COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers	D.T.E. 03-60

AT&T's SECOND SET OF INFORMATION REQUESTS TO VERIZON-MASSACHUSETTS

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-Massachusetts ("Verizon") the following information requests. AT&T requests responses in accordance with the Procedural Order Memorandum and Ground Rules issued by the Department in this docket on October 17, 2003 and November 24, 2003.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

2. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

3. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

4. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

5. If Verizon refuses 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.

DEFINITIONS

1. "Hot cut" means the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

2. "Bulk Hot Cut" means any hot cut(s) performed by Verizon pursuant to its bulk or project hot cut process.

3. "Individual Hot Cut" means all hot cuts that are not bulk or project hot cuts.

4. "Access Line" means a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Integrated Digital Loop Carrier Systems ("IDLC") that is used for serving residential and small business customers. "Access Line" does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

5. Unless otherwise stated, information requests refer to the state of Massachusetts.

INFORMATION REQUESTS

ATT-VZ-47 For each day between January 1, 2001 and the latest month for which this information is available, please provide for each Verizon central office ("CO") identified in response to ATT-VZ-1 the number of access lines transferred by Verizon via:

(a) any hot cut method;

(b) an individual hot cut method. For transfers made via this method please provide:

(i) the total number of access lines transferred;
(ii) the total number of Verizon retail access lines transferred to UNE-L;
(iii) the total number of UNE-P access lines transferred to UNE-L; and
(iv) the total number of service resale access lines transferred to UNE-L.

(c) a bulk hot cut method. For transfers made via this method please provide:

(i) the total number of access lines transferred;
(ii) the total number of Verizon retail access lines transferred to UNE-L;
(iii) the total number of UNE-P access lines transferred to UNE-L; and
(iv) the total number of service resale access lines transferred to UNE-L.

To the extent that Verizon is unable to provide this information for all CO's, please provide it for the ten Verizon CO's that had the highest total number of hot cuts for the period between January 1, 2001 and the latest month for which this information is available. Furthermore, if Verizon cannot provide the requested information on a daily basis, but can provide it organized by some other time increment (e.g. week, month, or quarter), please provide in that format.

ATT-VZ-48 For each day between January 1, 2001 and the latest month for which this information is available, please provide the total number of access lines in Massachusetts transferred by Verizon via:

(a) any hot cut method;

(b) an individual hot cut method. For transfers made via this method please provide:

(i) the total number of access lines transferred;

(ii) the total number of Verizon retail access lines transferred to UNE-L;
(iii) the total number of UNE-P access lines transferred to UNE-L; and
(iv) the total number of service resale access lines transferred to UNE-L.

(c) a bulk hot cut method. For transfers made via this method please provide:

(i) the total number of access lines transferred;
(ii) the total number of Verizon retail access lines transferred to UNE-L;
(iii) the total number of UNE-P access lines transferred to UNE-L; and
(iv) the total number of service resale access lines transferred to UNE-L.

To the extent that Verizon is unable to provide this information for all CO's, please provide it for the ten Verizon CO's that had the highest total number of hot cuts for the period between January 1, 2001 and the latest month for which this information is available. Furthermore, if Verizon cannot provide the requested information on a daily basis, but can provide it organized by some other time increment (e.g. week, month, or quarter), please provide in that format.

ATT-VZ-49 Please provide an electronic version of Verizon's non-recurring cost model and all supporting documentation for it.

ATT-VZ-50 What plans, if any, does Verizon have for augmenting its tandem network to accommodate the shift in traffic loads from Verizon switches to CLEC switches to insure that there is no impact on customer service based on the migration of service off of the Verizon network and onto the CLEC network? Please include details regarding tandem switch augments, new tandem switches that will be deployed and the additional tandem-to-end-office transport facilities that will be required.

ATT-VZ-51 On pp. 71-72 of Verizon's Initial Panel Testimony, Verizon states that "the elimination of UNE-P … would free up a large number of workers handling UNE-P related tasks in central offices and at work centers; this could account for some of the new work force needed. We would, however, expect to rely in part on new hires." With respect to this statement please explain the following:

(a) What are the "UNE-P related tasks" to which Verizon refers in this portion of the testimony?

(b) How many central office personnel will be freed up as a result of the elimination of UNE-P? Please provide all studies, documents, information, work papers, etc. used in determining this conclusion.

(c) What percentage, if any, of the central office personnel freed up will be qualified to perform hot cuts?

(d) How many work center personnel will be freed up as a result of the elimination of UNE-P? Please provide all studies, documents, information, work papers, etc. used in determining this conclusion.

(e) What percentage, if any, of the work center personnel freed up will be qualified to perform hot cuts?.Please describe how many "new hires" Verizon will rely upon during the following periods:

(i) During the period when the conversion of the embedded base of UNE-P customers occurs; and

(ii) During the "post-conversion 'steady state' period" mentioned on p. 70 of Verizon's Initial Panel Testimony.

ATT-VZ-52 For Verizon access lines that are currently provisioned on IDLC technology, please state the percentage of such access lines for which Verizon has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.

ATT-VZ-53 With regard to the procedures described on pp. 11-12 of Verizon's Initial Panel Testimony (November 14, 2003) for hot cuts of IDLC-equipped loops, has Verizon conducted any inventories at a Serving Area Interface ("SAI") level to determine its capacity of non-IDLC facilities that are available either as spare facilities or for "line swaps" in hot cuts involving IDLC loops? If so, please provide the following information:

(a) The total number of Verizon SAIs in Massachusetts,

(b) The total number of SAIs where IDLC-equipped loops are in use, and

(c) Of the SAIs where IDLC-equipped loops are in use:

(i) A table listing (1) all such SAIs, if any, for which no non-IDLC facilities are available and (2) the CO that each of these SAIs serves, and

(ii) Excluding all SAIs identified just above, the average number of IDLC-equipped loops per SAI, and the average number of non-IDLC facilities per SAI that are available for use in hot cuts.

ATT-VZ-54 P. 12 of Verizon's Initial Panel Testimony state that "in some cases, even more complex rearrangements of the outside plant will be required in order to free up copper or UDLC facilities." Please explain in detail what Verizon means by "more complex rearrangements"; how often these rearrangements will be required; how long they will take to be completed; and any effect that these "more complex rearrangements" will have on Verizon costs and the rates charged to CLECs.

ATT-VZ-55 On p. 12 of Verizon's Initial Panel Testimony, Verizon states that "[g]enerally, two outside dispatches will be required for a hot cut on an IDLC-equipped loop[.]" Please confirm that Verizon's new "IDLC surcharge" includes a cost for both of these dispatches and identify where in Verizon's cost study such costs appear.

ATT-VZ-56 When Verizon provisions an unbundled loop on a UNE-P basis to a CLEC, does Verizon know and record any circuit identification number for such loop, such as the TXNU number, or other information? If yes, please explain how and where Verizon stores such information. If no, please explain how Verizon maintains information regarding which CLEC has leased which loop.

ATT-VZ-57 With regard to the analysis of "incremental" hot cut demand resulting from customer-initiated changes in service providers presented on pp. 10-25 of William E. Taylor's November 14, 2003 testimony, please provide the following information.

(a) Please specify precisely what "their own facilities" means on p. 18, line 15.

(b) Please specify precisely what "the FCC data for Massachusetts" means on p. 19, lines 3-4, including the date of such data.

(c) Of the 1,000 customer lines that change suppliers in the example Mr. Taylor provides beginning on p. 19, please specify how many lines serve customers in the following categories (if the numbers provided do not sum to 1,000, please explain why):

(i) Customers being served by DS1 loops,
(ii) Business customers being served by DSO loops,
(iii) Residential customers.

ATT-VZ-58 Please describe what plans Verizon has, in areas where UNE-P is eliminated, for the treatment of UNE-P customers under the following circumstances:

(a) In COs where the customers' CLEC service providers currently have no collocation equipment. Please include in your description whether Verizon's plans include the method and means by which all necessary collocation facilities can be constructed within the 27-month period within which Verizon contends it can cut over the embedded base of UNE-P customers.

(b) For UNE-P customers of CLECs who have no collocations or network facilities anywhere. Please include in your description whether Verizon's plans include the method and means by which all necessary collocation facilities can be constructed within the 27-month period within which Verizon contends it can cut over the embedded base of UNE-P customers.

ATT-VZ-59 Has Verizon conducted any analyses to determine whether the increase in hot cut volumes that it has estimated will occur as a result of the elimination of UNE-P, and the additional personnel required to meet these volumes, will affect service quality associated with hot cuts? If yes, please provide all studies, work papers and documents created in connection with such analyses.

ATT-VZ-60 For the latest six months for which such information is available, please indicate the average number of lines per LSR included in hot cut requests to Verizon, and break out this number by Basic Hot Cuts and Large Job Hot Cuts.

ATT-VZ-61 On p. 16 of Verizon's Initial Panel Testimony, Verizon states that in certain COs, it utilizes devices that "automatically make copper-to-copper physical connections between any of a set of input positions and any of a set of output positions" on a distribution frame. With regard to this statement, please provide the following information:

(a) All factors that Verizon considers in deciding where to deploy and not to deploy such devices,

(b) The location and CLLI code of each CO where Verizon uses such devices,

(c) The number of lines in service at each CO,

(d) Whether the CO is manned or unmanned,

(e) A description of the device or devices in use in each CO, including the manufacturer's name, and the device's make and model number,

(f) The contracts or purchase orders through which each device was purchased, and

(g) The average length of time it takes for the devices to perform a single hot cut connection and associated disconnect.

ATT-VZ-62 On p. 18 of Verizon's Initial Panel Testimony, with respect to automated cross connections, Verizon states that it "closely monitors new product offerings from its vendors, and when any promising new device appears, evaluates it for its ability to reduce cost and improve performance." Please provide AT&T with a list of the vendors that Verizon has worked with and the vendor products that Verizon has evaluated.

ATT-VZ-63 On p. 22 of Verizon's Initial Panel Testimony, Verizon states that it is "using handheld devices on a trial basis" for communications between the Verizon organizations involved in a hot cut. Please describe:

(a) these handheld devices;

(b) the technology they use (e.g., wireless, infrared, plug-in);

(c) the number of central offices in which the trial is being conducted;

(d) the results of the trial to date;

(e) Verizon's plans for future use of the devices.

ATT-VZ-64 P. 29 of Verizon's Initial Panel Testimony states that Verizon's limitations on Large Job hot cuts "allow Verizon's managers to balance their force with minimal need for additional overtime." Please clarify if by "additional" overtime Verizon meant that these jobs are currently being performed on an overtime basis and not during the regular work tour of the Verizon personnel involved.

ATT-VZ-65 P. 29 of Verizon's Initial Panel Testimony states that it has performed Large Job projects that went beyond the 150 line/central office, 300 line/geographic area limits described in the testimony. Please identify each time when Verizon has done so by identifying the date, number of lines by CO and geographic area, and the CLEC(s) for whom such jobs were done.

ATT-VZ-66 P. 30 of Verizon's Initial Panel Testimony states that "the Manager's Area policy itself will obviously be reviewed and modified as appropriate in the context of the larger hot cut volumes that might result from a non-impairment finding by the Commission and the resulting elimination of UNE-P."

(a) Please confirm that there is nothing in Verizon's testimony that indicates what this revised policy would entail and what Verizon's large job capabilities will be in this environment.

(b) Please provide details of what Verizon's maximum throughput will be in such an environment.

(c) Please provide all limitations on redeploying craft labor from central office to central office across the state as volumes surge or contract in a particular area. For example, what are the constraints on redeploying craft from one managers area to another or from one geographic area to another, such as minimum advanced notice, minimum deployment tours, premium compensation required.

ATT-VZ-67 With regard to the "critical mass" of hot cut orders that must be reached under Verizon's new batch hot cut process (see pp. 31-32 of Verizon's Initial Panel Testimony), please provide the following information:

(a) What Verizon anticipates the "critical mass" will be by CO type according to the following categories

(i) Unstaffed COs with 5,000 or fewer lines,
(ii) Unstaffed COs with more than 5,000 lines,
(iii) Staffed COs with 10,000 or fewer lines,
(iv) Staffed COs with 10,000 to 40,000 lines,
(v) Staffed COs with 40,000 to 80,000 lines, and
(vi) Staffed COs with more than 80,000 lines;

(b) What happens if the critical mass is not met by the maximum 35-business-day holding period (if orders on hold will be processed by an alternative hot cut procedure, please specify the rates that will apply); and

(c) What happens after day 35 if a hot cut is not completed.

ATT-VZ-68 With respect to number porting and Verizon's responsibility to notify NPAC under Verizon's new batch hot cut process, please provide the following information:

(a) How and when Verizon will notify the CLEC that each cut was completed and that the customer's number has been ported;

(b) The procedures that Verizon proposes for reconciling any misunderstandings or disagreements between the CLEC, Verizon and NPAC should they arise with respect to any particular ported number (please specify the individuals or organizations within each entity that will become involved in such situations); and

(c) Any recourse or remedy that CLECs might have in the event that Verizon fails to notify NPAC

ATT-VZ-69 Under its new batch hot cut process, how will Verizon treat an order to change an existing customer's UNE-P service when there is a pending batch hot cut order? In your response, please address at least these two situations:

(a) A newly acquired customer of CLEC A seeks to change one or more features on his/her service during the holding period; and

(b) A newly acquired customer of CLEC A seeks to change his/her service during the holding period to CLEC B.

(c) A newly acquired customer of a CLEC seeks to change his/her service during the holding period to Verizon.

ATT-VZ-70 With regard to the new batch hot cut process, please explain the following.

(a) What are the hours of availability for the batch hot cut process (e.g., available on a 24/7 basis)?

(b) If the batch hot cut process is available outside of regular business hours, will the batch hot cuts be charged at normal costs or will an expedited fee be applied?

(c) Will there be a limitation on the volumes of out-of-hours batch hot cuts?

(d) Will all central offices be available for batch hot cuts outside of regular business hours?

(e) What will be the process for populating the E911 database after a batch hot cut?

(f) What metrics does Verizon propose for measuring the performance of batch hot cuts?

(g) Does Verizon's proposed batch hot cut rate include the costs from NPAC for number porting? If not, how does Verizon believe that that these costs should be handled?

(h) If Verizon assumes a CLEC's responsibility to notify NPAC for number porting after a batch hot cut, how and when would notification of NPAC occur? Will the frame technician (or some other Verizon work group) activate the number port immediately after each line is cut over, or will there be a waiting period?

(i) Do the manager and geographic area restrictions that exist for the current large job hot cut process apply to Verizon's proposed batch hot cut process? Additionally, if there are any geographic restrictions on the number of simultaneous batch hot cut jobs that can occur on a given day please explain these restrictions.

(j) Where is Verizon conducting its trial of this process? (see p. 36 of Verizon's Initial Panel Testimony).

(k) What CLEC(s) is participating in this trial?

(l) Please provide specifics on how Verizon is conducting this trial.

ATT-VZ-71 On p. 35 of Verizon's Initial Panel Testimony, Verizon says, with regard to an interim "UNE-P-like service" that it proposes as a transitional measure under the batch hot cut process, that "[i]nitially, and subject to subsequent review by the Company" it will "price the interim UNE-P-like service at the rates currently applicable to UNE-P" Please provide the following information about this proposal.

(a) In what way is this "UNE-P like service" the same as, and in what way is it different from, UNE-P service as currently provided by Verizon?

(b) When does Verizon plan to conduct this "subsequent review"?

(c) Does Verizon claim unilateral discretion to implement rate changes for this service, or will it be necessary to file for approval of such rate changes by the Commission?

(d) Will rate changes, if any, to this service be based on total element long run incremental cost ("TELRIC") principles? If not, please explain in detail on what basis Verizon will set such rates..

ATT-VZ-72 With regard to all surveys Verizon conducted in order to calculate hot costs as described in Section III of its Initial Panel Testimony, please provide copies of all original documents used to construct and administer the surveys. This request specifically refers to and includes

(a) Any and all workpapers and drafts produced by Verizon and any of its consultants during the process of creating the survey itself,

(b) Actual survey instruments and any letters, directions and/or instructions that were provided to respondents in connection with the survey instruments, and

(c) Survey responses.

ATT-VZ-73 For each survey document produced in response to ATT-VZ-72 that contains a response that was not used to calculate statistical results, please identify the particular response and explain why it was not used.

ATT-VZ-74 Please fully explain all charges that would apply to the following sorts of hot cuts under Verizon's proposed batch hot cut process:

(a) A hot cut project that includes 50 LSRs, 25 of which have been issued by CLEC A, and 25 of which have been issued by CLEC B. Each LSR has one line. Of the 50 LSRs, one line included in one of CLEC A's LSRs is on an IDLC facility and the other 49 lines are not on an IDLC facility.

(b) A single batch hot cut project that includes 50 LSRs, 25 of which have been issued by CLEC C, and 25 of which have been issued by CLEC D. The 25 LSRs issued by CLEC C each have one line and the 25 LSRs issued by CLEC D each have two lines. None of the lines are on IDLC facilities..

ATT-VZ-75 Please fully explain all charges that would apply to the following sorts of hot cuts under Verizon's Large Job hot cut process:

(a) A single hot cut project that includes 50 LSRs. The 50 LSRs are comprised as follow: each LSR has one line; and one line is on an IDLC facility and the other 49 lines are not on an IDLC facility.

(b) A single hot cut project that includes 50 LSRs. The 50 LSRs are comprised as follows: 25 of the LSRs have one line and 25 LSRs have two lines- none of the lines are on IDLC facilities.

ATT-VZ-76 Please provide all collected and uncollected revenues in accounts receivable for FY 2001, FY 2002, and YTD 2003 (i.e. those charges billed to CLECs) from CLECs arising from the performance of hot cuts. Separately list and identify for each such year, total revenues collected and uncollected.

ATT-VZ-77 Please refer to Exhibit II-D to Verizon's Initial Panel Testimony. For purposes of this question, an LSR does not "flow through" if it does not flow through *and* it requires manual intervention. Please provide, on a monthly and annual basis, for the most recent 12 months for which data are available:

(a) The total number of hot cut LSRs that did not flow through Verizon's OSSs at the stage represented by the first box below the heading "Application Date", and the percentage that this number represents of total hot cut LSRs;

(b) The number of hot cut LSRs that did not flow through Verizon's OSSs at the stage represented by the first box below the heading "Application Date", and that were manually returned to the CLEC for correction and/or resolution, and the percentage that such number constitutes of total hot cut LSRs;

(c) The number of hot cut LSRs that did not flow through Verizon's OSSs at the stage of the first box below "Application Date" and that were created manually by Verizon, and the percentage that such number constitutes of total hot cut LSRs.

Please identify the 12 month period used and provide copies of all studies, workpapers, data, or documents used to answer this request.

ATT-VZ-78 Please provide all of the source data used to construct Exhibits III-B and III-C to Verizon's Initial Panel Testimony in an electronic form in which the results can be replicated. Regarding Exhibit III-B, please identify each of the responses so they can be cross-referenced to survey response documents and please identify the person or persons responsible for the statistical analysis.

ATT-VZ-79 Regarding the linear regression analysis described on p. 55 of Verizon's Intial Panel Testimony, please provide:

(a) all documentation and work papers related to the linear regression analysis;

(b) any and all regression or other statistical analyses conducted in Verizon's effort to determine whether initial lines cost more than subsequent lines, including any model or regression specifications that may have been tested but later rejected;

(c) the identification of each person who contributed to the regression analysis and explain the role played by each.

ATT-VZ-80 Refer to Initial Panel Testimony, p. 26, wherein Verizon states that "[s]uch reports can now be downloaded electronically by the CLEC."

(a) Provide documentation of the availability of this functionality to CLECs.

(b) Will such reports available as part of the newly proposed Batch hot cut process?

(c) Are such reports available as part of the current bulk or project hot cut process?

(d) What is the interval between the submission of the LSRs and the availability of the spreadsheet?

(e) What is the version control protocol on the Spreadsheet? For example, if 50 LSRs are submitted, and subsequently the spreadsheet is generated, what is the process to modify or remake the spreadsheet if, for example, one of the 30 LSRs is cancelled? Please describe how the original spreadsheet will be modified or cancelled and replaced with a new spreadsheet. Please describe how the version control of these spreadsheets will work to insure that Verizon's personnel is always working from the most current spreadsheet.

ATT-VZ-81 In its Initial Panel Testimony, page 18, Verizon states: "For these reasons, automated cross-connect devices are neither feasible nor cost-effective for use in the larger central offices that support virtually all of the collocation and hot cut activity in Verizon MA's network."

(a) Provide the basis for the conclusion that automated cross-connects are not "cost-effective" for use in larger central offices, including the assumptions on cross connections between partitioned zones, and calculations of all costs and benefits used to reach this conclusion.

(b) When did Verizon conduct its analysis supporting it judgment that such automated cross connect systems were not cost effective?

ATT-VZ-82 In its Initial Panel Testimony, pp. 16-17, Verizon states: "In Verizon's judgment, this need for partitioning, and for cross connections between the partitioned zones, would render such devices unusable for large-scale central offices."

(a) Define "large-scale" central office as used in this statement. How many access lines would a CO need to house to constitute a "large scale" central office?

(b) Provide the complete basis for Verizon's assertion, including but not limited to all analyses, numerical modeling, engineering assessments, demonstrations, or trials related.

ATT-VZ-83 In its December 17, 2003 Supplemental Initial Panel Testimony, Verizon states that a LSR with either flow electronically through "Verizon's ordering systems" or be "routed to the NMC for manual processing (assuming that there are issues that can be addressed by the NMC representative), or is returned back to the CLEC for additional work.."

(a) Does "Verizon's ordering systems" refer to anything other than its WPTS system? If so, please specify what ordering systems other than WPTS this portion of the testimony refers to.

(b) What order problems will require routing to the NMC for manual processing? What percentage of LSRs contain each of these problems? Please provide any studies Verizon has conducted to determine what percentage of LSRs will require manual processing.

(c) What problems will require LSRs to be returned back to the CLEC for additional work? What percentage of LSRs will contain each of these problems? Please provide any studies Verizon has conducted to to determine what percentage of LSRs will require being returned to CLECs for additional work.

ATT-VZ-84 At what points does the WPTS system automatically forward work for review and verification to a CLEC? At what points does the WPTS system automatically forward work for review and verification to the Regional CLEC Coordination Center?

ATT-VZ-85 How quickly (in minutes) will the WPTS system's status information be updated? If the length of time necessary to update status information differs based upon the task performed, please list each task performed and the corresponding amount of time necessary to update WPTS.

ATT-VZ-86 At p. 6 of Verizon's Supplemental Initial Panel Testimony, Verizon states that "WPTS performs much of the review functions previously handled by a RCCC associate." Please identify each review function that WPTS performs that was previously handled by a RCCC associate. What review functions is an RCCC associate left to perform once WPTS is in place?

ATT-VZ-87 At p. 6 of Verizon's Supplemental Initial Panel Testimony, Verizon states that the "APC handles orders that fall out of the automatic assignment process because of facilities problems." What facilities problems, other than the presence of IDLC technology, would require the involvement of the APC? What percentage of LSRs would contain each of these problems?

ATT-VZ-88 Under Verizon's WPTS proposal, how will a frame technician advise the RCCC and/or CLEC of problems with a loop? Under what circumstances will a frame technician advise the RCCC but not the CLEC?

ATT-VZ-89 How long after a cutover is complete will CLECs be notified of the successful completion via WPTS? How will CLECs acknowledge the hot cut via WPTS?

ATT-VZ-90 Please describe the entirely new study of the NMC, Central Office Frame, and the RCCC described on p. 10 of Verizon's Supplemental Panel Testimony. What process was used to arrive at the task times used to cost the WPTS system? What role did Verizon's SMEs play in this new study?

ATT-VZ-91 If a survey was conducted to arrive at the task times used to cost the WPTS system, please provide copies of all original documents used to construct and administer the surveys. This request specifically refers to and includes

(a) Any and all workpapers and drafts produced by Verizon and any of its consultants during the process of creating the survey itself,

(b) Actual survey instruments and any letters, directions and/or instructions that were provided to respondents in connection with the survey instruments, and

(c) Survey responses.

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