COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion as to the propriety of the rates and charges set forth in the tariff filings by Verizon – New England, Inc., d/b/a Verizon – Massachusetts	DTE 98-57, Phase III

FIFTEENTH SET OF INFORMATION REQUESTS SUBMITTED BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

Pursuant to the May 24, 2002, Memorandum of the Hearing Officer in Phase III of this docket, AT&T hereby submits the following information requests to Verizon-MA.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon-MA subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon-MA's response to another information request in this proceeding, please provide a copy of that response with the answer.
5. If Verizon-MA cannot answer a request in full, answer to the extent possible and state why Verizon-MA cannot answer the request in full.
6. If Verizon-MA refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Information Requests

1. Please identify the total number of Verizon-Massachusetts access lines that are (1) currently served by digital loop carrier ("DLC") technology, and (2) currently not served by DLCs. For those lines that are presently serviced by DLC, please identify the number of those lines that serve residential customers and the number that serve business customers.

2. Please provide: (a) the name, CLLI code, and location for each central office ("CO") within the Verizon-Massachusetts network; (b) the name, CLLI code, and location for each remote terminal ("RT") within the Verizon-Massachusetts network; and (c) the name and location of the specific CO associated with each RT.

3. Please state the minimum, maximum, and statewide average number of lines served by Verizon-MA's remote terminals ("RTs"). For each of Verizon-MA's remote terminals (identified by CLLI code), please state: (a) the total number of lines served, the total number of residential lines served, and the total number of business lines served; (b) whether the RT is served by fiber feeder, copper feeder, or a combination thereof; and (c) for those RTs served at least in part by fiber feeder, state the capacity of the feeder (e.g., OC-3). Note : The term "feeder" as it is referred to here and throughout this document, refers to the physical plant (e.g. underlying transport facility) running between a VZ-MA RT and VZ-MA CO. That is, the RT "uplink" facility.

4. Please identify the types of DLC equipment, by manufacturer and model number, used in Verizon-MA's central offices ("COs"). Please identify the % of total DLC equipment deployed in COs by manufacturer and model number (e.g. 60% Alcatel Litespan 2000, etc.).

5. Please identify the types of DLC equipment, by manufacturer and model number, used in Verizon-MA's remote terminals ("RTs"). Please identify the % of total DLC equipment deployed in RTs by manufacturer and model number (e.g. 60% Alcatel Litespan 2000, etc.).

6. Please provide a table listing the manufacturer, model number and software release level for all DLC/DSLAM and ATM/OCD equipment currently deployed in each Verizon-MA central office.

7. Please provide a table listing the manufacturer, model number and software release level for all DLC/DSLAM and ATM/OCD equipment currently deployed in each Verizon-MA remote terminal.

8. Please provide a table listing the manufacturer, model number and software release level for all DLC/DSLAM and ATM/OCD equipment currently deployed anywhere within the Verizon-MA network other than central offices or remote terminals.

9. Please provide a diagram or diagrams depicting the form or forms of network architecture that Verizon plans to introduce in connection with or to support its PARTS or PARTS-like offering or offerings, and a diagram or diagrams showing the existing network architecture or architectures that will be modified as a result.

10. Please provide all current or previously considered presentations, reports, memoranda, cost-benefit or other analyses, feasibility studies, plans, assumptions, studies, research, or any other documents that discuss, concern, or refer to the merits or demerits of Verizon's proposed PARTS program or the deployment or potential of any other NGDLC technology by Verizon within the past 10 years.

11. Please provide all current and previously considered presentations, reports, memoranda, cost-benefit or other analyses, feasibility studies, plans, assumptions, studies, research, or any other documents that discuss, concern, or refer to the merits or demerits of or the deployment or potential of any NGDLC technology by any local exchange company other than Verizon, including but not limited to any such documents regarding SBC's Project PRONTO, within the past 10 years.

12. Please provide any documents, including graphic depictions, concerning the network equipment and architecture Verizon-MA is planning to use in the deployment of its PARTS program. Please identify the manufacturer and model of this equipment and provide any engineering sheets and technical specifications associated with such equipment. Please provide any cost figures (retail and discounted) for such equipment.

13. Please provide any schedule Verizon-MA has developed for the deployment of NGDLC technology to particular central offices and remote terminals as part of the PARTS program. If no such schedule is available, please provide a listing of the central offices and remote terminals (by CLLI code) that Verizon-MA has upgraded to NGDLC and is planning to upgrade to NGDLC technology.

14. Has Verizon ever explored or analyzed the possibility (either under PARTS or other architectures) of packetizing low-frequency spectrum (LFS) communications traffic (e.g., plain old telephone service, or POTS voice service) from the RT back to its central office in similar fashion as is done or envisioned for high-frequency spectrum (HFS) communications traffic (e.g. ADSL)? If so, please provide any feasibility studies, analyses, memoranda, notes, research or other documents concerning, describing, or reporting or commenting upon such efforts.

15. Has Verizon ever explored or analyzed the possibility of converging its "tdm voice" and "atm data" traffic at its RT sites, so that all traffic would be transported back to the central office over one common atm feeder facility ? If so, please provide any feasibility studies, analyses, memoranda, notes, research or other documents concerning, describing, or reporting or commenting upon such efforts.

16. Please indicate whether or not the equipment to be used by Verizon in its PARTS deployment is capable of performing a voice packet processor (VPP) functionality. If so, please explain and provide all available documentation concerning that capability. If not, please indicate whether Verizon has ever explored the potential for providing this functionality and provide any documents, including research and feasibility studies, relating to such efforts.

17. Has Verizon-MA ever deployed or considered deploying any Voice Gateway Equipment (e.g. GR008 or TR008 Gateways that allow interoperability between voice and data networks) in its network? Does Verizon plan to deploy such equipment as part of its PARTS offering or to support any other services? If so, please provide a detailed explanation of such plans and assessments, and all documentation discussing or explaining such plans and assessments.

18. What ATM classes of service (e.g. Constant Bit Rate, Variable Bit Rate, Unspecified Bit Rate) will be supported by the network equipment and network architecture deployed by Verizon-MA as part of the PARTS program? Please describe how Verizon-MA arrived at its decision to provide these classes of service and provide any documentation discussing or explaining Verizon's determination of what classes of service to support. If Verizon-MA intends to offer more than one class of service, please detail where and at what capacity each class will be available.

19. Does Verizon have any plans to change the classes of service supported by the PARTS architecture and equipment? If so, please detail these plans and provide any documents discussing, analyzing, evaluating, or explaining these plans.

20. If Verizon is planning to offer Unspecified Bit Rate (UBR) service as part of its PARTS program, what will be the Peak Cell Rate (PCR) for CLEC customers? What will be the PCR for Verizon retail customers?

21. What ADSL line rates will be offered to CLEC customers? What line rates will be offered to Verizon retail customers?

22. Will CLEC ADSL Lines be assigned to a specific Litespan 2000 Channel Bank Assembly designated for a CLEC which would necessitate moving the customers copper pair, or will Verizon simply reassign the existing ADSL port to the CLEC?

23. Please describe the process for assigning new customers and reassigning existing customers to ADSL ports? Are DSL ports pre-equipped at the RT? Assuming the RT is not pre-equipped with ADSL ports, is a truck roll required for every new customer?

24. Will a truck-roll be necessary to reassign service from an existing Verizon or CLEC ADSL customers to a different ADSL service provider?

25. Will the network architecture deployed under the PARTS program provide a Virtual Path Connection (VPC) for each local exchange carrier? If not, please

explain why not and provide all documentation discussing or concerning the unavailability of a VPC.

26. As part of its PARTS program, what kind of policing of peak cell rate will Verizon enforce on both CLEC ATM traffic and at the Optical Concentration Device (OCD) ingress? What kind of policing will Verizon enforce on Verizon's own traffic? Will this policing be on a Virtual Channel (VC) basis, Virtual Path (VP) basis or both? Will policing be enforced at the DSLAM ingress? Will cells be tagged at the OCD as CLP=1 as part of the policing process be automatically discarded at the OCD at all times, or only during periods of network congestion? Please explain all answers in detail.

27. Please identify by manufacturer and model, the OCD equipment to be utilized under VZ-MA's PARTS architecture. In addition, please provide any engineering sheets and or technical specifications associated with such equipment. Cost figures (retail and discounted) associated with such OCD equipment and associated components (e.g. In-Out-Modules or IOMs) should also be provided.

28. Within the network architecture and equipment deployed by Verizon as part of its PARTS program, where will CLECs be allowed a Point of Interface? If this point of interface is a port on the OCD, what type of port access would be offered? What is the maximum number of subscribers to whom a CLEC could provide service through a port on the OCD?

29. How many OCDs will Verizon be deploying per wire center? Please explain, and provide any documents concerning, discussing, analyzing, or explaining this information.

30. Under the PARTS offering, what is the maximum number of ADSL ports served per OC-3 ATM feeder?

31. Will all of the DSLAMs deployed as part of the PARTS program be Alcatel Litespan 2000? What version(s) of Litespan software will be deployed under PARTS? If Verizon will not solely rely on Litespan 2000, please provide a list of each manufacturer, model number and software version for the DSLAMs to be deployed in the PARTS program.

32. Please identify by manufacturer and model, the type of customer premises equipment (CPE) needed under Verizon's PARTS architecture. In addition, please provide any engineering sheets and or technical specifications associated with such CPE. Please provide all available information and documentation regarding the cost of such CPE equipment and any associated components.

33. Please describe in detail any OSS implications of Verizon's PARTS program. Please provide any documents discussing, explaining, analyzing, or concerning these implications.

Respectfully submitted,

_____

Jeffrey F. Jones
Kenneth W. Salinger
Jay E. Gruber
John T. Bennett
PALMER & DODGE LLP
111 Huntington Avenue
Boston, MA 02199-7613
(617) 239-0100

Cynthia T. McCoy
AT&T Communications of New England, Inc.
295 North Maple Avenue, Room 3132B2
Basking Ridge, New Jersey 07920
(908) 221-2997

June 10, 2002