

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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| INVESTIGATION BY THE DEPART- |) | D.T.E. 02-8 |
| MENT ON ITS OWN MOTION, |) | |
| PURSUANT TO G.L. c.159 secs. 12 and |) | |
| 16, INTO THE COLLOCATION |) | |
| SECURITY POLICIES OF VERIZON |) | |
| NEW ENGLAND INC. d/b/a VERIZON |) | |
| MASSACHUSETTS |) | |

QWEST'S
FIRST SET OF INFORMATION REQUESTS
OF VERIZON MASSACHUSETTS

Instructions

1. Please provide one (1) copy of your responses to the following information requests to Thomas Snyder, 1801 California Street, Suite 4900, Denver Colorado 80202 – email address: tw snyde@qwest.com. If possible, please provide notice to counsel so that a messenger can be dispatched to retrieve such responses by hand.
2. Please provide your responses as soon as each is available, but no later than ten (10) days.
3. For ease of reference, Verizon Massachusetts is identified herein as “Verizon” or “the Company.”
4. Please provide each response in writing on a separate piece of paper with a recitation of the request, a reference to the request number, the docket number on the case, the date of the response and the name of the person responsible for the answer.
5. Please be advised that these requests shall be deemed continuing so as to require further supplemental responses if Verizon or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm,

microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If Verizon finds that any one of these requests is ambiguous, please notify Qwest so that the request may be clarified prior to the preparation of a written response.

8. If a question or response refers to an information request of another party or another proceeding, please provide an answer that supplements that response, if applicable, and attach a copy of that response.

Information Requests

1. Please provide the complete resume or curriculum vitae for each of the members of the Panel Testimony, including Lawrence R. Craft, Francesco S. Mattera, Lynelle Reney, and Peter Shepherd.

2. For each proceeding in which the Panel Members have appeared as a witness on behalf of Verizon where collocation or collocation security was discussed, please list all proceedings by docket title, number, date and parties.

3. Explain how Verizon's proposals contained in its testimony would have changed the outcome at Verizon's CO at 140 West Street in NY after the 9/11 attacks had these proposals been implemented at the time of the attacks.

4. Provide the quantity of collocators and number of collocation sites in each Verizon CO in Massachusetts for each of the following years:

1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002

5. Provide the number of network outages, network impairments, and network troubles in Verizon's network in Massachusetts for each of the following years:

1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002

List each incident, the cause of the incident and the duration of the outage or network trouble.

6. Provide the number of network outages, network impairments and network troubles attributable to "harm" done by other carriers for the following years:

1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002

List each incident, the cause of the incident and the duration of the outage or network trouble.

7. Provide the number of network outages, network impairments and network troubles attributable specifically to the actions of collocators within a Verizon Central Office (CO) for the following years:

1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002

List each incident, the cause of the incident and the duration of the outage or network trouble.

8. Provide the number of network outages, network impairments and network troubles attributable specifically to the actions of Verizon's own personnel with a Verizon Central Office (CO) for the following years:

1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002

9. Provide a list of each security breach identified by Verizon for the state of Massachusetts referenced in its testimony on page 2. Identify the central office location and nature of the breach.

10. Provide a list of each security breach involving Verizon employees, contractors or agents or involving any personnel OTHER THAN collocators for the state of Massachusetts.

11. Provide a list of every Verizon CO that currently has a separate space for collocators. Provide a list of every Verizon CO that currently has a separate entrance for collocators.

12. Provide a list of every Verizon CO that currently does NOT have a separate space for collocators. Provide a list of every Verizon CO that currently does NOT have a separate entrance for collocators.

13. Provide a list of every Verizon CO in which CLEC equipment is "commingled" in the same rooms as Verizon's equipment, and provide the number of CLEC bays that are commingled in the same room as Verizon's equipment.

14. Provide a list of the Verizon COs in which Verizon has "existing unsecured cageless collocation arrangements", and the number of bays and CLECs in each CO involved with such arrangement

15. For the COs listed in #14 above, identify those where no secured space is currently available for relocation of the "unsecured cageless" collocated equipment

16. For the COs listed in #14 above, identify every incident of a security breach related to a collocator which had implemented a CCOE or "unsecured cageless" collocation arrangement

17. Provide a list of Verizon COs where it would not be feasible to “partition” Verizon’s equipment from “shared facilities” (e.g., temporary staging areas, elevators, loading docks, restrooms, etc)

18. Provide a list of Verizon COs where escorts would be required for CLECs to access “shared facilities” (e.g., temporary staging areas, elevators, loading docks, restrooms, etc).

19. Provide a list of Verizon COs Verizon would propose be categorized as “critical” high security-risk COs.

20. Provide a list of COs where Verizon currently has deployed its electronic card reader systems (CRAS) in lieu of locked key access.

21. Provide a list of COs and timetables when Verizon plans to deploy its electronic card reader systems (CRAS) in lieu of locked key access.

22. For each of the COs listed in response to number 21, provide the costs per-CO related to the deployment of electronic card reader systems (CRAS), including the cost of purchasing, installation and maintenance.

23. Provide the number of Verizon employees that currently possess keys to COs where Verizon has not implemented its CRAS system.

24. Please provide the details of the “in-depth, pre-screening” procedures that Verizon plans to implement to pre-screen collocated carrier personnel. Provide copies of any documentation regarding the same.

25. Please provide copies of any tariffs changes or proposed amendments to interconnection contracts that Verizon proposes in order to support its proposed changes to collocation arrangements.

26. For the incidents listed in #7 above, please identify and quantify the “personal and financial loss” to consumers and businesses, including carriers and governmental entities, attributable to any security incidents.

27. Please provide a list of all locations including carrier hotels, carrier POPS (IXC, CLEC, DLEC POPS, etc) or other commercial collocation facilities where Verizon or any of its subsidiaries or affiliates have collocated their own equipment.

28. For the locations identified in 27 above, please provide a copy of all contracts and/or leases governing the collocation arrangement.

29. For every CO in Massachusetts, please identify whether that CO houses a tandem switch, an STP, an emergency 911 switch or any other factor that would result in that CO being classified as “critical” according to Verizon’s testimony.

30. Identify every CO where new physical collocation arrangements cannot be provided in segregated CLEC areas with separate entrances. In addition, please explain how Verizon intends to notify CLECs, on an ongoing basis, which offices are on this list.

31. Identify the number of central offices in which CLECs have abandoned their collocation space.

32. For each CO identified in #30, identify the amount of square feet that is currently available for collocators in Secured Open Environments (SCOPE).

33. Please provide cost estimates for the implementation of separate/segregated space for collocators and explain Verizon’s plan for recovery of those costs.

34. Please identify any incidents in Massachusetts resulting in network disruption that resulted from collocators working on their equipment between the hours of 11 PM and 7 AM. Identify whether those collocators were working in a caged environment, cageless/SCOPE environment, or cageless/CCOE environment. When responding to this question, it is not necessary to identify the names of the CLECs involved.

35. Please identify any incident in which unauthorized CLEC personnel ventured beyond their designated area into areas where they were not authorized to access. When responding to this question, it is not necessary to identify the names of the CLECs involved. For each instance, state with specificity how the incident was identified as unauthorized access, provide documentation of the event and all actions, including discipline, taken. Specific individuals and CLECs may be redacted from the documentation. Identify any repeat offenses as they apply to individuals and/or central offices.

36. Please provide a copy of Verizon’s current policy regarding which Vendors can be hired by CLECs to work in Verizon’s central offices.

37. Please provide a copy of Verizon’s “approved vendor” list. If any vendors on this list are only approved for particular types of work/tasks, identify the type of work/tasks and the vendor.

38. Please provide a list of vendors that Verizon has approved for use by CLECs that are NOT also on Verizon’s own list of contractors as vendors that Verizon would hire to perform its own central office work.

39. If CLECs can only utilize Verizon approved Vendors, please identify “the fundamental differences between Verizon’s . . . vendors and CLEC . . . vendors, who would be installing and repairing equipment that is not physically separate from the Company’s equipment.”

40. Please provide copies of all tariffs, contracts and company technical documentation and/or procedures that address the training requirements for CLECs to work in Verizon’s Central offices.

41. Please identify those central offices where access to restrooms, eye wash stands, and other shared facilities can only be accessed by entering Verizon’s equipment areas.

42. Where partitioning is not feasible, identify specifically those areas to which Verizon would restrict CLEC access.

43. Provide the procedures that Verizon proposes to implement for coordination “at the carrier’s expense”, of “pre-arranged access to certain common areas, such as temporary staging areas and loading docks, for the delivery and unpacking of collocated carrier’s equipment for a given CO.”

44. Please provide a detailed explanation of the basis for determination of whether a central office is classified as “critical”.

45. Provide a list of central offices that include “critical customers”, identifying for each office the nature of the “critical customer” (e.g., airport, military installation government agency, nuclear power plant, etc).

46. Provide a list of central offices that would qualify as “critical” based on the “number of access lines and special services circuits served by a CO”. Provide an explanation of what kind of circuits are included in this access line account, and whether it includes unbundled loops or UNEs. For each central office listed, identify specifically the number of access lines and type of special service circuits as well as any independent reasons this office is considered by Verizon to be “critical.” Also, for each central office listed, identify the total number of collocators, the total number of collocation sites, the number and type of each physical collocation and the number of virtual collocations.

47. By Central Office, provide an estimate of the costs associated with each enhanced security measure proposed by Verizon to be implemented in that office and Verizon’s proposed method of recovering those costs.

Attachment 1, page 3

48. Identify any instance since 1996 where Verizon has requested to reclaim the badge of CLEC personnel due to “repeated misuse or other related security violations.”

49. Identify all instances when a CLEC requested specific space in a Massachusetts central office that interfered with security in that Verizon central office.

50. Explain how and why, in Verizon's opinion, collocation "inherently compromise[s] Verizon MA's ability to protect its network." In addition, specifically, describe with particularity what about collocation jeopardizes "full network reliability."

51. Explain how and why, in Verizon's opinion, CLEC and their personnel are not as interested in the security of the central office where they (the CLEC) have equipment and/or services in place as Verizon personnel in that central office.

52. For each CO, please provide the costs associated with Qwest's (including Qwest Interprise America, Inc.'s) collocation arrangements to implement Verizon's proposed collocation security plan (provide as proprietary response).

53. Please explain Verizon's current background check procedures for personnel requesting security badges, including whether all personnel, both Verizon and non-Verizon employees, are subjected to background checks, who performs the background checks, and what criteria is used in assessing whether an individual passes a background check.

54. Identify each Massachusetts CO on which Verizon maintains a sign or other marking identifying the CO as a facility owned by Verizon or a predecessor.

55. Please describe the method by which Verizon collocates out of its region, including whether such collocation is virtual or physical and, if the latter, whether the collocation is caged or cageless. Please also identify whether Verizon maintains physical collocation in any unsecured areas.

DATED: April 16, 2002

QWEST COMMUNICATIONS CORPORATION

By: _____

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