

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 02-8

REQUEST: Department's' Information Requests to WorldCom, Inc.

DATE: May 28, 2002

VZ-WCOM 1-1: On page 6, lines 12-13 of WCOM's testimony, WCOM states that "if adopted, Verizon's proposals would enable it to foist significant costs on collocators." Please provide any Massachusetts-specific costs estimates, including but not limited to a breakdown by specific type of costs. Also, please provide any and all documents in support of WCOM's claims.

Respondent: Roy Lathrop

RESPONSE: The sentence cited in this question criticizes Verizon's proposals for their "lack of specificity . . . with respect to the . . . costs Verizon seeks to impose on CLECs". In other words, WorldCom would expect Verizon to have identified any "Massachusetts-specific cost estimates, including but not limited to a breakdown by specific type of costs" in connection with its proposals. WorldCom has no Massachusetts-specific cost estimates or other cost-related documents with respect to Verizon's proposals.

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VZ-WCOM 1-2: Please provide the basis for WCOM's opinion, as set forth on page 11, lines 23-24 and page 12, lines 1-3 of WCOM's testimony, that the separate entrance allowed for CLEC personnel during Verizon work stoppages is "because Verizon employees might engage in misconduct during work stoppages."

Respondent: Roy Lathrop

RESPONSE: The full text of the sentence referred to in this question is: "Indeed, Verizon notes that one security measure permitted by the Department is 'the designation of a specific (even separate) entrance for CLEC use during work stoppages,' implying that some concern exists for the personal safety of CLEC personnel, presumably because Verizon employees might engage in misconduct during work stoppages." That is, it is Verizon (citing the Department) that identifies the value of a separate entrance as a security measure for use during work stoppages. A plausible explanation for why a work stoppage would require CLEC personnel to use a separate entrance as a security measure is the potential for misconduct on the part of Verizon employees participating in the work stoppage.

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VZ-WCOM 1-3: Does WCOM have any arrangements in Massachusetts or elsewhere whereby it allows third parties (*e.g.*, CLECs, ILECs, customers, etc.) to place their facilities or equipment on WCOM's premises? If yes, please list the WCOM premises 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 WCOM premise).

Respondent: Roy Lathrop

RESPONSE: WorldCom objects to the request on the grounds that it seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. WorldCom further objects to the request on the grounds that it is unduly burdensome.

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VZ-WCOM 1-4: If WCOM answered yes, to Question 1-3, please provide any and all documentation provided by WCOM to third parties that explains WCOM's procedures for those third parties to access WCOM premises where third-party facilities are located. If no such documents exist, please describe in detail the instructions provided by WCOM to third parties regarding such access.

Respondent: Roy Lathrop

RESPONSE: See WCOM's response to VZ-WCOM 1-3.

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VZ-WCOM 1-5: If WCOM answered yes, to Question 1-3, please describe WCOM's general practices regarding the following:

- a. whether third parties with facilities and equipment located in WCOM's premises are allowed access 24 hours a day, seven days a week, or only during weekdays, within normal business hours;
 - b. whether such access is unrestricted;
 - c. whether such third parties are given keys to locked doors or electronic authorized cards to access those WCOM premises;
 - d. whether such third parties walk unaccompanied through those WCOM premises to reach their facilities or equipment, or whether they must be escorted by WCOM personnel or must contact WCOM personnel to pre-arrange or coordinate visits.
 - e. Whether such third parties' facilities or equipment are segregated from WCOM's by placing the former in separate space (or separate rooms or floors) within WCOM's premises, or whether it is located in unseparated or unsegregated space;
 - f. Whether such third parties are allowed unescorted access to their unseparated, unsecured space, if applicable;
- Whether such third parties are allowed unrestricted access to common areas (e.g., temporary staging areas, loading docks, restrooms) without WCOM's knowledge or physical escort, or are required to contact WCOM personnel to pre-arrange or coordinate visits.

Respondent: Roy Lathrop

RESPONSE: See WCOM's response to VZ-WCOM 1-3.

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VZ-WCOM 1-6: Are there any WCOM premises in Massachusetts or elsewhere in which third-party (*e.g.*, CLECs, ILECs, customers, etc.) facilities or equipment are located, but WCOM does not permit those third parties with direct access to their facilities or equipment?

Respondent: Roy Lathrop

RESPONSE: See WCOM's response to VZ-WCOM 1-3.

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VZ-WCOM 1-7: Please describe WCOM'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 WCOM 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: Roy Lathrop

RESPONSE: WorldCom expects its technical personnel to conduct themselves in a professional manner when working at Verizon-controlled facilities. In the event Verizon alerted WorldCom management that WorldCom's technical personnel had violated Verizon's collocation procedures or otherwise engaged in inappropriate conduct, WorldCom would undertake corrective disciplinary action, up to and including termination, depending on the severity of the infraction.

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VZ-WCOM 1-8: Please identify the number of WCOM's virtual collocation arrangements in Massachusetts and elsewhere, by state.

Respondent: Roy Lathrop

RESPONSE: WorldCom objects to the request on the grounds that it seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. WorldCom further objects on the grounds that the information sought by Verizon is presumably in Verizon's possession. Without waiving its objections, WorldCom responds that it has at least one virtual collocation arrangement in Massachusetts.

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VZ-WCOM 1-9: Based on WCOM's actual experience with virtual collocation arrangements provided by Verizon in Massachusetts, please substantiate WCOM's claim on page 24, lines 13-17 of its testimony that Verizon's proposal to eliminate physical collocation in so-called "critical" offices would "result in WorldCom's inability to provide its customers with the same quality of service that Verizon can provide by being the only provider with physical access to its equipment." Also provide any and all documentation that supports WCOM's claims.

Respondent: Roy Lathrop

RESPONSE: The complete quote is: "If these customers are served from central offices Verizon identifies as 'critical,' for which Verizon proposes to eliminate physical collocation, it is possible that Verizon's proposal would result in WorldCom's inability to provide its customers with the same quality service that Verizon can provide by being the only provider with physical access to its equipment." WorldCom objects to the request to the extent it seeks to limit WorldCom's response to its "actual experience with virtual collocation." Without waiving its objection, support for WorldCom's position is provided at pages 9 to 11 of Mr. Lathrop's testimony.

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VZ-WCOM 1-10: Based on WCOM's actual experience with virtual collocation arrangements provided by Verizon in Massachusetts, please substantiate each of WCOM's claims regarding virtual collocation, as set forth on page 18, lines 1 –11 of its testimony.

Respondent: Roy Lathrop

RESPONSE: WorldCom understands that the request contains a typographical error; the request should have asked about page 11 of Mr. Lathrop's testimony. WorldCom's response is with respect to page 11, lines 1 - 11 of Mr. Lathrop's testimony.

WorldCom objects to this request to the extent it seeks to limit WorldCom's response to its "actual experience with virtual collocation." Without waiving its objection, WorldCom states that physical access provides operational control over (for example) network expansion and repair intervals that is not possible using remote access to virtually-located equipment.

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VZ-WCOM 1-11: Please indicate whether WCOM returns identification badges, card access or keys issued by Verizon to WCOM personnel in Massachusetts once they are no longer employed by WCOM, in accordance with Verizon MA's requirements. If WCOM has not done so, please explain why. If WCOM has done so, please provide any and all documentation listing the names of all former WCOM employees for whom WCOM has returned the above to Verizon and the associated dates.

Respondent: Roy Lathrop

RESPONSE: Local WorldCom management destroys the Verizon identification badges of terminated employees. Historically, this has been the understood method of dealing with such badges. Cards and keys permitting access to Verizon-controlled facilities are not issued by Verizon to individual employees; they are issued at the Company level. As such, there would be no need for WorldCom to return these items in the event an individual employee were terminated inasmuch as the cards or keys would still be needed for current WorldCom personnel to access WorldCom equipment at Verizon-controlled facilities. WorldCom would retrieve any cards or keys in the terminated employee's possession.

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VZ-WCOM 1-12: Please state whether it is possible for WCOM 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 WCOM has utilized such measures for each of its existing collocation arrangements, and indicate whether any relocation of WCOM's equipment was required and, if so, why it was required.

Respondent: Roy Lathrop

RESPONSE: With respect to the first sentence of VZ-WCOM 1-12, WorldCom believes that Verizon offers collocation arrangements that permit "locked cabinets, wire mesh partitioning [*i.e.*, cages], or covered cages." As such, WorldCom responds that it is "possible" to utilize these arrangements for the purpose of securing equipment and facilities.

With respect to the second sentence of VZ-WCOM 1-12, WorldCom objects to the request on the grounds that it seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. WorldCom further objects to the request on the grounds that it is unduly burdensome. WorldCom further objects on the grounds that the information sought by Verizon is presumably in Verizon's possession.