

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Conversent Communications of Massachusetts, LLC's
Responses to AT&T's First Set of Information Requests to CLECs
DTE Docket No. 03-60**

ATT-CLEC-1: Please confirm whether the CLEC is a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts, and state whether the CLEC is an affiliate of such a CLEC or of an incumbent local exchange carrier ("ILEC") within Massachusetts. If the is an affiliate of another CLEC or an ILEC, please identify the affiliate and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1).

Respondent: David Graham, Consultant

Response: Conversent is a CLEC providing telecommunications service in Massachusetts. Conversent is not an affiliate of such a CLEC or of an ILEC in Massachusetts.

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- ATT-CLEC-2:** Please state whether the CLEC currently uses non-ILEC switches to provide local exchange service to Massachusetts customers via analog voice-grade loops. (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.) If so, for each such switch please provide the following information:
- a. The switch type, including manufacturer and model;
 - b. The 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
 - c. The switch location by street address, city or town, and state if other than Massachusetts;
 - d. A list of all NPA/NXX codes or 1000s blocks of numbers served with the switch;
 - e. Currently equipped and currently utilized line-side capacity, by number of DS-0 and DS-1 circuits;
 - f. The number of customers being served by the switch who receive:
 - i. Only voice service;
 - ii. Only data service; and
 - iii. Voice and data service; and
 - g. A list of all Verizon-Massachusetts ("Verizon") central offices ("COs") in which the CLEC has a collocation arrangement which subtends to the switch.

Respondent: David Graham, Consultant

- Response:**
- a. See Conversent's response to DTE 1-14.
 - b. See Conversent's response to DTE 1-14.

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- c. See Conversent's response to DTE 1-14.
- d. Conversent is investigating this request.
- e. See Conversent's Response to Joint Parties - 5(d), (e).
- f. This information will be provided under the terms of a protective agreement.
- g. See Conversent's response to Joint Parties-10.

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ATT-CLEC-3: Please provide the following general information regarding any local exchange service that the CLEC is currently offer to customers in Massachusetts using voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS-1 or above circuits).

- a. Does the CLEC currently provide local exchange service to residential customers in Massachusetts using voice-grade loops served by a non-ILEC switch? Are you currently advertising or marketing this service, and if so how?
- b. Do you currently provide local exchange service to business customers in Massachusetts using voice-grade loops served by a non-ILEC switch? Are you currently advertising or marketing this service, and if so how?
- c. If the CLEC has offerings of local exchange service using voice-grade loops served by a non-ILEC switch that are targeted to specific customer segments within Massachusetts (*e.g.*, a residential offering, a small business offering, an offering available in only a portion of the state, etc.), please provide a list and description of these offerings, including a description of the service offered and a full explanation of the customer segment to which it is offered or provided. Please also indicate which, if any, of these offerings are provisioned on a UNE-L basis, and where.

Respondent: David Graham, Consultant

- Response:**
- a. See Conversent's response to Joint Parties - 6.
 - b. See Conversent's response to Joint Parties - 6.
 - c. See Conversent's response to Joint Parties - 6. Conversent does not have a tariffed residential offering.

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ATT-CLEC-4: Please state whether the CLEC leases voice-grade loops from Verizon to provide local exchange service in Massachusetts on a UNE-L basis. (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.) If so, please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center serving area in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- a. Residential customers so served;
- b. Business customer locations so served with 1 to 4 lines;
- c. Business customer locations so served with 5 to 9 lines;
- d. Business customer locations so served with 10 to 16 lines; and
- e. Business customer locations so served with 17 to 24 lines.

Respondent: David Graham, Consultant

Response: Yes.

- a. No.
- b. Responsive information will be provided on a state-wide basis under the terms of a Protective Order.
- c. Responsive information will be provided on a state-wide basis under the terms of a Protective Order.
- d. Responsive information will be provided on a state-wide basis under the terms of a Protective Order.
- e. Responsive information will be provided on a state-wide basis under the terms of a Protective Order.

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ATT-CLEC-5: For each Verizon CO in which the CLEC maintains a collocation arrangement used to provide service to customers using unbundled vice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS-1 or above circuits) on a UNE-L basis, please provide the total number of loops at the end of each quarter from January 1, 2002, to the present for the following categories:

- a. Residential;
- b. Business customer locations with 1 to 4 lines;
- c. Business customer locations with 5 to 8 lines;
- d. Business customer locations with 9 to 16 lines; and
- e. Business customer locations with 17 to 24 lines.

Respondent: David Graham, Consultant

Response: Conversent does not have this information available on a quarterly basis from January 2, 2002 to the present. Conversent will provide recent (as of 9/30/03) customer/line count information by wire center under the terms of a protective order.

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ATT-CLEC-6: For each Verizon CO where the CLEC serves customers on a UNE-L basis, and for each quarter since January 1, 2002, please provide the following information:

- a. The number of ILEC-to-ILEC hot cuts that the CLEC requested from Verizon, and the number of such hot cuts that Verizon performed for the CLEC;
- b. The number of CLEC-to-CLEC hot cuts that the CLEC requested from Verizon, and the number of such hot cuts that Verizon performed for the CLEC;
- c. A breakdown of performed hot cuts by the type of hot cut (e.g., individual, or batch);
- d. The percentage of hot cuts that required a field dispatch; and
- e. The percentage (listed separately) of hot cuts:
 - i. That were not completed by the scheduled due date; and
 - ii. That resulted in customer-affecting line trouble.

Respondent: David Graham, Consultant

Response: This information is not available in the manner requested. A majority of Conversent's lines were migrated to Conversent by way of basic (non-batch) hot cuts. Most of those lines were ILEC to CLEC migrations. Conversent is satisfied with Verizon's basic hot cut performance.

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ATT-CLEC-7 Please describe the method or methods by which the CLEC requests hot cuts from Verizon. Please also describe the method or method by which the CLEC obtains notification of completed hot cuts.

Respondent: David Graham, Consultant

Response: Conversent requests hot cuts by way of the Verizon web-GUI.

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ATT-CLEC-8: Please state whether the CLEC leases UNE-P arrangements from Verizon to provide local exchange service in Massachusetts. If so, please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center serving area in which you offer service (if the data is available), and on a statewide basis, the number for your company of:

- a. Residential;
- b. Business customer locations with 1 to 4 lines;
- c. Business customer locations with 5 to 8 lines;
- d. Business customer locations with 9 to 16 lines; and
- e. Business customer locations with 17 to 24 lines.

Respondent: David Graham, Consultant

- Response:**
- a. No.
 - b. This information will be provided under the terms of a protective order.
 - c. This information will be provided under the terms of a protective order.
 - d. This information will be provided under the terms of a protective order.
 - e. This information will be provided under the terms of a protective order.

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- ATT-CLEC-9:** If the CLEC provides cable television service in Massachusetts, please state for the state as a whole and, to the extent available, for each city or town in Massachusetts:
- a. To how many customer locations does the CLEC provide local exchange service?
 - b. To what percent of the CLEC's telephony customers does the LCEC provide standalone local exchange service, without also providing either broadband or cable television service? What is the typical or average price for this service?
 - c. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with broadband service, without also providing cable television service? What is the typical or average price for this combined service?
 - d. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with cable television service, without also providing broadband service? What is the typical or average price for this combined service?
 - e. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with both cable television and broadband service? What is the typical or average price for this combined service?

Respondent: David Graham, Consultant

Response: This question does not apply to Conversent.

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ATT-CLEC-10: Please state whether the CLEC owns one or more dedicated transport circuits which provides an unswitched transmission path at a DS-1 or higher level between any two Verizon central offices at which the CLEC maintains active physical collocation facilities. If the answer is yes, please provide the following information;

- a. As to each such pair of central offices, state:
 - i. The common name, address, and CLLI code for each pair of central offices;
 - ii. The transmission level of each dedicated transport circuit terminating at both physical collocation facilities (e.g., DS-1, DS-3, OC-3, etc.); and
 - iii. Whether the CLEC is "operationally ready" (as the phrase is used in *Triennial Review Order* ¶ 406) to provide dedicated transport between those two Verizon central offices.
- b. Does the CLEC purchase, lease or otherwise obtain UNE Transport, special access, or any other type of transmission capacity on the route, or any portion thereof, between any pair of COs just identified? If so, please identify the type of transmission capacity and the pair of central offices served by this capacity.

Respondent: David Graham, Consultant

Response: No.

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ATT-CLEC-11: Please state whether the CLEC has any long-term (10 or more years) dark fiber infeasible rights-of-use ("IRUs") between any two Verizon COs at which the CLEC maintains active physical collocation facilities. If the answer is yes, please provide the following information:

- a. As to each pair of central offices, identify:
 - i. The common name, address and CLLI code for each pair of central offices,
 - ii. The number of dark fiber circuits terminating at both of the physical collocation facilities,
 - iii. The term of the IRU.
- b. Does the CLEC purchase, lease or otherwise obtain UNE Transport, special access, or any other type of transmission capacity on the route, or any portion thereof, between an pair of COs just identified? If so, please identify the type of transmission capacity and the pair of central offices served by this capacity.

Respondent: David Graham, Consultant

Response: No.

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ATT-CLEC-12: Please state whether the CLEC offer dedicated transport to unaffiliated carriers on a wholesale basis between any pairs of Verizon COs? If so, for each such pair of Verizon COs, please provide the following:

- a. How such transport is offered to unaffiliated carriers (e.g., through tariffs, standard contracts, individually negotiated contracts),
- b. The levels (DS-1, DS-3, OC-3, etc.) at which such dedicated transport has been provided to wholesale customers,
- c. The amount of unused lit capacity available for purchase by unaffiliated carriers on a wholesale basis, at each transmission level.

Respondent: David Graham, Consultant

Response: Conversent does not offer dedicated transport to unaffiliated carriers on a wholesale basis between any pairs of Verizon central offices.