Attachment ESJ-6

MCI-VZ NY
Data Responses

Case: 02-C-1425
MCI
Date of Request: August 19, 2003
Respondent: VZ Panel

MCI-VZ-2	The August 6, 2003 version of the WPTS User Guide and the WPTS web-based training program make reference to a requirement for a field dispatch for all IDLC orders. Please explain the reason for this requirement. Are there IDLC orders that do not require a field dispatch? Explain

RESPONSE:
Because the Judge's ruling on MCI's motion to compel was not received by Verizon until late on the afternoon of August 28, and because Verizon personnel who were required to provide answers to the interrogatories were not available on Friday August 29 or over the three-day Labor Day weekend, Verizon was not able to provide a response to this interrogatory within the five day period specified in 16 NYCRR section 5.3(e). Verizon will provide a response to this interrogatory by Friday, September 5, 2003.

SUPPLEMENTAL RESPONSE (9/5/03):

IDLC technology multiplexes groups of 24 voice grade channels to specially formatted IDLC interfaces within the central office. There is no direct access to an individual voice grade channel on an IDLC system.

If a CLEC orders UNE-P to serve a Verizon end user whose loop facility is currently provided using IDLC, no transfer and thus no dispatch is required because Verizon continues to provide both the switching and the loop to the CLEC. However, if a CLEC orders an UNE Loop only, to serve a Verizon end user whose loop facility is currently provided using IDLC, all such "IDLC orders" require a transfer to alternative facilities (i.e., copper or UDLC) and must be dispatched. The field technician must move one or more non-IDLC portion(s) of the loop (either sub-feeder cable, distribution cable and service wire, or just distribution cable and service wire, or just service wire) to the alternative facility.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-16	On page 14 of the Panel Testimony, Verizon states that there are "additional steps [that] have been included in Verizon's hot cut process at the request of the CLECs, for service assurance reasons." Please identify all of these steps.

RESPONSE:

Many of these steps were born out of the collaboratives and technical workshops relating to hot cuts. These steps include:

- Dial tone verification on DD-2 (ANI) and at FDT
- 'Go/No Go' on Due date by the CLEC
- Verizon dial tone left in until well after the cut to allow for throwbacks
- LSR cross check with the Project spreadsheets
- MLT testing of the loop prior to migration

Many of these steps could now be eliminated based on the evolution of the process.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-35	On Pages 19-20 of the Panel Testimony, Verizon states, "… Verizon's OSS flow a sizable portion of properly completed LSRs through the service order generation process … thus obviating the need for … manual assignment by the APC." What percentage of hot cut orders require manual assignment by the APC? Please list the five most commonly occurring reasons for orders to require manual assignment by the APC, and please indicate the percentage of CLEC orders on which these conditions occur.

RESPONSE:

Verizon does not measure the percentage of hot cut orders that require manual assignment by the APC.

The most common reasons why orders require manual assignment by the APC/FMC (Facilities Management Center) are:

- The order was assigned to a working facility
- The order was assigned to a pending assignment
- A cage discrepancy exists (e.g., the assigned facility is not designated "in service")
- A service order error

Verizon does not measure the percentage of CLEC orders on which these conditions occur.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-40	Referring to Page 22 of the Panel Testimony and the subsequent discussion, is there a limit on the number of loops that can be ordered by a CLEC on a single "basic" hot cut request? Does this impact the completion interval? If there is a limit, once it is exceeded, is a CLEC required to follow the Large Job Process? Please explain.

RESPONSE:

There is currently no limit on the number of Basic cuts that can be requested on a single LSR.

Hot Cut intervals are published at:
http://www22.verizon.com/wholesale/attachments/une_intervals.xls

CLECs are not required to use the large job process, although it might be encouraged as it could benefit both Verizon and the CLEC.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-49	Referring to Pages 32-33 of the Panel Testimony, are basic and batch hot cut volumes taken into account when determining the "negotiated" due date for a Large Job? Please explain.

RESPONSE:

When the local frame managers are contacted by the NMC in order to set the negotiated date, all pending future work is taken into account.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-55	Referring to Page 39, Lines 9-10 of the Panel Testimony, please identify the "certain other loop types" that are ineligible for the batch hot cut process, and please explain why the process does not apply to "IDLC lines and to certain other loop types."

RESPONSE:

The following loops have been excluded from the initial Batch Hot Cut process:

- IDLC circuits due to high level of coordination required
- Digital accounts: ISDN, xDSL, SWXX, etc.
- EEL or M-Loop type migrations
- Virtual (V-loop) migrations
- CSS (Customer Specified Signaling) loops
- RSU (Remote Switch Units; where service is provisioned via Verizon owned Remote Switch, shares NPA/NNX with Host)
- Foreign Exchange Lines
- Loop to Loop migrations (port will drop this out) CLEC to CLEC

These were excluded for 2 reasons; (1) the batch process was conceived as a process for mass-market–type customers and (2) to simplify the initial phases of the Batch Hot Cut process.

If it appears, over time, that certain loops should be added to the Batch Hot Cut process, Verizon is willing to investigate their potential inclusion.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-56	Referring to Page 40, Lines 3-5 of the Panel Testimony, please identify the CLECs with whom Verizon expects to trial the batch process and how Verizon will measure performance. Please also identify the precise date on which Verizon expects to begin the trial.

RESPONSE:

A complete list of trial participants has not yet been developed. Verizon will measure the success of the trial based on the extent to which the trialed process performs as intended.

Precise date of the trial has not been identified.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-64	Referring to Panel Testimony Pages 120-121, given the time required to offer jobs internally before adding new hires, what is the average time that it would take to net one additional employee?

RESPONSE:

The average time to add employees is approximately 60 days.

Case: 02-C-1425
MCI
Date of Request: October 31, 2003
Respondent: VZ Panel

MCI-VZ-66	Referring to Panel Testimony Pages 125 Lines 5-7, how many technicians can connect cross-wires in a single 100 pair count appearing in a single vertical on an MDF at the same time?

RESPONSE:

One

Case: 02-C-1425
MCI
Date of Request: November 20, 2003
Respondent: VZ Panel

MCI-VZ-113	At page 10, lines 13-21 of the panel testimony, Verizon states that "there is no technically feasible, practicable means of obtaining access to individual voice-grade loops at the central office when such loops are provisioned over an IDLC system." Telcordia's Notes on the Network SR-2275 issue 04 section 12 page 53 states that a "variety of technical feasible" options exist to unbundle IDLC loops. Does Verizon agree with that statement? If no, please explain. If yes, please reconcile that with the portion of the panel testimony referenced above. Please omment specifically regarding options 4 and 5 appearing on pages 54-56 of the Telcordia document.

RESPONSE:

For purposes of clarifying the following response, a copy of the relevant pages from the Telcordia document are attached to the response.

(a) Verizon agrees with the Telcordia statement to the extent that Verizon has implemented several of these options, as set forth in Verizon's Initial Panel Testimony. Also, it should be noted that Telcordia's succeeding sentence in the cited reference states that "Each ILEC has established its own set of approved unbundling options along with the corresponding methods, procedures and practices needed for implementing these options." In addition, Telcordia document SR-2275 explicitly states:

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The statement quoted from page 10 of Verizon's testimony refers to options other than those that Verizon has implemented, as described in the testimony. Also, it should be noted that the quoted statement does not say that other options do not exist;

it simply states that other solutions are not, at present, "technically feasible and practicable." A variety of factors bear on the feasibility and practicability of implementing particular solutions within Verizon's network. These are well-illustred by issues raised by Telcordia's Options 4 and 5, as referred to in the interrogatory and as discussed below.

(b) Option 4 (as described in Telcordia SR-2275) is entitled "Utilize a separate GR-303 Interface Group for the CLEC customers." Telcordia's discussion of this option includes the statement "Since the GR-303 Interface Group supports operations functionality, there are a variety of issues (provisioning, alarm reporting, sharing of test resources, etc.) that are currently being addressed by the industry." This statement is consistent with Verizon's discussion of GR-303 multi-carrier issues set forth in Verizon's Initial Panel Testimony.

Option 5 (as described in Telcordia SR-2275) is entitled "Share a GR-303 Interface Group and use the sidedoor port of the switch to transport CLEC traffic out of the ILEC switch." Telcordia's discussion of this option includes the following statement:

"The ILEC must address the following issues associated with the sidedoor port arrangement:

A. The cost of a DS1 switch termination for a sidedoor port is about ten times the cost of a DS1 line card on a RDT.
B. Since each CLEC circuit requires a nailed up DS0, the ILEC may encounter blocking over the IDLC system as other circuits compete for DS0 channels.
C. The number of sidedoor ports that can be engineered varies depending on the LDS supplier.
D. There is limited support in existing special services design systems and databases to support sidedoor port circuits.
E. The ILEC may need field visits to install special services D4 channel units at the RDT."

Verizon's agrees with Telcordia's discussion above and believes that Telcordia has accurately characterized some of the technical and operational issues associated with sidedoor port arrangement.

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Subsequent to the passing of the Telecommunications Act of 1996, the ILECs sought judicial relief and won an appeal at the U.S. Eighth Circuit Court to repeal the UNE mandates. Upon appeal by the FCC and CLECs, the U.S. Supreme Court issued its "FCC Remand Order," which required the FCC to re-examine all seven UNEs and justify/explain the rationale for each UNE that the FCC considers necessary.

In November 1999, the FCC released its Docket 99-238, which eliminated the Operator/Directory Services UNE, but retained the other six UNEs. In addition, the FCC added a new UNE called "Sub-Loop". A sub-loop unbundled network element refers to any portion of the ILEC's whole loop which is outside the central office and that a CLEC can access and make interconnection to offer service to a customer.

In December 1999, the FCC released its Docket 99-355, which mandated another UNE, this one relating to the high-frequency portion of the loop. The mandate requires line sharing arrangements between an ILEC and a CLEC for both whole loop and sub-loop unbundling configurations. Line sharing, which is also known as spectrum unbundling, refers to the same twisted copper pair being used by more than one carrier. The ILEC can carry traditional voice-switched telephone service within the 0- to 3-Khz spectrum, and the CLEC can provide DSL services over the spectrum above 3 Khz. All ILECs must begin line sharing implementations by mid-year 2000.

12.13.2 Loop Unbundling

There are two main types of loop unbundling. The first is called "whole loop" unbundling, which is the unbundling of a whole loop from the MDF in the ILEC's central office to the customer premises. The second type is called "sub-loop" unbundling, which refers to a portion of the ILEC's whole loop being offered to a CLEC. This section provides more information about each type of loop unbundling.

12.13.2.1 Whole Loop Unbundling Configurations

Typically, when a customer requests dial tone service from a CLEC, the ILEC removes the wired connection to the ILEC switch in the central office and rewires the customer's loop to a CLEC "meet" point in the central office. Figure 12-32 depicts whole loop transfers in the ILEC central office when the customer is served by copper facilities or by a UDLC system. In most cases, there is an analog handoff to the CLEC. If the CLEC requests a digital handoff, the ILEC may utilize a D4 channel bank to digitize the circuits. Most CLECs transport the unbundled loops back to their central offices (switches) using GR-303 IDLC systems. To do this, the CLECs deploy GR-303 RDTs within their collocation cages in the ILEC's central offices.

The most critical factor associated with unbundling a customer loop is the type of loop facility that the customer is already utilizing for service, such as all-copper, UDLC system, or IDLC system.

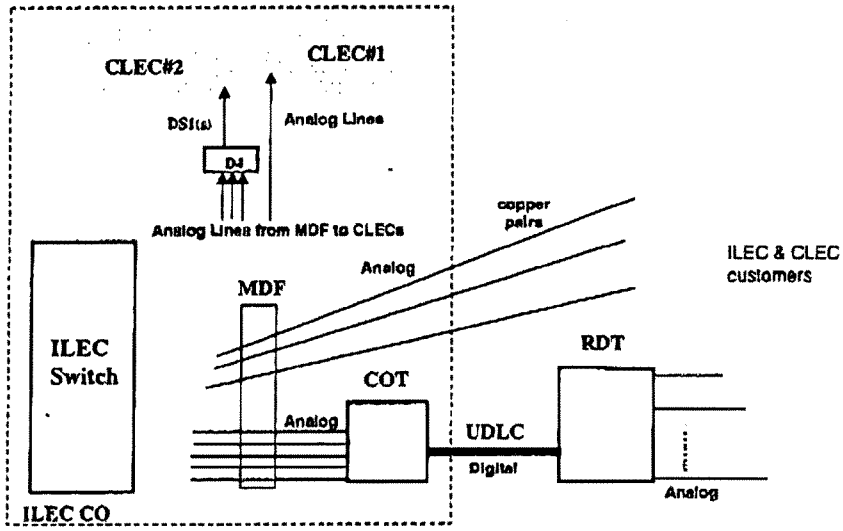

Figure 12-32. Unbundling Loops Served by Copper or UDLC Systems

- If the customer is receiving service over all-copper facilities, the transfer of the whole loop is straightforward as indicated in Figure 12-32. The ILEC removes the central office connection to its switch and places a jumper from the MDF to the meet point at the CLEC's collocation cage. There is no need to rewire the outside plant or visit the customer premises.
- If the customer is receiving service over a UDLC system, the transfer of the whole loop can be straightforward as shown in Figure 12-32. The ILEC removes the central office connection to its switch and places a jumper from the MDF to the meet point at the CLEC's collocation cage. Again, there is no need to rewire the outside plant or visit the customer premises.
- However, if the customer is served by an IDLC system, the loop is digitally transmitted to the ILEC switch. There are a variety of "technically feasible" options available to the ILEC to unbundle the loop. Each ILEC has established its own set of approved unbundling options along with the corresponding methods, procedures, and practices needed for implementing these options. Numerous unbundling options are possible because many of today's RDTs support multiple kinds of interfaces such as: GR-303, TR-08, UDLC, and D4 DS1. Also, some RDTs are capable of supporting multiple GR-303 Interface Groups, thereby permitting a single RDT to connect to multiple switches.

  Some common IDLC unbundling options are:

  1. Bypass the IDLC system and transfer the loop to an all-copper pair

     If there are available spare copper facilities serving the customer's neighborhood, transferring the IDLC customer to a spare all-copper circuit may be a viable option for the ILEC, as shown in Figure 12-33. Although this

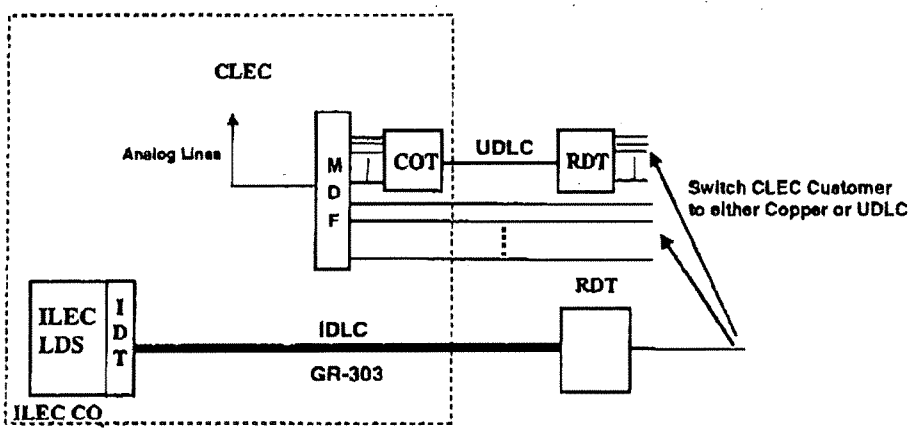

Figure 12-33. IDLC Unbundling - Bypass the IDLC System

procedure is relatively simple, it requires central office and outside plant rewiring to complete the new circuit from the MDF to the customer. The all-copper unbundled loop is the easiest unbundling architecture for the ILEC to perform maintenance and testing.

Some ILECs serve new neighborhoods/housing developments with DLC systems and install a very limited number of copper pairs to support certain services. In these areas, spare copper facilities can be quickly exhausted if used for unbundled loops.

2. Bypass the IDLC system and transfer the loop to a UDLC system

   If there are no spare copper facilities in the customer's neighborhood, the ILEC may transfer the customer's circuit from the IDLC system to a UDLC system (see Figure 12-33). This transfer will also involve both central and outside plant work activity.

   The customer fill rates at IDLC/UDLC CEV sites are typically 50 to 70%. There is a moderate amount of spare capacity on the UDLC systems to support transfers from IDLC systems.

3. Utilize the UDLC capability of the IDLC system

   If the IDLC system is equipped to support UDLC functionality, the ILEC can electronically re-provision the circuit from IDLC to UDLC (see Figure 12-34). No outside plant work activity is needed. Central office work activity is needed to run jumpers from the MDF to the collocation cage and, if necessary, place a UDLC plug-in at the COT.

4. Utilize a separate GR-303 Interface Group for the CLEC customers

   Figure 12-35 shows the use of separate GR-303 Interface Groups to carry ILEC and CLEC traffic. The RDT must support the MIG (Multiple Interface Group) capability defined in the GR-303 specification. This configuration allows a CLEC switch to connect to the ILEC's RDT at the GR-303 interface level.

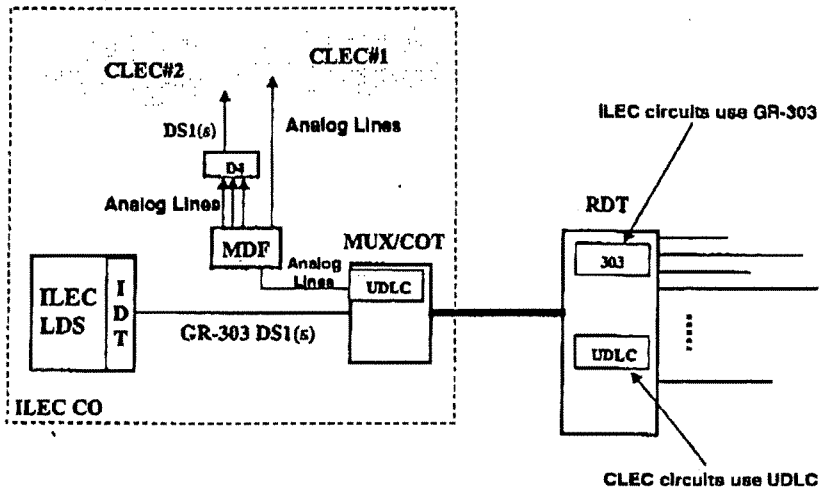

Figure 12-34. IDLC Unbundling Using the UDLC Capability of RDT

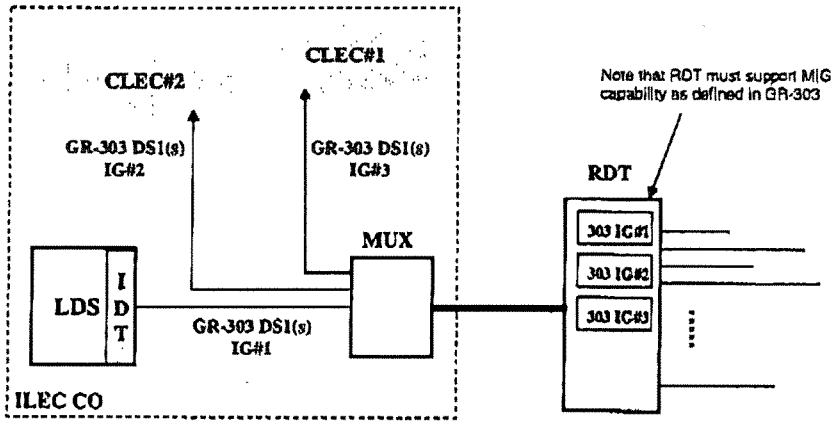

Figure 12-35. IDLC Unbundling Using Separate GR-303 Interface Groups

This arrangement may be cost effective for those CLECs having a "critical mass" of subscribers served by the RDT or group of RDTs in a CEV. Since the GR-303 Interface Group supports operations functionality, there are a variety of issues (provisioning, alarm reporting, sharing of test resources, etc.) that are currently being addressed by the industry.

In response to the Telecommunications Act of 1996, GR-303 requirements were changed in 1997 to permit a single DS1 to be called a 303 Interface Group. A minimum of two DS1s was previously required. This change allows a CLEC to serve a small base of customers at an RDT more economically (but at the risk of lower service availability and reliability).

5. Share a GR-303 Interface Group and use the sidedoor port of the switch to transport CLEC traffic out of the ILEC switch

Figure 12-36 shows the use of a GR-303 Interface Group sharing ILEC and CLEC traffic where all CLEC traffic is routed through sidedoor port DS1s out of the ILEC's switch.

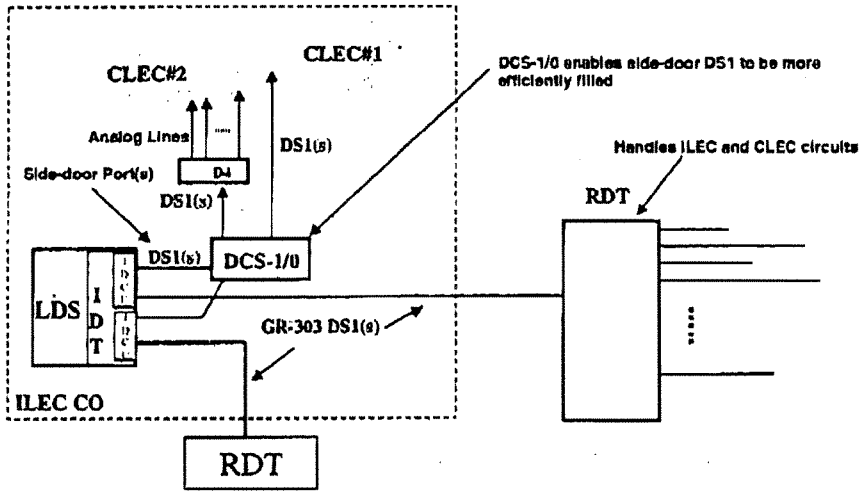

Figure 12-36. IDLC Unbundling Using Sidedoor Port

CLEC circuits are provisioned as non-switched, non-locally switched circuits within the IDLC system. While the DCS-1/0 is shown in the figure, it is not a requirement of this architecture. The advantage of using a DCS-1/0 is realized if the CLEC is not fully utilizing a DS1 from the ILEC LDS to the CLEC, and multiple switch modules with IDCUs are used by the ILEC. If a DCS-1/0 is placed between the LDS DS1 sidedoor port and the CLEC DS1s, it would permit full utilization of the sidedoor LDS/IDCU hardware by enabling CLEC DS0s to be rearranged in the DCS-1/0 and placed on the individual CLEC DS1s.

The ILEC must address the following issues associated with the sidedoor port arrangement:

A. The cost of a DS1 switch termination for a sidedoor port is about ten times the cost for a DS1 line card on a RDT.

B. Since each CLEC circuit requires a nailed up DS0, the ILEC may encounter blocking over the IDLC system as other circuits compete for DS0 channels.

C. The number of sidedoor ports that can be engineered varies depending on the LDS supplier.

D. There is limited support in existing special services design systems and databases to support sidedoor port circuits.

E. The ILEC may need field visits to install special service D4 channel units at the RDT.

6. Utilize separate TR-08 Interface Groups to transport CLEC traffic

   Figure 12-37 shows the use of separate TR-08 Interface Groups to carry CLEC traffic while utilizing the GR-303 Interface for ILEC traffic. In the figure, the RDT supports both GR-303 and TR-08 generic interface capabilities. CLEC switches can interconnect with the ILEC's RDT utilizing the DS1 handoff from the TR-08 interface.

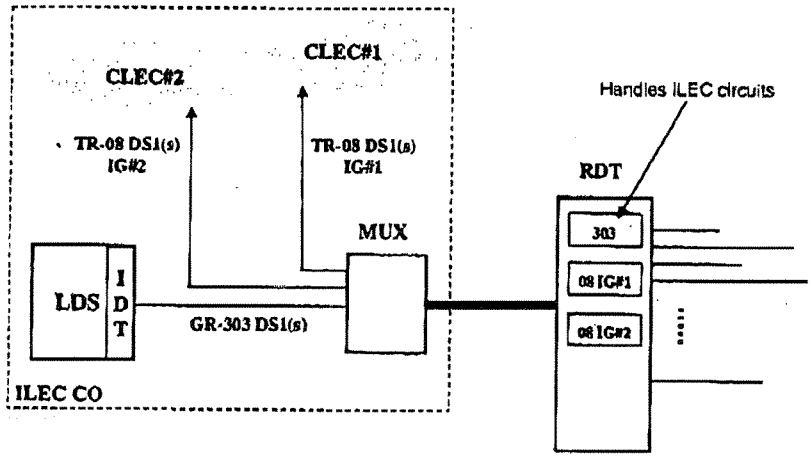

Figure 12-37. IDLC Unbundling Using Separate TR-08 Interface Groups

7. CLEC leases entire RDT

   Figure 12-38 shows the configuration when a CLEC leases an entire RDT from the ILEC.

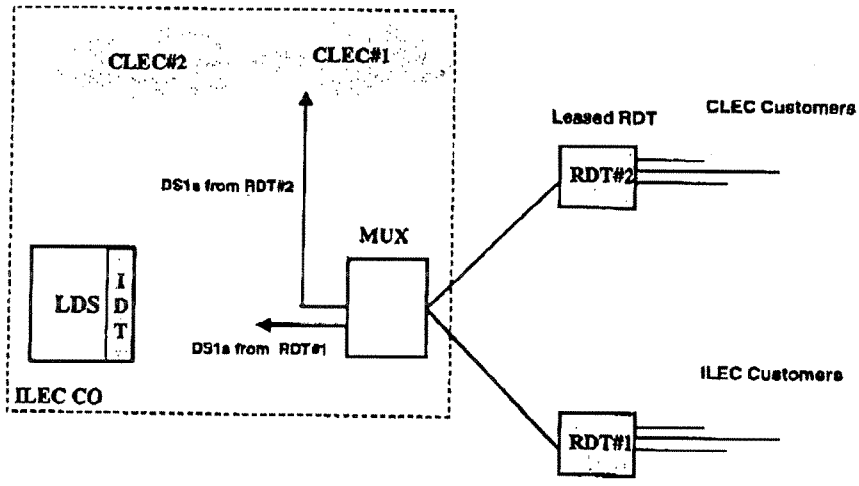

Figure 12-38. IDLC Unbundling - CLEC Leases Entire RDT

Case: 02-C-1425
MCI
Date of Request: November 24, 2003
Respondent: VZ Panel

MCI-VZ-122S	Refer to Verizon's Initial Panel Testimony at page 14, lines 20-23. In this section of the testimony, the panel discusses the utilization of robotic automated frame wiring devices (ADF) that are presently installed in offices serving towns such as: Angelica, Avoca, Canisteo, Hinsdale, and Lafargeville. Please provide the average installation time (form when the equipment arrived in the Central Office until it was operationally functional) experienced for the offices listed. Calculate the average based on actual days physically worked on the installation project.

RESPONSE:

Verizon objects to this interrogatory on the grounds that it would require an unduly burdensome special study. Specifically, the request would require Verizon to perform an extensive investigation and analysis of data from the job tracking database in order to determine actual hours worked on each specific installation. In some cases, related work activities such as power, cable racking, etc. would require Verizon to relate some percentage of hours worked to the installation of the robotic automated frame. In addition, at least one of the installation jobs is still pending.

SUPPLEMENTAL RESPONSE (12/15/03):

Pursuant to discussion with counsel for MCI, and subject to the above objections, and without waiving them, Verizon provides the following information on the date on which the relevant equipment was shipped and the date on which installation was completed.

Office	Ship Date	Complete Date	Status
Angelica	11/15/2002	5/6/2003	Complete
Avoca	11/22/2002		Pending
Canisteo	11/29/2002	9/19/2003	Complete
Hinsdale	10/23/2002	5/6/2003	Complete
Lafargeville	11/15/2002	5/6/2003	Complete