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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion as to the propriety of the rates and charges set forth in the tariff filings by New England Telephone and Telegraph Company d/b/a/ Bell Atlantic

D. T. E. 98-57

TENTH SET OF INFORMATION REQUESTS SUBMITTED BY

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

REGARDING BELL ATLANTIC'S TARIFF FILINGS

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-MA subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon-MA's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon-MA cannot answer a request in full, answer to the extent possible and state why Verizon-MA cannot answer the request in full.
6. If Verizon-MA 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.
7. Unless otherwise stated, these requests concern Verizon-MA's Massachusetts intrastate operations.

Information Requests.

1. In Verizon-MA's proposed tariff DTE MA No. 17, section 12, does the term Network Interface Device (NID) apply only to single family dwellings or does it also apply generally to a Multiple Dwelling Unit (MDU)? If it applies to a MDU, is the NID also used to refer to what is commonly known as a riser termination block and/or a horizontal termination block? Please explain your answer in detail.

2. Verizon-MA's proposed DTE MA No. 17, section 12.1.4A states:

"Cutover of a TC's end user to the TC's NID will be performed by the Telephone Company at a negotiated time. The Telephone Company will place a jumper cable to connect the Telephone Company's NID to the TC's NID. The Telephone Company will check for continuity at the time of installation."

a) Is the scenario referenced above related to single family residential dwellings, MDU's, or some other situation? If it does pertain to a MDU scenario, does Verizon consider the NID synonymous with the riser termination block? Does Verizon also consider the NID synonymous with the horizontal cable termination block? Explain your answer fully.

b) Assume a single family residential situation, under what circumstances can a TC technician perform the NID-to-NID connection without the presence of a Telephone Company technician, and under what circumstances is a Telephone Company technician required? Please explain your answer in full.

c) In a MDU scenario, under what circumstances can a TC technician perform the NID-to-NID connection without the presence of a Telephone Company technician, and under what circumstances is a Telephone Company technician required? Please explain your answer in full.

3. At MDU locations, does Verizon-MA always own both the riser cable and riser termination block, or are there instances where Verizon-MA owns the riser termination block but not the riser cable? Please explain your answer in detail.

a) If there are instances where Verizon-MA does not own the riser cable but does own the riser termination block at MDU locations, are there different tariff rates for the provisioning of the riser termination block only versus the rates where both the riser termination block and riser cable are provided?

b) Please list and explain in detail the proposed tariff prices for each of the following situations: 1) Verizon-MA owns both the riser termination block and riser cable, and 2) Verizon-MA owns and provides only the riser termination block. The answer should include, but not be limited to, a breakdown of the price of the individual riser pair on the riser termination block; the price of the riser cable, if there are separate charges for the riser termination block and the riser cable; the price of any existing cross connect located in the riser closet, connecting the riser cable to the horizontal cable; and the price for the existing horizontal cable, if not already included in the price of the riser cable, etc.

4. Refer to DTE MA No. 17, sections 12.2.2D and 12.2.3F for the following:

a) Please reconcile or otherwise explain fully the apparent inconsistency between the proposed DTE MA No. 17, section 12.2.2D, which states that:

"Telephone Company technicians will perform all installation and cross connect work where operations must be performed directly on Telephone Company equipment."

and 12.2.3F, which states that:

"All TC technicians must be trained to meet industry standards to complete cross connects on Telephone Company house and riser facilities."

b) Are there instances when the TC technician is permitted under the tariff to perform direct cross connections between the TC's equipment termination block and Telephone Company riser termination block at MDU locations, without the presence of a Telephone Company technician?

c) If the answer to 3b is yes, please describe under what circumstances a TC technician would be allowed to perform cross connects without a Telephone Company technician present.

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d) Are there instances when the TC technician must have a Telephone Company technician present in order to perform cross connections between the TC's equipment termination block and Telephone Company riser termination block at MDU locations?

e) If the answer to 3d is yes, please describe under what circumstances a TC technician must have a Telephone Company technician present in order to perform cross connects?

f) Please distinguish clearly and explain fully the differences between the following two types of situations: 1) situations requiring that a Telephone Company technician must be present in order for a TC technician to perform a cross connection ("coordinated cross connects"), and 2) situations where a TC technician would be permitted to perform a cross connection without a Telephone Company technician present ("non-coordinated cross connects").

g) Please provide all documentation regarding Verizon-MA's methods and procedures for implementing a coordinated cross connect between the Telephone Company riser termination block and the TC termination block (including the exchange of records necessary for commencement and/or termination of billing). If provisions related to such methods and procedures are located in the tariff, please cite to the relevant tariff pages. If there are no such provisions located in the tariff, please explain why, and also please explain where they can be found.

h) Please provide all documentation regarding Verizon-MA's methods and procedures for implementing a non-coordinated cross connect between the Telephone Company's riser termination block and the TC's termination block (including the exchange of records necessary for commencement and/or termination of billing). If provisions related to such methods and procedures are located in the tariff, please cite to the relevant tariff pages. If there are no such provisions located in the tariff, please explain why, and also please explain where they can be found.

5. If a coordinated effort to cross connect between the TC's equipment termination block and the Telephone Company's riser termination block at a MDU location is required, what contingency plans and reimbursement procedures are in place if the Telephone Company fails to meet the TC at the appointed time? Provide all documentation regarding Verizon-MA's methods and procedures. Also, please cite to the tariff pages where these provisions may be found. If provisions related to contingency plans and reimbursement procedures are not located in the tariff, please explain why, and also please explain where they can be located.

6. Please cite to the relevant tariff pages that describe Verizon's obligation to notify CLECs regarding the type of cable termination blocks (e.g. 66M1-50, Krone, etc.) Verizon-MA is currently using on the MDU frames, at which a cross connect is requested. If the requested information is not located in the tariff, please explain why, and also please explain where it can be found.

7. Is the TC or the Telephone Company responsible for maintaining the house and riser cable obtained by the TC pursuant to Tariff No. 17 at an MDU location? Please explain your answer in detail.

8. If a trouble at an MDU location occurs, and that trouble has been isolated to the riser cable obtained by the TC from Verizon-MA pursuant to Tariff No. 17, is a coordinated effort necessary in order to correct the problem and restore the end user's service? If yes, please detail the TC's responsibility and the Telephone Company's responsibility in this effort and explain what contingency plans and reimbursement procedures are in place if the Telephone Company fails to meet the TC at the appointed time. Provide all relevant documentation regarding methods and procedures.

9. DTE MA No. 17, section 12.1.3B states that the Telephone Company is responsible for dispatching to clear a trouble that the TC has isolated to the Telephone Company's NID. Will the Telephone Company dispatch a technician within 24 hours or

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less of receiving the trouble call from the TC? If the answer is no, please detail the Telephone Company's dispatch times and circumstances under which the respective times would apply. If terms such as "major trouble" or "minor trouble" are used, please define what constitutes a major and minor trouble.

10. In instances where the TC owns the riser cable at an MDU location, for example at a residential apartment complex, and Verizon-MA owns the horizontal cables that run between the riser closets and the end-users' apartments, does Verizon-MA provide access to the horizontal cable at the horizontal cable termination blocks typically located in the riser closet?

a) If the answer is yes, please identify the prices, terms and conditions that would apply in such circumstances and their location in the tariff. With your answer, please provide all relevant documentation regarding Verizon's methods and procedures in the above scenario. If the requested information is not located in the tariff, please explain why, and also please explain where it may be found.

b) If the answer is no, please explain in detail why Verizon-MA does not permit a connection between the TC-owned riser and the Verizon-MA-owned horizontal cable.

11. Referring to Part B, Section 12.2.1C.1a, what is the basis for the "14 inches." If this is this an industry standard, please so indicate and cite to the standard and its source. If this is a Verizon determination, please explain how Verizon arrived at this number.

12. Please explain fully Verizon's interpretation of Part B, Section 12.2.1C.1a. When Verizon states that "If suitable space is available, the TC will install its terminal block and equipment no closer than 14 inches to the Telephone Company terminal equipment", does this mean that if suitable space is not available, a TC would be able to install its equipment closer than 14 inches to Telephone Company equipment? Or does the above phrase mean that if 14 inches of space is not available between TC equipment and Telephone Company equipment, no suitable space exists, and TC equipment may not be installed.

13. Referring to Part B, Section 12.2.1C.1b, please provide further clarification when Verizon would not allow a CLEC to install a terminal block and equipment because it would be "in the path of Telephone Company growth." Does this mean immediately projected growth or long-term growth? If this includes long-term growth, how far ahead does Verizon plan to calculate projected growth? Does "growth" include only growth expected from identified customers?

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

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