

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 ELEVENTH SET OF INFORMATION**

**REQUESTS TO VERIZON**

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

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

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.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

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.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

The references in the following questions are to the hard copy of the Non-Recurring Cost Model that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

ATT-VZ 11-1. For each "UNE/Service Description" (" Service Description ") listed in the Verizon-Massachusetts Wholesale NRC Model Non-Recurring Cost Summary (the "Cost Summary"), please specify:

The corresponding non-recurring charge currently assessed in Massachusetts pursuant to Tariff 17 ("Current NRCs");

The non-recurring charge Verizon proposes to impose if the non-recurring cost study submitted in this docket is approved in full ("Proposed NRCs");

Each individual cost element which makes up the total Current NRCs; and

Each individual cost element which makes up the total Proposed NRCs.

ATT-VZ 11-2. Please explain in detail Verizon's justification for the proposed rate increase in each instance in which the total Proposed NRC exceeds, by at least twenty percent, the total Current NRC for a given Service Description. Please respond separately to this request for each Service Description.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its attorneys,

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