

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)

Investigation by the Department of Telecommunications and) D.T.E. 01-20

Energy on its own Motion into the Appropriate Pricing, based)

upon Total Element Long-Run Incremental Costs, for)

Unbundled Network Elements and Combinations of Unbundled)

Network Elements, and the Appropriate Avoided Cost Discount)

for Verizon New England, Inc. d/b/a Verizon Massachusetts')

Resale Services in the Commonwealth of Massachusetts.)

**WORLDCOM, INC.'S FIRST SET OF
INFORMATION REQUESTS TO VERIZON**

WorldCom, Inc. hereby requests that Verizon provide the data, information and documents described below. The Department's Ground Rules concerning Information Requests are incorporated herein by reference.

- Provide all documents (including studies and associated workpapers) concerning Verizon's actual and contemplated purchases of switches or switching equipment

for the last five years, including but not limited to:

(a) vendor contracts, letters of intent, letters of agreement, amendments, addenda and related documentation;

(b) documents concerning negotiations between Verizon and switch vendors, presentations by vendors to Verizon, requests for information, requests for pricing proposals, proposals, letters of intent, and switch equipment pricing exercises;

(d) correspondence; and

(e) vendor price lists/tables.

- To the extent not already responsive to question 1 above, provide all switch contracts, amendments, addenda and related documentation concerning Verizon's ten most recent purchases of switches or switching equipment from Nortel, Lucent, Siemens, or any other switch vendor, including but not limited to documents concerning the negotiation and purchase of 5ESS and DMS100 switches or switching equipment.
- With respect to the documents responsive to questions 1 and 2 above, separately identify with precision (e.g., by page and relevant section or subsection) the location of
- each discount for each piece of equipment purchased;
- the discounts used in the models/studies submitted to support Verizon's proposed UNE rates, including but not limited to each growth discount and each replacement/cut-over discount.

- To the extent not already responsive to questions 1 and 2, above, provide all documents concerning negotiations between Verizon and Lucent, Nortel, Siemens, or any other switch vendor concerning the prices to be paid by, or discounts available to, Verizon for the purchase of switches or switching equipment following the closure of the Bell Atlantic/GTE merger which formed Verizon.
- To the extent not already responsive to questions 1 and 2 above, provide all documents concerning terms and conditions that could affect the price of switches or switching equipment purchased by Verizon in the year 2000 for any region in its footprint, including but not limited to:

(a) vendor contracts, letters of intent, letters of agreement, amendments, addenda and related documentation;

(b) documents concerning negotiations between Verizon and switch vendors, presentations by vendors to Verizon, requests for information, requests for pricing proposals, proposals, letters of intent, and switch equipment pricing exercises;

(d) correspondence; and

(e) vendor price lists/tables.

- Provide a detailed description of the current replacement/cut-over discount available to Verizon from each of its switch equipment vendors.
- Provide a detailed description of the current growth discount available to Verizon from each of its switch equipment vendors.

- Provide all supporting documentation (including studies and associated workpapers) for all inputs (including factors) used by the SCIS model to develop UNE rates, and separately

(a) identify the vendor price lists/tables used to populate inputs in the SCIS model, and;

(b) provide all information necessary to verify that the vendor prices/discounts used to populate the SCIS model do, in fact, correspond to the identified vendor price lists/tables.

- Provide all documents (including studies and associated workpapers) concerning Verizon's short-term plans for replacing switches in Massachusetts.
- Provide all documents (including studies and associated workpapers) concerning Verizon's long-term plans for replacing switches in Massachusetts.

Respectfully submitted,

WORLDCOM, INC.

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Dated: New York, New York

May 17, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York

May 17, 2001
