a), (b), (c): See response to ATT 3-157, part (a). If the data service is disconnected as described in that response, then the subsequent voice hot cut can be performed like any other hot cut, including the use of WPTS. Since the “alternative migration method” referred to in that response has not yet been developed, it is not currently “supported in WPTS.”

VZ # 303

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-160** Please confirm that Verizon's proposed batch hot cut process does not involve any pre-wiring and that all dial tone checks are performed on the day of the cut.

**REPLY:** Correct. See also, Verizon MA's response to ATT 3-144.



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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-162** Does the WFA-DI system keep track of, and/or permit aggregation of, travel time by employee? Does the employee record "travel time" as an identifiable category?

**REPLY:** Yes, travel time is recorded by each employee for start and end locations. The TRVL Work Code in WFADI is used when an associate travels from one location to another to perform work.

VZ # 307

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-163** Does the WFA-DI system keep track of, and/or permit aggregation of, travel time by employee type? If so what categories of employees (i.e., functional groups) report time for travel to WFA-DI (please provide a complete list of all functional groups who may have reported travel time to the WFA-DI system).

**REPLY:** Verizon MA does not understand the terms “employee type” and “functional group” as used in this information request. However, WFA-DI keeps track of travel time for all central office technicians who are required to travel between central offices. It does not cover other employee groups and the WFA-DI time records are not broken down by any subcategory of employees within the general central office technician category.

VZ # 308

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Kevin Vaninwegan  
**Title:** Manager

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-164** Please indicate whether any travel time contained in the WFA-DI systems is separately identified by the nature of the work for which the travel is undertaken. Please indicate how travel time for maintenance and other non-UNE service order work tasks would be accounted for or excluded from your calculations.

**REPLY:** The TRVL Work Code will have basic remarks in the report field with additional information, for example, Gas, Pick up/Drop off vehicle, Rover, etc. However, the remarks are not added on a systematic or regular enough basis to permit a detailed and complete breakdown of the data by type of work. Work code TRVL includes all travel time from point A to point B for travel between locations in the technician's tour. It is not specific to each job function performed at the location. It would be inappropriate to exclude travel time for maintenance and other non-UNE service order work tasks in the calculations since the travel time percentage is based on total travel as a percentage of total central office work. To exclude certain instances of travel time from the calculation (e.g., travel incurred to perform retail work) would require a similar exclusion of such instances of the underlying central office work (e.g., all of the central office wiring or other work associated with retail) from the total central office work. Such an exclusion to the calculations is not possible, nor would it likely lead to any significant difference in the result.

VZ # 309

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Jim McLaughlin  
**Title:**

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-166** Please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment, i.e., working or spare) which are located in remote, non-staffed central offices. Please indicate the date as to which this data is relevant.

**REPLY:** See Exhibit AT&T 3-166. The information provided on the Exhibit is proprietary, confidential and competitively sensitive and will be provided pursuant to the terms of the Department's Protective Order.

VZ # 311

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Jim McLaughlin  
**Title:**

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-167** For the same date as above, please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment, i.e., working or spare) which are located in remote central offices where CLECs currently have collocation.

**REPLY:** Please see Verizon MA's response to AT&T 3-166.

VZ # 312

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Jim McLaughlin  
**Title:**

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-168** For the same date as above, please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment, i.e., working or spare) which are located in manned central offices (i.e., normally staffed).

**REPLY:** Please see Verizon MA's response to AT&T 3-166.

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

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Jim McLaughlin  
**Title:**

**REQUEST:** AT&T Communications of New England, Inc., Set #3

**DATED:** January 6, 2004

**ITEM: AT&T 3-169** For the same date as above, please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment) which are located in manned central offices (i.e., normally staffed, i.e., working or spare) where CLEC's currently have collocation.

**REPLY:** Please see Verizon MA's response to AT&T 3-166.