

MCI's FIRST SET OF INFORMATION REQUESTS TO
COMPETITIVE LOCAL EXCHANGE CARRIERS; Massachusetts 03-60
Allegiance Telecom Response Jan 26, 2004

MCI-CLEC-1 Please state whether you are an incumbent local exchange provider ("ILEC") or are an affiliate of an ILEC providing telecommunications service in Massachusetts. If you are an affiliate of an ILEC, please identify the ILEC 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)

ANSWER: Allegiance Telecom of Massachusetts, Inc. is a competitive local exchange carrier providing telecommunications service in Massachusetts. Allegiance Telecom is not an affiliate of an incumbent local exchange carrier within Massachusetts

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MCI-CLEC-2 Please state whether you are an affiliate of a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts. If you are an affiliate of an CLEC, please identify the CLEC 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)

ANSWER: Allegiance Telecom of Massachusetts, Inc. is a competitive local exchange carrier providing telecommunications service in Massachusetts. Allegiance Telecom is not an affiliate of a CLEC within Massachusetts

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MCI-CLEC-3 Do you lease 2-wire voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a DS-1.)

ANSWER: Yes.

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MCI-CLEC-4 Do you use non-ILEC switches to provide local exchange service to Massachusetts customers? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a DS-1.)

ANSWER: Yes.

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MCI-CLEC-5 To the extent that you have not already provided this information in response to the Massachusetts Department of Telecommunications and Energy's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers.

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- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");

ANSWER: **Confidential and Proprietary – Not for Release**

- b. V&H coordinates;

ANSWER: **Confidential and Proprietary – Not for Release**

- c. street address, city and zip code;

ANSWER: **Confidential and Proprietary – Not for Release**

- d. currently equipped line side capacity in

- i. DS-0/voice grade circuits and

ANSWER: Equipped Capacity: i. **Confidential and Proprietary – Not for Release**

- ii. DS-1 circuits;

ANSWER: **Confidential and Proprietary – Not for Release**

- e. currently utilized line side capacity in

- i. DS-0/voice grade circuits and

ANSWER: Utilized Lines in Service: i. **Confidential and Proprietary – Not for Release**

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;

ii. DS-1 circuits;

ANSWER: **Confidential and Proprietary – Not for Release**

f. current switch processor capacity in CCS;

ANSWER: N/A

g. busy hour and busy season utilized switch processor capacity in CCS;

ANSWER: N/A

h. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

ANSWER: Stand-alone

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MCI-CLEC-6 Using the switches identified in CLEC-5:

a: Do you currently provide local exchange service to residential customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].

ANSWER: No

b. Do you currently provide local exchange service to business customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.

ANSWER: Allegiance Telecom currently offers local exchange service to business customers in Massachusetts. Allegiance is actively pursuing business customers through direct sales methods.

c: Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

ANSWER: All products and services available in Massachusetts are described in the Allegiance Massachusetts tariff located at <http://www.algx.com/pdf/malocal.pdf>

d. For each switch identified in CLEC-5 other than circuit switches, please provide the following additional information regarding the local exchange service that you provide:

i. How many telephony customers do you serve via that switch?

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- ii. To what percentage of those customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the retail price for this service?

ANSWER: **Confidential and Proprietary – Not for Release**

- iii. To what percentage of those customers do you provide local exchange service and broadband service but not cable television service? What is the price for this service?

ANSWER: **Confidential and Proprietary – Not for Release**

- iv. To what percentage of those customers do you provide local exchange service and cable television service but not broadband service? What is the price for this service?

ANSWER: None (0%)

- v. To what percentage of those customers do you provide local exchange service, cable television service, and broadband service? What is the price for this service?

ANSWER: None (0%)

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MCI-CLEC-7 Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, on a monthly or quarterly basis, for the most recent 12-month period, the number of:

- a: Newly installed business lines served by unbundled loops;
- vi. Number of such lines that were migrated from the ILEC's retail service.

ANSWER: See table below. Information is not available by wire center.

- vii. Number of such lines that were migrated from a CLEC's retail service.

ANSWER: Allegiance does not track ILEC versus CLEC migrations.

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CLEC- 7: - Number of New Unbundled
Business Lines – for the State of
Massachusetts (Gross Installs)

<u>Month</u>	<u>Lines</u>
Jan-03	
Feb-03	
Mar-03	
Apr-03	
May-03	
Jun-03	
Jul-03	

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Aug-03

Sep-03

Oct-03

Nov-03

Dec-03

- Information is not available by CLLI or by
ILEC or CLEC

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b. Newly installed business lines served by UNE-P;

i. Number of such lines that were migrated from the ILEC's retail service.

ANSWER: None

ii. Number of such lines that were migrated from a CLEC's retail service.

ANSWER: None

c. Newly installed business lines served by non-circuit switches;

i. Number of such lines that were migrated from the ILEC's retail service.

ANSWER: None

ii. Number of such lines that were migrated from a CLEC's retail service.

ANSWER: None

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- d. Newly installed residential lines served by unbundled loops;
 - i. Number of such lines that were migrated from the ILEC's retail service.

ANSWER: None

- ii. Number of such lines that were migrated from a CLEC's retail service.

ANSWER: None

- e. Newly installed residential lines served by UNE-P.
 - i. Number of such lines that were migrated from the ILEC's retail service.

ANSWER: None

- ii. Number of such lines that were migrated from a CLEC's retail service.

ANSWER: None

- f. Newly installed residential lines served by non-circuit switches;
 - i. Number of such lines that were migrated from the ILEC's retail service.

ANSWER: None

- ii. Number of such lines that were migrated from a CLEC's retail service.

ANSWER: None

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

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If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

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MCI-CLEC-8 Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, for the most recently available time period, the total number of:

a: Active business lines served by unbundled loops;

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<u>CLLI</u>	<u>Lines</u>
BURLMABE	263

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b. Active business lines served by UNE-P;

ANSWER: None

c. Active business lines served by non-circuit switches;

ANSWER: None

d. Active residential lines served by unbundled loops;

ANSWER: None

e. Active residential lines served by UNE-P;

ANSWER: None

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f. Active residential lines served by non-circuit switches.

ANSWER: None

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

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MCI-CLEC-9 If you do not currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), please list and describe your reasons for not doing so.

ANSWER: N/A

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MCI-CLEC-10 If you currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), but do not offer and/or market service to such customers unless they have or need a certain minimum number of loops to their premises, please state that minimum number, and list and describe your reasons for not offering and/or marketing service below that level.

ANSWER: N/A

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MCI-CLEC-11 For each switch identified in your response to CLEC-5, please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

TABLE 1A

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*Allegiance only serves business customers. - **Confidential and Proprietary – Not for Release**

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CLEC Switch CLLI	Number Of Loops Per End- User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers¹	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers²

¹ This category includes loops used for fax and/or modem-only traffic.

² This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

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TABLE 1B

Allegiance serves only business customers in Massachusetts and does not currently offer DSL services. Below are two tables: one shows Allegiance Voice-Only customers in Massachusetts by ILEC wire center, the following shows all Allegiance customers in Massachusetts by ILEC wire center.

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MA Voice-Only Customers (excluding DS1 level loops)

	L o o p s								P e r C u s t o m e											
Clli Code	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19-24	25 or

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MA All-Customers (excluding DS1 level loops)

L o o p s P e r C u s t o m e r

C l l i C o d e	1	2	3	4	5	6	7	8	9	1 0	1 1	1 2	1 3	1 4	1 5	1 6	1 7	1 8	19 - 24	25 or more
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TABLE 1C

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[illegible]

³ This category includes loops used for fax and/or modem-only traffic.

⁴ This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

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MCI-CLEC-12 For each switch identified in your response to CLEC-5 other than circuit switches, please provide the following for each switch:

- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;

ANSWER: None.

- b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;

ANSWER: None.

- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

ANSWER: None.

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MCI-CLEC-13 Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products, either by geography, class of customer, or otherwise? If so, please explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

ANSWER: Allegiance's End User Communications Services Tariff states:

Service Areas – The Company's exchange areas, rate classes, and local calling areas are identical to those defined in the tariffs of the New England Telephone and Telegraph Company - Massachusetts serving the same exchange areas as the Company. Where facilities are available, the Company shall provide service in the exchange areas served by New England Telephone and Telegraph Company – Massachusetts, the certified ILEC within the Company's service areas as reflected herein.

Availability: -- Service available where facilities permit

Exchange areas currently served can be found in section 1.1.1 and 1.1.2 of the Tariff at:
<http://www.algx.com/pdf/malocal.pdf>

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MCI-CLEC-14 Have you made any changes to your Massachusetts intrastate tariffs in the last 24 months that would limit the availability of your local exchange service, either by restricting the geographic area in which you offer your service, restricting the customers to whom you service is available, or otherwise? If so, please explain.

ANSWER: No.

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MCI-CLEC-15 Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating "Yes" or "No" in each box.

ANSWER: See table below and response to question CLEC-17

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	TO VZ voice only	TO VZ voice plus DSL	TO VZ DSL only	TO CLEC UNE- P voice only	TO CLEC switch -based voice only	TO CLEC line sharin g	TO CLEC line splittin g	TO CLEC DSL only
FROM VZ voice only								
FROM VZ voice plus DSL								
FROM VZ DSL only								
FROM CLEC UNE-P voice only								
FROM CLEC switch- based voice only								
FROM CLEC line sharin g								
FROM CLEC line splittin								

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g								
FROM CLEC DSL only								

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MCI-CLEC-16 Please explain whether you have always been able to obtain a customer service record ("CSR") from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

ANSWER: In instances where the customer is currently on UNE-P with Verizon and converting to UNE loop with Allegiance, Allegiance has had serious difficulty obtaining CSRs from Verizon. When trying to pull an electronic CSR for a UNE-P customer, Allegiance typically receives an error message. For CLECS, there are some CLECS that we are unable to obtain CSRs for either UNE-P or voice service on UNE loop.

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MCI-CLEC-17 Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

ANSWER: Allegiance processes all orders electronically today using EDI for LSR for facility based ordering including REQTYP = A, B, C, and J. All returning confirmations, rejects, completions, and jeopardy notifications are received and stored electronically. Allegiance also has an industry standard electronic interface for ASR with Verizon. Electronic interfaces are also in place to process E911, LIDB, CNAM, and Number Portability. Allegiance has the internal applications to automatically provision services in to their network. In addition, Allegiance has electronic monitoring tools to manage all network services, trouble-shoot, Test, and repair on their own network. Pre-Order transactions are processed using the Verizon GUI (LSI), however Allegiance has completed certification testing for an EDI Pre-Order interface to be deployed in the next 6 months. Allegiance is currently using the Verizon GUI for Trouble Reporting, Maintenance and Repair. All Billing is managed via electronic file processing.

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MCI-CLEC-18 Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

ANSWER: See response to CLEC-17

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MCI-CLEC-19 Please explain whether you currently have in place and use electronic automated systems to:

a: Process orders placed by customers whose service will be provisioned using your own switches.

ANSWER: See response to CLEC-17

b. Provision service for customers using your own switches

ANSWER: See response to CLEC-17

c: Maintain and repair service for customers whose service is provisioned using your own switches.

ANSWER: See response to CLEC-17

d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.

ANSWER: See response to CLEC-17

e. Conduct testing for customer services provisioned via your own switches using UNE loops.

ANSWER: See response to CLEC-17

f. Bill customers whose services are provisioned using your own switches.

ANSWER: See response to CLEC-17