

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lynelle Reney

**Title:** Director

**Respondent:** Lawrence R. Craft

**Title:** Manager

**Respondent:** Francesco S Matera

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-1 For each central office in which at least one CLEC is collocated, please provide the following:

- (a) the address and any other identifying name of the CO;
- (b) a diagram of the floor plan of each CO, identifying (i) areas occupied by CLEC equipment only, (ii) areas occupied by Verizon equipment only; (iii) areas occupied by intermingled CLEC and Verizon equipment; (iv) the location of shared facilities, e.g., loading docks, staging areas, and restrooms; and (v) the path taken by CLEC employees, agents, and vendors to gain access to CLEC equipment and shared facilities;
- (c) a copy of the CO-specific security plan, if one exists. If one does not exist, please provide a copy of the security plan that otherwise applies to the CO;
- (d) the number of CLECs collocated at the CO;
- (e) the number of CLEC employees, agents, or vendors that have visited the CO in each month in which CLEC equipment has been collocated there, and the total number of such visits;
- (f) the number of Verizon employees, agents, and vendors who have visited the CO during those months, and the total number of such visits; and

- (g) the number of Verizon employees who are assigned to the CO on a permanent basis.

**REPLY:**

- a) See attached for a list of COs where at least one CLEC is collocated.
- b) Verizon MA objects to this request on the grounds that it is unreasonable because of the overly broad scope of the data requested and the burden of compliance. Verizon MA also objects to this request on the grounds that it seeks information that is confidential in nature and is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

Typically, diagrams of CO floor plans, where readily available, include the name of the CLEC and the collocated space occupied by that CLEC by location and type of collocation arrangement. Such diagrams also identify the location and specific type of Verizon equipment, as well as the Company's designated areas of future growth. They are highly confidential, internal business documents used by Verizon for planning purposes to determine where physical collocation is available. Verizon MA provides CLECs with information regarding the amount of square footage in a CO available for collocation space on its Company website.

As a general practice, Verizon does not provide collocated carriers with copies of CO floor plans – even on a confidential basis. This is because the presence of collocated carriers in a particular CO is highly commercially sensitive, third-party data, which Verizon is not at liberty to disclose. Likewise, CO floor plans reveal competitively sensitive information about Verizon's current business operations and anticipated growth.

The only exception to Verizon MA's general practice of not disclosing CO floor plans is when a CLEC seeks to collocate physically in a CO where there is no longer available physical collocation space. In those limited cases, Verizon MA has allowed CLEC confidential access, on Company premises only, to the CO floor plan, and has submitted a diagram to the Department with its physical collocation waiver or exemption request on a proprietary basis in accordance with federal requirements. Disclosure of all CO floor plans in this proceeding is totally unwarranted and would be detrimental to collocated carriers and Verizon MA by providing an unfair competitive advantage to other service providers.

In addition, it is inappropriate and unnecessary to disclose this highly competitively sensitive information in this proceeding because it is not relevant to the issues to be decided in the case. This proceeding deals strictly with the issue of collocation security procedures. Moreover, all physical collocation arrangements (caged and cageless) in Massachusetts are currently located in secured space separated from Verizon MA's equipment in the CO, with one exception.

Verizon MA recently determined that there is only one CO in Massachusetts where a cageless collocation arrangement exists that is located in an unsecured area and cannot be converted to a separate, secured space. This is also the only CO in Massachusetts where a CLEC has access to restroom facilities in unsecure space because Verizon MA's equipment is intermingled. In all other collocated COs in Massachusetts, CLECs are provided reasonable access to restroom facilities in separate areas using secured pathways, *i.e.*, secured from Verizon MA's equipment. Likewise, current procedures provide CLECs with reasonable access to loading docks and staging areas, the use of which can be coordinated with Verizon for CLEC vendor equipment deliveries and assemblage during prearranged mutually agreeable time periods. Therefore, the information requested is irrelevant, unreasonable, and beyond the scope of this proceeding.

- c) See attached. This document is also found on Verizon's website: <http://128.11.40.241/east/wholesale/html/pdfs/RSECOL00.pdf>, as reflected in the Collocation Handbook-Section 4, Security Guidelines.
- d) See Verizon MA's Reply to (a) above.
- e) The requested information is not readily available.
- f) The requested information is not readily available.
- g) See attached. This reflects only the COs where CO technicians are based and from which they are dispatched. It does not represent a fixed number of employees permanently assigned to a particular CO. This is because Verizon's CO workforce is assigned on a dynamic basis, which means that although technicians may be assigned to a primary CO, they may be dispatched to multiple COs depending upon workload.

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**D.T.E. 02-8**

**Respondent:** Lynelle Reney

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-2 Please refer to page 5 of Verizon's Panel Testimony where the witnesses state: "Verizon MA also plans to implement an in-depth, pre-screening of collocated carrier personnel designated to access physical collocation arrangement in its COs as a requirement of providing identification badges."

- (a) Please elaborate as to the elements of this pre-screening process and how it will be implemented. Please indicate whether a pre-screening process will be implemented with respect to Verizon employees and outside vendors, and, if so, how the elements of the process or its implementation may differ for Verizon employees or outside vendors, as compared to the pre-screening process proposed for collocated carrier personnel. Provide copies of all documents related to the proposed pre-screening.
- (b) Please explain how this proposed pre-screening process "is consistent with Verizon's more stringent pre-screening and background checks for its employees and vendors that are being adopted as part of its nationwide effort to enhance security in its COs since September 11<sup>th</sup>"? Please provide documentation regarding these "more stringent pre-screening and background checks. Please indicate whether Verizon is using "more stringent pre-screening" and "background checks" as a means of determining which Verizon employees and vendors should receive identification badges. If these processes are not being used for purpose of issuing identification badges or are not being used exclusively for the purpose of issuing identification badges, please explain for what purposes pre-screening and background checks are being used. Please also explain if such pre-screening and background checks are being used in the same manner for Verizon employees and vendors. If not, how does its use differ?

- (c) Please provide an estimate of the cost of this pre-screening process, both in terms of the costs associated with developing the process and the costs associated with implementing such a process. Please also explain how any such costs would be allocated.
- (d) Is Verizon aware of any other pre-screening processes that have been used for purposes of issuing identification badges to collocated carrier personnel? If the answer to this question is yes, please provide a description of these processes, indicate where these processes are being employed, indicate whether these prescreening processes are implemented for collocated carrier personnel only, and provide any documentation available about these processes.

**REPLY:**

- a) The pre-screening process for CLECs and their contractors should include the following: (1) CLEC certification that it has conducted a criminal background check of its employee and/or contractor dating back not less than 7 years in the county of residence, or previous county of residence; and (2) CLEC certification that it has conducted employee drug screening to scan for the presence of controlled substances, as listed on the current Verizon non-employee access credential application. This process for CLECs is consistent with Verizon MA's current practices for its employees (See Attachment 1). In addition, Verizon is in the process of working with its vendors to adopt a pre-screening process on a going-forward basis. Verizon's vendors are also responsible contractually for any harm resulting from their actions.
- b) See Verizon MA's Reply to (a) above. The more stringent requirements proposed by Verizon is to increase the duration of the criminal background check from five to seven years.
- c) Verizon MA has not determined the costs associated with implementing this process. The costs for CLECs to conduct the necessary criminal background check and drug screening for their personnel will be borne by the CLECs.
- d) Verizon is not aware of any other pre-screening processes used by other companies for collocated carriers.

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**Respondent:** Lawrence R. Craft  
**Title:** Manager

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-3 Please refer to page 16 of Verizon's Panel Testimony where the witnesses state: "Verizon MA requests that the Department permit the Company to establish the proposed *pro-active* security procedures that would secure and segregate....the telecommunications network infrastructure from harm....", and that "the Department should join with Verizon to ensure that additional security measures can be implemented, and seek appropriate changes to FCC rules, if necessary."

- (a) In Verizon's view, which, if any, of the proposed security measures set forth in the Panel Testimony can the Department adopt as part of this proceeding? For each such measure specified, please explain why Verizon holds this view and provide citations, as necessary.
- (b) In Verizon's view, which, if any, of the proposed security measures set forth in the Panel Testimony can be adopted only if the FCC changes its rules? For each such measure, please explain why Verizon holds this view and provide citations, as necessary.

**REPLY:** Verizon MA objects to this request to the extent that it would encompass information that is subject to the attorney/client privilege, or consists of attorney work product, including the mental impressions, conclusions, opinions, or legal theories of counsel concerning litigation or regulatory proceedings, or was prepared in anticipation of litigation, for use at trial or hearings, and/or for the purpose of settlement. Notwithstanding this objection, Verizon MA responds as follows:

(a) & (b):

As stated in Verizon MA's Reply to Allegiance 1-1, Verizon MA currently provides physical collocation (caged and cageless) arrangements in secured, separate collocation space in all but one Massachusetts central office ("CO"). Verizon MA provides reasonable access to shared facilities via separate and secure pathways in all but this one CO, as described in Verizon MA's Reply to Allegiance 1-1. Because this one cageless collocation arrangement cannot be moved to a secured and separate space, it would be converted to a virtual collocation under Verizon MA's security proposal. Likewise, for security reasons, Verizon MA proposes that certain "critical" COs be designated as available only for virtual collocation. While an argument can be made that a waiver or modification of existing federal regulations (*see e.g.*, 47 C.F.R. Part 51 §51.321 and §51.323) may be required to enable the Department to adopt those security measures, Verizon MA believes that its proposal is consistent with current FCC rules, which state that an incumbent local exchange carrier is not required to provide for physical collocation if it demonstrates to the Department that physical collocation is not practical for technical reasons or because of space limitations.

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**Title:** Manager

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-4 Please refer to page 17 of Verizon's Panel Testimony where the witnesses lay out five different security methods for providing access to CLECs to collocated space and shared facilities.

- (a) For each CO where collocation occurs, please indicate which of the five security methods are employed. For each such CO, please explain why a particular security measure or combination of measures has been chosen.
- (b) Has Verizon developed criteria for determining which of the five stated security measures should be employed at a CO? If so, please provide a list of these criteria.

**REPLY:** (a) & (b):  
All Verizon MA COs require authorized access credentials or identification for entry, and are secured either by a key lock or electronic access card reader system. Likewise, Verizon MA generally places appropriate signage, *e.g.*, masking tape on the floor, to mark secured and separate means of ingress and egress for collocated carriers. Although most COs do not have assigned security guards, Verizon technicians are present in the collocated COs, as indicated in Verizon MA's Reply to Allegiance 1-1(g); see also Verizon MA's Reply to Allegiance 1-1(c).



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**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-5 Please refer to page 19 of Verizon's Panel Testimony where, in discussing alleged problems with the use of cameras for security purposes, the witnesses state: "since CLECs can access COs 24 hours a day, seven days a week, a minimum of four guards per collocated CO (or one per shift) would be required to provide real-time monitoring."

- (a) Please clarify what the witnesses mean by the term "per collocated CO"?
- (b) Has Verizon estimated the costs associated with real-time monitoring of COs where collocation occurs? If so, please provide an estimate of these costs, broken down by individual CO.

**REPLY:**

- a) The term means a Verizon central office that has one or more CLEC physical collocation arrangement(s).
- b) No. Verizon has not estimated the costs associated with real-time monitoring of collocated COs (*e.g.*, costs for equipment hardware, software, communications facilities, staffing or supervision, etc.). See also Verizon MA's Reply to XO-VZ-1-6.

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**Respondent:** Lynelle Reney  
**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-6 Please refer to page 20 of Verizon's Panel Testimony where the witnesses state: "Verizon is aware of instances where CLECs have not reported lost access cards or returned cards given to former employees and representatives."

- (a) For each such instance involving the loss or failure to return a Verizon-issued card, please provide (1) the date Verizon learned that an access card was lost or not returned; (2) the nature of the problem, *i.e.*, card lost, card not returned; (3) a description of how and when the problem was resolved, *i.e.*, card returned, card found, card cancelled; (4) a description of any security consequences associated with the lost or unreturned card; and (5) any written documentation regarding the occurrence and resolution.
- (b) For each of the three most recent calendar years (1999, 2000, 2001), please provide the number of access cards that were issued (or renewed) to CLEC personnel for purposes of accessing Verizon facilities in Massachusetts and the number of instances where lost cards were not reported or cards given to former CLEC employees or representatives were not returned.

**REPLY:** See Verizon MA's Reply to AG-VZ 1-1 for reported instances of lost access cards. Notwithstanding Verizon MA's policy of requiring CLECs to return access credentials that are no longer required (*e.g.*, termination of employment of CLEC personnel or vendors), that procedure is seldom followed by the CLECs. Since access cards generally have a one-year life-span (*i.e.*, effective one-year from the date of issuance), Verizon MA may not know that

that an access card is no longer required – but “not returned” - until the card has either expired or been renewed. Once a card has expired, the user is no longer able to access the CO utilizing that card. To reinstate the expired access card, the CLEC must submit a renewal application to Verizon MA. When cards are reported as “lost,” the CLEC is required to submit a replacement application.

- a) The number of access cards issued to CLECs in Massachusetts is not readily available. In addition, Verizon MA has no way of determining the number of unreported lost access cards because the Company is unaware that a card is indeed lost until the CLEC reports it as such. Likewise, Verizon MA cannot determine whether a card should be returned because CLECs do not inform Verizon MA when it terminates employment for its personnel or vendors, even though they are required to do so for purposes of access credential management. Accordingly, Verizon MA cannot track the number of expired (*i.e.*, non-renewed) access cards that were lost or not returned.

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**Title:** Director

**Respondent:** Lawrence R. Craft

**Title:** Manager

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-7 Please refer to page 20 of Verizon's Panel Testimony where the witnesses state "Verizon is also aware of CLEC personnel or agents using cards belonging to others."

- (a) For each such instance involving the use of another employee's access card, please provide (1) the date and location of the instance; (2) a description of the circumstances involved; (3) a description of how and when the problem was resolved; (4) a description of any security consequences associated with the infraction; and (5) any written documentation regarding the occurrence and resolution.
- (b) With respect to footnote 18 on page 20, please explain the security consequences associated with unmonitored secondary exits that serve only as exits. Please indicate whether these secondary exits are locked for purposes of preventing entry.

**REPLY:**

- (a) See Verizon MA's Reply to AG-VZ-1-1. It should be noted that not all instances of a CLEC employee using another's access card are reported. This is because it is difficult to observe someone using another individual's access card. Verizon MA can, however, detect a misuse of CLEC access cards when a malfunction occurs. In such cases, the CLEC representative contacts Verizon and is asked to provide his/her name and card number. If the individual's name does not match the name on file in connection with the particular CLEC card number, then Verizon would deactivate the card, reiterate the restriction against misuse of cards, and only reactivate that card at the request of the assigned CLEC user calls.

If we catch the infraction, no security consequences result because

- (b) Secondary exits that provide no entry are intended primarily for emergency evacuations. Such exits are always locked to prevent entry, but allow free egress from the building. Thus, they can only be used as entrances if someone inside the central office (CO) improperly props the door open to allow entry in violation of Verizon's security guidelines, thereby bypassing any security control point, sign in log or card access reader that would restrict access to Verizon space in the CO.

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**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-8 Referring to page 21 of Verizon's Panel Testimony, please explain whether measures are in place which prevent individuals from "tailgating" Verizon employees entering areas requiring card access. If so, please explain what these measures entail and whether similar measures could be employed to prevent the "tailgating" of CLECs or vendors.

**REPLY:** In accordance with Verizon's Security Guidelines provided in Verizon MA's Reply to Allegiance 1-1(c), Verizon and CLEC personnel and vendors are instructed to deny access to any individual ("tailgater") who attempts to enter the central office (CO) through a secured door and who does not display the proper and currently valid Verizon-issued access identification card. Every individual authorized to access the CO is responsible for following those guidelines to ensure the security and safety of the facility.

**Verizon New England Inc.  
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**D.T.E. 02-8**

**Respondent:** Francesco S Matera

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-9 Referring to page 23 of Verizon's Panel Testimony, in which the witnesses propose "relocating existing *unsecured* CCOE arrangements to secured, separated areas, where space permits, or otherwise converting them to virtual collocation arrangements," in which central offices does Verizon contend that relocating CCOE arrangements to "secured, separated areas" would not be feasible? Produce all documents related to Verizon's analysis in concluding that such relocation would not be feasible.

**REPLY:** No document exists. Since filing its Panel Testimony on April 5, 2002, Verizon MA has determined that there is only one CCOE arrangement in Massachusetts (*i.e.*, Hopkinton CO) that is located in unsecured space and cannot be relocated due to a lack of separate and secure space in the central office. See also Verizon MA's Reply to Allegiance 1-1(b).

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**D.T.E. 02-8**

**Respondent:** Francesco S Matera

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-10 Referring to page 27 of Verizon's Panel Testimony, in which the witnesses propose that "[i]n those cases where new physical collocation arrangements cannot be provided in segregated CLEC areas with separate entrances, virtual collocation arrangements should be required," in which central offices does Verizon contend that future collocation arrangements should only be virtual? Produce all documents related to Verizon's analysis in concluding that physical arrangements would not be feasible at those central offices in the future.

**REPLY:** As stated in its Reply to Allegiance 1-9, Verizon MA has only identified one existing cageless collocation arrangement which cannot be relocated to secured, separate space in the central office (CO). Because this is an ever-changing process based on future CLEC demand in a particular CO and the potential termination of existing CLEC arrangements, Verizon MA cannot predict which COs would fall into this category. Therefore, the availability of secured, separate collocation space would need to be determined at the time of the individual CLEC collocation request in a particular CO.



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**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-11 Referring to page 27 of Verizon's Panel Testimony, in which the witnesses state that "Verizon MA believes that a higher, yet reasonable, degree of security is required to ensure full network reliability, and can only be attained if collocators are located in separate and segregated areas of the CO," please identify the date on which Verizon MA management first concluded that the degree of security extant in Verizon MA facilities did not "ensure full network reliability." Also, please identify the specific individuals who reached that conclusion, and produce all of the documents they relied upon in reaching that conclusion.

**REPLY:** The longstanding position of Verizon (and the former Bell Atlantic companies) has been that providing CLECs unfettered access to its COs would diminish the level of network security. This is set forth in the Company's prior filings in D.P.U. 98-21, D.T.E. 98-57, and in FCC Docket No. 98-147. Verizon's position regarding separate and secured collocation space is based on the collective knowledge and experience of numerous individuals across various organizations in the Company, including but not limited to Security, Network Operations, Real Estate and Project Management. Verizon is unable to identify each of those individuals, and is unaware of any specific documents relied upon in reaching that conclusion. In addition, in Massachusetts, as noted in Verizon MA's Reply to Allegiance 1-9, there is only one physical (cageless) collocation arrangement that is currently in unsecured space.

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**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-12 Referring again to page 27 of Verizon's Panel Testimony, in which the witnesses state that "Verizon MA believes that a higher, yet reasonable, degree of security is required to ensure full network reliability, and can only be attained if collocators are located in separate and segregated areas of the CO," please identify all other security options considered and rejected by Verizon MA before concluding that "full network reliability . . . can only be attained if collocators are located in separate and segregated areas of the CO." Also, please identify the specific individuals who considered and rejected these other options and produce all documents reviewed or relied upon by them in reaching that conclusion.

**REPLY:** Verizon also considered the following alternative proposals: (1) virtual collocation only in collocated COs; (2) expansion of security escorts in COs to be funded by CLECs; (3) expansion of electronic surveillance, *i.e.*, card reader access systems; and (4) use of biometric feedback devices to authenticate access authority. With the exception of biometric devices, which has been deferred, the other alternatives are still being considered by Verizon's Security, Network Operations, Real Estate and Project Management organizations as reasonable security measures. See also Verizon MA's Reply to Allegiance 1-11.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-13 Referring to page 28 of Verizon's Panel Testimony, in which the witnesses state, in referring to the Verizon "Safe Time" policy, "[t]hat safety policy would be undermined, and network security threatened, if separating or partitioning collocator equipment were not required, and collocator personnel could access unsecured equipment any time of the day," please identify the date on which Verizon management first concluded that network security would be threatened "if separating or partitioning collocator equipment were not required, and collocator personnel could access unsecured equipment any time of the day." Also, please identify the specific individuals who reached that conclusion, and produce all of the documents they relied upon in reaching that conclusion.

**REPLY:** See Verizon MA's Reply to Allegiance 1-11.

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**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-14 Referring to page 30 of Verizon's panel testimony, in which the witnesses state, "[c]ommingling of Verizon MA's and CLEC's equipment in the same unpartitioned equipment area presents insurmountable security problems," please identify the date on which Verizon management first concluded that "[c]ommingling of Verizon MA's and CLEC's equipment in the same unpartitioned equipment area presents insurmountable security problems." Also, please identify the specific individuals who reached that conclusion and produce all documents they relied upon in reaching that conclusion.

**REPLY:** See Verizon MA's Reply to Allegiance 1-11.

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**Respondent:** Lynelle Reney

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-15 Please identify with specificity any breaches of security experienced by Verizon MA, dating from the time of the first collocation by a CLEC in a Verizon central office, that Verizon MA attributes to commingling of Verizon MA equipment with CLEC. For each such incident, please identify the date and location of the security breach, and the Verizon employee responsible for investigating the security breach, and produce all documents related to the security breach or Verizon's investigation of it.

**REPLY:** See Verizon MA's Reply to AG-VZ 1-1.

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**Respondent:** Francesco S. Mattera

**Title:** Director

**Respondent:** Lynelle Reney

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-16 Please refer to footnote 25 on page 31 of Verizon's Panel Testimony.

(a) How many times over the last three calendar years (1999, 2000, 2001) has Verizon terminated or taken steps to terminate one of its own employees, vendors or employee of a vendor for accidentally causing damage in one of its COs? For each such instance, please provide the date, location and nature of the accidental damage; the date on which Verizon initiated action to terminate; and the date on which the employee or vendor was terminated (or, in the event the employee was not terminated, the date and nature of the resolution of Verizon's action with respect to that employee or vendor.) For each such instance, please also provide any documentation that establishes that the employee, vendor or employee of a vendor was terminated or that Verizon initiated action to terminate an employee or vendor.

(b) Please provide all employment contracts, union contracts and other documents or agreements which set forth the process by which Verizon may terminate an employee or vendor for accidentally causing damage to one of its COs. In answering this question, please cite or otherwise indicate all terms in the contracts, documents or agreements which (1) demonstrate that Verizon has the ability to terminate employees or vendors for accidentally causing damage to its COs, and (2) set out the process by which Verizon can terminate employees or vendors on these grounds.

(c) How many times over the last three calendar years (1999, 2000, 2001) has Verizon terminated or taken steps to terminate one of its own employees or vendors for intentionally causing damage in one of its COs? For each such instance, please provide the date,

location and nature of the intentional damage; the date on which Verizon initiated action to terminate; and the date on which the employee or vendor was terminated (or, in the event the employee was not terminated, the date and nature of the resolution of Verizon's action with respect to that employee or vendor.) For each such instance, please also provide any documentation that establishes that the employee or vendor was terminated or that Verizon initiated action to terminate an employee or vendor.

- (d) Please explain how the Verizon's inability to terminate CLEC or agents creates a "disincentive" for CLEC employee or agents "to follow proper procedures and exercise care and caution when working around Verizon MA's equipment."
- (e) Please indicate all instances in which CLEC employees or agents have accidentally or intentionally caused damage to one of Verizon's COs. For each such instance, please provide the date, location and nature of the damage; the CLEC that allegedly caused the damage; whether Verizon considered the damage to be caused accidentally or intentionally; and any documentation regarding the incident. For each such instance, please also indicate whether Verizon contacted the CLEC involved about the damage, and/or whether Verizon made any demands or recommendations regarding continued employment of that employee or agent by the CLEC. If such contact was made, please provide any documentation regarding that contact.
- (f) Please indicate all instances in which Verizon employees, vendors or agents have accidentally or intentionally caused damage to Verizon COs, from January 1999 to the present. For each such instance, please provide the date, location and nature of the damage; whether Verizon considered the damage to be caused accidentally or intentionally; and any documentation regarding the incident.

**REPLY:**

- a) The information is not readily available, with the following exception. Verizon MA has not terminated or undertaken to terminate any of its CO technicians or equipment installation technicians for accidentally causing damage within or to Verizon MA's COs during the three-year period.

- b) See attached Code of Business Conduct. Verizon MA's labor contracts do not address the conditions under which an employee may be terminated.
- c) See Verizon MA's Reply to Allegiance 1-16(a) above.
- d) Because Verizon MA is not in a position to discipline or terminate the employment of CLEC personnel or contractors for not following proper CO procedures or exercising due care when in proximity of Verizon MA's equipment, there is no incentive or motivation for CLEC personnel to do so. Thus, CLEC personnel and contractors may not follow proper CO procedures, believing that they are not directly accountable or answerable to Verizon MA for the consequences of their actions.
- e) See Verizon MA's Reply to AG-VZ-1-1.
- f) See Verizon MA's Reply to AG-VZ-1-1.



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**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-17 Does Verizon employ cleaning crews in its Massachusetts central offices? If so, do these crews clean secure and unsecured areas? What security clearance must each member of a cleaning crew possess in order to gain entrance to each type of area?

**REPLY:** The information is not readily available and will be supplemented at a later date.

VZ # 35

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-18 Referring to page 33 of Verizon's panel testimony, in which the witnesses state, "[i]t is virtually impossible to provide adequate security for Verizon MA's facilities in an unsecured environment where CLEC personnel is allowed 24 hour a day, seven days a week unescorted access," please identify the date on which Verizon management first concluded that "[i]t is virtually impossible to provide adequate security for Verizon MA's facilities in an unsecured environment where CLEC personnel is allowed 24 hour a day, seven days a week unescorted access." Also, please identify the specific individuals who reached that conclusion and produce all documents they relied upon in reaching that conclusion.

**REPLY:** See Verizon MA's Reply to Allegiance 1-11.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lynelle Reney

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-19 Referring to page 33 of Verizon's panel testimony, in which the witnesses state "Verizon MA estimates that approximately 13 of the 27 CCOE arrangements in Massachusetts are placed in unsecured areas within nine COs," please identify the nine central offices referred to, the specific measures Verizon proposes for those central offices, and the approximate cost of implementing those measures.

**REPLY:** See Verizon MA's Reply to Allegiance 1-9. Verizon MA has not estimated the costs associated with implementing these measures. See also Verizon MA's Reply to XO-VZ-1-6.

VZ # 37

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Francesco S. Matera

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-20 Please refer to page 39 of Verizon's Panel Testimony where the witnesses state that Verizon proposes to convert certain "critical" CO sites to sites that would provide virtual collocation only, even if physical collocation space were otherwise available.

- (a) Please discuss how Verizon proposes to "work with the Department" to identify these "critical" sites. Is Verizon proposing to work with the Department to identify such sites outside of an adjudicatory or other regulatory review process where CLECs and other entities can present testimony or comment on issues related to identification and conversion of such sites?
- (b) With respect to the first "key factor" currently identified by Verizon for determining which COs might be selected as "critical", please explain what types of switches or signaling elements housed in a CO would qualify that CO for "critical" status under Verizon's proposal.
- (c) With respect to the second "key factor" identified by Verizon for determining which COs might be selected as critical, please identify which airports, military installations, government agencies and nuclear power plants in Massachusetts would qualify as "critical customers" under Verizon's proposal. For each such "critical customer", please identify the associated CO or COs that would qualify as "critical" for purposes of serving that customer.
- (d) With respect to the third "key factor" identified by Verizon for determining which COs might be selected as critical, please indicate what specific number of access lines and/or special services circuits would operate as a threshold for determining

which COs are “critical”. For each CO where collocation occurs, please provide the number of access lines and special services circuits.

- (e) If it is the case that Verizon proposes that the three key factors for determining which COs might be selected as “critical” are to be applied interactively, please explain how Verizon would apply these three factors interactively to determine whether a CO is critical.

**REPLY:**

See Verizon MA’s Reply to XO-VZ 1-4.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Francesco S. Matera  
**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-21 For each CO in which Verizon maintains that CLEC equipment would have to be relocated in order to ensure the security of Verizon equipment, please indicate (a) whether all or some relocated CLEC equipment would remain in the CO building, (b) if any equipment would be moved out of the CO building, where it would be moved; (c) the distance between the closest relocated CLEC equipment and Verizon equipment; and (d) the approximate cost to implement the move, including the cost to prepare the separate space and to move the equipment.

**REPLY:** See Verizon MA's Reply to Allegiance 1-19 and XO-VZ 1-6.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-22 Is it Verizon's contention that CLECs should bear all of the costs involved in implementing the proposals contained in the panel testimony? If not, in what manner should costs be shared between CLECs and others?

**REPLY:** Yes. These are reasonable costs directly related to Verizon MA's obligation to provide access to central offices for the purpose of interconnecting competitive networks. This is consistent with the FCC's finding that incumbent carriers should be permitted "to recover the costs of implementing these [collocation] security measures from collocating carriers in a reasonable manner." See First Report and Order and Further Notice of Proposed Rulemaking, Deployment of Wireline Services Offering Advanced Telecommunications Capability CC Docket No. 98-147, ¶48.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-23 Does Verizon believe that any cost/benefit analysis should be applied to the proposed measures? If so, what should be the criteria for determining whether the cost of implementing a particular measure outweighs the benefits that will likely be achieved through that measure?

**REPLY:** No. See also Verizon MA's Reply to XO-VZ 1-6.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lawrence R. Craft  
**Title:** Manager

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-24 Since September 11, 2001, has Verizon undertaken a review of the security plans that cover its Massachusetts central offices to identify measures that would enhance the protection of those facilities from intentional or accidental damage of any origin? If so, which, if any, additional security measures have been implemented? Have any potential measures that were identified not been implemented and, if not, why not? Were any potential additional security measures rejected or not implemented because their cost would outweigh the benefits that the measures would bring? What criteria did Verizon apply in determining whether a particular measure should be implemented? What criteria did Verizon apply in determining whether a particular measure was cost-justified, if cost was a factor at all in its decision-making?

**REPLY:** The following security measures were taken Company-wide since September 11<sup>th</sup>:

- ?? Company facility protection was greatly increased
- ?? 24 X 7 guard coverage was instituted at certain critical locations
- ?? Guard force was upgraded at critical locations, *i.e.*, experience levels of guards
- ?? Armed guards were posted at certain critical facilities
- ?? Supervision of guard force was upgraded
- ?? Verizon Security personnel were assigned to critical buildings to oversee security and perform security reviews (approximately 1,000 locations visited per week)
- ?? Access control at Verizon facilities was strengthened/reinforced
- ?? Verizon IDs were scrutinized
- ?? Bag, parcel searches were conducted
- ?? Visible Verizon ID badge policy was enforced, and employees were encouraged to challenge personnel without visible IDs

?? Mail Security Guidelines were developed and implemented  
?? Response protocol was developed

No documents exist regarding any cost/benefit analysis. Additional security measures relating to collocation security that Verizon MA proposes be implemented are described in its Panel Testimony filed on April 5, 2002, in this proceeding.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Lynelle Reney

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-25 Is Verizon in possession or aware of any evidence that, since September 11, 2001, CLEC employees, agents, or vendors are more likely to engage in conduct that would pose a threat to equipment located in Verizon central offices where the CLEC is collocated than they were before September 11, 2001? If so, please identify all such evidence and produce copies of any documents constituting or related to such evidence.

**REPLY:** See Verizon MA's Reply to AG VZ 1-1. Although there are no known instances of such conduct in Massachusetts, the purpose of strengthening Verizon MA's collocation security measures, as raised by the Department in this proceeding, is to prevent such incidents from occurring in Massachusetts. Verizon's proposal provides a reasonable means of ensuring that those individuals with no legitimate reason to enter Verizon MA's COs cannot access the facility. This not only protects Verizon MA's equipment, but the equipment of collocated carriers as well. Such preventive steps are reasonable and necessary because of the potential to target telecommunications facilities, which are generally considered at higher risk. Accordingly, the Department should enable Verizon MA to take these additional precautions and implement the proposed collocation security procedures.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** Allegiance Telecom of Massachusetts, Inc., Set #1

**DATED:** April 12, 2002

**ITEM:** AL-VZ 1-26 Please produce all documents that are in any way related to, in whole or in part, collocation security, and that were filed by Verizon in any of the following proceedings:

- (a) Covad/Bell Atlantic Arbitration, DTE 98-21;
- (b) Teleport Petition, D.T.E. 98-58;
- (c) Verizon Massachusetts Tariff Filing, D.T.E. 98-57 (all phases);
- (d) Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 (FCC) (including all phases); and
- (e) G.T.E. Services Corporation, et al. v. Federal Communications Commission, No. 99-1179 (United States Circuit Court of Appeals for the D.C. Circuit).

**REPLY:** Verizon MA objects to this request on the grounds that the request is overly broad and unduly burdensome.

Without waiving these objections, Verizon responds to this request as follows:

The requested information is voluminous. Due to the voluminous nature of the requested information, a copy of all documents will be made available for inspection by the Department and other parties at the Company's offices at 125 High Street Boston, Massachusetts, at a mutually agreeable time.

VZ # 44