

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce F. Meacham

Title: Group Manager – Service Costs

REQUEST:

AT&T Communications of New England, Inc., Set #4

DATED:

January 14, 2004

ITEM: AT&T 4-173

Please fully explain the bases, and provide support, for the following assumptions in Verizon's Wholesale Non-Recurring Cost Model:

- (a) The assumed percentage of initial hot cut orders whose **due dates are canceled or modified** as reported in NMC Activity # 6, column D in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7
- (b) The assumed percentages of initial hot cut orders for which **assignment problems are referred "to CLEC, APC, NMC"** as reported in NMC Activity # 5, Column D in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7
- (c) The assumed percentages of initial hot cut orders for which **throwbacks are performed** as reported in NMC Activity # 7, Column D in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7

REPLY:

- (a) – (c) Please see Verizon MA's reply to Information Request Conversent 6-23.

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REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: January 14, 2004

ITEM: AT&T 4-174 If not included in your response to ATT-VZ-173, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the assumptions about which information request ATT-VZ-173 inquires, and provide an explanation of how Verizon used such information in order to calculate these percentages. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

REPLY: Please see Verizon MA's reply to Information Request Conversent 6-23. All data and calculations are contained in Exhibit III-A (Non-Recurring Cost Model) that was attached to Verizon MA's Initial Panel Testimony.

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REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: January 14, 2004

ITEM: AT&T 4-175 Please fully explain the bases, and provide support, for the following assumptions in Verizon’s Wholesale Non-Recurring Cost Model:

- (a) The “Connect Time” (in minutes) for **querying CLECs about “non flow through orders”** as listed in NMC activity # 2, Column C in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7.
- (b) The “Disconnect Time” (in minutes) **for querying CLECs about “non flow through orders”** as listed in NMC activity # 2, Column G in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7.
- (c) The “Connect Time” (in minutes) **for creating manual orders, “if necessary,”** as listed in NMC activity # 4, Column C in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7.
- (d) The “Disconnect Time” (in minutes) **for creating manual orders, “if necessary,”** as listed in NMC

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activity # 4, Column G in, respectively:

- (i) Tab 1
- (ii) Tab 3
- (iii) Tab 5
- (iv) Tab 7.

- (e) The “Connect Time” (in minutes) **for canceling or modifying due dates on orders**, as listed in NMC activity # 6, Column C in, respectively:

- (i) Tab 1
- (ii) Tab 3
- (iii) Tab 5
- (iv) Tab 7.

- (f) The “Disconnect Time” (in minutes) **for canceling or modifying due dates on orders**, as listed in NMC activity # 6, Column G in, respectively:

- (i) Tab 1
- (ii) Tab 3
- (iii) Tab 5
- (iv) Tab 7.

- (g) The “Connect Time” (in minutes) **for performing throwbacks**, as listed in NMC activity # 7, Column C in, respectively:

- (i) Tab 1
- (ii) Tab 3
- (iii) Tab 5
- (iv) Tab 7.

REPLY:

(a), (c), (e), (g) Please see Verizon MA’s reply to Information Request Conversent 6-22.

(b), (d), (f) Please see Verizon MA’s reply to Information Request Conversent 6-25.

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REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: January 14, 2004

ITEM: AT&T 4-176

If not included in your response to ATT-VZ-175, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the assumptions about which information request ATT-VZ-175 inquires, and provide an explanation of how Verizon used the information in these reports in order to calculate these percentages. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

REPLY: Please see Verizon MA's replies to Information Requests Conversent 6-22 and 6-25. All data and calculations are contained in Exhibit III-A (Non-Recurring Cost Model) that was attached to Verizon MA's Initial Panel Testimony.

**Verizon New England Inc.
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Docket No. 03-60

Respondent: Bruce F. Meacham
Title: Group Manager – Service Costs

REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: January 14, 2004

ITEM: AT&T 4-177 Please fully explain the bases, and provide support, for the following assumptions in Verizon's Wholesale Non-Recurring Cost Model:

- (a) The "Connect Time" (in minutes) for analyzing throwbacks as listed in RCCC activity # 10, Column C in, respectively:
 - (i) Tab 1
 - (ii) Tab 3
 - (iii) Tab 5
 - (iv) Tab 7
- (b) The "Connect Typical Occurrence" factor for analyzing throwbacks as listed in RCCC activity # 10, Column D in, respectively:
 - (v) Tab 1
 - (vi) Tab 3
 - (vii) Tab 5
 - (viii) Tab 7
- (c) The "Connect Time" (in minutes) for coordinating throwbacks as listed in RCCC activity # 11, Column C in, respectively:
 - (ix) Tab 1
 - (x) Tab 3
 - (xi) Tab 5
 - (xii) Tab 7
- (d) The "Connect Typical Occurrence" factor for coordinating throwbacks as listed in RCCC activity # 11,

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Column D in, respectively:

- (xiii) Tab 1
- (xiv) Tab 3
- (xv) Tab 5
- (xvi) Tab 7

- (e) The “Connect Time” (in minutes) for completing throwbacks as listed in RCCC activity # 12, Column C in, respectively:

- (xvii) Tab 1
- (xviii) Tab 3
- (xix) Tab 5
- (xx) Tab 7

- (f) The “Connect Typical Occurrence” factor for completing throwbacks as listed in RCCC activity # 12, Column D in, respectively:

- (xxi) Tab 1
- (xxii) Tab 3
- (xxiii) Tab 5
- (xxiv) Tab 7

- (g) The “Connect Time” (in minutes) for assigning outside plant and central office facilities for non-flow-through service orders, answering calls for assistance from Field Technicians, and responding to queries from NMC, as listed in APC activity # 1, Column C in, respectively:

- (xxv) Tab 1
- (xxvi) Tab 3
- (xxvii) Tab 5
- (xxviii) Tab 7

- (h) The “Connect Typical Occurrence” factor for assigning outside plant and central office facilities for non-flow-through service orders, answering calls for assistance from Field Technicians, and responding to queries from NMC, as listed in APC activity # 1, Column D in, respectively:

- (xxix) Tab 1
- (xxx) Tab 3
- (xxxi) Tab 5
- (xxxii) Tab 7

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REPLY: (a), (c), (e), (g) Please see Verizon MA's reply to Conversent 6-22.
(b), (d), (f), (h) Please see Verizon MA's reply to Conversent 6-23.

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DATED: January 14, 2004

ITEM: AT&T 4-178

If not included in your response to ATT-VZ-177, above, please provide all data, analyses, workpapers, and/or reports upon which Verizon relied in arriving at the assumptions about which information request ATT-VZ-177 inquires, and provide an explanation of how Verizon used the information in these reports in order to calculate these percentages. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., Excel spreadsheet).

REPLY: Please see Verizon MA's reply to Information Requests Conversent 6-22 and 6-23. All data and calculations are contained in Exhibit III-A-P (Non-Recurring Cost Model) that was attached to Verizon MA's Initial Panel Testimony.

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REQUEST: AT&T Communications of New England, Inc., Set #4

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ITEM: AT&T 4-179

Regarding each of the forward-looking adjustment factors listed in Tabs 1, 3, 5 and 7, respectively, of Verizon's Wholesale Non-Recurring Cost Model that are less than 100%, please specify exactly the improvements that Verizon took into account in calculating the factor listed there, and please explain how the factor was calculated. With respect to each such improvement, please indicate the time when Verizon expects to have implemented such improvement.

REPLY:

Please see the attached, which lists each forward-looking adjustment factor less than 100% and the nature of the improvements associated with the factors. The improvements are expected to take place within the three year planning period (2004 – 2006) covered by the forward-looking cost study. Attachment AT&T 4-179 contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

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DATED: January 14, 2004

ITEM: AT&T 4-180 Please confirm that a 100% Forward Looking Adjustment Factor means that no improvement to the indicated task in the hot cut process is expected within Verizon's planning period, and indicate the relevant planning period. If a 100% factor means something different, please state what it means.

REPLY: A 100 % Forward looking Adjustment Factor means no known or foreseen improvements are expected to take place within the three year planning period (2004 – 2006) covered by the forward-looking cost study.