

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Complaint of Covad Communications and)	
AT&T Communications of New England, Inc.)	
Regarding Collocations Power Charges Assessed)	Docket No. 01-39
By Verizon New England, Inc.)	
)	

VERIZON MASSACHUSETTS'
FIRST SET OF INFORMATION REQUESTS TO
COVAD COMMUNICATIONS COMPANY

Verizon Massachusetts ("Verizon MA") requests that Covad Communications Company ("Covad") respond to the following information requests addressed to it or its witness in the above proceeding. In the event that responses to all or part of these requests will not be forthcoming in the time period established by the Massachusetts Department of Telecommunications and Energy please notify Verizon MA as soon as possible. Pursuant to the Hearing Officer Memorandum Re: Procedural Schedule; Service List; and Ground Rules issued by the Hearing Officer on May 10, 2001, responses are due within ten (10) calendar days of receipt.

These requests shall be deemed continuing so as to require further and supplemental responses if Covad or its representative (witness) receives or generates 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 documents, claims or privileges, etc.

If Covad feels that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

DEFINITIONS AND INSTRUCTIONS

A. 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.

B. The words "document" and "documentation" are used in their broadest sense and include, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten

notes, workpapers, records or reports, bills, checks, articles from journals, or other sources, contracts, agreements, pamphlets, plans, specifications, summaries, studies, and any other data compilations or written matter of any kind from which information can be obtained, and all copies of such documents which bear notations, marginal comments or other markings that differentiate such copies from the original.

C. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of “documents” which are to be identified shall include the documents that do exist.

D. If the responding party objects to any request by reason of a claim of privilege, state the privilege claimed and the facts relied on to support that claim of privilege.

E. These requests shall be deemed continuing so as to require further and supplemental responses if the responding party or its witness receives or generates additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

F. Please serve a copy of the responses to these requests on the Company’s attorney, Keefe B. Clemons, Regulatory Counsel, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1. Identify the specific pieces of equipment that Covad has installed in Verizon MA’s central offices that use DC power (by manufacturer and model number).
2. Referring to page 5, paragraph 24 of Covad’s Direct Testimony, please provide all technical documentation, including but not limited to the manufacturer’s equipment specifications, technical drawings, and Covad engineering specifications supporting Covad’s assertion that its DSLAM equipment that is collocated in Verizon’s central offices is “designed to use or... ‘drain’ no more than 40 amps of power at any one point in time.”
3. Referring to page 5, paragraph 24 of Covad’s Direct Testimony, please describe if the “two sub-feeds for each DSLAM” provided by Verizon are connected directly to Covad’s DSLAM. If they are not directly connected to the Covad DSLAM, identify how power is delivered to the Covad DSLAM.
4. Referring to page 6, paragraph 24 of Covad’s Direct Testimony, please provide all technical documentation, including but not limited to manufacturer’s

specifications and detailed engineering drawings that use the term “or-gated power.”

5. Referring to page 6, paragraph 25 of Covad’s Direct Testimony, please provide a detailed list of all equipment deployed by Covad in Verizon MA’s central offices where Covad orders 40 amps of power to serve a single piece of collocated equipment.
6. Referring to page 6, paragraph 25 of Covad’s Direct Testimony, does Covad deploy any equipment that uses only one “sub-feed” to power the Covad equipment?
 - a. If the answer is yes, provide a detailed list of all equipment that is fed by a single power feed.
 - b. Identify if the power to this equipment is fed directly from a Verizon power feed or if there are additional Covad distribution points for power.
 - c. Provide detailed specifications of how power is delivered to each piece of equipment.
7. Referring to page 8 of the “Diagram of Typical Covad Power Configuration”:
 - a. Does Covad deploy a secondary power distribution point at the “CLEC Collocation” (e.g., fuse panel or Battery Distribution Bay)?
8. Referring to page 4, paragraph 16 and page 9, paragraph 39 of Covad’s Direct Testimony, provide all documentation, including any correspondence to Verizon, indicating that Covad “was ordering a single 40 amp drained feed.” Provide all documentation where Covad explicitly detailed that the power drain on either feed would be using “or-gated power,” the total load on either feed would not be equal to the load specified on the application, and that 100% of all equipment deployed by Covad would be engineered for redundant power.
9. Referring to page 10, paragraph 49 of Covad’s Direct Testimony, provide all documentation supporting Covad’s understanding that the NY commission informally told Verizon “to fix the problem via a tariff filing.” Please provide the names of any persons communicating this understanding to Covad.
10. Referring to page 11, paragraph 50 of Covad’s Direct Testimony, provide all documentation supporting Covad’s understanding that “the FCC informally told Verizon that its collocation power charging practices were illegal.” Please provide the names of any persons communicating this understanding to Covad.
11. Referring to page 12, paragraph 60 of Covad’s Direct Testimony:
 - a. Provide the terms and conditions of DTE 15 that would permit Covad to specify a fused capacity of 250% of the drain.

- b. Provide all industry standard engineering practices that Covad has in its possession detailing a fusing capacity of 250% of the load.
 - c. Provide documentation where any other ILEC permits the collocater to specify the fuse size on an ILEC provided power feed.
 - d. Is Covad aware of any other ILEC that charges for any or all portion of power based on fused capacity? If so, identify those ILECs that bill any portion of power at a fused capacity.
- 12. Referring to page 15, footnote 16 of Covad's Direct Testimony, explain why the 11 collocation arrangements "merely sat dormant for more than almost two years" and identify any conduct by Verizon that Covad contends caused these collocation arrangements to remain dormant for "more than almost two years."
- 13. Referring to page 22, paragraph 22 of Covad's Direct Testimony where Covad offers its assurance "that Verizon does not use non-redundant power feeds for its own retail services," please describe the basis for Covad's "assurance" with respect to this issue and provide any documentation supporting this assurance.
- 14. Please provide all documentation from September 1999, in which Covad notified Verizon that it believed that the Verizon MA was triple charging Covad for DC power.
- 15. While employed with Verizon, did Mr. Fogarty engineer or design "load sharing" equipment?
 - a. If yes, please provide all such central offices where the equipment he designed was placed.
 - b. If the answer is no, please provide all records of Mr. Fogarty's knowledge, at the time of Verizon employment, of how load sharing works.
- 16. Please provide documentation and all correspondence during the December 1999 and the Fall of 2000 where Covad discussed with Verizon "load sharing," sub-feeds, or "or-gated" equipment and how such equipment uses power.
- 17. Is it Mr. Fogarty's claim that fusing power at 125% and 150% was not an industry standard during the time of his employee at Verizon?
 - a. If the answer is no, it was not an industry standard, please provide documentation of other such industry standards during that time period.
- 18. Is it Covad's contention that their equipment never used the "B" sub-feed to power its equipment?
- 19. Referring to page 8, paragraph 37 of Covad's Rebuttal Testimony filed January 4, 2002, where in the Verizon Collocation Application or tariffs are power feeds referred to as "sub-feeds."

20. Referring to page 10, paragraph 46 of Covad's Rebuttal Testimony, Covad discovered it was "inadvertently overdrawing power at a few central offices."
- a. Identify each central office in Verizon where Covad was inadvertently overdrawing power including central office name, state, and Common Language Code.
 - b. Provide copies of the applications where Covad requested power augments at each of the locations identified in (a) above.
 - c. Identify all additional equipment Covad was planning to install with the augment applications identified in (a) above.
 - d. Identify each piece of equipment Covad has installed in each of the arrangements identified in (a) above after the request for power was submitted to Verizon, and the date it was installed. Provide copies of MOPS and work orders for each job.
 - e. Identify each date any additional equipment was added to the original collocation arrangement prior to requesting additional power. Include copies of all MOPs and work orders for the equipment installations that led to using more than a total of 40 amps of power.
 - f. Identify the amount of time that Covad was drawing the full drained amount of power specified on the application on each power feed prior to requesting additional power from Verizon.
 - g. Identify each piece of equipment connected to the original A and B feeds that resulted in a total load of more than 40 amps on the A&B feeds.
 - h. Provide documentation to support Covad's assertion that the augment to add power was a result of Covad knowing that it was using more than 40 amps of power on the A&B feeds prior to Verizon performing the audits.
 - i. Explain in detail how connecting additional equipment to the original power feeds of the collocation arrangement was accidental.
21. Referring to page 11, paragraph 49 of Covad's Rebuttal Testimony, was it John Fogarty or Valerie Evans that advised Covad counsel that "one of the feeds served only as a backup feed"? If the answer is no, identify the person or persons that advised counsel, their employer and job responsibility, and when they modified their understanding of how Covad's equipment allegedly draws power.

Dated: January 17, 2002