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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director

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

DATED: May 8, 2001

ITEM: ATT 2-7

a) For each tandem identified in the response to Data Request No. 6, whether located in an end office wire center location or other building, provide the busy-hour traffic carried by that tandem switch, and the number of trunks terminated on the switch;

b) Provide Verizon's best available estimate of the fraction of Verizon's local and intra-LATA toll calls (show separately for the two types of traffic) both originating and terminating in a Verizon end office switch that are routed via a tandem switch as opposed to routing via direct trunks between Verizon end offices;

c) Provide Verizon's best available estimate of the fraction of Verizon's local and intra-LATA toll calls (show separately for the two types of traffic) originating in a Verizon end office switch and terminating on a CLEC switch, or vice-versa, that are routed via a Verizon tandem switch as opposed to routing via dedicated trunks between the Verizon end office and the CLEC switch;

d) Provide Verizon's best available estimate of the fraction of Verizon's inter-LATA calls that are routed via a tandem switch as opposed to direct routing via dedicated trunks from end office switches directly to an IXC POP.

Provide all available data and documentation – statistical data, planning guidelines, studies, analyses, work papers, and so on – that substantiate this information.

REPLY:

a) Below is the number of working trunks associated with each Verizon Massachusetts tandem. In addition, see Verizon MA's response to Information Request ATT 4-6.

REPLY: ATT 2-7
(cont'd)

Tandem:	Working Trunks:
BRTNMACO03T	80400
BRTNMACO04T	42696
CMBRMA0118T	93960
CMBRMABE01T	80016
FRMNMAUN04T	65016
LWRNMACA03T	65664
NWTNMAWA01T	62904
SPFDMAWO01T	49776
WRCSMACE03T	51048

b, c and d) The data requested is not available and would require a burdensome time-consuming special study to produce. Verizon does not keep such therefore cannot provide actual data or an estimate.

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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director

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

DATED: May 8, 2001

ITEM: ATT 2-44 Please provide the total discounted price Verizon has paid to manufacturers for its ten most recent purchases of interoffice transmission equipment, breaking down the total price into charges for equipment, engineering and installation costs. To the extent these purchases don't cover the full range of transmission equipment Verizon uses in its interoffice network, provide in addition the corresponding information from the most recent contracts that cover the full range of cable sizes. Provide all available data and documentation -- invoices, purchase orders, work papers, and so on -- that substantiate this information.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, and unduly burdensome, and seeks the disclosure of confidential and commercially sensitive material, and not reasonably calculated to lead to admissible evidence. Without waiving these objections, Verizon MA provides the following response:

Please see the attached documentation which Verizon MA considers proprietary and confidential. This information is being provided subject to the terms of the protective agreement in this proceeding.

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

Commonwealth of Massachusetts

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

Respondent: Nancy Matt
Title: Manager – Service Costs

REQUEST: **AT&T Communications of New England, Inc., Set #4**

DATED: May 11, 2001

ITEM: ATT 4-5 For all port elements, please provide the effective fill being assumed, taking into account the SCIS fill factor inputs as well as the adjustments for utilization shown in Workpaper Part C-1, Section 38, of the cost study. Please provide all engineering guidelines or engineering planning documents that support the effective fill factors being assumed in Verizon's switching cost study.

REPLY: Workpaper, Part C-1, Section 38 pages 1, 2, and 4, shows the administrative fills in column (H), average fills in column (I), and the utilization adjustment factors, due to breakage in column (J). Please see Verizon MA responses to Information Requests ATT 4-43, ATT 4-44, and ATT 4-45.

VZ # 122

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

Commonwealth of Massachusetts

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

Respondent: Dinell Clark
Title: Staff Director

REQUEST: AT&T Communications of New England, Set #5

DATED: May 17, 2001

ITEM: ATT 5-9 Please provide the engineering guideline (Bell System Practice or similar document) that outlines how Verizon is to engineer the deployment of Battery Distribution Fuse Bays in its central offices. This should include, but not be limited to specifically noting the distance between the Battery Distribution Fuse Bays and the telecommunications equipment they serve.

REPLY: Please see Verizon MA's response to Information Request ATT 5-2l Attachment #2.

VZ # 331

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

Commonwealth of Massachusetts

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

Respondent: Bruce F. Meacham
Title: Senior Specialist

REQUEST: AT&T Communications of New England, Set #6

DATED: May 18, 2001

ITEM: ATT 6-2 Identify all activities for which you propose recovering costs on a non-recurring basis which will result in changes to facilities which will be available for subsequent provider of telephone services using those facilities.

REPLY: The non-recurring costs identified by the NRCM are generally recovered when incurred. To the extent any of these costs need not be incurred for a new or change of service request, they are not charged. For example, a Field Installation cost may be incurred on a service order to complete the cross-connection at the Serving Area Interface ("SAI"). To the extent those facilities are not needed to serve a different end user customer location after the first subscriber terminates service, that cost would not be incurred (or charged) on a subsequent order for service at the original end-user customer location.

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

Commonwealth of Massachusetts

D.T.E. 01-20

Respondent: Nancy Matt
Title: Manager - Service Costs

REQUEST: AT&T Communications of New England, Inc., set #12

DATED: May 25, 2001

ITEM: ATT 12-9 Please provide the SCIS/MO inputs used by Verizon in this docket in an uploadable Excel file.

REPLY: Please see the two attached PROPRIETARY Excel files. Verizon MA considers these files to be third party proprietary and confidential documents that will be provided subject to the terms of a mutually acceptable Protective Agreement. Since these files cannot be provided on paper, a copy is being provided to the Department and AT&T on disk. A copy will be provided to other parties upon request subject to the same terms.

VZ # 384

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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #14

DATED: May 31, 2001

ITEM: ATT 14-3 Identify which of the factors identified on page 23 of the Panel testimony (forecast uncertainties, customer inward-outward movement, random fluctuations in demand, future growth, maintenance requirements and other factors) are accommodated by the level of administrative spare included in Verizon-MA's engineering capacity planning.

REPLY: The general administrative spare percentages included in Verizon MA's response to Information Request ATT 14-2, are to accommodate customer inward outward movement, maintenance requirements, and the technical/physical nature of the design of the particular plant and equipment. Forecast uncertainties, defective plant (defective pairs and defective switch originating equipment), random fluctuations in demand, future growth, and other factors are not included in the administrative spare percentages.

VZ # 432

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

Commonwealth of Massachusetts

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

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

REQUEST: AT&T Communications of New England, Inc., Set #14

DATED: May 31, 2001

ITEM: ATT 14-13 Referring to page 32 of the Verizon-MA Panel testimony, identify the actual average discount for electronic switching, operator systems and circuit account investments used in the development of the forward-looking land and building factor.

REPLY: The requested information is not available. The calculation of the land and building factor begins with "booked investments". The type of information requested is not available in the accounting records.

VZ # 442

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 #14

DATED: May 31, 2001

ITEM: ATT 14-20 Provide documentation supporting the assertion at page 79 of the Verizon-MA Panel testimony that average residential demand is 1.2 lines per living unit.

REPLY: Attachment ATT 14-20 supports the assertion on page 79 of Verizon MA's Panel testimony. Verizon MA considers certain data responsive to this request proprietary and competitively sensitive. This information will be made available to parties subject to the terms of a mutually agreeable Protective Agreement.

The source of this data is a proprietary system - CRIS. Average residential demand is calculated by taking the total residential lines and dividing by the primary residential lines (total lines minus secondary lines). Data for 2000 and January through April of 2001 is indicated. The average demand shown is approximately 1.19 lines per living unit.

VZ # 449

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

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)0

REQUEST: AT&T Communications of New England, Inc., Set #14

DATED: May 31, 2001

ITEM: ATT 14-21 Provide the average business demand in terms of the average number of business lines per business (or business unit).

REPLY: Verizon MA objects to the question on the grounds that the information requested is not readily available and would require a special study. In addition, this request is burdensome and not reasonably calculated to lead to admissible evidence.

VZ # 450

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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director – Network Engineering

REQUEST: AT&T Communications of New England, Inc., Set #15

DATED: June 1, 2001

ITEM: ATT 15-3 Referring to Verizon's response to ATT-VZ 4-14, identify how many years of demand is considered when initially installing power plant for a switch.

REPLY: Verizon MA designs its central office power plant 8-hour battery backup (see Verizon MA's response to Information Request ATT 4-14) to occur throughout the life of a central office switching machine.

VZ # 488

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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director – Network Engineering

REQUEST: AT&T Communications of New England, Inc., Set #15

DATED: June 1, 2001

ITEM: ATT 15-5 Referring to Verizon's response to ATT-VZ 4-22, state whether central office switch engineers charge the same account as central office transport engineers. If the answer is no, provide a breakdown of expenses by account. Also provide the percentage of engineers involved in digital switching vs. the percentage of engineers involved in digital transport and other engineers primarily involved in digital circuit equipment.

REPLY: Verizon MA objects to this question on the grounds that the question is overly broad. The accounts that are charged depend on the type of work that is being done. There are account codes that are charged by both central office engineers and transport engineers.

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

Commonwealth of Massachusetts

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

Respondent: D. Albert & J. Levecchi
Title: Director/ Director

REQUEST: AT&T Communications of New England, Inc., Set #15

DATED: June 1, 2001

ITEM: ATT 15-8 Does Verizon assumes that the objective fill is the maximum and that growth jobs are instituted before the maximum fill is reached, resulting in a very low fill right after a growth job and something slightly less than the maximum fill just before a growth job? If the answer is no, explain why and produce the calculations and assumptions Verizon used to develop the fill factors in its study. If the answer is yes, identify the timeframe assumed by Verizon when determining the average utilization between growth jobs for:

(a) Line fill

(b) Trunk fill

REPLY: Verizon MA's Direct Panel testimony does not use the terminology "objective fill". Verizon MA's "maximum fill' is the administrative fill (also referred to as critical fill and relief fill), which is based on Verizon's administrative spare level(s) (see Verizon MA's response to Information Request ATT 14-2).

The basis for the utilization/fill levels used in Verizon MA's cost studies is as follows:

Switch Digital Trunks:
(Verizon MA cost study uses a utilization/fill of 90%)

- Administrative (max) fill is 95%. 10% capacity addition assumed. Average of 95% and 85% is 90%. See response to Information Request ATT 4-42. Verizon's actual average annual trunk growth is 14%.

REPLY: ATT 15-8 (cont'd)

- Verizon MA actual digital trunk utilization is 86%
- Verizon MA's operating objective for digital trunk utilization is 85%

Switch Analog lines:
(Verizon MA's cost study uses a utilization/fill of 93%)

- MA's actual analog line utilization is 88%
- Verizon MA's operating objective for analog line utilization is 93%

Switch Digital lines:
(Verizon MA's cost study uses a utilization/fill of 80%)

- Verizon MA's actual digital line utilization is 55%
- Verizon MA's operating objective for digital line utilization is 60%

DLC Remote Terminal Plug-in (Channel) Capacity:
(Verizon MA's cost study uses a utilization/fill of 80%)

- Verizon MA's actual RT plug-in capacity (channel) utilization is 70%

Outside Plant Copper feeder cable:
(Verizon MA's cost study uses a utilization/fill of 55.2%)

- See Verizon MA's response to Information Request ATT 2-24 (b)

Outside Plant Copper Distribution cable:
(Verizon MA's cost study uses a utilization/fill of 40%)

- See Verizon MA's response to Information Request ATT 2-24 (a)

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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #15

DATED: June 1, 2001

ITEM: ATT 15-11 Specify the maximum engineered CCS trunk capacity (per trunk) for a trunk group with greater than 10 trunks (DS0s).

REPLY: For a primary high usage end office DS1 trunk group (24 trunks), the engineered CCS capacity per trunk is 14.5 CCS.

VZ # 496

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

Commonwealth of Massachusetts

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

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #15

DATED: June 1, 2001

ITEM: ATT 15-12 Identify the percentage of Verizon-Massachusetts end office trunk groups that have more than 10 trunks (DS0s).

REPLY: 100 percent.

VZ # 497

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

Commonwealth of Massachusetts

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

Respondent: Louis Minion
Title: Manager

REQUEST: AT&T Communications of New England, Inc., Set #17

DATED: June 8, 2001

ITEM: ATT 17-1 Please define and explain the purpose of the following systems ("Systems") listed as part of the one-time development expense in Workpaper 4 Page 1.
(a) Gateway;
(b) Core Network Sys; and Operator Services.

REPLY:

a) The Gateway Systems refer to the interfaces or front ends between the Verizon MA's OSSs and the CLEC users. The interface and gateway systems act as "middleware" between the CLEC and Verizon MA's core OSS, and provide formats for OSS access. This middleware eliminates the need for the CLECs to train their representatives on the nuances of each separate underlying core OSS and its functionality. These systems were designed to meet CLEC requirements and industry standards reflecting those requirements. For example, the Direct Customer Access System ("DCAS") and Request Manager ("RM") are electronic systems that provide secure access to Verizon MA's ordering OSS functionality and can be utilized through either Electronic Data Interchange ("EDI") formats or the Web Graphical User Interface ("Web GUI"). DCAS also provides access to pre-ordering functions utilizing EDI, Common Object Request Broker Architecture ("CORBA") or the Web GUI.

b) Core network systems refer to those systems that perform the actual pre-ordering, ordering, provisioning, billing and maintenance/repair functions. These functions are defined as follows:

REPLY: ATT 17-1 (cont'd)

- **Pre-ordering**: the process whereby Verizon and CLECs exchange information about current and/or proposed customer products/services and/or unbundled network elements.

- **Ordering**: the process whereby a CLEC submits a request for products/services and/or unbundled network elements.

- **Provisioning**: the process whereby Verizon MA executes a request for a set of products/services and/or unbundled network elements and provides to the CLEC acknowledgment and status reports.

- **Maintenance and Repair**: the process by which a CLEC initiates a request for repair of existing products/services and/or unbundled network elements, with acknowledgments and status reports.

- **Billing**: the process by which Verizon MA provides appropriate usage data to facilitate end-user billing. It also involves the exchange of information to process claims and adjustments.

Operator Services systems are those that are needed to provide CLEC access to White Pages Listings, Direct Access to Directory Assistance and Branding/Unbranding of operator services calls.

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

Commonwealth of Massachusetts

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

Respondent: Louis Minion
Title: Manager

REQUEST: AT&T Communications of New England, Inc., Set #18

DATED: June 12, 2001

ITEM: ATT 18-2 The DTE stated, at page 36 of its Phase 4-L Order[1] (the "4-L Order") that, "Bell Atlantic has proposed to establish rates to recover a portion of approximately $108 million in expenditures and approximately $18 million in ongoing costs which it states were incurred to modify and provide CLECs with access to OSS covering New York and New England." Please explain the relationship between the development costs shown in column D of Workpaper 4, page 1 and the development costs cited above in the 4-L Order.

REPLY: The development costs shown in column D of Workpaper 4, page 1 reflect an update to the development costs cited above in the 4-L Order.

VZ # 516

[1] DTE 10/14/99 Order in -Phase 4-L 96-73/74, 96-75, 96-80/81, 96-83, 96-94.