

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-47 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.

REPLY:

The data requested is not readily available and would require a burdensome special study to derive.

VZ # 161

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-48

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.

REPLY:

- a) Please see Exhibit 2-48a for the data on the number of UNE loops migrated each month from Jan 2002 thru November 2003 (latest month for which data is available).
- b) The information requested is not readily available and would require a burdensome special study that would entail an extensive manual review.
- c) The information requested is not readily available and would require a burdensome special study that would entail an extensive manual review.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Frank Tracy

Title: Director – Network Engineering

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-50
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.

REPLY: Verizon MA objects to this Information Request on the grounds that it is beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving it, Verizon MA states that Verizon MA monitors utilization of existing trunk groups on a regular basis, and trunks are augmented as needed. Verizon MA works with CLECs to ensure no network blockages.

**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 #2

DATED: December 22, 2003

ITEM: AT&T 2-51

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.

REPLY:

- a) The “UNE-P related tasks” being referenced are those performed in the work centers and the central offices. The work center tasks include taking and processing orders that fall out of the flow through systems and managing the work to make sure that it is processed in an orderly fashion. In the central offices, there are no manual tasks performed for migration from Verizon retail to UNE-P or from UNE-P to UNE-P. However, for provisioning new UNE-P, frame wiring is required from OE (“Office Equipment”) to Cable/Pair. It may also include Tie Pairs.
- b) Verizon has not conducted a study of this issue.
- c) All frame technicians are qualified to perform hot cuts.
- d) Verizon has not conducted a study of this issue.
- e) 100% of the personnel freed-up will be qualified to work on hot cuts within their current job titles, *e.g.*, a representative in the NMC will be able to work on ordering issues for ht cuts.
 - (i) The number of new hires expected is as set forth in the scalability model.
 - (ii) See (i) above

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Levicchi

Title: Director – Network Engineering

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-52 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.

REPLY: In Massachusetts, 0.5% of Verizon MA access lines are served from terminals fed solely by IDLC, and they would not have existing, parallel copper or UDLC facilities available. The remaining access lines are in terminals that are fed, at least in part, by copper or UDLC. However, the feasibility of utilizing those alternative facilities for hot cut conversions in any given terminal cannot be determined definitively in advance, and would depend on many factors that would need to be ascertained at the time of the request.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Michael Nawrocki
Title: Principal MTS- Technology

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-53 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.

REPLY: Verizon MA has not conducted an inventory at the Cross Box level to determine the capacity of non-IDLC facilities that are spare or available for line-swaps. This would involve a burdensome special study to derive. Moreover, the status of

facilities at the terminals is constantly changing and information collected through any inventory process would in all likelihood be out of date even before it was completed.

VZ # 167

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Mike Nawrocki
Title: Principal MTS- Technology

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-54

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.

REPLY:

Exhibit II-B-2 of the Initial Panel Testimony illustrates a situation where a single end user for which a hot cut is not being requested must be moved in order to free-up a suitable facility for an end user for whom a hot cut is being requested. Situations can and do arise where more than one end user for whom hot cuts are not being requested must be moved in order to ultimately free up a suitable facility for the customer to be hot cut. However, these more complex situations have not been included in Verizon MA's cost studies and Verizon MA has not conducted an analysis of such arrangements.

To the extent that this question refers to CLEC costs that result from Verizon MA charges, the answer is "none," since the costs of such rearrangements have not been included in the Company's cost studies.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-56

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.

REPLY:

UNE-P service, like a Verizon MA retail line, is identified by the telephone number. This information is provided to the CLEC on the Local Service Confirmation. The records pertaining to assigned telephone numbers are stored in the various Verizon MA provisioning and billing systems.

VZ # 170

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Dr. William Taylor
Title: Senior Vice-President - NERA

REQUEST: AT&T Communications of New England, Inc., Set #2
DATED: December 22, 2003

ITEM: AT&T 2-57

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.

REPLY:

- (a) “Their own facilities” has the same meaning as defined by the FCC. The 49% in parentheses following “their own facilities” is based on Table 10 of the FCC Report, Local Telephone Competition: Status as of December 31, 2002, released June 2003.
- (b) “The FCC data for Massachusetts” comes from Tables 8, 9 and 10 of the FCC report, Local Telephone

Competition: Status as of December 31, 2002,
released June 2003.

- (c) Dr. Taylor's example using 1,000 lines is a hypothetical example and does not differentiate between business or residential customers. Dr. Taylor's example ignores DSL loops as they are high capacity loops that do not enter into Dr. Taylor's analysis of hot cuts.

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

**Respondent:
Title:**

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-58 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.

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: Michael Nawrochi
Title: Principal MTS- Technology

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-62 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.

REPLY: Attached as Exhibit 2-62 is a list of vendors whose products have been reviewed by Verizon for automated cross-connect capability. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with 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: Jim McLaughlin

Title: Executive Director – Operations

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-63 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.

REPLY: Please see Exhibit 2-63, attached, for information regarding the trial for the "Wireless in the Central Office" project. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with 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: Jim McLaughlin

Title: Executive Director - Operations

REQUEST:

AT&T Communications of New England, Inc., Set #2

DATED:

December 22, 2003

ITEM: AT&T 2-64

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.

REPLY:

Verizon MA did not mean to state that large jobs are currently being performed on an overtime basis. As the testimony indicates, these jobs are being performed with minimal need of overtime.

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Jim McLaughlin

Title: Executive Director - Operations

REQUEST:

AT&T Communications of New England, Inc., Set #2

DATED:

December 22, 2003

ITEM: AT&T 2-65

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.

REPLY:

Verizon does not maintain detailed records that would enable it to provide the requested information. Nevertheless, as a general matter, the specified limits are routinely exceeded in situations (such as those following carrier bankruptcies and acquisitions), when large numbers of lines must be transferred from one carrier to another.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-67 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.

REPLY:

- (a) The total number of lines per office has little, if any, bearing on the "Critical Mass." Verizon will take into account the activity associated with Platform lines (*i.e.*, inward and migrations) in setting initial 'Batch Limits' for each central office. These initial 'Batch Limits' can be as few as one line in a Central Office within the 35 business days if there is no demand, or as many as needed in order to cut over all of the requested Batch Hot Cuts within the proposed interval. Based on the scalability study, the busiest offices will require between 100 and 150 lines cut per day. However, Verizon will need to retain the flexibility to change these numbers over time based upon demand.
- (b) Assuming that there are no CLEC issues, all lines will be migrated on or before day 35 whether or not the "Critical Mass" has been met.
- (c) Assuming that there are no CLEC issues, all lines will be migrated on or before day 35 whether or not the "Critical Mass" has been met.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-68 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

REPLY:

- (a) The CLEC will be able to view the status of their orders in WPTS throughout the process. Specifically, once the cut is completed and the port has been activated, WPTS will be updated to show (on a line-by-line basis) which orders have been completed and which, if any, have problems. Also, the CLEC will receive the same PCN and BCN notifiers that they receive today on all Hot Cut LSR's submitted.
- (b) As today, the RCCC will be the controlling organization within Verizon should any problems arise

with the Batch Hot Cut. Verizon is in the process of determining the best processes and procedures to handle porting problems.

- (c) Verizon will only have the ability to activate the port with NPAC. However, this does not preclude the CLEC's ability to view, change and activate the port. Therefore, should there be a problem in the porting of the line, the CLEC will be able to access its existing interface with the NPAC database as it does today. Verizon plans to enter into an agreement with the CLECs that adopt this process that would govern the rights and obligations arising out of the port authorization.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-69 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.

REPLY:

- (a) Since the customer can be migrated to a UNE-P service under the same guidelines as today (*i.e.*, the CLEC can specify what types of features it would like on the line), the customer will not be able to make any changes to the account while the UNE-L order is pending. However, the CLEC has the option to cancel the pending LSR migration to UNE-L and submit a change order and then resubmit a migration to UNE-L LSR.
- (b) This will be handled the same way that such requests are handled today. If there is a pending order to migrate the customer to UNE-L (with CLEC A) and CLEC B submits a request to take over that account,

that 2nd request will be referred back to CLEC B advising it that the customer has a pending migration with CLEC A. The customer would need to decide if it is going to maintain service with CLEC A or cancel that order and have CLEC B take over the account.

- (c) 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: Carleen Gray

Title: Manager – Product Development

REQUEST:

AT&T Communications of New England, Inc., Set #2

DATED:

December 22, 2003

ITEM: AT&T 2-71

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.

REPLY:

- (a) The service would be functionally similar to UNE-P, but would not be offered as an unbundled product subject to the legal obligations associated with such a product, including but not limited to TELRIC pricing.
- (b) Verizon has not yet determined a date for this review.

- (c) Any change in the rates will be made in compliance with any and all applicable legal requirements.
- (d) Verizon as yet has no specific plans relating to the existence, time, or amount of any such rate change. Verizon does not believe that TELRIC pricing requirements would apply to the UNE-P-like product.

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

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST:

AT&T Communications of New England, Inc., Set #2
December 22, 2003

DATED:

ITEM: AT&T 2-80

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.

REPLY:

- (a) Every CLEC that has the ability to use WPTS will be able to download these reports. Web-based training will be available for CLEC usage of WPTS at: <http://www22.verizon.com/wholesale/elearning/wpts/lehotcut/>

Attached is a copy of slides Verizon plans to add to its web-based training site.

- (b) Yes, each CLEC will be able to view all of its Batch Hot Cut orders on WPTS.
- (c) Yes, the reports are available as part of the current bulk or project hot cut process.
- (d) Typically, the spreadsheet is available shortly after the FOC is received.
- (e) All modifications to orders are updated in WPTS; therefore, all users can download a spreadsheet at any point in the process to view the current orders included on a project. On large jobs, the RCCC freezes the spreadsheet on due date -7, prior to sending to the central office for rewiring. If there are modifications to the original spreadsheet, the RCCC manually updates the spreadsheet to track lines that were ordered through to completion.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Michael Nawrocki
Title: Principal MTS - Technology

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-81 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 its judgment that such automated cross connect systems were not cost effective?

REPLY:

- (a) The reasoning underlying the conclusion that automated cross-connects should be used in small, unstaffed central offices and are not cost effective for use in larger central offices is set forth in Verizon MA’s initial testimony, and is based on the judgment and experience of its experts, and on its experts’ review of capabilities of the equipment in question.
- (b) Verizon’s initial assessment of these devices was performed in the 2002 timeframe. Verizon continues to believe that such devices are not cost-effective for larger central offices at this time.

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Docket No. 03-60

Respondent: Michael Nawrocki
Title: Principal MTS- Technology

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-82 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.

REPLY:

- (a) Verizon MA's statement regarding "large scale central offices" is intended to distinguish such offices from the small remote offices of several thousand lines described in Verizon MA's Initial Panel Testimony.
- (b) Verizon MA's judgment concerning the need to partition automated cross connect frames in large scale central offices is based on its subject matter experts' knowledge of such devices and is further substantiated by vendor product information readily available of vendor web sites. The reasoning underlying the conclusion set forth in Verizon's Initial Panel Testimony is based on the experience of its experts, and on its experts' review of capabilities of the equipment in question.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Maryellen Langstine

Title: Director - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-83 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 determine what percentage of LSRs will require being returned to CLECs for additional work.

REPLY: (a) “Verizon’s ordering systems” refer to the service order processor (SOP) used to create and distribute Verizon’s internal service order. WPTS is not an

ordering system.

- (b) In November 2003, less than 5% of UNE and UNE-P LSRs were routed to the NMC for manual processing. The primary reason an order is routed for manual processing is that the service ordered or the action requested on the LSR was not designed to flow through. Flow-through percentages are reported as part of Verizon MA's C2C metric OR-5-01. Flow-through scenarios detailing the types of services and actions that flow-through are located in the business rules section of the verizon.com/wholesale web site.
- (c) There are many reasons why LSRs are returned to CLECs for correction. A burdensome special study would be required to determine the percentage of LSRs that contain each type of problem. Below are common reasons LSRs are returned to CLECs for additional work.
- Telephone number not found
 - Requested feature is not available in serving central office
 - Service address mismatch
 - Circuit id not found
 - LSR would not result in any changes to the account.
 - Requested feature already exists on the account
 - Account has a local service provider freeze

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-84 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?

REPLY: Verizon objects to this Information Request on the grounds that the request is vague and ambiguous. Without waiving its objection, Verizon MA responds as follows:

Please see the web-based training for CLEC usage of WPTS:
<http://www22.verizon.com/wholesale/elearning/wpts/clechotcut/>

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-85 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.

REPLY: WPTS status information is updated immediately.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-86
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?

REPLY: All review functions for Basic Hot Cuts have been mechanized via WPTS. However, WPTS identifies all exceptions that the automated systems are unable to correct so that a RCCC technician/associate can ensure that corrective action is taken.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-88 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?

REPLY: The frame technician will be able to status line level activity directly into WPTS. This status will be immediately available to both the CLEC and the RCCC. Should WPTS experience any service outages, the frame technician would have to contact the RCCC.

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

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-89 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?

REPLY: Once the frame technician inputs the status that the cut is complete, the CLEC will be able to view this information in WPTS. The CLEC has the ability to accept (acknowledge) the cut in WPTS currently. Please see the web-based training for CLEC usage of WPTS:
<http://www22.verizon.com/wholesale/elearning/wpts/clechotcut/>