

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S THIRTIETH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

INFORMATION REQUESTS

- ATT-VZ 30-1 Please identify the tariff and tariff provision in which the terms and conditions for the Power Distribution element can be found. If tariff language on the Power Distribution element presently does not exist, please provide the terms and conditions upon which Verizon intends to apply the Power Distribution element.
- ATT-VZ 30-2 Please explain whether the costs of the power distribution cable are recovered in non-recurring charges for collocation. Please support your answer with an itemized listing of all items the cost of which are recovered in non-recurring charges.
- ATT-VZ 30-3 If a CLEC pays a non-recurring charge for power distribution cable, please state whether Verizon intends to charge the Power Distribution element in such a situation.
- ATT-VZ 30-4 Please state whether the Power Distribution element will recover the cost of distribution power cables between the Verizon BDFB and the collocation arrangement. Please state whether other connecting points are considered in the cost development for this element and identify any such connecting points.
- ATT-VZ 30-5 Please state whether Verizon intends to apply a power distribution charge in situations where a CLEC does not utilize distribution cable for bringing power to its collocation arrangement.
- ATT-VZ 30-6 Please provide central office diagrams for the following three central offices:
- a. CMBRMAWA
 - b. CMBRMABE
 - c. BSTNMAHA
- These diagrams should show clearly: (1) the location of Verizon's DC Power Plant, (2) the placement of BDFBs throughout the central office, (3) the placement of Verizon telecommunications equipment in Verizon's own equipment line-ups, (4) the placement of collocation equipment, and (5) the scale.
- ATT-VZ 30-7 Please provide in electronic format all work papers relied upon by Verizon in developing the cabling distances for the Power Distribution element found in Verizon's Mass Part CA - Physical cost study.

Respectfully submitted,

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