

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

Commonwealth of Massachusetts

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

Respondent: Donald E. Albert
Title: Director

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

DATED: May 25, 2001

ITEM: ATT 12-19 Please list each entire new switch (*cf.* Verizon's direct panel testimony at page 139) purchased by Verizon since January 1, 2000, for use anywhere in Verizon's service territory, and for each such switch, list the switch maker, the switch model number, the switch size in terms of number of lines to be served by the switch, the total list price for the switch, the total net price paid for the switch, and the total price of the switch per line to be served by the switch.

REPLY: Verizon MA objects to this request on the grounds that it is overly broad and burdensome. Notwithstanding this objection, Verizon MA provides the following response specific to Massachusetts.

Verizon MA considers this information to be proprietary and confidential, and will provide this information to parties subject to a mutually acceptable Protective Agreement.

**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, Inc., Set #13

DATED: May 31, 2001

ITEM: ATT 13-2 Provide the requested information concerning Verizon NRCM TISOC Task #1.

- (a) Is Task #1 made necessary only by CLEC-caused errors? If there are circumstances in which Task #1 is necessary for any reason other than CLEC-caused error, please list all such reasons.
 - (i) Please provide some examples of actual orders that have been submitted to Verizon electronically and that also required Task #1. If no actual orders requiring Task #1 are available, please list and describe in detail all of the types of problems that would be encountered by Verizon and which would require Task #1.
 - (ii) Wherever a forward-looking adjustment is applied to Task #1, explain how that adjustment was calculated and provide all documents substantiating that calculation. Please specify all instances in which the forward-looking adjustment to Task #1 was based only on the opinion of experts and no additional information is available.
- (b) How does Verizon's OSS determine that an LSR needs manual assistance?
 - (i) Provide any and all rules residing in the OSS that would cause an LSR to be manually printed in the TISOC.
- (c) For every element in the Verizon NRCM which lists Task #1 as taking 50 minutes to complete:
 - (i) State the number of minutes which are spent manually typing into Verizon's OSS.

- (ii) State the number of minutes it currently takes to:
 - a. receive the order
 - b. Print the order
 - c. Review the order
 - d. Type and confirm the order request
- (d) For every element in the Verizon NRCM which lists Task #1 as taking 160 minutes to complete:
 - (i) State the number of minutes which are spent manually typing into Verizon's OSS?
 - (ii) State the number of minutes it currently takes to:
 - a. receive the order
 - b. Print the order
 - c. Review the order
 - d. Type and confirm the order request
- (e) Please provide copies of any documents created or provided by Anderson Consulting in connection with its evaluation of Telecom Industry Services Operations Center activities.
- (f) Using the worksheet "Conn Time" (CONNECT - AVERAGE WORK TIME (Minutes)), please explain why the cells corresponding to TISOC Tasks #1-4 for "2W Hotcut Init," "IDLC to Copper Hotcut Init," "4W New Init," and "4W Hotcut Init" all indicate that the source of their data is worksheet #1 "2W New Init."
- (g) Using the worksheet "Conn Time" (CONNECT - AVERAGE WORK TIME (Minutes)). For each element where non-grayed blank cells exist, and no value is listed for TISOC Tasks #1-4, please provide the reference cell used for that element and the reason why there is no value shown on this worksheet. One example of a non-greyed blank cell is cell E5, corresponding to "2W Hotcut Init."
- (h) If LSRs have errors caused by a CLEC, what steps are taken to train or instruct the CLEC to prevent reoccurrence of the error?
 - i) How is this information communicated to the CLEC?
 - ii) Please provide all communications such as correspondence or training guides that Verizon may have given to any CLEC to aid the CLEC in preventing errors from reoccurring.

REPLY:

- (a) No. Verizon MA's nonrecurring cost studies do not consider the cost it incurs for work performed in the TISOC for processing orders that fall out of the electronic order entry system due to CLEC-caused errors. TISOC Task #1 reflects

REPLY ATT 13-2
(cont'd)

the average work time necessary to process orders for either large numbers of lines or complex lines, neither of which are designed to flow through Verizon MA's OSSs.

- (i.) The average work time for Task #1 was taken from the Andersen Consulting work time study performed to provide input to Verizon MA's TISOC staffing plan. The Andersen study was performed by recording the observed work times for over 800 manually processed service orders. No copies of these orders were taken by Andersen Consulting. As already stated above, the cost developed for Activity #1 represents the cost to process complex orders, not to resolve CLEC input errors. Please see Verizon MA's reply to (b) below for a list of possible CLEC input errors.
 - (ii.) As described in Mr. Meacham's Direct Testimony starting at Page 27, a panel of 18 subject matter experts involved in establishing and/or improving the provisioning process for UNEs reviewed each work activity to reach a consensus on what the forward-looking adjustment factor should be. NRC Exhibit L provides a copy of the instructions followed by the panel.
- (b) The development of Verizon's electronic order interfaces (EDI or Web GUI) and the growing sophistication of CLECs have evolved such that the majority of simple CLEC Local Service Requests (LSRs) flow automatically through Verizon's electronic order interfaces. There are two reasons an LSR is sent to the TISOC for manual handling – either the LSR is designed to go there (Level 2 – complex orders) or the LSR has errors and did not flow through the OSS. There are a number of conditions that may cause CLEC LSRs to pass the entry system edits but require manual review by the TISOC.
- (i.) Examples of such conditions are:
 - (1) An invalid LSR field has been populated,
 - (2) An LSR field contains invalid data,
 - (3) The address populated on the LSR does not match LiveWire,
 - (4) A required field has not been populated,
 - (5) The FEATURE field contains invalid data,

REPLY: ATT 13-2
(cont'd)

- (6) A required form has not been submitted,
- (7) A supplemental service order has been sent on an LSR when the service order has already been completed,
- (8) A Verizon technician was unable to obtain access to the end-user customer's premises,
- (9) The LOOP is not qualified as requested (e.g., loop length too long, loaded facilities, no copper facilities available, spectrum incompatibility issues),
- (10) The retail service or line cannot be migrated (e.g., BOSS/CRIS account is not live),
- (11) A problem with the telephone number provided (e.g., incorrect Area Code, incorrect Wire Center, no account found, no match to end user name, no match to end user address, status is non-working, status is disconnected),
- (12) Date Due is in jeopardy due to facilities (e.g., facility problem, no spare facilities available, no copper facilities available),
- (13) Duplicate Purchase Order Number (i.e., a new PON has been received and the identical work being requested on the new PON is pending or completed by another PON), and
- (14) A pending order exists on the same account the LSR is requesting activity on.

CLEC service orders that do not flow through the electronic interface are directed to Force/Load Administrators who assign the CLEC service orders by Purchase Order Number (PON) to TISOC service representatives who review the LSRs to resolve the condition(s) blocking flow-through.

- (c) The 50 minute TISOC Task #1 work time for UNE loops was taken from the results of the Andersen Consulting observations. These observations were not broken down into the discrete steps requested.
- (d) The 160 minute TISOC Task #1 work time for UNE Specials was taken from the results of the Andersen Consulting observations. These observations were not broken down into the discrete steps requested.

REPLY: ATT 13-2
(cont'd)

- (e) Please see the attached Andersen Consulting work time study. Verizon MA considers this information to be proprietary and confidential. This information is being provided to parties subject to the terms of a mutually acceptable Protective Agreement.
- (f) The "Conn Time" data that belong in the cells corresponding to TISOC Tasks #1-4 for "2W Hotcut Init," "IDLC to Copper Hotcut Init," "4W New Init," and "4W Hotcut Init" are duplicates of the data in "2W New Init." The values used for TISOC Connect Times in Column C of worksheets #3, 5, 7, etc. were linked to the numbers for "2W New Init" as a spreadsheet-building shortcut. The cost calculations on all worksheets linked to these data are unaffected.
- (g) Please see reply to (f) above.
- (h) Verizon provides assistance to CLECs to prevent the re-occurrence of LSR errors in three ways: (1) providing LSR entry training, (2) making available Flow-through Error Reports and (3) conducting monthly Flow Through Workshops.
 - (i.) Error reports have been offered upon request to all CLECs through the CLEC Flow Through Workshops. Attached is a sample of the report that is produced by Verizon.
 - (ii.) Verizon provides basic service order entry training to CLECs. Over 1,000 CLEC students attended Verizon-sponsored training during the year 2000. Verizon also conducts monthly Flow Through Workshops for all CLECs. These workshops are held in New York. A conference bridge is available to any CLECs that wish to participate but are unable to attend in person. The schedule, agenda and material to be discussed are made available on the Verizon Wholesale website:

http://128.11.40.241/east/wholesale/industry_conf_education/master.htm

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

Commonwealth of Massachusetts

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 14-12 Identify separately the actual average discount for Digital Circuit equipment, Digital Switch and SONET Circuit and other terminal equipment – CPE reflected in the 1998 DCPR installed investment for hardwired and plug-in equipment upon which the forward-looking EF&I factors were developed.

REPLY: Data identifying the actual discounts underlying the DCPR investments is not available. A burdensome and time consuming special study would be required to produce the requested data.

VZ # 441

**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 15-6 Referring to Verizon's response to ATT-VZ 4-26, provide list and net prices that Verizon paid for the equipment used to convert the following offices from a remote switch to a host or standalone switch:

KGTNMASLDS0

(b) NCKTMAUNDS0

REPLY: Verizon MA considers the information requested to be proprietary and confidential. This information is being provided to parties subject to the terms of a mutually acceptable Protective Agreement.

VZ # 491

**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 #15

DATED: June 1, 2001

ITEM: ATT 15-9 Referring to Verizon's response to ATT-VZ 4-46:

Quantify the designed busy hour minute of use capacity and compare and contrast this with the designed busy hour minute of use capacity adjusted for the mid-point of the growth cycle.

Identify the switch growth cycle time period (e.g., one year growth cycle) used in the local switch MOU and contrast this with the growth cycle time period assumed for the trunk MOU. Show all calculations.

REPLY: (a) For local usage, Workpaper, Part C-2, Line 12 shows the BH MOU for the mid-point of 26,012,508. Capacity BH MOU is 17,419,090 CCS (line 11) times $100/60 = 29,031,817$ BH MOU. Since the line growth is 1.5% per year, and line CCS growth is 5% per year, the sum is 6.5% per year compounded for three years. This results in an overall growth of 20.795% over the three year planning cycle. The mid-point would therefore be $0.20795 / 2 = 0.103925$; and $1 - 0.103925 = 0.896$. Therefore the mid-point BH MOU is $29,031,817 \times 0.896 = 26,012,508$ (shown on line 12).

For trunks a similar calculation was performed. Workpaper, Part C-2, Line 18 shows the mid-point of 19,058,711 BH MOU. Capacity BH MOU is 11,886,930 (line 17) times $100/60 = 19,811,550$.

Since trunk growth is 1.5% per year, and trunk CCS growth is 1% per year, the sum is 2.5% per year compounded for three years. This results in an overall growth of 7.68906% over the three year

REPLY: ATT 15-9
(cont'd)

planning cycle. The mid-point would therefore be $0.0768906 / 2 = 0.03844531$; and $1 - 0.03844531 = 0.962$. Therefore the mid-point BH MOU is $19,811,550 \times 0.962 = 19,058,711$ (shown on line 18).

- (b) The local switch MOU is based on SCIS inputs using the access lines in service for the year 2000 and grown for three years to reach the end of the study period 2003. The local trunk MOU is based on SCIS inputs using trunks in service for 2001 and then grown for two years to reach the end of study period. Both calculations were then brought back to the mid-point of the growth cycle as identified in part (a) of this question. The study assumes the trunks grew at the same growth rate from 2000 to 2001 as 2001 to 2003.