

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William Taylor

Title: Senior Vice President, NERA

REQUEST: Attorney General, Set #1

DATED: July 5, 2001

ITEM: AG-VZ 1-8 Please refer to the direct testimony of William E. Taylor, page 7, line 19, where he states: "RCN is another effective competitor in Massachusetts. A comparison of RCN Platinum service with an equivalent package constructed by Verizon shows that RCN has a price advantage of more than \$75 per month over Verizon."

- a. Identify the specific communities in which RCN is currently offering basic residential or business telephone service in Massachusetts. For each such community, indicate the number of residential and business customers (separately) currently being served by RCN.
- b. Identify the specific communities in which RCN has obtained construction or other entry authorization but in which no or only limited service is currently being provided. For each such community, indicate: (1) the date at which the construction or entry authority was granted by the municipality or other local franchising authority, (2) the date that construction commenced, (3) the present status of such construction, and (4) the date at which the full build-out is currently expected to be completed.

**ERRATA
REPLY:**

- a.) The best source of information on the specific communities served by RCN would be either to request such data from RCN or to review RCN's tariffs. Attached is a portion of RCN's tariffs which indicate that RCN offers its services throughout the 128 LATA in Massachusetts.

Verizon MA has two sources of data on the markets served by RCN that clearly demonstrate that RCN is an effective competitor in Massachusetts. The first data source is the number of

ERRATA

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(cont'd)

wholesale services that RCN purchases from Verizon MA grouped by area code. See the attached chart. These data are the confidential and proprietary information of RCN that may not be disclosed by Verizon MA without its authorization. The information is, accordingly, being provided only to the Department.

The second data source is the "CLEC 2001 Study" published by New Paradigm Resources Group, Inc. This report indicates that RCN:

- ?? Seeks to become a single source provider of residential services,
 - ?? Has more than 32,000 miles of fiber cable in place,
 - ?? Has a Lucent 5ESS switch in Boston,
 - ?? Has entered a joint venture with Boston Edison, and
 - ?? Serves the residence market in Allston, Belmont, Boston, Brookline, Brighton, Burlington, Dedham, Framingham, Hyde Park, Lexington, Needham, Newton, Norwood, Quincy, Randolph, Somerville, Wakefield, Waltham, Watertown, and Woburn.
- b.) Verizon does not routinely track the construction or other entry authorizations required by its competitors. Verizon has information related to the licensing of poles and conduit to its wholesale customers, which might be a partial indicator of construction activity. These data are the confidential and proprietary information of RCN that Verizon MA may not disclose without its authorization. The information is, accordingly, being provided only to the Department.

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set #1

DATED: July 5, 2001

ITEM: AG-VZ 1-11 For each month beginning in January 2000 and extending to the most recent month for which data is available, provide:

- a. The total number of Flexpath T-1 exchange access lines/trunks being provided by Verizon MA at retail to business customers in Massachusetts.
- b. The total number of Flexpath T-1 exchange access lines/trunks installed as new inward orders by Verizon MA at retail to business customers in Massachusetts.
- c. The interval being quoted by Verizon MA to its retail customers for installation of Flexpath T-1 exchange access lines/trunks from the date at which the retail customer order is placed with Verizon MA until the date at which the Flexpath T-1 Service is installed.
- d. The actual installation interval experienced by Verizon MA with respect to its retail customer orders for installation of Flexpath T-1 exchange access lines/trunks from the date at which the retail customer order is placed with Verizon MA until the date at which the Flexpath T-1 Service is installed.
- e. The number of "missed installation dates" for Flexpath T-1 Service provided at retail by Verizon MA to its retail end-user customers, and the number of orders that had not been installed within thirty (30) calendar days of receipt by Verizon MA of the order from the CLEC.
- f. The total number of T-1 Special Access facilities being provided by Verizon MA to CLECs in Massachusetts.

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(contd)

- g. The total number of T-1 Special Access facilities installed by Verizon MA as new inward orders received from CLECs in Massachusetts.
- h. The interval being quoted by Verizon MA to CLECs for installation of T-1 Special Access facilities from the date at which the CLEC order is placed with Verizon MA until the date at which the T-1 Special Access facility is installed at the CLEC's customer's location.
- i. The actual installation interval experienced by Verizon MA to CLECs for installation of T-1 Special Access facilities from the date at which the CLEC order is placed with Verizon MA until the date at which the T-1 Special Access facility is installed at the CLEC's customer's location.
- j. The number of "missed installation dates" for T-1 Special Access facilities provided by Verizon MA to CLECs in Massachusetts.
- k. The total number of T-1 UNE facilities being provided by Verizon MA to CLECs in Massachusetts.
- l. The total number of T-1 UNE facilities installed by Verizon MA as new inward orders received from CLECs in Massachusetts.
- m. The interval being quoted by Verizon MA to CLECs for installation of T-1 UNE facilities from the date at which the CLEC order is placed with Verizon MA until the date at which the T-1 UNE facility is installed at the CLEC's customer's location.
- n. The actual installation interval experienced by Verizon MA to CLECs for installation of T-1 UNE facilities from the date at which the CLEC order is placed with Verizon MA until the date at which the T-1 UNE facility is installed at the CLEC's customer's location.
- o. The number of "missed installation dates" for T-1 UNE facilities provided by Verizon MA to CLECs in Massachusetts, and the number of orders that had not been installed within thirty (30) calendar days of receipt by Verizon MA of the order from the CLEC.

REPLY: AG-VZ 1-11 (cont'd) Verizon Massachusetts considers certain data responsive to this request proprietary and competitively sensitive. The data will be made available to the extent provided for in a mutually acceptable Protective Agreement.

Please see the attached table which provides the requested information for retail Flexpath T1 services, intraLATA Special Access services, and UNE T1 facilities.

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

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Paula L. Brown

Title: Vice President - Regulatory

REQUEST: Attorney General, Set #1

DATED: July 5, 2001

ITEM: AG-VZ 1-17 Please refer to your June 13, 2001 (sent June 25, 2001) response to DTE-VZ-3-1. Using your definition of “new products and services” *i.e.*, any new product and service not currently offered in Verizon MA’s tariffs or any combination of new and/or existing services including the bundling of a new set of existing services not currently offered in combination, state the number of new products and services that Verizon MA has offered and expects to offer in:

- a. 1999.
- b. 2000.
- c. 2001.
- d. 2002.
- e. 2003.

REPLY: a. In 1999, Verizon MA introduced the following new products and services.

Anonymous Call Rejection Service
Usage Three Way Calling Service
Call Manager Package
Weekend Choice Plan
Expanded Community Calling Plus Service
SoundDeal Package
Intrastate Interlata Directory Assistance Service
Sensible Minutes Plan

REPLY: AG-VZ 1-17
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ISDN Basic Service Enhancements
Caller ID with Name and Call Waiting ID with Name
ISDN Primary Service Optional Features

- b. In 2000, Verizon MA introduced the following new products and services.

Centrex Call Management
Local Package
Unlimited Phone Home Calling Card Trial
Multi-line Package Bonus Discount
Enhanced ISDN-PRI Hub Service
Virtual Office ISDN
Talking Call Waiting
Native American Lifeline
Bell Atlantic Access Number Single Rate
Optional Centrex Features

- c. In 2001, Verizon MA introduced the following new product and service.

Business Special Toll Program

Verizon Massachusetts considers information regarding the products and services it plans to introduce during the remainder of 2001 to be proprietary and competitively sensitive. The information will be made available to the extent provided for in a mutually acceptable Protective Agreement.

- d. Verizon Massachusetts considers information regarding its plans for the introduction of products and services in 2002 to be proprietary and competitively sensitive. The information will be made available to the extent provided for in a mutually acceptable Protective Agreement.
- e. Verizon Massachusetts considers information regarding its plans for the introduction of products and services in 2003 to be proprietary and competitively sensitive. The information will be made available to the extent provided for in a mutually acceptable Protective Agreement.

