COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 02-8

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 28, 2002

VZ-ATT 1-1: On page 8, lines 14-16 of AT&T's testimony, AT&T states that "[w]hile an attack upon the physical integrity of a telecommunications facilities is a security concern that should never be overlooked, the likelihood of such an attack is small in comparison to the likelihood of a remotely directed electronic or cyber attack." Please explain fully that statement and provide any and all documents in support of AT&T's conclusion.

Respondent: Michael Paszynsky

RESPONSE: Once again, we are faced with a classic risk assessment. In making such an assessment, AT&T's security personnel, and other security experts, use the "risk triangle" (Vulnerability/Criticality/Probability). This triangle measures a particular site's vulnerability and criticality and the probability of an attack upon that site. In order for any risk assessment to have some measure of validity, these three factors must be considered.

Examining these three factors, and weighing the likelihood of a physical attack upon a telecommunications central office, node or other network element results in a fairly low assessment of risk. There are several reasons for this assessment. First, would-be terrorists do their homework prior to an attack. Thus, these terrorist would understand the resilience of modern telecommunications networks due to facilities redundancy, routing diversity, and "self-healing" functionalities. Both AT&T and Verizon advertise their networks' reliability and effectiveness of their restoration technology. *See* Attachment A.

Why, I ask, would a single network element attract terrorist attention? Chances are, the physical elimination or destruction of a single element would go unnoticed by the general public. On the other hand, let's look at the destruction which could be caused to the telecommunications infrastructure by a well-designed, well-placed, and well-executed logic bomb. Could you imagine how a Melissa-like virus event would disrupt

the public telecommunications network? Moreover, a cyber or logic attack can be executed in relative safety and anonymity. No special risk. No special tools. No cover of darkness required. This type of attack would more likely be the terrorist's choice. And, in the end, let's not forget that terrorists thrive on the creation of fear. This fear is maximized through attacks that produce a large number of fatalities and bodily harm. Attacks upon telecommunications facilities are less likely to produce the immediate bodily harm that terrorists desire.

Following September 11th, Marv Langston, a former deputy Chief Intelligence Officer at the Defense Department said: "[T]he U.S. needs to prepare itself for what he described as an 'electronic Pearl Harbor.'" Air Force Lt. General (Retired) Al Edmonds, who now heads the Federal division of Electronic Data Systems, said, "I would suspect a cyber attack could be next, and that would be absolutely paralyzing." In the 1990s, the Pentagon produced a series of studies that showed a cyber attack on computer and communications systems could cripple the United States as severely as a physical attack. John Garber, vice president of Cryptec Secure Communications in Chantilly, Va, and a former National security Agency official, said the capabilities of the U.S. intelligence community are "fairly well known" by the terrorist organizations that are suspects.

Terrorist groups are increasingly using new information technology and the internet to formulate plans, raise funds, spread propaganda, and engage in secure communications. There is little doubt that they are capable of a sophisticated electronic attack.

The conclusion that an electronic attack is more likely than a physical attack is confirmed by intelligence data that I review daily. As part of my duties on behalf of AT&T, I must produce a daily threat assessment that examines any potential danger to AT&T's network throughout the world. In evaluating these potential threats, AT&T personnel review intelligence information from government, contract house and private sources. At present, indications drawn from these sources do not point to a physical attack upon a telecommunications facility.

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VZ-ATT 1-2: On page 8, lines 23-24 of AT&T's testimony, AT&T states that "terrorist organizations plotting a physical attack like those carried out on September 11th are more likely to focus their attention on other public utility systems such as water or energy facilities." Please explain fully that statement and provide any and all documents in support of AT&T's conclusion.

Respondent: Michael Paszynsky

RESPONSE: See AT&T's Response to Verizon Information Request 1-1.

Presidential Executive Order 13010 (1996) emphasized 8 critical infrastructures playing into the security of the United States. These are: Electrical Power, Gas and Oil Production, Telecommunications, Banking and Finance, Water Supply Systems, Transportation, Emergency Services, and Government Operations. From intelligence resources such as the National Infrastructure Protection Center (NIPC) and others that I review regularly, I believe that terrorist forces are more interested in water supply, waste management, electrical power, and emergency services. For example, in NIPC reports, telecommunications are referenced "to a lesser degree . . . (wherein) outages or system degradations could affect remote control access to pivotal systems . . ."

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VZ-ATT 1-3: On page 18, line 28 and page 19, lines 1-2 of AT&T's testimony, AT&T states that "[t]he primary terrorist threat facing telecommunications facilities comes from cyber or electronic sabotage. Given this, it makes little sense to categorize certain central offices as facing a 'high risk' of physical attack." Please provide the basis for AT&T's underlying assumption, including any and all documents in support of that assumption. Also please explain fully why AT&T does not believe that telecommunications facilities are at risk of physical attack, and provide any and all documents in support of AT&T's conclusion.

Respondent: Michael Paszynsky

RESPONSE: See AT&T's Response to Verizon Information Request 1-1.

If terrorists are going to take the personal risks necessary to plant explosive devices, they want to achieve maximum time on the airwaves -- the lead story on the evening news, continuous coverage on CNN. That requires devastation akin to Oklahoma City and the World Trade Center. It requires video of victims being carried out of ruins on stretchers. Physical destruction of a central office, and the potential resulting localized disruption of landline, telephone-based communications just does not rise to the same degree of terrorist-desired impact – not by itself, anyway. Certainly, AT&T and Verizon may ascribe a "high-risk" label to certain of their facilities – but, that is a self-assessment from the perspective of their own activity of the potential inconvenience to their own operations and their respective customers that destruction of a telephone central office may cause.

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VZ-ATT 1-4: On page 9, lines 7-9 of AT&T's testimony, AT&T states that "[t]he new security risks that have materialized of late, namely organized terrorist threats, cannot be properly addressed through a change in collocation [security] policy." Would AT&T support a change in Verizon MA's collocation security policy so that Verizon MA's central office procedures are comparable to AT&T's procedures for other carriers' personnel accessing AT&T's telecommunications facility premises? If not, please explain fully why AT&T's premises are entitled to a higher level of protection than Verizon MA's central offices. Also please provide any and all documents that indicate that AT&T's telecommunications facility premises would be subject to a higher risk than Verizon MA's central offices.

Respondent: Michael Paszynsky

RESPONSE: I do not believe that the security procedures for AT&T's central offices are, in all instances, an appropriate model for Verizon to follow in securing collocation sites within its central offices. This conclusion flows from the application of a standard risk assessment that involves the comparison of risks (and their consequences) on the one hand to costs of measures needed to reduce those risks on the other. The fundamental difference here is that Verizon is a dominant telecommunications carrier while AT&T is not. The costs created by a dominant carrier's implementation of additional security measures are amplified because such measures impeded competitor's access to critical network elements.[1] Thus, when analyzing a dominant carrier's security proposal,

[1] The value of the telecommunications is in the number of other lines that a customer may reach. If a minor CLEC adopts such arduous and costly security measures that other carriers cannot be interconnected with its network economically, the value of its service to its customers will be dramatically diminished. Conversely, since all CLECs need to be interconnected with Verizon to provide their customers the ability to communicate with the majority of

(continued...)

effects upon competition must be considered as part of the cost/benefit analysis. Implementing AT&T's security measures in Verizon's central offices would adversely impact the development of competition in a way that does not occur when implemented in AT&T's own central offices.

Moreover, AT&T restates its position that changes in collocation policy will not address many of the "security breaches" Verizon has alleged in this proceeding. As long as human beings need to access central offices, doors will be left open and access cards will be shared – such incidents are not endemic to the collocation environment. I recall just as many, perhaps more, of these types of incidents being reported during the existence of the old Bell system – when every employee was from the same company – than are reported today.

If collocation has proven such a troublesome security problem for Verizon, I am left to ask: Why hasn't Verizon contacted me about it? During my tenure as AT&T's top security officer, I am in regular contact with Verizon's security personnel regarding a range of security matters. I have not received a single communication from Verizon security executives concerning any of the alleged security problems created by current collocation arrangements. If collocation arrangements truly pose a security problem, I should have heard about it long before this proceeding.

(continued...)

other customers in the area, costly and impractical security measures adopted by Verizon have a direct anti-competitive effect.

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VZ-ATT 1-5: On page 11, lines 6-8, AT&T indicates that it "has space license arrangements in some of its central offices that result in the placement of third-party facilities in those offices." On lines 8-11, AT&T further stated that it "has large business and government customers, as well as CLECs and ILECs, including Verizon, maintaining equipment in its buildings." Please list the AT&T central offices or other premises in Massachusetts where third-party facilities are located, including street address, the number of third parties at each location, and the total square footage occupied by those third parties (as compared with the total square footage in the particular AT&T central office).

Respondent: Doug Gorham

RESPONSE: AT&T objects to this request on the grounds that it is irrelevant to the Department's current examination of Verizon's collocation policies. Without waiving this objection, AT&T answers as follows:

AT&T Local Services has third-party facilities at 19 Brigham Street, Marlborough, Massachusetts, and at 230 Congress Street, Boston, Massachusetts. The space used at 19 Brigham Street is 1,800 square feet and there are 4 customers. The space used at 230 Congress Street is 2,300 square feet and there are 6 customers.

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VZ-ATT 1-6: Please provide any and all documentation provided by AT&T to third parties that explains AT&T's procedures for those third parties to access AT&T central offices or premises where third-party facilities are located. If no such documents exist, please describe in detail the instructions provided by AT&T to third parties regarding such access in Massachusetts.

Respondent: Doug Gorham

RESPONSE: An Access Control Request form is submitted to a collocator upon signing of service contract. The AT&T Local Service Collocation Administrator meets the collocator on site to review AT&T space license site policies. In addition to the operational procedure relating to service, procedures for the use of common areas, freight elevator and rest rooms are discussed. AT&T Local Service access and security procedures are also reviewed.

Within its central offices, AT&T positions space license sites in separate rooms or cages, which are accessible from a common hallway or exterior door. Third parties are granted unescorted, 24 hour a day, 7 day a week access to their collocated equipment by means of card access controlled doors.

In situations where third parties must traverse through areas where AT&T's equipment is located to reach their own facilties, AT&T generally requires an AT&T employee escort. AT&T applies this requirement flexibly, however, recognizing that third parties may need quick access to their equipment in order to maintain service quality.

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VZ-ATT 1-7: On page 11, lines 11-13, AT&T states that, "as a general proposition, physical access to AT&T's switching centers and other network facilities is strictly monitored and managed." Please explain fully under what terms and conditions AT&T provides physical access to third parties utilizing its central offices or premises in Massachusetts.

Respondent: Michael Paszynsky

RESPONSE: See AT&T's response to Verizon Information Request 1-6.

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VZ-ATT 1-8: Is it AT&T's general practice in Massachusetts to allow third parties (*e.g.*, CLECs, ILECs, customers, etc.) with facilities and equipment located in AT&T's central offices to access those AT&T premises 24 hours a day, seven days a week? If not, please explain under what terms third parties are allowed to access those AT&T premises (*e.g.*, during weekdays, within normal business hours).

Respondent: Michael Paszynsky

RESPONSE: AT&T provides third parties that have entered into space license agreements access to its central offices 24 hours a day, 7 days a week.

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VZ-ATT 1-9: Is it AT&T's general practice in Massachusetts to give third parties (*e.g.*, CLECs, ILECs, customers, etc.) with facilities and equipment located in AT&T's central offices keys to locked doors or electronic authorized cards to access those AT&T premises? If not, please explain how third parties are allowed entry into those AT&T premises.

Respondent: Michael Paszynsky

RESPONSE: AT&T provides access to its facilities to third parties that have entered into space license agreements by means of a single card access system.

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VZ-ATT 1-10: Is it AT&T's general practice in Massachusetts to allow third parties (*e.g.*, CLECs, ILECs, customers, etc.) with facilities and equipment located in AT&T's central offices to walk unaccompanied through those AT&T premises to reach the third-party facilities or equipment? If not, please explain under what terms and conditions third parties are given access to their facilities and equipment located in those AT&T premises (*e.g.*, whether third parties must be escorted by AT&T personnel or must contact AT&T personnel to pre-arrange or coordinate visits).

Respondent: Michael Paszynsky

RESPONSE: AT&T permits these third parties to enter through a dedicated card-controlled outside door, which leads directly into the collocation area, or through a dedicated card-controlled interior door in a common hallway which leads directly into the space licensed area. Neither means of access provides the third party with access to AT&T's proprietary equipment.

In situations where third parties must traverse through areas where AT&T's equipment is located to reach their own facilities, AT&T generally requires an AT&T employee escort, at no charge to the third party. AT&T applies this requirement flexibly, however, recognizing that in certain circumstances third parties may need quick access to their equipment to maintain service quality for their end users.

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VZ-ATT 1-11: Is it AT&T's general practice for third parties (*e.g.*, CLECs, ILECs, customers, etc.) with facilities and equipment located in AT&T's central offices to segregate third-parties' facilities or equipment from AT&T's by placing the former in separate space (or separate rooms or floors) within AT&T's premises? If not, please identify those Massachusetts central offices where third-party facilities or equipment is located in unseparated or unsegregated space, what type of third-party (*e.g.*, CLECs, ILECs, customers, etc.) is involved, and under what terms and conditions such unseparated or unsegregated arrangements are allowed (*e.g.*, pre-divestiture configuration, etc.). Also, please indicate whether third parties are allowed unescorted access to that unseparated, unsecured space.

Respondent: Michael Paszynsky

RESPONSE: AT&T allows these third parties to place their equipment in segregated areas within AT&T's central offices. See also, VZ-ATT 1-10.

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VZ-ATT 1-12: Is it AT&T's general practice in Massachusetts to allow third parties (*e.g.*, CLECs, ILECs, customers, etc.) with facilities and equipment located in AT&T's central offices unrestricted access to common areas (*e.g.*, temporary staging areas, loading docks, restrooms) without AT&T's knowledge or physical escort? If not, please explain under what terms and conditions third parties are given access to such common areas in those AT&T premises (*e.g.*, whether third parties must be escorted by AT&T personnel or must contact AT&T personnel to pre-arrange or coordinate visits).

Respondent: Michael Paszynsky

RESPONSE: Where access to the space license area is made through a card-controlled door in a common hallway, AT&T permits access to common areas. If access is provided directly through a card-controlled exterior door, no common area access is permitted. However, should a third-party need to access common areas, an escort is provided at no charge.

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VZ-ATT 1-13: Are there any AT&T central offices or premises in Massachusetts or elsewhere in which third-party (*e.g.*, CLECs, ILECs, customers, etc.) facilities or equipment are located, but AT&T does not permit those third parties with direct access to their facilities or equipment?

Respondent: Michael Paszynsky

RESPONSE: No. For space license arrangements, AT&T permits direct access by the third-party to their equipment.

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VZ-ATT 1-14: Please explain fully any and all differences between the terms and conditions applicable to third parties to access AT&T's central offices versus Verizon MA's central offices. To the extent that AT&T's procedures for third parties (*e.g.*, CLECs, ILECs, customers, etc.) with facilities and equipment located in AT&T's central offices differ from Verizon MA's procedures applicable to collocated carriers accessing its central offices, please explain fully the reasons for those differences. This should include, but not be limited to, an explanation of whether such differences are attributable to a lower or greater degree of security risk for ATT's versus Verizon MA's central offices.

Respondent: Michael Paszynsky

RESPONSE: For those parties that have entered into space license agreements with AT&T, AT&T provides third-party access to their equipment by use of a single card-control system that permits 24 hour a day, 7 days a week access, whether or not the AT&T central office is staffed. Cards expire after 12 months and are reissued upon application demonstrating the need for re-issuance.

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VZ-ATT 1-15: Please explain fully any changes that AT&T has considered since September 11th regarding its security procedures in those central offices where third-party (*e.g.*, CLECs, ILECs, customers, etc.) facilities and equipment are located. Please identify which, if any, of those possible changes in security procedures were implemented, and where. Please explain fully the basis for AT&T's decision to employ such changes to its security procedures, and provide any and all documents in support of that decision.

Respondent: Michael Paszynsky

RESPONSE: Immediately following the September 11th attacks, AT&T posted armed guards at many of its central office facilities. With the passage of time and continual updating of security risk assessment, it was determined that AT&T is conducting a comprehensive review of its security procedures at its central offices and business locations. That review and risk assessment continues, and has included input from AT&T's customers. Unlike Verizon, AT&T has realized that feedback from its customers will be an important factor in any future modifications to security procedures, because business inconvenience and added cost are important considerations in determining whether a particular security measure should be implemented. At present, AT&T has not identified any new security measures that are justified on a risk and cost assessment basis, or otherwise, since September 11th. This assessment, of course, is subject to change upon the completion of the comprehensive review AT&T has undertaken.

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VZ-ATT 1-16: Please describe AT&T's procedures for disciplining its employees when they have violated Verizon MA's collocation procedures. This should include, but not be limited to, such violations as accessing Verizon MA's central offices without proper authorization, loaning electronic access cards or locked door keys to other AT&T personnel, theft of or damage to another's equipment, and roaming outside of collocated areas and into the vicinity of Verizon's facilities and equipment within the central office.

Respondent: Michael Paszynsky

RESPONSE: I am not aware of any cases of this sort being reported to AT&T Corporate Security. I am familiar with AT&T's disciplinary procedures, and its Code of Conduct. The Code clearly states that AT&T prohibits the willful destruction of company property or the property of others. The Code also states employees are individually responsible for notifying Corporate Security immediately if they suspect, observe, or learn of unethical business conduct or the commission of any dishonest, destructive, or illegal act. Employees may be disciplined, up to and including dismissal, even for first offenses. In certain situations, criminal charges can also result.

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VZ-ATT 1-17: Regarding page 13 of AT&T's testimony, please explain how "dummy" cameras within the central office can deter a terrorist attack.

Respondent: Michael Paszynsky

RESPONSE: My response is: "Please explain how real cameras can deter a terrorist attack." All security devices have some inherent deterrence value. For example, even though a fence may be compromised in minutes it offers a psychological deterrent. It defines property bounds. It tells a would-be intruder, "Stay Out." Dummy or "prop" cameras have a certain utility as well. When used properly, and in conjunction with other appropriate devices, they offer some deterrent quality. At the very least, they give an intruder cause for pause.

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VZ-ATT 1-18: Regarding page 14 of AT&T's testimony, does AT&T recommend that Verizon MA employ full motion security cameras in all collocated central offices in Massachusetts? Would AT&T's recommendation change should collocated carriers be required to bear the associated costs?

Respondent: Michael Paszynsky

RESPONSE: AT&T objects to this request on the grounds that the question is ambiguous. Verizon has not made clear what a "full motion" security camera is.

Without waiving this objection, AT&T states:

AT&T recommends that, as a general matter, security devices should be used only if warranted on the basis of a valid risk assessment. The costs should be shared equitably.

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VZ-ATT 1-19: Regarding page 14 of AT&T's testimony, does AT&T recommend that Verizon MA employ "high technology biometric devices that require authentication based on fingerprints or retinal scans" in all collocated central offices in Massachusetts? Would AT&T's recommendation change should collocated carriers be required to bear the associated costs?

Respondent: Michael Paszynsky

RESPONSE: AT&T would recommend such devices only if warranted on the basis of a valid risk assessment using the criteria describes previously in AT&T's Response to Verizon Information Request 1-1.

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VZ-ATT 1-20: On page 16, lines 13-14, AT&T states that "one of the visible costs" of Verizon MA's collocation security changes is "construction and equipment relocation." Please confirm that AT&T's costs claims are solely based on the assumption that there are Verizon central offices where existing physical collocation arrangements are located in unseparated, unsegregated and unsecured space that would require relocation if Verizon MA's proposed collocation security plan were implemented.

Respondent: Objection by counsel

RESPONSE: AT&T objects to this request. AT&T cannot know all the collocation changes that will lead to "visible" costs until Verizon provides a detailed description on a central office by central office basis of what it is proposing.

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VZ-ATT 1-21: Please provide any and all documents in support of AT&T's testimony at pages 27, lines 9-14 that the implementation of Verizon MA's proposed collocation security plan would require a "mass relocation of facilities [that] will have a significant impact on CLECs' operations and services" in Massachusetts

Respondent: Objection by counsel

RESPONSE: AT&T objects to this request on the grounds that Verizon has yet to provide sufficient detail concerning its security proposals for AT&T to provide specific documentation.

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VZ-ATT 1-22: Please identify the number of AT&T's virtual collocation arrangements in Massachusetts and elsewhere, by state.

Respondent: Doug Gorham

RESPONSE: AT&T objects to this request on the grounds that the question is ambiguous as it is not clear whether Verizon is referring to AT&T virtual collocation sites within ILEC central offices or space license arrangements within AT&T central offices. Furthermore, AT&T collocation arrangements outside of Massachusetts are not relevant to this proceeding and it is unduly burdensome to gather such information.

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VZ-ATT 1-23 Based on AT&T's actual experience in Massachusetts, please substantiate its claim that "physical collocation minimizes the inherent delays associated with virtual collocation," as set forth on page 17, lines 17–19 of its testimony.

Respondent: Doug Gorham

RESPONSE: Network growth and rearrangements in a virtual office must be run through an application process. The application provides technical information on the devices to be installed for growth or rearrangement. Upon receipt of an application, Verizon must verify that space, power, fiber, cabling, etc. exist to support the request. Verizon must also verify the availability of a trained technician for installation and activation. AT&T Local Network Services must provide training if Verizon is not familiar with the device or technology. If Verizon can support the request, they have up to 76 business days to complete. This is typically a 2 week process in a physical collocation.

The description above indicates the points of dependency at which AT&T would need to rely on Verizon to implement and maintain virtual collocation. It has been AT&T's experience in Massachusetts that when AT&T must rely on Verizon to provision and maintain facilities, Verizon is consistently late and its performance is poor. AT&T's experience trying to obtain special access circuits from Verizon is a good example. As Ms. Halleran testified in D.T.E. 01-34, Verizon systematically offered and provided longer intervals to CLECs than to its own retail customers, was systematically late in provisioning special access to CLECs to a greater extent than to its own retail customers, and the circuits Verizon provisioned to CLECs failed at a systematically higher rate than those it provisioned to its own end user customers. AT&T seeks to avoid reliance on Verizon whenever possible.

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VZ-ATT 1-24 Based on AT&T's actual experience with virtual collocation arrangements provided by Verizon in Massachusetts, please substantiate each of AT&T's claims regarding virtual collocation, as set forth on page 18, lines 1 –11 of its testimony.

Respondent: Doug Gorham

RESPONSE: Virtual collocation does not allow AT&T to perform routine quality audits on its equipment. Our sites are reviewed and graded on installation and maintenance standards. Verizon virtual collocation standards do not meet ours.

Installation and provisioning of circuits are subject to delays such as the case in Westboro. In this case AT&T was required to provide training to Verizon techs before the installation of a sonet device. AT&T funded the provision of training and educational materials by Lucent, the manufacturer of the device. Yet, Verizon technicians still had difficulty in completing installation and turn-up of the device and requested assistance from AT&T Local Services. AT&T technicians needed to visit the site and confer with Verizon personnel in order to ensure proper installation. The end result was several costly delays in the testing and turn-up of the sonet device.

AT&T uses common warehouses and nodes to store spares for equipment in collocation arrangements for which it has access. For arrangements to which it does not have access and for which it will rely on Verizon for maintenance service, AT&T will need to maintain an extra spares kit at each such location for use by Verizon technicians. (Access to these kits help reduce MTTR during outages/failures.) The cost to furnish these kits for each site would be extensive. In other words, AT&T is not able to take advantage of economies of scale associated with maintaining its

collocation cages in those situations where it does not have direct access. In those situations it will have to duplicate its inventory of spares.

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REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 28, 2002

VZ-ATT 1-25: Please indicate whether AT&T returns identification badges, card access or keys issued by Verizon to AT&T personnel in Massachusetts once they are no longer employed by AT&T, in accordance with Verizon MA's requirements. If AT&T has not done so, please explain why. If AT&T has done so, please provide any and all documentation listing the names of all former AT&T employees for whom AT&T has returned the above to Verizon and the associated dates for returning such identification.

Respondent: Doug Gorham

RESPONSE: AT&T generally has not returned these items to Verizon for several reasons. With regard to access cards, Verizon no longer uses card access systems to secure its central offices in Massachusetts, thus AT&T no longer has any of these items to return.

Regarding keys, Verizon does not issue keys to individual CLEC employees, rather it issues a set of keys to the CLEC upon the execution of a collocation agreement. Verizon policy limits the amount of keys issued to CLECs and makes the management and control of these keys a CLEC responsibility. The number of keys is generally less than the number of employees that need them, so the keys are kept at a central location and used by an individual employee on an as-needed basis. Thus, the return of an individual key upon a particular AT&T employee's departure does not make sense and would be contrary to Verizon's own policies.

AT&T generally has not returned identification badges to Verizon due to the fact that these badges expire on an annual basis and a program of returning them to Verizon is somewhat redundant. Nevertheless, AT&T does maintain control over the badges of departed employees. On a

going forward basis, AT&T will be returning such badges to Verizon..

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 02-8

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 28, 2002

VZ-ATT 1-26: Please state whether it is it possible for AT&T to secure the equipment and facilities in its collocation arrangements in Massachusetts by utilizing locked cabinets, wire mesh partitioning, or covered cages. Also, please indicate in which Verizon MA central offices AT&T has utilized such measures for each of its existing collocation arrangements, and indicate whether any relocation of AT&T's equipment was required and, if so, why it was required.

Respondent: Doug Gorham

RESPONSE: It is possible for AT&T Local Services to secure the facilities and equipment utilizing wire mesh partitioning in all but 5 of its collocation arrangements. SCOPE locations that do not allow for secured equipment are at Ware Street and Bent Street in Cambridge and in Lexington, Canton, and Peabody.

AT&T objects to the remainder of Verizon's request concerning the relocation of equipment as ambiguous.