

WORLDCOM INC.'S RECOMMENDED INFORMATION REQUESTS

Synopses

Questions 1-6 seek data concerning the treatment of the various categories of customers in absolute and relative terms and how their treatment has changed over time. In addition, these questions seek data necessary to demonstrate the portion of ordered or requested circuits that are interstate and the declining number of ordered or requested circuits over the last year. WorldCom expects that these data will show that ILECs provide significantly different quality of service to different categories of customers that order or request functionally and technically identical special services, and that these data will refute the ILECs' claims that the decline in the quality of their performance is due at least in part to the volume of orders they receive.

Questions 7-10 seek data that will enable the Department to determine the adequacy of the ILEC's facilities, the reasonableness of the ILEC's identification of need for new facilities, the reasonableness of ILEC claims that allegedly inaccurate demand forecasts caused the ILEC to miss a requested or promised delivery date, and the reasonableness of the ILEC's response to demand forecasts. In WorldCom's experience, ILECs blame an unjustifiably large percentage of missed installations on facilities and demand forecasts and attribute a greater percentage of missed installations to facilities shortages for CLECs, IXCs and ISPs than for business customers and affiliated customers.

Questions 11-12 seek data that will enable the Department to determine the reasonableness of the ILEC's procedures for informing CLECs, IXCs and ISPs of what information the ILEC requires in an ASR or other form of service request and for processing allegedly non-executable ASRs or other forms of service requests. It will also reveal whether the ILEC uses the same processes for handling service requests from each category of special services customers, including CLECs, IXCs, ISPs, business customers and affiliated customers. In WorldCom's experience, most ILECs have no discernable procedures for informing CLECs, IXCs and ISPs of the required format and content of ASRs or other forms of service requests or of the process for handling allegedly non-executable ASRs or other forms of service requests. The lack of efficient processes and procedures for CLECs, IXCs and ISPs contrasts markedly with the efficient processes employed for business customers and affiliated customers, and causes significant delays whenever an ILEC deems an ASR or other form of service request from a CLEC, IXC or ISP non-executable.

Questions 13-15 seek data necessary to determine whether the ILEC's procedures for identifying and handling CNR situations are reasonable and non-discriminatory as between the various categories of customers. It will also enable the Department to determine whether a CNR order is counted by the ILEC as having been installed on time. In WorldCom's experience, ILECs claim CNR for an unjustifiably large percentage of missed delivery dates for CLECs, IXCs and ISPs as compared to business customers and affiliated customers.

Questions 16-21 seek data necessary to determine the timeliness of the ILEC's provisioning and installation of special services and whether all types of customers obtain reasonable and nondiscriminatory treatment. Most ILECs have different procedures for providing due dates to different categories of customers, including CLECs, IXC's, ISPs, business customers and affiliated customers. The answers to questions 16-21 should reveal whether such disparate treatment is discriminatory. They will also enable the Department to determine whether orders are properly being installed on a first-come first-served basis, and whether the ILEC has in place a system for providing "smart FOCs." In addition, the data should confirm that the installation interval and the average number of business days between the date on which an executable ASR was received and the due date offered by the ILEC are increasing. The data will also reveal whether the ILEC improperly provides business customers and affiliated customers with "off-tariff" credits and payments while offering CLECs, IXC's and ISPs only the tariffed credits and payments. Finally, the data should reveal that there are meaningful differences that could lead to discrimination in the way the ILEC's personnel charged with handling the accounts of CLECs, IXC's, ISPs, business customers and affiliated customers are compensated or evaluated to motivate behavior.

Questions 22-23 seeks data that that will enable the Department to determine whether the ILEC is responding to missed or delayed installations in a reasonable and non-discriminatory manner.

Questions 24-27 seek data that is necessary to determine the reasonableness of the quality of the ILEC's new special services installations and of its procedures for responding to trouble reports and failures after new installations. In addition, the data will reveal whether a disproportionately high number of problems affect CLECs, IXC's and ISPs as opposed to business customers and affiliated customers.

Question 28 seeks data that will enable the Department to determine whether the ILEC makes information concerning the status of a given order or request for special services available to the various categories of customers on-line in a nondiscriminatory manner. WorldCom has recently discovered that many ILECs make such information available on-line only to business customers and/or affiliated customers and not to customers that are CLECs, IXC's or ISPs.

Question 29 seeks information relating to the claims of ILECs that differences in treatment of business customers and affiliated customers on the one hand and CLECs, IXC's and ISPs on the other are due to reasons other than the fact that CLECs, IXC's or ISPs are also competitors of the ILEC. Confirming the ILECs' prior representations to the FCC that special services provided to all categories of customers are equivalent eliminates any claimed justification for different performance for disparate categories of customers.

Definitions

ASR means Access Service Request.

Affiliated customer means a special services customer of the ILEC that is affiliated with the ILEC and is an ISP or offers interLATA services pursuant to Sections 271 and 272 of the Communications Act.

Business customer means a special services customer of the ILEC that is not an affiliated customer of the ILEC and is not a CLEC, IXC or ISP.

CLEC means Competitive Local Exchange Carrier that is not affiliated with the ILEC.

Customer not ready (“CNR”) Situation means a new special services installation that cannot be installed by the due date by the ILEC, through no fault of the ILEC, but because the customer or a connecting carrier is not ready for the installation to be completed. Such a situation must be coded CNR by the ILEC for it to be counted as a CNR.

Customer service record (“CSR”) means a record maintained by the ILEC that has customer service details and that is commonly referred to as a CSR.

Due date means the date communicated by the ILEC to the customer (whether an affiliated customer, business customer, CLEC, IXC or ISP and by any means, including a FOC or otherwise) by which the ILEC offers or agrees to install a circuit or circuits.

Executable service request means a request by ASR, or any other form of special services request, adequate for the ILEC to create a service order.

Failure after new installation means a new special service installation that fails within 30 days of the installation.

Firm order confirmation (“FOC”) means the ILEC response to an initial or supplemental ASR which provides the requesting customer with the specific date by which the requested circuit or circuits will be installed.

ILEC means Incumbent Local Exchange Carrier.

Installation interval means the time in business days or average business days for a special service to be installed after the ILEC has received an executable service request.

ISP means Internet Service Provider. Unless otherwise indicated, ISP means an Internet Service Provider not affiliated with the ILEC.

IXC means Interexchange Carrier. Unless otherwise indicated, IXC means an Interexchange Carrier not affiliated with the ILEC.

New special services installation means an installation for a customer to whom no special services have been previously installed and additions to existing special services installations.

New special services installation trouble report means a trouble report for a new special services installation within 30 days of the installation.

Non-executable service request means a request for special services that is not adequate for the ILEC to create a service order by ASR or other form of special services order or request.

On-line means using a gateway or access through the Internet.

On-time installation means a special service installation completed by the ILEC on the due date offered or agreed to by the ILEC.

Past due installation means an installation after the due date.

Policies and practices relating to employees means any policy, practice or goal relating to employee evaluation, promotion, retention, or compensation.

Special services means private line services, intrastate special access services and interstate special access services.

Trouble report means any record (whether paper or electronic) used by the ILEC for the purposes of tracking disposition of a service repair or maintenance situation.

Instructions

1. All uses of the conjunctive include the disjunctive and vice versa. Words in the singular include the plural and vice versa.
2. Unless otherwise indicated, these questions cover the period from January 1, 1998, to the present.
3. Each response should identify documents sufficient to demonstrate the grounds of the response. Copies of such documents, with clear indication of the particular question to which each document or group of documents is responsive, may be produced in lieu of such identification.
4. For each response, provide a detailed explanation of the methodology used to calculate the response, including the system(s) from which the data was extracted; any data included/excluded from the calculation; and the methodology and/or calculations used.
5. If you cannot answer a question or any portion of a question, answer what portions you can answer and provide a detailed explanation as to why the remainder cannot be answered. If you cannot answer a question or portion of a question because you do not compile data or keep records in a manner that permits you to answer the question, (a) state that as the reason and provide a detailed description of the manner in which you do compile the requested data or records; and (b) provide the best available data or information in whatever format it is kept.
6. Where indicated, the content of your answers should be separately broken out by:
 - IXC's not affiliated with the ILEC
 - CLECs not affiliated with the ILEC
 - ISPs not affiliated with the ILEC
 - Business customers
 - ISP customers affiliated with the ILEC
 - Customers affiliated with the ILEC offering interLATA services pursuant to Sections 271 and 272 of the Communications Act
7. Where indicated, the content of your answers should be separately broken out by:
 - circuit type (*i.e.*, DS-0, DS-1, DS-3, OCN)
 - intrastate special access services
 - interstate special access services
 - private line services

Questions

1. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, state the ILEC's annual revenues for special services from 1998 to the present.
2. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, state the number of circuits ordered or requested from the ILEC each month.
3. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, state the number of circuits that the ILEC installed each month.
4. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, as of the end of each month, the number of circuits ordered or requested that were installed by the due date.
5. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, as of the end of each month, the number of circuits ordered or requested that were not installed by the due date.
6. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, provide the number of currently uninstalled circuits that have been ordered or requested categorized by "age" (defined as the number of days since an executable service request was received). Provide age groups as follows: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 days, and 40+ days.
7. For each of your answers to Questions 5 and 6, and all broken-out subparts thereto, provide the ground asserted by the ILEC for failing to install the circuits ordered or requested including, but not limited to, lack of ILEC facilities, ILEC personnel, other reasons for which the ILEC was responsible, or CNR.
8. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, provide the total amount of money spent annually by the ILEC on installing new facilities over which special services could be provided. Describe in detail any and all current plans (including projections of annual expenditures by the ILEC for 2001 and 2002) for installing new facilities over which special services can be provided in the future.
9. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any processes, policies, or practices establishing priorities for assigning facilities between circuits ordered or

requested by CLECs, IXC's and ISPs, and circuits ordered or requested by business customers and affiliated customers, when all circuits ordered or requested cannot be installed by the due date due to lack of ILEC facilities.

10. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any processes, policies, or practices for obtaining and responding to demand forecasts. Describe separately any processes, policies, or practices for obtaining and responding to the ILEC's own demand forecasts.
11. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe the ILEC's policies, practices, and processes for handling non-executable service requests.
12. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any of the ILEC's policies, practices, and processes for obtaining data from each of the categories of customers so that an executable service request can be created in the format required by the ILEC, including but not limited to, identifying any instruction or materials provided by the ILEC to CLECs, IXC's or ISPs; any organizations, centers, and titles of individuals involved in any such processes; and whether steps in the various processes are performed manually or electronically.
13. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any policies, practices and processes the ILEC uses to define a CNR situation and to determine that an uninstalled circuit ordered or requested is properly coded CNR. Describe any policies, practices and processes relating to documenting or reporting a CNR situation for new special services installations.
14. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, as of the end of each month, the number of uninstalled circuits coded CNR.
15. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any policies, practices and processes the ILEC uses to prevent a CNR situation. Your response should include, but not be limited to, a description of the activities in which technicians engage (*e.g.*, do technicians call the customer before attempting installation? if so, when is such a call made? do you call the ordering carrier if a customer is not ready? if so, is the call made from the customer's premise?). If the CNR process has changed over the past three years, describe any such changes and the date(s) on which such changes were implemented. Describe any training material(s) or customer notification(s) regarding your process.

16. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, for each month, the average number of business days before the ILEC offered or agreed to an installation due date in a FOC or any other means once an executable service request was received. If the ILEC does not provide a FOC for business customers and affiliated customers, explain in detail how the ILEC notifies business customers and affiliated customers of the due date and the internal process through which such due date is generated and provided. Provide the average number of days it takes between the time an executable service request is received by the ILEC, and the time the various categories of customers receive an offered or agreed to due date back from the ILEC.
17. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe how due dates are established and communicated to the customer. Also describe the process by which facility checks are performed prior to establishing and/or communicating such due dates. For purposes of this question, please state whether any part of the process for establishing a due date involves negotiations with the customer. If so, please explain in detail the nature of those negotiations. If the ILEC's process has changed over the past two years, describe any such changes and the date(s) on which such changes were implemented.
18. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, for each month, the average installation interval and the average number of business days between the date on which an executable service request was received and the due date agreed to by the ILEC.
19. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any policies and practices relating to (a) documenting and reporting, (b) employees, and (c) payments or credits to the various categories of customers, for on-time installations, past due installations, and maintenance and repair.
20. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any policies and practices relating to (a) documenting and reporting, (b) employees, (c) and payments or credits to the various categories of customers, for installation intervals for new special services.
21. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any policies or practices relating to (a) documenting and reporting, (b) employees, and (c) payments or credits to the various categories of customers, for complaints by any customer concerning ILEC performance (including but is not limited to escalations) about new special service installations.

22. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any processes, policies, or practices relating to the treatment of the various categories of customers when problems such as a delayed due date, delay in the notification of a due date or missed due date occur. Describe all training materials or notification provided to employees regarding such policies and/or practices.
23. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any processes, policies, or practices relating to the treatment of the various categories of customers in a jeopardy situation (that is, a situation in which the ILEC changes the due date after having offered or agreed to a due date), including but not limited to how the ILEC informs the various categories of customers of the jeopardy situation. Also describe, on a month-to-month basis, the average number of business days in advance of the original due date by which the various categories of customers are informed of the jeopardy situation.
24. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, as of the end of each month, the number of new special service installation trouble reports received and the amount of credits or payments issued to the various categories of customers.
25. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any processes, policies or practices, including but not limited to (a) documenting and reporting, (b) employees, and (c) payments or credits issued to the various categories of customers relating to new special service installation trouble reports.
26. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, set forth, as of the end of each month, the number of failures after new installations and the amount of credits or payments issued to the various categories of customers.
27. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any processes, policies or practices, including but not limited to (a) documenting and reporting, (b) employees, and (c) payments or credits to the various categories of customers, concerning failures after new installations.
28. For each category of customer indicated in Instruction 6 and each category of circuit and service indicated in Instruction 7, describe any of the ILEC's policies, practices, and processes that enable the various categories of customers to review and/or retrieve on-line at no charge:
 - (a) customer service records;
 - (b) status of pending service requests;

- (c) design layout records of special services circuits;
 - (d) circuit details including assigned and spare ports;
 - (e) current and previous bills;
 - (f) usage patterns; and
 - (g) information on product availability and product descriptions
29. SBC Communications, Inc. (“SBC”) and the Verizon Telephone Companies (“Verizon”) have stated that special access and private line services “belong in the same market” because both types of services “use the same facilities and are technically equivalent” and both “are provided by the same vendors to the same group of customers (predominantly large businesses).” *See* Comments of SBC and Verizon, at 13 n.32, *In the Matter of: Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket 96-98 (dated April 5, 2001). State whether the ILEC agrees with each portion of this statement. Explain in detail the basis of your answer.