

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

Respondent: Francesco S. Mattera

Title: Director

Respondent: Lynelle Reney

Title: Director

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-1 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.

REPLY: Such documents are not maintained in the normal course of business for internal Company witnesses. See pages 6-9 of Verizon MA's Panel Testimony filed April 5, 2002.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft
Title: Senior Specialist
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Title: Director
Respondent: Lynelle Reney
Title: Director
Respondent: Peter Shepherd
Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-2 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.

REPLY: Lynelle Reney previously testified on collocation issues, as indicated on page 8, lines 11 through 15 of Verizon MA's Panel Testimony filed April 5, 2002. The other Panel Members have not previously testified on collocation or collocation security issues.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-3 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.

REPLY: Verizon MA objects to this request on the grounds that it calls for speculation, is overly broad and unduly burdensome, and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Notwithstanding this objection, Verizon MA responds as follows.

The question unreasonably implies that it would be within the Department's or Verizon MA's direct control to prevent an air attack, such as occurred on September 11th. Verizon MA believes that it is not the Department's intent to examine ways to physically fortify central offices ("COs") to withstand crashing planes or bombs, or equip COs with anti-aircraft defense systems to fend off such attacks. Rather, the purpose of this investigation is to establish reasonable collocation security measures that would better deter or prevent harm to the network and loss of service to the millions of end user and carrier customers served by those facilities.

Consistent with actions taken by other entities (e.g., airports, government facilities, etc.) since September 11, 2001, the Department recognizes that "access" to the COs is a primary focus of strengthening collocation security procedures. To that end, it is reasonable and responsible for Verizon MA to examine CLEC access to its COs in a collocated environment and, as a business, to exercise better control over the level and extent to which access is allowed. After all, it was not only an act of crashing of a plane, but the

series of events leading up to that act (*e.g.*, lax enforcement of immigration policies, access to flight school lessons by those on “high security watch” lists, failure to adequately screen airplane passengers for possession of weapons, etc.) that enabled the events of September 11th to occur. Unless “access” to COs by non-Verizon personnel is thoroughly and appropriately addressed, Verizon MA will be unable to secure adequately its COs and ensure the safety and security of its network infrastructure. Accordingly, Verizon MA’s proposed collocation security measures are reasonable and appropriate preventive steps to better protect its investments, preserve its network, and maintain its ability to provide continuous service for its end user and carrier customers by ensuring a more secure collocated environment.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-4 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

REPLY: Verizon MA objects to this request on the grounds that it is unreasonable on its face because of the overly broad scope of the data requested and the burden of compliance. Verizon MA further objects to this request on the grounds that it seeks information that is irrelevant, immaterial and beyond the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding its objection, Verizon MA responds as follows.

Historical data is not readily available in the form requested for years 1990 and 1991. The data requested for years 1992 through 2002 is attached. See also Verizon MA's Reply to Allegiance 1-1(d).

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-5 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.

REPLY: Verizon MA objects to this request on the grounds that it is unreasonable on its face because of the overly broad scope of the data requested and the burden of compliance. Verizon MA further objects to this request on the grounds that it seeks information that is irrelevant, immaterial and beyond the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding its objection, Verizon MA responds as follows.

The information is not readily available in the form requested. However, in an attempt to be responsive to this request, Verizon MA will make available its monthly Quality of Service Reports filed with the Department since 1991 in compliance with the Department's order in D.P.U. 89-300-Q. These reports contain information relating to network outages and trouble report rates. Due to the voluminous nature of the material requested, Verizon MA will make a copy available for inspection in its offices at 125 High Street, Boston, Massachusetts, at a mutually agreeable time.

VZ # 49

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-6 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.

REPLY: See Verizon MA’s Replies to Qwest 1-5 and AG-VZ-1-1.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-7 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.

REPLY: See Verizon MA's Replies to Qwest 1-5 and AG-VZ-1-1.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-8 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 ("sic") Office (CO) for the following years:

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

REPLY: See Verizon MA's Reply to Qwest 1-5.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence D. Craft

Title: Senior Specialist

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-9 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.

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

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-10 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.

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

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-11 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.

REPLY: See Verizon MA's Replies to Allegiance 1-1 and 1-9 regarding separate space in Massachusetts COs for physical collocation arrangements. See also the attached list, which identifies 38 Massachusetts COs where there is currently no separate, secure space available for collocation. The information requested for a list of Massachusetts COs with separate entrances is not readily available.

It should be noted that Verizon MA would continue to provide physical collocation arrangements in COs where separate entrances for collocators do not exist provided that the use of a common entrance or common vestibule would not enable collocated carrier personnel to gain access to Verizon MA's separate and secure equipment areas located behind locked doors in separate rooms or on separate floors.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-12 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.

REPLY: See Verizon MA's Replies to Allegiance 1-9 and Qwest 1-11.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-13 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.

REPLY: See Verizon MA’s Reply to Allegiance 1-9.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-14 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

REPLY: Se Verizon MA’s Reply to Allegiance 1-9.

VZ # 58

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-15 For the COs listed in #14 above, identify those where no secured space is currently available for relocation of the “unsecured cageless” collocated equipment

REPLY: See Verizon MA’s Reply to Allegiance 1-9.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-16 For the COs listed in #14 above, identify every incident of a security breach related to a collocater which had implemented a CCOE or “unsecured cageless” collocation arrangement

REPLY: See Verizon MA’s Replies to AG-VZ 1-1 and Allegiance 1-9.

VZ # 60

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-17 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)

REPLY: The information requested is not readily available. See Verizon MA’s Replies to Allegiance 1-1 and 1-9 and Qwest 1-43.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-18 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).

REPLY: See Verizon MA’s Replies to Allegiance 1-1 and 1-9 and Qwest 1-43.

VZ # 62

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-19 Provide a list of Verizon COs Verizon would propose be categorized as “critical” high security-risk COs.

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: Lawrence W. Craft

Title: Senior Specialist

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-20 Provide a list of COs where Verizon currently has deployed its electronic card reader systems (CRAS) in lieu of locked key access.

REPLY: CRAS is deployed in the following COs: Dorchester, Cambridge, Worcester (2 COs), Springfield (2 COs), Boston (5 COs), Framingham, Billerica, Boylston, Brockton, Burlington, Colrain, Hopkinton, Lynnfield, Marlboro, North Andover, Fall River, Harvard, Taunton, Rowley, Essex, Tewksbury, Chelmsford, Dracut, Wilmington, North Chelmsford, Merrimac, West Newbury, and Westford. S

VZ#64

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-21 Provide a list of COs and timetables when Verizon plans to deploy its electronic card reader systems (CRAS) in lieu of locked key access

REPLY: Verizon MA projects that it will deploy CRAS during 2002 in the following COs: Adams, Agawam, Amherst, Becket, Bridgewater, Brimfield, Charlton, Dennis, East Bridgewater, East longmeadow, Easthampton, Franklin, Great Barrington, Hatfield, Holyoke, Leicester, Lenox, Marion, Milton, Northhampton, Orange, Pittsfield, Shelburne Falls, Southbridge, Spencer, West Stockbridge, Westfield. In addition, upgrades or expansions to the existing CRAS are planned in the following COs for 2002: Billerica, Colrain, Worcester, Hopkinton, Essex, Tewksbury, North Chelmsford, Dracut, Wilmington, Merrimac, West Newbury, Westford.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-22 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.

REPLY: See Verizon MA's Reply to XO-VZ 1-6.

The average historical, estimated cost for deploying electronic card reader systems in a central office ("CO") is approximately \$30,000 per central office. However, CRAS costs may differ based on individual characteristics of the CO, *e.g.*, size of CO, number of collocators, location of collocation arrangements, etc.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-23 Provide the number of Verizon employees that currently possess keys to COs where Verizon has not implemented its CRAS system.

REPLY: Verizon MA objects to this request on the grounds that it is unreasonable on its face because of the overly broad scope of the data requested and the burden of compliance. Verizon MA further objects to this request on the grounds that it seeks information that is irrelevant, immaterial and beyond the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding its objection, Verizon MA responds as follows.

The information is not readily available.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-24 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.

REPLY: See Verizon MA’s Reply to Allegiance 1-2.

VZ # 68

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-25 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.

REPLY: No documents exist.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-26 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.

REPLY: The information is not readily available. 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: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-27 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.

REPLY: Verizon MA objects to this request on the grounds that it is unreasonable on its face because of the overly broad scope of the data requested and the burden of compliance. Verizon MA further objects to this request on the grounds that it seeks information that is irrelevant, immaterial and beyond the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA also objects to the extent that this request seeks highly confidential, competitively sensitive information relating to Verizon affiliates not regulated by the Department. Disclosure of such documents is inappropriate, unnecessary and detrimental to Verizon Communications because it would provide an unfair competitive advantage to competitors in this proceeding by disclosing highly confidential information that is not relevant to the issues to be decided.

Notwithstanding its objection, Verizon MA responds as follows.

The information requested is not readily available.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-28 For the locations identified in 27 above, please provide a copy of all contracts and/or leases governing the collocation arrangement.

REPLY: See Verizon MA's Reply to Qwest 1-27.

VZ # 72

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-29 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.

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: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-30 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.

REPLY: See Verizon MA's Reply to Qwest 1-11. The process for notifying CLECs is for Verizon MA to file an exemption with the Department and convert the office to virtual collocation only. Currently, there are no outstanding assignments in response to CLEC collocation requests in those 38 COs identified in Verizon MA's Reply to Qwest 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: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-31 Identify the number of central offices in which CLECs have abandoned their collocation space.

REPLY: The number of central offices in Massachusetts with terminated collocation arrangements is 238

VZ # 75

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-32 For each CO identified in #30, identify the amount of square feet that is currently available for collocators in Secured Open Environments (SCOPE).

REPLY: There is no SCOPE space available in the 38 Massachusetts COs listed in Verizon MA's Reply to Qwest 1-11.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-33 Please provide cost estimates for the implementation of separate/segregated space for collocators and explain Verizon's plan for recovery of those costs.

REPLY: See Verizon MA's Reply to XO-VZ 1-6. No such data exists.

VZ # 77

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-34 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.

REPLY: While there have been no such identified incidents in Massachusetts, such incidents have occurred in other Verizon jurisdictions, as documented in Verizon MA's Reply to AG 1-1.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-35 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.

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

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-36 Please provide a copy of Verizon's current policy regarding which Vendors can be hired by CLECs to work in Verizon's central offices.

REPLY: See attached. This information is also available on Verizon's Wholesale Website (CLEC Handbook, Volume 1):

<http://www22.verizon.com/wholesale/handbooks/toc/1,3989,c-1,00.html>

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-37 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.

REPLY: See attached. This information is also available on Verizon's Wholesale Website (CLEC Handbook, Volume 1):

<http://www22.verizon.com/wholesale/handbooks/toc/1,3989,c-1,00.html>.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-38 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

REPLY: No such document exists. Verizon MA only uses approved or certified vendors. However, CLECs may opt to use unapproved/uncertified vendors for work inside their collocation facility only. Current procedures require CLECs to utilize approved or certified vendors when conducting work in Verizon MA's portion of the central office.

Verizon does not "approve or certify" vendors. Rather, vendors are approved or certified by industry standard sources, such as Telecordia. Verizon MA has no knowledge of vendors approved or certified only for CLEC work

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-39 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.”

REPLY: See Verizon MA’s Reply to Qwest 1-39.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-40 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.

REPLY: CLEC technicians are required to follow Verizon's Installation Practice and Industry Standards (Information Publication - IP-72201). Those procedures are voluminous and are available on Verizon's Wholesale Website (CLEC Handbook, Vol. 3):
<http://128.11.40.241/east/wholesale/resources/pdf/ip72201.pdf>

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-41 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.

REPLY: See Verizon MA's Replies to Allegiance 1-1 and 1-9.

VZ # 85

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-42 Where partitioning is not feasible, identify specifically those areas to which Verizon would restrict CLEC access.

REPLY: It is Verizon MA's position that CLEC access to the central office should only be allowed when separate and secure collocation space is available.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-43 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 dockets, for the delivery and unpacking of collocated carrier’s equipment for a given CO.”

REPLY: Verizon’s Wholesale Website states as follows:

Where the CLEC shares a common entrance to the central office with Verizon, the reasonable use of shared building facilities (e.g., elevators, unrestricted corridors, designated rest rooms, etc.) is permitted. Verizon makes reasonable efforts to provide access to shared building facilities; however, the location of physical collocation space is dependent on various qualifications that include space availability, proximity to distributing frames, power, and CEFs. Access to such facilities may be restricted by security requirements, and a Verizon employee may be required to accompany the CLEC personnel. In certain central offices, CLEC personnel may be allowed access to shared building facilities only when an authorized Verizon employee is available to accompany the CLEC personnel.

This can also be found at:

http://www22.verizon.com/wholesale/handbooks/section/1,3984,c-3-4-4_2,00.html

Under current procedures, collocated carriers are required to pre-arrange for access to those common areas. *See e.g.*, Method of Procedure (MOP) in Section 7 of the Network Equipment Installation Standards (IP-72201) referred to in Verizon MA’s Reply to Qwest 1-40. It states, in pertinent

part, that:

Special delivery, storage, staging of equipment and removal of trash and debris

- a. Equipment to be delivered on site and delivery dates are as follows:
- b. Special requirements related to storing, staging, and/or moving equipment are as follows:
- c. Plans related to the removal of trash and debris at the end of each shift are as follows:
(

<http://128.11.40.241/east/wholesale/resources/pdf/ip72201.pdf>

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-44 Please provide a detailed explanation of the basis for determination of whether a central office is classified as “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. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-45 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).

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. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-46 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 (“sic”), 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.

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: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-47 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

REPLY: See 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 W. Craft

Title: Senior Specialist

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-48 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.”

REPLY: See Verizon MA’s Reply to AG 1-1.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-49 Identify all instances when a CLEC requested specific space in a Massachusetts central office that interfered with security in that Verizon central office.

REPLY: The premise of the question is incorrect. CLECs do not request specific space. Rather, CLECs apply for "next available space" of CLEC-designated size.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence W. Craft

Title: Senior Specialist

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-50 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."

REPLY: See e.g., Verizon MA's Reply to Qwest 1-3.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-51 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.

REPLY: See Verizon MA's Replies to XO-VZ 1-3 and Allegiance 1-16.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-52 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).

REPLY: See Verizon MA's Reply to XO-VZ1-6.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-53 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.

REPLY: See Verizon MA's Reply to Allegiance 1-2.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-54 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.

REPLY: To the best of Verizon MA's knowledge, each Massachusetts CO has signage or other markings that identifies Verizon or a predecessor as the owner or operator of the facility.

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

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd
Title: Director

REQUEST: Qwest Communication Corporation, Set #1

DATED: April 16, 2002

ITEM: Qwest 1-55 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.

REPLY: See Verizon MA's Reply to Qwest 1-27.