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March 21, 2003

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Docket D.T.E. 01-20

Dear Ms. Cottrell:

AT&T respectfully urges the Department to deny Verizon's unjustified request for three additional days to develop and file its reply comments concerning its compliance filing in this proceeding.

It appears that Verizon is scrambling to come up with new justifications for and new information to explain away the deficiencies that other parties have identified in Verizon's compliance filing. If so, that would be improper. It is far too late for Verizon to introduce more new evidence or backup in an effort to explain away its deviations from the Department's orders.

If Verizon is not trying to manufacture and present new evidence at this time, then there is no need for the requested extension of time. The schedule calling for Verizon to file its reply comments on March 25, one week after receiving the comments of other parties, was established by the Hearing Officer on February 11, more than five weeks ago. Verizon raised no objection to this schedule at the time, or during the technical sessions. Verizon should have had any and all staff needed to work on its reply comments lined up long ago.

AT&T, other parties, and DTE staff managed to review and analyze the many thousands of pages in Verizon's voluminous compliance filing in less than three weeks. Indeed, because of the delays in AT&T receiving (i) working electronic copies of Verizon's compliance filing models (which did not occur until February 20 or 21), and (ii) the quite limited backup that existed for the entirely new FLC factor proposed by Verizon (which did not occur until late in the afternoon of March 3, less than two days before the start of the technical sessions), AT&T had substantially less time than that to conduct this review.

Verizon has failed to demonstrate any credible reason why it should need any additional time to address the short list of issues raised in comments on its compliance filing. Verizon must limit its reply comments to a discussion of whether its compliance filing in fact complies with the Department's orders. Because Verizon may not now attempt to introduce new evidence – in the

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form of “backup” or anything else – to justify its compliance filing, Verizon’s reply comments must of necessity be quite limited in scope. Thus, the time allotted by the Department for Verizon to prepare and file reply comments was and remains reasonable.

Very truly yours,

Kenneth W. Salinger

pc: Marcella Hickey, Esq., Hearing Officer
Tina Chin, Esq., Hearing Officer
Michael Isenberg, Director, Telecommunications Division
Service List