

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

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-1 a) Provide a copy of Verizon's most complete and accurate database containing customer location information, and all documentation necessary to interpret and utilize that data;

b) To the extent there are customers locations not appearing in the database, identify the absence of such information in whatever manner is available to Verizon – for instance, by indicating what fraction of the lines served by a given wire center have associated geocoded information, or by identifying towns and other geographic identities for which no (or only limited) geocoded information is available.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, Verizon MA provides the following response:

- a) The LiveWire Database contains Verizon's most complete and accurate customer address information. CLECs have access to this database through Verizon MA's OSS interface.
- b) Verizon MA does not maintain a geocoded database containing customer location information. The data is unavailable and would require a burdensome special study to develop.

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Respondent: John Livecchi

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-3 a) For each wire center identified in the response to Data Request No. 2, provide the wire center boundaries of that wire center, in electronic form if available (e.g., identifying mapping coordinates for the wire center boundaries), or in paper form otherwise;

b) To the extent there is information available linking a given customer location to the wire center that serves that location, provide such information for each customer location identified in your response to Data Request No. 1.

REPLY: a) Verizon MA does not maintain this information electronically, but does have a paper copy of each individual geographical exchange (rate center) in Massachusetts. Except in a limited number of cases where a geographical exchange is served by more than one wire center, the wire center boundary and rate center boundary are the same. Verizon MA considers these large maps to be voluminous and will make a copy available at its office at 185 Franklin St. at a mutually agreeable time. In addition, a copy of these maps is available at the Department.

b) Please see Verizon MA's response to Information Request ATT 2-1.

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REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-8 Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of Network Interface Devices (NIDs), showing such prices separately for NIDs used at residential and business premises. To the extent that different size NIDs are used in different situations, provide the price of all NID sizes commonly installed by Verizon Bell. To the extent there is a separate price for the NID case and for the actual line protector installed in the case, break the total price down into these components. Provide all available data and documentation – invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response which Verizon MA considers to be proprietary and confidential, and will be provided subject to the terms of a mutually acceptable Protective Agreement.

Attached is a copy of the Amendment 09 of Contract No.14207D dated 2, 2001 between Verizon Communications and TII Industries, and the latest price sheet associated with Verizon MA's purchase of NIDS under a contract that was recently extended through April 2004. In addition, Amendment 4 dated May 2000, and its corresponding price list is included. Also, attached is the original terms and conditions in the contract, and section 6 specifically refers to prices.

Verizon MA primarily uses three types of NIDs. These numbers include 001554336, 001554385, and 001554112.

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D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin

Title: Director

Respondent: John Livecchi

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-10 Provide the average length, size (number of pairs), percentage structure (aerial versus buried), and installed cost per foot of drop cable deployed by Verizon. To the extent any or all of these quantities depend on the population demographics involved – that is, rural, semi-rural, suburban, urban, downtown business district, etc. – separately specify the answers by such demographic environments, by wire center, or by other differentiators suitable for clearly portraying such differences. Provide all available data and documentation – statistical data, planning guidelines, studies, analyses, work papers, and so on – that substantiate this information.

REPLY: The average length of aerial drop wire (125ft.) and buried drop wire (80ft.) is based on the judgement of Verizon MA's engineers. The Company does not maintain records detailing the actual drop lengths.

A drop cable size of 2 pairs is assumed in the cost study.

The percentage of structure used in the cost study is based on a sample and varies by wire center. The results of the sample may be found in the cost study workpapers, Part B-1, Section 5, Subsection 5.12.

The installed cost of drop wire is based on ECRIS data and varies by density zone. The investments are displayed in the cost study workpapers, Part B-1, Section 5, Subsection 5.9

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D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-13 Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of copper cables, displaying this information for each cable size (number of wire pairs) purchased. To the extent these recent contracts do not cover the full range of copper cable sizes Verizon commonly deploys in its distribution, feeder, and interoffice network, provide in addition the corresponding information from the most recent contracts that cover the full range of cable sizes. The information supplied should be sufficient to determine the per-foot price of each cable size. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response which Verizon MA considers to be proprietary and confidential, and will be provided subject to the terms of a mutually acceptable Protective Agreement.

Attached are the current copper cable prices from Superior Telecommunications. This company is Verizon's supplier for copper cable for New England. The prices are adjusted quarterly, and the next adjustment is scheduled contractually for July 2001.

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REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-15 Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of fiber optics cables, displaying this information for each cable size (number of fiber strands) purchased. To the extent these recent contracts do not cover the full range of fiber cable sizes Verizon commonly deploys in its feeder, and interoffice network, provide in addition the corresponding information from the most recent contracts that cover the full range of cable sizes. The information supplied should be sufficient to determine the per-foot price of each cable size. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response. Verizon MA considers the information to be proprietary and confidential and will provide the information subject to the terms of a mutually acceptable protective agreement.

Please see the attached Amendment 11 to the contract (No. X11502D) between Sumitomo Electric Lightwave and Telesector Resources Group, Inc., d/b/a Verizon Services Group. The attachment to Amendment 11 includes the revised prices for all cable shipped after January 1, 2001. that includes the prices.

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REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-17 Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of poles used to support aerial distribution, feeder, and interoffice cables. To the extent these recent contracts do not cover all the pole sizes that Verizon commonly deploys in its distribution, feeder, and interoffice network, provide in addition the corresponding information from the most recent contracts that cover the full range of cable sizes. Identify, and separately show the price of, all hardware associated with the purchase of poles. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response. Verizon MA considers the information to be proprietary and confidential and will provide the information subject to the terms of a mutually acceptable protective agreement.

Please find attached Contract No. BA 18346 dated April 2000 between Telesector Resources Group Inc. and FOR-TEK regarding the purchase of telephone poles. Exhibit A contains the price list for poles, and is further addressed in Section 6.0 of the contract.

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D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-19 a) Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of manholes used in connection with underground copper distribution, feeder, and interoffice cables. To the extent the manhole price depends on the size of the manhole, identify each size manhole Verizon commonly purchases, and provide sufficient information to determine how the price depends on the manhole size.

b) Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of manholes, hand holes, and/or pull boxes used in connection with underground fiber optics feeder and interoffice cables. To the extent the price depends on the type and size of the manhole, identify each type and size of such structure Verizon commonly purchases, and provide sufficient information to determine how the price depends on these differences.

For both parts of this question, provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response. Verizon MA considers the information to be proprietary and confidential and will provide the information subject to the terms of a mutually acceptable protective agreement.

Please find attached the latest two amendments of Contract No. X11339D that provide the prices for manholes valid through September 30, 2001. Please note that freight rates are also addressed in the addendum.

VZ # 80

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D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-25 Provide the fully discounted price that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of serving area interfaces (SAIs). To the extent the SAI price depends on the size of the SAI, in terms of the copper pairs terminated on the interface, identify each size SAI Verizon commonly purchases, and provide sufficient information to determine how the price depends on the SAI size. Also, to the extent the SAI price depends on whether the SAI is used in indoor or outdoor environment, provide sufficient information to determine how the price depends on these two uses. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response which Verizon MA considers to be proprietary and confidential, and will be provided subject to the terms of a mutually acceptable Protective Agreement.

Attachment A is Amendment 5 and 6, and the related price chart associated with Contract X08260D for the serving area interfaces (or cross connects) from Marconi which is has the largest usage in New England. Marconi previously merged with Reltec. There are two other vendors, 3M and HUB Fabricating Co., (a subsidiary of TYCO), but their usage is very small.

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D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-27 a) Please provide the fully discounted price, including a breakdown of charges for equipment, engineering and installation costs that Verizon, or its purchasing subsidiary or affiliate, has paid to manufacturers for its ten most recent purchases of Digital Loop Carrier (DLC) systems.
b) Provide all available breakdown of the equipment price into its separate components. At a minimum, identify the common equipment and line card components of the equipment cost. In particular, identify the manufacturer's engineering and installation costs separately from the price of the DLC itself, to the extent such information is available. To the extent there is a range of DLC sizes, specified in terms of the maximum number of lines that can be served by the DLC, or types that Verizon commonly purchases, provide the information requested in parts (a) and (b) for the full range of sizes and types of DLC Verizon purchases. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate the information provided in response to this data request.

REPLY: Verizon MA objects to this question on the grounds that it burdensome to produce the requested information. Notwithstanding this objection, Verizon MA provides the following response which Verizon MA considers to be proprietary and confidential, and will be provided subject to the terms of a mutually acceptable Protective Agreement.

Attached is the copy of the contract (AlcatelBA18504) between Telesector Resources Group, Inc., d/b/a Verizon Services Group Alcatel USA Marketing, Inc., and a copy of the corresponding price list that is relevant to Massachusetts. Verizon MA does not have an electronic copy of the price list.

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D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-34 To the extent that existing ARMIS data is either incomplete or inaccurate with respect to the following information, please provide Verizon's best available estimation of the total minutes of use per access line on its network for the year 1999, and for 2000 if the information is available. To the extent possible, please provide the requested data both at a total level and disaggregated into local, intraLATA and interLATA categories and for business and residence lines. Please also supply copies of all data, documentation, workpapers, studies, and analyses that Verizon used to develop its response to this request.

REPLY: Verizon MA objects to this request on the grounds that it is unduly burdensome, time consuming, and would require a special study, if Verizon even has the ability to gather the necessary data. Notwithstanding this objection, Verizon MA provides the following response.

For Massachusetts, the average number of DEMs (Dial Equipment Minutes) per average billable access line is 21,963 for the year 1999, and 23,144 for the year 2000. The above numbers are based on Total DEMs and Total Billable Access Lines from the ARMIS 43-04 Reports.

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D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-35 To the extent that existing ARMIS data is either incomplete or inaccurate with respect to the following information, please provide Pacific's best available estimation of the total minutes of use on its network for the year 1999, and for 2000 if the information is available. To the extent possible, please provide the requested data both at a total level and disaggregated into local, intraLATA and interLATA and for originating and terminating usage. Please also supply copies of all data, documentation, workpapers, studies, and analyses that Verizon used to develop its response to this request.

REPLY: Verizon MA objects to this request on the grounds that it is unduly burdensome, time consuming, and would require a special study, if Verizon even has the ability to gather the necessary data. Notwithstanding this objection, Verizon MA provides the following response.

The total number of DEMs on our network in Massachusetts is 98,493,000,000 for 1999, and 103,011,000,000 for 2000.

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D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director – Service Costs

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: May 8, 2001

ITEM: ATT 2-45 Provide the relationship between the installed cost of transmission terminal equipment and the discounted price of the equipment provided in response to Data Request No. 44. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: The average relationship between the installed cost and the discounted price of transmission terminal equipment is represented by the EF&Y factor of 1.5320. The development of this factor is displayed in Part G-3 of the workpapers (FRC 357C).