

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Jeffrey L. Milligan  
**Title:** Product Manager - Collocation

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-1 On page 3, lines 18-19 of SPRINT's testimony, SPRINT states that it "operates as an ILEC in 18 states." Please list those states, and list the number of collocated central offices by state. Also provide the number of collocated carriers at each central office, the total number of collocation arrangements by type - physical (by specific type, *i.e.*, caged, SCOPE or cageless) and virtual collocation, and the total square footage occupied by those collocated carriers (as compared with the total square footage in the particular SPRINT central office).

**REPLY:** Objection: This question is burdensome and would require Sprint to conduct a special study. Without waiving this objection, Sprint responds as follows with the number of collocated central offices by state. The other requested information is not readily available in the format requested.

Florida – 50  
Indiana – 0  
Kansas – 0  
Minnesota – 1  
Missouri – 4  
North Carolina – 35  
Nebraska – 3  
New Jersey – 3  
Nevada – 17  
Ohio – 5  
Oregon – 0 (applications pending)  
Pennsylvania – 7  
South Carolina – 2  
Tennessee – 8  
Texas – 5  
Virginia – 10  
Washington – 2  
Wyoming – 0

SPRINT #1

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-2 Referring to page 4, lines 4-7 of SPRINT's testimony, please respond as follows:

- (a) the date and time of the alleged Revere incident;
- (b) the name(s) of the employees involved;
- (c) the model number, manufacturer, and cost of the allegedly stolen router;
- (d) the location of the router, *e.g.*, whether it was mounted in a SPRINT equipment bay;
- (e) the type of SPRINT collocation arrangement (*e.g.*, specific type of physical or virtual) ;
- (f) the nature of SPRINT's security measures at that time (*e.g.*, caged enclosure, locked cabinets, remote alarm surveillance, cameras, etc.)
- (g) whether the router was installed and in-service at the time;
- (h) the result of any investigation and/or any criminal or other prosecution regarding this matter.

Also, please provide any and all documentation relating to the Revere incident, including but not limited to any documentation in support of SPRINT's claims that Verizon employees observed the removal of the router.

- REPLY:**
- a) Employee does not remember the specific date it was approximately July 2000.
  - b) Verizon employees – unknown. Sprint employee – source of information = Joe Baco
  - c) Cisco model 3600 4-slot Modular Router, part number CISCO3640-DC, \$7,656.00.
  - d) Mounted in Sprint equipment bay
  - e) Scope collocation

- f) Sprint depended upon Verizon for physical security.
- g) Installed and in-service
- h) Reported to Verizon security. No copy of report was provided by Verizon.

SPRINT #2

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Ed Fox

**Title:** Regulatory Policy

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-3 Referring to page 7, lines 19-20 of SPRINT's testimony, please define what SPRINT means by the "best markets," and explain fully why it believes that so-called "critical" offices would serve those markets.

**REPLY:**  
*See the examples noted at page 7, line 21 of Mr. Fox's Rebuttal Testimony. Based upon Mr. Fox's experience, the central offices with the highest number of special services are those with the greatest revenue potential.*

SPRINT #3

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-4 Please state whether it is it possible for SPRINT 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 SPRINT has utilized such measures for each of its existing collocation arrangements, and indicate whether any relocation of SPRINT's equipment was required and, if so, why it was required.

**REPLY:** Objection. This response would require a special engineering study to determine if adding cabinets is compatible with Sprint's deployment engineering plan and to determine the cost. Without waiving this objection, Sprint states as follows: Sprint has not analyzed the feasibility of utilizing locked cabinets, wire mesh partitioning or covered cages. Sprint has not utilized such measures in any Verizon MA central offices.

SPRINT #4

**Sprint Communications Company L.P.  
Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Steve Broom

**Title:** Access Planner

**Respondent:** Craig Dingwall

**Title:** General Attorney & Director,  
State Regulatory NE

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-5 Please provide any and all documentation for SPRINT's statement on page 6, lines 8-9 of its testimony that "[t]he CLEC community ...is totally dependent upon its greatest competitor [Verizon] for its only source of telecommunications services."

**REPLY:** Objection. This question requests public information and documents that are available to Verizon, and it would be burdensome for Sprint to produce "any and all" documents that support this statement. Without waiving this objection, Sprint states as follows:

The statement is intuitive in that a collocating CLEC must depend upon the ILEC in which it collocates for "last mile" facilities to connect to customers. If CLECs were not dependent upon ILECs for their only source of telecommunications services, Congress, the FCC and the Department would not have imposed collocation obligations on ILECs. *See* the FCC's Local Competition Order in which the FCC found that "specific rules defining minimum requirements for nondiscriminatory collocation arrangements will remove barriers to entry by potential competitors and speed the development of competition." CC Docket Nos. 96-98 and 95-185, First Report and Order, released August 8, 1996, ¶ 558. *See* the FCC's UNE Remand Order, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking released November 5, 1999, ¶ 3, where the FCC noted "Toward this end, section 251 imposes specific market-opening mechanisms, such as mandatory interconnection, unbundling, and resale requirements on incumbent LECs, in order to break the incumbents' control over local facilities." *See* CC Docket No. 98-147, Fourth Report and Order released August 8, 2001, ¶ 2 "On remand, we conclude that equipment is "necessary for interconnection or access to unbundled network elements' within the

meaning of section 251(c)(6) and thus may be collocated if, absent deployment of the equipment, the requesting carrier would, as a practical, economic, or operational matter, be precluded from obtaining “equal in quality” interconnection or “nondiscriminatory access” to unbundled network elements from the incumbent LEC.” *See also* 47 U.S.C. § 251(c)(6).

SPRINT #5

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Craig Dingwall

**Title:** Director and General Attorney

**Respondent:** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-6 Please indicate whether SPRINT places any of its equipment or facilities at non-ILEC locations in Massachusetts or elsewhere. If yes, please identify all telecommunications services that SPRINT provides that are not related to any collocation arrangements located at Verizon premises.

**REPLY:** Objection. This question requests information that is irrelevant, beyond the scope of this proceeding (*i.e.*, collocation security in Verizon-MA's central offices) and it would require a nationwide special study. Without waiving this objection, Sprint states that it has not placed any of its equipment or facilities at non-ILEC locations in Massachusetts.

SPRINT #6

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Ed Fox

**Title:** Regulatory Policy

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-7 Referring to page 7, lines 9-10 of SPRINT's testimony, please explain fully SPRINT's basis for defining SCOPE as a caged physical collocation arrangement.

**REPLY:** See Verizon's Panel Testimony, which states at page 10, lines 11-17: "While SCOPE arrangements are placed in the same segregated and secured, environmentally conditioned area used for traditional "caged" physical collocation, CCOE arrangements may not require the construction of a separate collocation area, e.g., a separate room or isolated space segregated from Verizon's own network equipment. Rather, due to space limitations, CCOE may be located in non-secured, non-separated space within Verizon's CO premises." Accordingly, SCOPE in contrast to CCOE requires the construction of a separate collocation area, e.g. a room or isolated space segregated from Verizon's own network equipment. SCOPE is therefore in a secured, segregated space in the CO, usually accomplished by construction of a cage.

SPRINT #7

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Craig Dingwall

**Title:** Director and General Attorney

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-8 Please indicate whether SPRINT returns identification badges, card access or keys issued by Verizon to SPRINT personnel in Massachusetts once they are no longer employed by SPRINT, in accordance with Verizon MA's requirements. If SPRINT has not done so, please explain why. If SPRINT has done so, please provide any and all documentation listing the names of all former SPRINT employees for whom SPRINT has returned the above to Verizon and the associated dates.

**REPLY:** Objection. This question is vague, burdensome, overbroad with no designated time period, calls for speculation, and it would require Sprint to conduct a special study of people that may be no longer employed by Sprint. Without waiving this objection, it is Sprint's policy and practice to comply with all lawful collocation rules and regulations.

SPRINT #8

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Craig Dingwall

**Title:** Director and General Attorney

**Respondent** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-9 Please describe SPRINT'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 SPRINT 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.

**REPLY:** See Sprint's response to VZ-Sprint 1-8. Sprint further objects to this question because it is based upon a hypothetical and assumes facts not in evidence. Without waiving this objection, Sprint states that it takes any alleged violations of collocation procedures very seriously. Upon receipt of such an allegation, Sprint will investigate the allegation through employee/vendor interviews and take appropriate disciplinary steps, including termination of employment if warranted.

SPRINT #9

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Craig Dingwall

**Title:** General Attorney & Director,  
State Regulatory NE

**Respondent:** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-10 Please identify the number of SPRINT's virtual collocation arrangements in Massachusetts or elsewhere, by state.

**REPLY:** Sprint objects to that part of the question that requests information outside Massachusetts as overbroad, irrelevant and beyond the scope of this proceeding. Without waiving this objection, Sprint responds as follows: Sprint has no virtual collocations in Massachusetts.

SPRINT #10

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-11 Based on SPRINT's actual experience with virtual collocation arrangements provided by Verizon in Massachusetts, please substantiate each of SPRINT's claims regarding virtual collocation, as set forth on page 7, lines 1-5 and page 8, lines 1-3 of its testimony.

**REPLY:** Sprint is unwilling to assume the business risk (see Covad's Rebuttal Testimony filed in this proceeding) of accepting virtual collocation from Verizon, and therefore has no actual experience in Verizon's virtual collocation.

SPRINT #11

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Jeffrey L. Milligan

**Title:** Product Manager - Collocation

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-12 Referring to page 14, lines 7-10 of SPRINT's testimony, please indicate the state where such rates apply, and provide a copy of the applicable SPRINT ILEC tariff for CCOE in that state, including all tariff terms and conditions and rates for SPRINT's provision of CCOE (not limited to security charges).

**REPLY:** Sprint objects to this question because it would be burdensome for Sprint to produce the entire voluminous public document, "SPRINT ILEC tariff for CCOE in that state, including all tariff terms and conditions and rates for SPRINT'S provision of CCOE (not limited to security charges)." Without waiving this objection, Sprint responds as follows:

Sprint's Intrastate Tariffs:

Florida - E17. Expanded Interconnection Services

Indiana – I.U.R.C. No. T-3 Section 17 Expanded Interconnections Services

North Carolina – Centel – NCUC No. 1 Section 20 Collocation Services

North Carolina – C.T.&T. – Section 20 Collocation Services

Ohio – P.U.C.O. No. 1 Section 17 Expanded Interconnection Services

Oregon – PUC OR No. 6 Section 17 Collocation Services

Pennsylvania – Pa.P.U.C. No. 29 Section 17 Expanded Interconnection Services

South Carolina – Section 17 Collocation Services

Tennessee – Section 17 Collocation Services

Virginia – Section 17 Collocation Services

All other States are priced on an Individual Case Basis.

Sprint's Tier 1 states also have a FCC tariff for Expanded Interconnection Service

SPRINT #12

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Ed Fox

**Title:** Regulatory Policy

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-13 On page 14, line 22 and page 15, lines 1-2 of SPRINT's testimony, SPRINT states that "[i]f Verizon were [to] implement[ed] everything it proposed, its network would be only marginally more secure than it is today and every bit as vulnerable to significant network tampering as it was before." Please provide any and all documentation in support of SPRINT's claims.

**REPLY:** Sprint's analysis of Verizon supplied security incidents between 1999 and February 2002 indicates that there is not a single security event that can be construed as a terrorist threat to Verizon's network. Nearly 2/3 of the reported events were against the CLECs, whereas the remaining 1/3 involved events such as CLECs wandering outside their space, not proper ID, leaving doors open, or use of VZ test equipment. If all of this latter category of incidents were eliminated, Verizon's network will not be the least bit more secure from terrorist attacks.

SPRINT #13

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Craig Dingwall

**Title:** Director and General Attorney

**Respondent:** Steve Broom

**Title:** Access Planner

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-14 On page 17, lines 14-15 of SPRINT's testimony, SPRINT states that "[i]f implemented, Verizon's proposed security measures could cost each affected CLEC hundreds of thousands of dollars or more." 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 SPRINT's claims.

**REPLY:** Objection. This question is burdensome and would require Sprint to conduct a special study. Without waiving this objection, Sprint responds as follows: On average, the cost to Sprint to move a collocation arrangement is approximately \$70K and \$100K. This includes the cost of the collocation arrangement from the ILEC, Sprint's cost to buy and install its equipment plus the cost of disassembling the collocation that would have to be removed. *See* Verizon's collocation tariffs for specific costs to move collocation arrangements.

SPRINT #14

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Ed Fox

**Title:** Regulatory Policy

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-15 Referring to page 18, lines 3-4 of SPRINT's testimony, please indicate to what offices SPRINT is referring and on what basis SPRINT concludes that, under Verizon MA's collocation security proposal, there will not "ample space" for all existing collocated carriers to remain in a central office. Please provide any and all documentation in support of SPRINT's claims.

**REPLY:** The statement is based upon Mr. Fox's information and belief, with no particular reference to any specific central office. As of the date that Verizon filed its Panel Testimony in this proceeding, Verizon was unable to determine the availability of ample space for all carriers.

SPRINT #15

**Sprint Communications Company L.P.**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Craig Dingwall

**Title:** Director and General Attorney

**REQUEST:** Verizon Set #1

**DATED:** May 28, 2002

**ITEM:** VZ-Sprint 1-16 Referring to page 19 of its testimony, would SPRINT agree that as a result of this investigation on collocation security measures, the Department can develop its recommendation for consideration by the FCC in connection with Homeland Security efforts to strengthen measures for protecting “telecommunications infrastructure and facilities from further terrorist attack?”

**REPLY:** Objection. This question calls for a legal conclusion and speculation. Without waiving this objection, Sprint responds as follows: *See* the Department’s regulations (220 CMR 1.00-45.00, *et. seq.*) and page 19 of Ed Fox’s rebuttal testimony.

SPRINT #16