NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-1 Referring to paragraph 7 of the Garbarino affidavit, please provide a list of functions as to which "a meaningful comparison" between Bell Atlantic and CLECs can be made.

REPLY: The internal process functions for which a meaningful comparison to a BA-MA retail function can be made are Ordering OSS Response Times for the Customer Service Record, Due Date Availability, Address Validation, Product & Service Availability and Telephone Number Reservation transactions. The method of comparison for OSS response times is described in paragraphs 8 and 9. A chart at the end of paragraph 11 displays BA-MA and CLEC results for these functions.

Mr. Miller, in his affidavit, also provides detailed information on the functions to which a meaningful comparison can be drawn. See Miller affidavit paragraphs 18 through 33.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-2 Referring to paragraph 7 of the Garbarino affidavit, does the "trouble report for maintenance" rely on RETAS and, if so, does Bell Atlantic plan to continue to use RETAS? If Bell Atlantic does not intend to use RETAS in the future, explain why not, what will be used in its place and how trouble reports will differ.

REPLY: The results are a combination of RETAS electronic transactions and manual phone calls placed by the CLECs who do not use the gateway. Bell Atlantic has no plans at this time to discontinue the use of the RETAS system for resale and wholesale trouble administration functions within Massachusetts.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-3 Referring to paragraph 8 of the Garbarino affidavit where Bell Atlantic identifies examples of information CLECs will be able to access,

(a) Will CLECs be able to access information regarding "Feature Availability" by switch?

(b) Will CLECs be able to access information regarding Loop Certification (xDSL)?

(c) What impact does the "security layer" have on CLECs' ability to access information, including the speed of access?

(d) Other than the security layer, are there any differences between how a CLEC accesses OSS through the CLEC interface and how a Bell Atlantic representative accesses OSS through "dumb" terminals? If so, explain each difference in detail.

REPLY: (a) Yes.

(b) Yes.

(c) CLECs are required to have proper security access, however once through the security firewall, CLECs have access to the authorized data. The security layer has no impact on the access to information. Since the transaction must traverse the gateway security, speed of access is affected. This impact is accounted for in the measurement process which recognizes a four-second differentiation between retail and wholesale response times.

REPLY: DTE-ATT 1-3 (cont'd)

d) Whether a CLEC chooses to use EDI or the Web GUI, its pre-order transaction enters a Bell Atlantic gateway system that provides security and automatically directs the transaction to the appropriate back-end OSS. By contrast, BA-MA representatives must log in separately to each back-end OSS, must know which OSS contains the information they need, and must query the appropriate OSS individually. As a result, BA-MA has provided CLECs with pre-order functionality that is superior to that provided to BA-MA's own retail representatives.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-4 Referring to the discussion of the 4-second differential in paragraph 9 of the Garbarino affidavit, will Bell Atlantic add a 4-second access delay to the EDI or CORBA interfaces?

REPLY: BA-MA does not add any time to transaction times that is not required for request processing. The four-second difference in response times accounts for the additional functionality and security provided by the DCAS interface. Additional information on response-time differences can be found in BA-MA's proposal for Internal Process Performance Standards filed on August 19, 1997 in connection with the Phase 3 *Consolidated Arbitrations* proceeding. The Department adopted metrics and standards associated with Internal Processes in its Phase 3-E Order, issued on September 25, 1998.

In addition, Mr. Miller describes pre-ordering functionality in paragraphs 18 through 23 of his affidavit.

Response time for EDI and CORBA interfaces will also be measured. The four-second differential would apply to these interfaces as well.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-5 Referring to the table following paragraph 11 of the Garbarino affidavit, are the CLEC data for Massachusetts only or for all of Bell Atlantic-North? If the data are for Massachusetts only, how are the data extracted if the same interfaces are used for the entire Bell Atlantic-North territory?

REPLY: The data represent results for the Bell Atlantic – North region (New York and New England). Also refer to paragraphs 20 and 21 of Mr. Miller's affidavit. Mr. Miller explains that the data are for the entire New England and New York area and cannot be, at this time, isolated specifically to Massachusetts.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-6 Referring to the table following paragraph 11 of the Garbarino affidavit, do the data relate only to the WEB GUI interface or also include EDI or CORBA?

REPLY: The data following paragraph 11 relate to the EIF interface. Performance is measured at the gateway entrance point (DCAS). Also see BA-MA's response to DTE-ATT 1-4.

NET# 15

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-7 Referring to the table following paragraph 11 of the Garbarino affidavit and other references to "metrics" throughout Bell Atlantic's submissions,

(a) Identify any differences between the metrics used by Bell Atlantic in the New York 271 proceedings and in Bell Atlantic's Massachusetts 271 submissions.

(b) For each such difference, provide a detailed explanation of why different metrics are being used in Massachusetts.

(c) Provide a copy of the "summary document showing differences in metrics" between Massachusetts and New York referred to at Section VIII D. 1.6 of the KPMG Bell Atlantic OSS Evaluation draft Master Test Plan dated September 13, 1999.

REPLY:

(a) Attached is a detailed comparison of New York and Massachusetts metrics that was prepared at the request of KPMG and the Department.

(b) The Massachusetts metrics are based on the Massachusetts performance standards plan that was adopted by the Department in the *Consolidated Arbitrations* proceeding. The affidavit describes this proceeding in paragraphs 4, 5 and 6. The Department reviewed BA-MA and CLEC proposals before it established specific measurements, standards and performance remedy plans (See Phase 3-E order issued September 1998). A final decision from the Department on certain elements of the internal process standards is still pending.

(c) Attached is the requested document.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-8 Referring to the table following paragraph 11 of the Garbarino affidavit, please provide the following information for both the first and second quarter of 1999:

(a) Explain whether the numbers in the cells represent average response times for some or all the transactions that occurred in the month.

(b) For each of the five Pre-Ordering categories, identify by month the total number of CLEC transactions and the total number of Bell Atlantic transactions that were averaged and, if applicable, explain why any transactions were not included in the averaging process, and for each excluded transaction provide the response time.

(c) For each of the five Pre-Ordering categories, identify by month the total number of instances where the response time for a CLEC exceeded the average Bell Atlantic time by more than four seconds and for each such instance provide the actual time by which the response time exceeded the average Bell Atlantic response time.

(d) For each instance where the response time for a CLEC exceeded the average Bell Atlantic time in the applicable month by more than four seconds, identify all reasons why the response time for a CLEC transaction exceeded the average Bell Atlantic response time by more than four seconds.

(e) Identify by month and transaction category the median response times for both Bell Atlantic and CLEC transactions.

REPLY: DTE-ATT 1-8
(con't)

(a) The response to this question can be found in the metric guidelines that are provided in Exhibit 9 Book 1 Tab 9, which describes the transactions that are included in the metric. The chart following paragraph 11 includes a column with a "metric #", and that metric number corresponds to the detailed definitions that are provided in Exhibit 9.

(b) The attached chart below provides wholesale and retail transaction counts for each type of transaction and each month January 1999 through June 1999.

See metric definition included in Exhibit 9, Book 1, Tab 9 regarding "time-out" transactions, which are excluded from response time calculations.

(c) BA-MA does not report response time data by CLEC. As described in paragraph 9 of Mr. Garbarino's affidavit, response times are calculated using the EnView system, which replicates the keystrokes that a CLEC and BA-MA representative makes.

The discussion and chart included in paragraph 11 demonstrates when results were longer than the four second standard. There were only two instances where wholesale average response times exceeded the standard for average response times. In both instances, the four-second standard was exceeded by less than 1/10 of a second. Replicating these results and than investigating the cause of such a small difference is not possible.

(d) See response to (c).

(e) BA-MA reports average response times in conformance with the metrics ordered by the Department in the *Consolidated Arbitrations*. BA-MA processes tens of thousands of transactions each month (see attached chart). The effort and expense required to review past transactions, re-compile daily data and calculate median response times would be overly burdensome, if possible at all. However BA-MA has agreed to submit transaction-specific data for July, August and September 1999 to the Department and KPMG as part of the OSS Evaluation Project. This data represents the most finite level of detail available.

NET #17

Attachment
ITEM: ATT 1-8
NET #17

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99
Transaction Counts						
Retail Address Validation	13514	13519	15076	10526	9033	11203
Retail Customer Service Record	5176	11040	8388	4846	4526	4778
Retail Due Date Availability	4320	6185	7075	5140	3989	5233
Retail Product and Services Availability	5842	5855	6656	5176	4511	5124
Retail Telephone Number Select	6707	6149	7491	5258	4511	5562
Wholesale Address Validation	2981	3088	3541	3446	3088	3338
Wholesale Customer Service Record	2969	3056	3538	3431	3050	3234
Wholesale Due Date Availability	2934	3062	3546	3434	3060	3212
Wholesale Product and Services Availability	2979	3050	3532	3449	3071	3330
Wholesale Telephone Number Select	2004	2115	2172	3607	3246	3501

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-9 Referring to the statement in paragraph 12 of the Garbarino affidavit that "interfaces offered to CLECs are scheduled to be available 24 hours per day, 7 days per week":

(a) Identify all "interfaces offered to CLECs" that CLECs currently are able to access 24 hours per day, 7 days per week.

(b) Identify all "interfaces offered to CLECs" that CLECs currently are not able to access 24 hours per day, 7 days per week.

(c) Identify all alternatives available to BA-MA to obtain Pre-ordering information if the BA-MA interface referred to in paragraph 13 of the Garbarino affidavit is unavailable.

(d) Identify all alternatives available to CLECs to obtain re-ordering information if "interfaces offered to CLECs" are unavailable.

REPLY:

a) Both EDI and the WEB GUI interfaces are available 24 hours per day, 7 days per week. If a CLEC has access problems with the interface, the help desk is available to assist.

b) None.

c) BA-MA alternatives would depend on the problem. If the communications line is unavailable, BA-MA would have no alternatives. If connectivity is available, BA-MA can access pre-ordering information directly from the underlying operations support systems as long as the underlying OSS Application is available.

d) CLECs have the option of utilizing the EDI interface or the Web GUI or both. If one were unavailable, the other could be used. However, since the interface is generally available more than 99% of the time, it is usually not an issue.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-10 Referring to paragraph 13 of the Garbarino affidavit, does BA-MA intend to shorten the system availability measurement period from 15 to 10 minutes as was done in New York? If so, when? If not, why not?

REPLY: The system availability measurement has not been shortened in New York. However, BA-MA is in the process of reducing the measurement from 15 minutes to 6 minutes. A specific implementation date has not been determined but is expected in the near future. Upon implementation, it will apply to both New York and Massachusetts.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-11 Referring to the discussion in paragraph 13 of the Garbarino affidavit concerning "the same transaction sent at the same time directly to the OSS," explain how the same transaction can be sent at the same time through a CLEC interface and directly to the OSS.

REPLY: The term "same transaction" refers to the type of transaction. For example, single line Customer Service Record requests are sent to both the CLEC interface and directly to BA-MA's OSS. Therefore, there are two equivalent transactions.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-13 Explain how a determination is made that the "BA-MA interface is unavailable" and how a determination is made that a CLEC interface is unavailable.

REPLY: A determination that the "BA-MA interface is unavailable" is not made for the purpose of calculating OSS availability. The EnView system tests retail availability directly at the OSS. The calculation of system availability performance (PO-2) assumes that the BA-MA interface is always available.

CLEC interface unavailability is determined when "…EnView fails to receive a response to a CLEC transaction, but is able to receive a response to the same transaction sent at the same time directly to the OSS…" (Garbarino affidavit at paragraph 13).

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-14 Referring to the reference in paragraph 14 of the Garbarino affidavit to the significant system outage in February,

(a) Did the system outage require the rerouting of Bell Atlantic traffic?

(b) Were CLECs notified that the traffic was being rerouted? If so, how?

(c) Are there any differences in the backup systems or rerouting plans relied on in the event of a system outage as between Bell Atlantic traffic and CLEC traffic? If so, please explain the differences.

REPLY:

(a) No. The loss of power to the data center lasted approximately 20 minutes. Once power was restored, all systems at Blue Hill were recovered at Blue Hill.

(b) When the outage occurred, the BA Solutions Center Help Desk (for the CLECs) was notified of the problem. The Solutions Center then placed an upfront message on the line notifying anyone calling them that there was a problem at Blue Hill. Subsequent to this incident, the CLEC notification process was modified to include a combination of E-Mail and pager notification to CLECs regarding systems incidents/outages.

(c) Each critical system has a back-up plan. Some systems have roll-over capabilities to similarly configured systems within the same data center or in another BA data center. In most cases, the systems for the CLEC (Web, EDI, DCAS, DCF) have immediate failover capabilities.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-15 Referring to the table following paragraph 14 of the Garbarino affidavit, which appears to contain monthly OSS availability percentages for CLECs as a group, are there differences between the percentages presented and the percentages applicable to any individual CLECs? If so, provide on a monthly basis for both the first and second quarter of 1999 the prime time and non-prime time OSS availability percentages on an individual CLEC basis for all CLECs that did not achieve OSS availability percentages as high as the percentages reflected in the table and explain why OSS availability is lower than average for some CLECs. If not, provide the OSS availability percentages contained in the table on a monthly basis for the second quarter of 1999.

REPLY: The methodology for calculating OSS Interface Availability uses EnView-generated transactions, as described in the affidavit and associated guidelines for metric PO-2 (Exhibit 9, Book 1, Tab 9). These data measure total availability percentages. CLEC-specific data are not measured.

OSS availability: 2nd QTR

	April	May	June
Prime	100%	99.44	100%
Non-Prime	99.58%	98.61%	99.90%

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-16 Referring to the table following paragraph 14 of the Garbarino affidavit, explain why the OSS availability percentages tend to be lower for non-prime time than for prime time.

REPLY: Non prime-time hours have been designated to enable BA-MA performance of required system maintenance, disaster recovery backup and other activities required to ensure optimum system performance. Because such activities, which can occasionally disrupt OSS availability**,** are being undertaken during these hours, there is a somewhat greater incidence of OSS unavailability.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-17 Referring to the reference in paragraph 16 of the Garbarino affidavit to "completion notices," when in the order and provisioning process is the notice provided and in what form (electronic, mail, fax)?

REPLY: When the order is completed, BA-MA notifies the Competing Carrier electronically. In addition, in some cases, depending on the type of service, carriers are also notified by telephone. Completion of the order is defined as the date on which provisioning has been completed and the billing systems in BA-MA have been updated to reflect the change in customer responsibility.

Beginning in August of 1999, BA-MA began providing CLECs with an additional completion notice that is sent over the same interface used to submit the order. This notice is sent upon completion of the physical work associated with the order, *prior to completion in the billing system*. Carriers may also utilize the pre-ordering interfaces to obtain a status of a pending order, and can thus determine whether physical work has been completed on an order as soon as that information is posted in the Service Order Processor, just as a BA-MA retail representative can for retail orders.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-19 Referring to paragraph 17 of the Garbarino affidavit, how does Bell Atlantic define "on-time?" If the definition is anything other than the time experienced by Bell Atlantic for the processing of its own customer orders, explain why.

REPLY: Paragraph 17 refers to LSR confirmation and reject transactions. Confirmation and reject notices are not sent on BA-MA retail orders.

Exhibit 9, Book 1, Tab 9 includes detailed definitions of the confirmation (metric OR-1) and rejection (metric OR-2) notice. The definition of "On Time" is consistent with the Department's Phase 3E order in the *Consolidated Arbitrations* (refer to Part III of BA-MA's Phase 3-E Compliance Filing).

NET# 28

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-20 Referring to the table following paragraph 20 of the Garbarino affidavit, which appears to contain monthly OSS order processing timeliness percentages for CLECs as a group, are there differences between the percentages presented and the percentages applicable to any individual CLECs? If so, provide on a monthly basis for both the first and second quarter of 1999 the timeliness percentages on an individual CLEC basis for all CLECs that did not experience timeliness percentages as high as the percentages reflected in the table and explain why he percentages are lower than average for some CLECs. If not, provide the timeliness percentages contained in the table on a monthly basis for the second quarter of 1999.

REPLY: The data presented in the chart after paragraph 20 are CLEC aggregate data for eleven Resale Ordering metrics. During the three months shown, the on-time results ranged from 95.19% to 100%. These data represent the composite of all CLEC results.

Attached is CLEC aggregate data for the first and second quarter of 1999, including some revisions to the chart in Mr. Garbarino's affidavit. The attachment shows both the original and updated data whenever a change has been made.

These results represent the composite performance for all CLECs and individual results may vary. In addition, response times can be affected by the size, complexity and individual circumstances of an order.

With respect to the transaction-specific data requested, BA-MA has already agreed to submit equivalent transaction specific data for July, August and September 1999 to the Department and KPMG as

REPLY: DTE-ATT 1-20
(cont'd) part of the OSS Evaluation Project (Master Test Plan or MTP).

NET# 29

Attachment
DTE-ATT 1-20
Net #29

Massachusetts – Internal Process Measures

				January	February	March	April	May	June
Function	**Metric #**	**Product**	**Metric**	**CLEC**	**CLEC**	**CLEC**	**CLEC**	**CLEC**	**CLEC**
Ordering – Resale									
Order Confirmation Timeliness	OR-1-02	POTS	% On Time LSRC - Flow Through	99.45	99.58	99.86	99.73	98.22	97.76
	OR-1-04	POTS	% On Time LSRC - < 10 Lines (E)	98.90	99.08	~~95.83~~ 96.16	95.17	96.54	94.52
		Specials	% On Time LSRC - < 10 Lines (E)	100.00	99.10	~~100.00~~ 99.41	100.00	99.25	100.00
	OR-1-06	POTS	% On Time LSRC - >/= 10 Lines (E)	100.002	100.00	100.00	98.18	100.00	100.00
		Specials	% On Time LSRC - >/= 10 Lines (E)	100.00	100.00	100.00	100.00	100.00	100.00
Reject Timeliness	OR-2-02	POTS	% On Time LSR Reject - Flow Through	100.00	100.00	100.00	99.92	99.66	98.01
	OR-2-04	POTS	% On Time LSR Reject - < 10 Lines (E)	97.61	98.97	~~95.19~~ 95.20	95.59	95.94	95.52
		Specials	% On Time LSR Reject - < 10 Lines (E)	100.00	100.00	100.00	99.43	100.00	100.00
	OR-2-06	POTS	% On Time LSR Reject - >/= 10 Lines (E)	100.00	100.00	100.00	100.00	97.72	100.00
		Specials	% On Time LSR Reject - >/= 10 Lines (E)	100.00	100.00	100.00	100.00	100.00	100.00
Completion Notification	OR-4-02		Completion Notice - % On Time	99.95	100.00	99.98	99.98	100.00	100.00

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-22 Referring to the table following paragraph 21 of the Garbarino affidavit, for each category provide the number of orders received on a monthly basis for the first two quarters of 1999 and for each order provide the elapsed time from the original placement of the order until the order was rejected or accepted.

REPLY: Attached are the counts of transactions included in each of the UNE Order Confirmation, Reject and Completion Notification timeliness metrics shown after paragraph 21. In conformance with the Phase 3-E ruling, these metrics reflect electronically submitted orders. See also the Company's reply to DTE-ATT 1-86 for additional information.

With respect to the transaction-specific data requested. BA-MA has already agreed to submit equivalent transaction specific data for July, August and September 1999 to the Department and KPMG as part of the OSS Evaluation Project (Master Test Plan or MTP).

NET# 31

Attachment
DTE-ATT 1-22
NET #31

Massachusetts – Internal Process Measures – Number of transactions for each category of reported metric

				January	February	March	April	May	June
Function	**Metric #**	**Product**	**Metric**	**CLEC**	**CLEC**	**CLEC**	**CLEC**	**CLEC**	**CLEC**
Ordering –									
Order Confirmation Timeliness	OR-1-02	POTS	% On Time LSRC - Flow Through	0	4	121	187	247	428
	OR-1-04	POTS	% On Time LSRC - < 10 Lines (E)	357	1538	1780	2174	1967	1949
		Specials	% On Time LSRC - < 10 Lines (E)	31	72	74	44	35	34
	OR-1-06	POTS	% On Time LSRC - >/= 10 Lines (E)	2	9	4	20	12	20
		Specials	% On Time LSRC - >/= 10 Lines (E)	0	1	0	0	6	0
Reject Timeliness	OR-2-02	POTS	% On Time LSR Reject - Flow Through	0	7	22	96	20	52
	OR-2-04	POTS	% On Time LSR Reject - < 10 Lines (E)	61	102	199	316	151	143
		Specials	% On Time LSR Reject - < 10 Lines (E)	1	0	1	3	2	5
	OR-2-06	POTS	% On Time LSR Reject - >/= 10 Lines (E)	~~0~~	0	7	8	10	6
		Specials	% On Time LSR Reject - >/= 10 Lines (E)	0	0	0	0	0	0
Completion Notification	OR-4-02		Completion Notice - % On Time	360	1355	1678	2235	2157	2086

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-23 Referring to paragraph 23 of the Garbarino affidavit, on how many occasions in the first two quarters of 1999 has the processing of UNE orders by Bell Atlantic resulted in the end user customer losing service for any period of time exceeding 5 minutes? For each such occasion, identify the length of time the customer was without service, and explain the circumstances that caused the extended out of service time.

REPLY: BA-MA does not have information to respond to this question. The metrics referred to in paragraph 23 relate to the ordering processes and specifically measure the timeliness of confirmation, reject and completion notifications. Late notifications do not mean that end user customers have lost service or have been inconvenienced in any way.

BA-MA tracks and reports several measures for missed installation appointments, out of service trouble reports and installation troubles (situations where the end user has "lost service" for some duration), but cannot relate these occurrences to failures in the ordering process.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-24 Referring to the statement in paragraph 27 of the Garbarino affidavit that Bell Atlantic "reports the speed of answers for calls," where and why is the speed of answer for calls reported?

REPLY: Average speed of answer is shown in the charts following paragraphs 29 and 30. As the charts and the affidavit indicate, this is supplemental information that has been provided in BA-MA's 271 filing. The data are provided as additional evidence of BA-MA's commitment to providing quality support to CLEC ordering and maintenance operations, but are not required to be included in the monthly metrics reported to the Department.

NET# 33

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-25 Referring to paragraph 30 of the Garbarino affidavit, explain how Bell Atlantic plans to provision hot cuts in commercial volumes if its call centers are not designed to handle high volume. What volume levels is the call center now designed for? What testing has Bell Atlantic performed to determine whether the call center can handle the volume levels it is now designed for?

REPLY: Paragraph 30 refers to average speed of answer in the repair center. The repair center's operation is not connected with the provisioning of Hot Cuts and therefore this is not related to BA-MA's ability to provision Hot Cuts in commercial volumes and the volume of calls that can be handled by the repair center. Issues relating to the ordering of UNE Hot Cuts would be directed to the UNE order assistance center. Average speed of answer for this function is shown after paragraph 29 (results for January, February and March were 8 seconds, 8 seconds and 10 seconds respectively).

BA-MA provides automated systems that enable CLECs to enter, modify and obtain status on trouble reports electronically without calling the repair center. Based upon that expectation BA-MA did not forecast the high call volumes for the first quarter. Because the volume of calls has exceeded expectations, Bell Atlantic has since taken action to ensure that calls are answered on a timely basis, including consolidating the centers that handle New York and New England.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-27 For each order rejected during the first quarter of 1999, please provide the following information:

(a) nature or type of order;

(b) time and date when order was received by Bell Atlantic;

(c) method by which order was made;

(d) date and time notice of rejection was given to CLEC;

(e) reason for rejection;

(f) whether CLEC disputed the rejection and, if so, on what grounds; and

(g) whether, in Bell Atlantic's view, the rejection was in error.

REPLY: BA-MA objects to this question because providing the information requested would be unduly burdensome. However, without waiving this objection, BA-MA has agreed to submit transaction-specific data for July, August and September 1999 to the Department and KPMG as part of the OSS Evaluation Project (Master Test Plan or MTP). When compiled, this information will contain proprietary and confidential data, including CLEC- and customer-specific information. Accordingly, the data will be made available subject to appropriate non-disclosure and proprietary agreements.

Data for request (f) and (g) do not exist in any BA database.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice President
Respondent: Kenneth Garbarino
Title: Director

REQUEST:
DATED: September 24, 1999

ITEM: DTE-ATT 1-28 Referring to paragraph 33 of the Garbarino affidavit,

(a) Identify the types of orders that "are designed to flow-through" and those that are not.

(b) Identify the reasons that cause an order designed to flow-through to not flow-through.

(c) Provide the data from which the presented flow-through percentages were calculated and indicate whether such data represent all transactions of the relevant period or only a sample or subset of such transactions.

(d) If such data represented a sample of all transactions, please describe the criteria that were used to pick the sample.

(e) Provide the data representing the universe of all transactions during the relevant period.

REPLY:

(a) The types of orders designed to flow-through, as of August 21, 1999, are attached. All other order types are not currently able to flow-through.

(b) Orders designed to flow-through will not flow through if the order contains an error or if a condition exists on the account which requires manual review such as a conflict with a pending order or on the account itself.

(c) Attached is a chart that summarizes the data for % Flow Through for UNE and Resale orders. A detailed description of

REPLY: DTE-ATT 1-28 (cont'd)

this metric (OR-5) is included in Exhibit 9, Book 1, Tab 9, Page 12 of 27. Results are reported for all applicable transactions and not determined by sampling.

d) See response to c.

e) See response to c.

Attachment
DTE-ATT 1-28
NET # 37

MASSACHUSETTS	**Jan**			**Feb**			**Mar**		
	Prod	**Num**	**Denum**	**Prod**	**Num**	**Denum**	**Prod**	**Num**	**Denum**
Resale									
% Flow Through	60.88	2794	4589	61.33	3371	5496	63.67	4436	6967
UNE									
% Flow Through	0.00	0	4589	0.24	4	1624	6.11	121	1979
	Apr			**May**			**Jun**		
	Prod	**Num**	**Denum**	**Prod**	**Num**	**Denum**	**Prod**	**Num**	**Denum**
Resale									
% Flow Through	63.91	4248	6646	55.92	3196	5715	63.76	3987	6253
UNE									
% Flow Through	7.29	187	2562	9.81	247	2517	16.44	428	2603

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-29 Referring to paragraph 66 of the Garbarino affidavit, does Bell Atlantic measure an order as complete where Bell Atlantic completes the frame work and the CLEC then advises Bell Atlantic that it is not working?

REPLY: Coordinated cut-over (Hot Cuts) loop orders are considered complete upon acceptance by CLEC. Additional details are provided in the *Phase 3-E Order Performance Measurements Definitions* (Exhibit 9, Book 1, Tab 1). Refer to Definitions section for Average Completion Interval, metric number PR-2.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-30 Referring to paragraph 66 of the Garbarino affidavit, does Bell Atlantic rely on completion times in WFA to measure completion intervals? Provide the interval guide for this and other offered products.

REPLY: Yes. The WFA system feeds SOP, which feeds SORD. Most provisioning data is reported from SORD. The Company proposes that the provisioning interval for a Hot Cut be five business days, as defined in pending Tariff D.T.E. MA No. 17, Part A, Section 3, Page 8.

Please also see Tariff D.T.E. MA No. 17, Part A, Section 3, generally, which discusses service and installation intervals.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-31 Referring to paragraph 66 of the Garbarino affidavit, how is hot cut performance measured?

REPLY: Paragraph 66 describes how completion intervals are affected by Hot Cut and LNP orders, which are unique to UNEs and have no retail equivalent. Hot Cut and LNP have standard provisioning intervals of 5 and 3 days, respectively. Hot Cut and LNP provisioning performance (% On Time) is shown in the chart following paragraph 78 and is described in paragraph 77. In addition, pages 13 and 14 of Exhibit 9, Book 1, Tab 1 contain a more detailed description of these measurements.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-37 Referring to the statement in paragraph 77 of the Garbarino affidavit that "BA-MA revised the process used to report its hot cut performance," identify the former reporting process, the current reporting process, the changes made in the process and the reasons for the changes and provide the data and calculations (in both hard copy and electronic form) used to reach the 86.29% figure.

REPLY: In March, hot cut performance was calculated from manually reported data. Post March 1999, performance is calculated using the frame start and stop time WFA/C completions. WFA/C, Work Force Administration, is a mechanized system, which tracks activity associated with Hot Cuts. Additional information on this change was included in the metric definitions provided on page 13 of Exhibit 9, Book 1, Tab 9.

Attached are transaction-specific data for March performance results. The information included in the attachment contains CLEC- and customer-specific data that is considered proprietary. It is being provided to the Department only.

Below is a recap of March 1999 data along with the supporting orders used to calculate the percentage. Additional results are provided in response to interrogatory ATT 1-38.

Scheduled HC	248 Orders
Hot Cuts Made	214 Orders
Hot Cuts Missed	34 Orders
% HC on Time	86.29%

A Hot Cut is considered "Made" if the cut completes and is turned up to the CLEC in a timely fashion at the pre-appointed due date and time. A cut is considered "Missed" if any one of the following

REPLY: DTE-ATT 1-37
(Cont'd)

situations exists:

- If the cut completes early due to a BA-MA error (i.e., prior to the appointed time or a "Premature Disconnect") and the CLEC notifies the Company of the problem.
- If the cut completes late
- If the CLEC identifies a BA-MA problem within one hour of the Hot Cut turn-up.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-38 Referring to paragraph 77 of the Garbarino affidavit, identify on a monthly basis the total number of CLEC hot cut orders for the first two quarters of 1999 and, for each month, the number of CLEC complaints that hot cuts considered by Bell Atlantic to be "on-time" did not result in service being provided to the end user customer.

REPLY: BA-MA reported Hot Cut data for the first time in March 1999. Below are the volumes associated with the 1st two quarters of 1999.

Month	# of Hot Cuts	% On Time
March	248	86.29%
April	100	80.62%
May	129	88.00%
June	99	91.91%

BA-MA does not maintain information on Hot Cut complaints in the manner requested. Failure in service being provided to the end user may be the result of CLEC performance.

Current BA-MA processes require completion notification calls to the CLEC and verification calls from the CLEC to BA-MA. The process quoted below also includes provisions to restore or "cutback" a customer who reports a trouble after cutover:

"If a customer has been converted to a CLEC (the Hot Cut is

REPLY: DTE-ATT 1-38

complete and we are waiting for verification), and the CLEC has a problem in their network and request the service to be thrown back to BA, follow the restoral procedures and refer to your supervisor or the duty supervisor if out of hours."

In addition , BA-MA has established a special telephone number (1-877-HOT-CUTS) for CLECs to call and report any problems associated with Hot Cut provisioning.

BA-MA tracks and reports Percent Installation Troubles within 7 and 30 days on all UNE orders. This data is provided is provided in Attachment I of Mr. Garbarino's affidavit. BA-MA has provided the transaction specific data supporting these results in response to DTE-ATT 1-33.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-35 Referring to paragraph 74 of the Garbarino affidavit, please identify the process for determining a repeat trouble.

REPLY: A Repeat Trouble report is defined as a trouble report on the same line, circuit or trunk as a previous trouble report within the last 30 calendar days. A more detailed description is provided in the *Phase 3-E Order Performance Measurement Definitions* (Exhibit 9, Book 1, Tab 1).

NET# 44

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-41 Referring to paragraph 83 of the Garbarino affidavit, are the "over 100,000 trunks in service" only CLEC trunks or a combined total of CLEC and retail trunks? If the latter, please identify the total number of CLEC trunks and the total number of retail trunks, along with the number of troubles on a monthly basis for each category (CLEC and retail) of trunks.

REPLY: The 100,000 trunks referenced in the affidavit reflect the number of CLEC message trunks in service as of February 1999 (103,696). The number of CLEC trunks in service as of August 1999 is 144,678 and Retail trunks in service are 176,689. The number of troubles can be found in Attachment I of the affidavit.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-42 Referring the table following paragraph 86 of the Garbarino affidavit, please provide the data from which the table was prepared.

REPLY: Trunks Missed Appointments-Facilities

	Jan	Feb	Mar
Missed Appointment	0	0	0
Total Orders	3,128	3,193	3,444

Please refer to Exhibit 9, Book 1, Tab 9, Page 15 of 27, for technical definition of metric PR-5-01.

NET# 51

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Paula Brown
Title: Vice President - Regulatory

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-44 Referring to paragraph 5 of the Brown affidavit, how many fiber miles (as compared to the 1,600 attributed to CLECs) does Bell Atlantic have and how many voice grade equivalent lines (as compared to the more than a quarter million voice grade equivalent lines attributed to CLECs) does Bell Atlantic have?

REPLY: Please see BA-MA's replies to DTE-Nextlink 1-1 and DTE-Nextlink 1-4.

NET # 53

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Paula Brown
Title: Vice President – Regulatory

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-45 Referring to paragraph 6 of the Brown affidavit, what percentage of business customers in the Bell Atlantic-Massachusetts region have switched to a local service competitor?

REPLY: Please see BA-MA's reply to DTE-MCIW 2–2(B).

NET # 54

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Paula Brown
Title: Vice President – Regulatory

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-46 Referring to paragraph 21 of the Brown affidavit, identify all instances where Bell Atlantic has made "existing combined UNEs, including UNE platform" available to CLECs in their combined form.

REPLY: To date, BA-MA has not received or processed an order from a CLEC for "UNE-platform" or for any other "existing combined UNEs". However, BA-MA recently completed Network Design Requests (NDRs) for a number of CLECs. The NDR process is a prerequisite for ordering unbundled switching on a stand-alone or existing combined UNE basis.

NET # 55

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-47 Referring to paragraph 7 of the Howard affidavit, identify the procedures Bell Atlantic has in place for making adjacent space, including adjacent vaults, available for physical collocation before it determines that physical collocation space is not available.

REPLY: BA-MA does not have procedures for making adjacent space available for physical collocation before it determines that physical collocation space is not available. In accordance with the FCC Advanced Services Order, BA-MA is not required to provide adjacent collocation when there is space in the central office.

As described in D.T.E. - Mass. - No. 17, Part E, Section 10, the CLEC will be specifically notified in the event that BA-MA has no space available for physical collocation. The CLEC is then permitted to construct or otherwise procure controlled environmental vaults (CEVs) or similar structures, where technically feasible, using BA-MA approved vendors. The CLEC is responsible for complying with all zoning requirements, any federal, state or local regulations, ordinances and laws, and obtaining all associated permits. Please see Part E, Section 10 of the pending tariff for a full description of the terms and conditions associated with BA-MA's adjacent-structures tariff offering.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-48 Referring to paragraph 7 of the Howard affidavit, identify the procedures Bell Atlantic has in place for unsecured cageless collocation, microwave collocation and collocation at the remote terminal.

REPLY: Please see D.T.E. – Mass. - No.17, Part E, Section 9, which is pending before the Department and describes in detail the Cageless Collocation Open Environment (CCOE) offering and Part E, Section 4, which describes in detail Microwave Collocation. Please also see D.T.E. - Mass. - No.17, Part E, Section 10, which describes in detail Adjacent Structures.

It should be noted that BA-MA does not presently have procedures in place for collocation at a remote terminal. Requests for collocation at a remote terminal would be handled through the bona fide request (BFR) process.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-49 Referring to paragraph 7 of the Howard affidavit, identify, by month, the number of physical collocation applications that have been rejected by Bell Atlantic in 1999 and the reasons for each such rejection.

REPLY: As shown below (by month) a total of 91 physical collocation applications were denied between January and July 1999. These applications were denied because BA-MA did not have sufficient space to accommodate the type of collocation requested by the CLEC.

Total Jan – July 1999 = 91

January 1999 = 0

February 1999 = 4
March 1999 = 3
April 1999 = 7
May 1999 = 39

June 1999 = 35

July 1999 = 3

As indicated in response to DTE-ATT 1-52, an additional 23 applications were denied in 1998 for the same reason. No requests were denied prior to 1998. Of the 114 applications (91 + 23) that have been denied, 102 could presently be accommodated through another form of physical collocation. As of July 31, 1999, CLECs had resubmitted 69 applications requesting a different form of physical collocation or virtual collocation.

REPLY: DTE-ATT 1-49 As of September 10, 1999, there were only two central offices (with six denied applications) that were closed to all types of collocation and three central offices (with six denied applications) that were open to only virtual collocation.

NET# 58

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-50 Referring to paragraph 7 of the Howard affidavit, identify the methods, procedures and pricing Bell Atlantic has in place for providing cabling between two collocation cages and identify the number of cages Bell Atlantic has connected using these methods.

REPLY: Please see BA-MA's reply to DTE-ATT 1-107.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-51 Referring to paragraph 7 of the Howard affidavit, identify the percentage of collocation cages Bell Atlantic has completed and made available to CLECs within 76 days following receipt of an application for collocation.

REPLY: Between January 1, 1999, and September 28, 1999, 327 of 435 or 75.2% of physical, scope, and cageless collocation jobs were completed within 76 business days. More importantly, however, 421 or 96.8% of physical collocation arrangements were completed by the "Date Given to CLEC." The "Date Given to CLEC" takes into consideration special or extraordinary conditions that must be addressed before BA-MA can complete the construction of a physical arrangement. BA-MA's performance in meeting the Date Given to the CLEC is a more accurate measure of BA-MA's performance in meeting CLEC demand for collocation. Examples of special circumstances, which may require up to an additional 15 business days to complete, include undertaking a Switch and/or Equipment Removal, Asbestos Removal, and/or Raw Space/Special Construction.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-52 Referring to paragraph 7 of the Howard affidavit, identify the number of total collocation applications received by Bell Atlantic in 1998 and 1999, the number of those applications that were rejected and the five most common reasons for application rejections.

REPLY: 1998 Total Collocation Applications = 474
23 applications rejected

1999 Total Collocation Applications = 861(as of 9/30/99)
91 applications rejected

The only reason that BA-MA has rejected an application is that BA-MA did not have sufficient space to accommodate the specific type of collocation requested by the CLEC. Also, please see BA-MA's response to DTE-ATT 1-49.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-53 Referring to paragraph 7 of the Howard affidavit, identify the Maintenance Operating Procedures and Network Validation Testing procedures Bell Atlantic has in place.

REPLY: Please see BA-MA's reply to DTE-ATT 1-111.

NET# 62

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-54 Referring to paragraph 7 of the Howard affidavit, identify the procedures Bell Atlantic has in place for Special Billing Numbers.

REPLY: Please see BA-MA's reply to DTE-ATT 1-112.

NET# 63

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. No. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-55 Referring to paragraph 7 of the Howard affidavit, how many times in the past two years has Bell Atlantic changed any collocation procedures, e.g., Application Acceptance and Change Notification? For each such change, identify the procedures that have been changed and the reasons for the change.

REPLY: BA-MA objects to this request on the ground that it is overly broad and would be unduly burdensome to produce information that is responsive to this request. Without waiving its objection, BA-MA responds as follows:

BA-MA has periodically changed its collocation procedures over the past two years in order to better meet customer demand, deploy new collocation products, and meet regulatory requirements.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-56 Referring to paragraph 7 of the Howard affidavit, does Bell Atlantic require CLECs to purchase power on a Per Amp or Power Drain basis? If the policy differs from the policy in place in any other Bell Atlantic state, explain how and why.

REPLY: The power is charged on a per fused amp provided basis as described in D.T.E. – Mass. - No. 17, Part E, Section 2.5.3.C. and the policy is the same across the Bell Atlantic footprint.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-57 Referring to paragraph 12 of the Howard affidavit, how many requests have been made to Bell Atlantic in 1998 and 1999 that have been deemed not to be Bona Fide Requests. For each such request, explain why the request was determined not to be a Bona Fide Request and whether Bell Atlantic refused the request.

REPLY: BA-MA received one submission for a Bona Fide Request ("BFR") for interconnection that was deemed not to be a BFR. The BFR requested interconnection at an OC-3 Interface. The request was deemed not to be a BFR since BA-MA was in the process of acceptance testing the OC-3 Interface with the vendor and agreed to make the service available as a general offering upon conclusion of the testing.

NET# 66

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Donald Albert
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-59 Referring to paragraph 13 of the Howard affidavit, provide a list of "the full array of technical capabilities" referred to.

REPLY: BA-MA provides the following separate and distinct trunk groups that supports the exchange of traffic:

1. Traffic Exchange Trunks for the transmission and routing of terminating Local Traffic, Tandem Transit Traffic, translated LEC IntraLATA toll free service access code (e.g., 800/888/877) traffic, IntraLATA Toll Traffic.

2. Access Toll Connecting Trunks for the transmission and routing of Exchange Access traffic, including translated InterLATA toll free service access code (e.g., 800/888/877) traffic, between CLEC Telephone Exchange Service customers and purchasers of Switched Exchange Access Service via a BA Tandem.

3. Information Services Trunks for the transmission and routing of terminating Information Services Traffic.

4. BLV/BLVI Trunks for the transmission and routing of terminating BLV/BLVI traffic.

5. 911/E911 Trunks for the transmission and routing of terminating E911/911 traffic.

6. Directory Assistance Trunks for the transmission and routing of terminating directory assistance traffic.

REPLY: DTE-ATT 1-59 (cont'd)

7. Operator services (IntraLATA call completion) Trunks for the transmission and routing of terminating IntraLATA call completion traffic.

8. Other Trunks as may be requested and agreed to by BA-MA and the interconnecting party.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Donald Albert
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-60 Referring to paragraph 13 of the Howard affidavit, what technical capabilities does Bell Atlantic provide to account for differences in traffic type?

REPLY: Please see BA-MA's response to DTE-ATT-1-68.

NET# 69

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-65 Referring to paragraph 38 of the Howard affidavit, do CLECs have direct access to MSAG data? If not, why not?

REPLY: MSAG information for Massachusetts is available to the CLECs in two different ways. PS/ALI provides online view capabilities for streets in a specific community, and for larger MSAG requests a fax may be sent to BA-MA. BA-MA processes the request and in most cases places the extract in the home directory for that CLEC. Some customers request mail or FTP modes which BA-MA accommodates.

NET# 74

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-66 Regarding 911/E911 interconnection methodology, has SS7 capability been implemented for Bell Atlantic selective routers (tandems) in its 911 network? If so, is that same functionality currently available to CLEC E911 trunks as well?

REPLY: The Massachusetts E911 message trunk network has been converted to SS7 signaling. The E911 tandem interconnection with all BA-MA end office host switches is SS7. The E911 tandems currently interconnect with CLEC host switches using SS7 signaling also.

BA-MA strongly recommends that all message trunk interconnection with the E911 tandems in Massachusetts be done using SS7 signaling.

NET# 75

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-68 Referring to paragraph 44 of the Howard affidavit, when CLECs establish their own Operator Call Completion service using their own facilities and personnel, how does Bell Atlantic route traffic to the CLEC's service?

REPLY: When non-facilities based CLECs request their subscriber's Operator Call Completion traffic be routed to their own Operator Services facilities and personnel, routing to the requested platform will be accomplished though Line Class Code technology (LCC). A CLEC can request Customized Routing as part of the Network Design Request (NDR) process. The customized routing plan would include the necessary trunking and transport network required to deliver the call to the CLEC's Operator Services network. The service order process is utilized to assign the appropriate LCC to each CLEC telephone line requiring customized routing.

For a facilities-based CLEC providing operator services to their own subscribers, the routing between the CLEC's switch and their alternate operator service provider is performed by the CLEC at its own switch.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-69 Referring to paragraph 51 of the Howard affidavit, what is a Service Provider Identifier, how does it work and how can branded and unbranded traffic be commingled?

REPLY: A Service Provider Identifier (SPID) associated with each line number identifies the service provider of the calling customer. This feature utilizes an Originating Line Number Screening (OLNS) query to the Bell Atlantic Line Information Database (LIDB) on each call placed to OS/DA to determine the SPID. The SPID information returned from LIDB to BA-MA's Operator Services Nortel switch determines the branding treatment. This feature allows both branded and unbranded traffic to be routed to the Bell Atlantic Operator Services network via shared transport trunks.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-70 Referring to paragraph 57 of the Howard affidavit, what does Bell Atlantic charge a CLEC to license a copy of Bell Atlantic's regional directory assistance listings and what do daily updates include?

REPLY: Rates, terms and conditions for Bell Atlantic's Regional Directory Assistance licensing agreements are subject to negotiation between Bell Atlantic and a CLEC who may request such service.

Daily updates, including the same directory assistance listings Bell Atlantic provides to itself, are also subject to negotiation between Bell Atlantic and a CLEC who may request such service.

NET# 79

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-71 Referring to paragraph 57 of the Howard affidavit, are the numbers in the regional directory assistance database 7 or 10 digits and does the directory include adjacent ICO listings?

REPLY: Specific terms, conditions, format, and content for Bell Atlantic's Regional Directory Assistance licensing agreements are subject to negotiation between Bell Atlantic and a CLEC who may request such service. However, directory assistance listings for Massachusetts generally include 10 digit telephone numbers and will include the same listings BA-MA provides to itself, including ICO listings.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-72 Referring to paragraph 66 of the Howard affidavit, explain how a totally facilities based carriers initiates an order to add, delete or modify a listing in the directory listing database.

REPLY: Please see BA-MA's response to DTE-ATT 1-168 (a).

NET# 81

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-73 Referring to paragraph 66 of the Howard affidavit, explain how CLEC and Reseller directory listings are validated and what happens when a CLEC or Reseller listing cannot be validated. Identify any differences between the procedures for validating Bell Atlantic directory listings and the procedures for validating CLEC and Reseller directory listings.

REPLY: Please see Paragraph 34 of Ms. Crawford's affidavit. There are edits built within the ATLAS system to detect errors before the information is forwarded either to BA-MA's Directory Assistance or BAYPC. System editing is performed on the listing data element, without any regard to service provider. Please see BA-MA's response to DTE-ATT 1-171 for additional information.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-74 Referring to paragraph 79 of the Howard affidavit, are all central offices in Massachusetts now LNP-capable? If not , how many offices remain to be converted?

REPLY: All Massachusetts offices are LNP capable.

NET # 83

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-76 Referring to paragraph 81 of the Howard affidavit, identify the efforts Bell Atlantic is engaging in to "refine its procedures and the coordination activities with CLECs."

REPLY: Paragraph 82 of the Howard Affidavit describes one such improvement. Other improvements include processes on relating internal BA-MA orders, flagging disconnect orders that are to be held for coordination, and improving internal number administration processes to identify ported numbers in BA-MA's systems.

NET # 85

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Howard
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-77 Referring to the statement in paragraph 91 of the Howard affidavit that "call completion rates and transmission quality are comparable," provide data showing that the actual rates and quality are comparable for resale and retail line traffic.

REPLY: BA-MA does not have call completion rates for resale traffic compared against BA-MA's retail traffic between end user customers. As stated later in the same paragraph, "Because BA-MA does not differentiate between resale and retail line traffic, call completion rates and transmission quality are comparable". The use of the term "comparable" is based on the fact that they are handled in the same manner over the same facilities.

In addition, please see Paragraphs 51 and 63 regarding resellers using BA-MA's Operator Services and Directory Assistance in which BA-MA stated that the resellers and BA-MA's own traffic and calls are handled "in a nondiscriminatory manner based upon first in/first out call queuing".

NET# 86

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-80 Referring to paragraph 20 of the Miller affidavit, identify the number of transactions processed for Massachusetts, as opposed to the entire region.

REPLY: Pre-order transaction volumes are available for the New England and New York areas only in aggregate. Individual State volumes are not available.

NET# 89

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-81 Referring to paragraph 20 of the Miller affidavit, explain why transactions cannot be isolated to Massachusetts at this time and when Massachusetts-specific results will be available.

REPLY: Transactions are processed and counted through a common system serving New England and New York. The system is not currently programmed to isolate individual states in the counting process. Bell Atlantic plans to implement changes to the system in order to isolate state specific transaction volumes, however, an implementation date has not been set.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-83 Referring to paragraph 31 of the Miller affidavit, for each of the types of service orders identified on attachment 11 "that can flow through the system," identify on a monthly basis the percentage of resale orders that flowed through the system in 1998 and 1999 and the percentage of UNE orders that flowed through the system in 1998 and 1999.

REPLY: BA-MA does not maintain the data requested by type of service order. However attached is a chart that shows, for both Resale and UNE, the number of flow-through-eligible orders and the number of flow-through orders that were successfully flowed through. The ratio of actual flow through to eligible flow through is referred to as "achieved" flow through.

This data is available from September 1998 on a combined New England and New England basis.

Attachment
DTE-ATT 1-83
NET #92

Bell Atlantic North Achieved Flow Through Percentage by Order Type				
	Sept ' 98	***Oct ' 98***	***Nov ' 98***	***Dec ' 98***
A. Resale				
Total Successful Flow Through	17211	19940	16178	14153
Total Flow Through Eligible	21539	24381	19838	17198
% Achieved Flow Through	**79.91%**	**81.78%**	**81.55%**	**82.29%**
B. UNE				
Total Successful Flow Through	20	22	31	33
Total Flow Through Eligible	36	70	59	57
% Achieved Flow Through	**55.56%**	**31.43%**	**52.54%**	**57.89%**
	Jan ' 99	***Feb ' 99***	***Mar ' 99***	
C. Resale				
Total Successful Flow Through	11531	11171	10796	
Total Flow Through Eligible	14202	13909	12943	
% Achieved Flow Through	**81.19%**	**80.31%**	**83.41%**	
D. UNE				
Total Successful Flow Through	15	142	412	
Total Flow Through Eligible	35	454	814	
% Achieved Flow Through	**42.86%**	**31.28%**	**50.61%**	
	Apr ' 99	***May '99***	***Jun '99***	
E. Resale				
Total Successful Flow Through	16242	14069	14452	
Total Flow Through Eligible	19420	17172	17600	
% Achieved Flow Through	**83.64%**	**81.93%**	**82.11%**	
F. UNE				
Total Successful Flow Through	818	1058	1619	
Total Flow Through Eligible	1954	3222	4086	
% Achieved Flow Through	**41.86%**	**32.84%**	**39.62%**	

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-84 Referring to paragraph 33 of the Miller affidavit, explain why Bell Atlantic requires 72 hours to confirm an 11 line order and 24 hours for a 10 line order.

REPLY: Paragraph 33 of the Miller affidavit should have stated that confirmations would be returned in 72 hours on orders with *10 or more lines* instead of *more than 10 lines.*

Orders with 10 or more lines allow for up to 72 hours to return a confirmation in order to provide BA-MA with adequate time to confirm the availability of facilities to serve those lines. Similar processes apply to BA-MA retail orders.

NET# 93

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-85 Referring to paragraph 34 of the Miller affidavit, how many UNE orders have been processed by Bell Atlantic's Wholesale Service Center this year and what percentage of those orders have flowed through the system?

REPLY: See response to DTE-ATT 1-28.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-86 Referring to paragraph 34 of the Miller affidavit, what are the performance measurements for UNE orders handled by Bell Atlantic in Massachusetts this year?

REPLY: The performance measures for UNE orders referenced in Mr. Miller's affidavit are presented in paragraph 21 of Mr. Garbarino's affidavit. Additional details are provided in Exhibit 9, Book 1, Tab 9. The metrics and standards are based on the Department 's Phase 3-E order in the *Consolidated Arbitrations* proceeding.

Some of the data presented in paragraph 21 of Mr. Garbarino's affidavit require correction. Attached is an updated chart of Internal Process results (Ordering) for UNE. The chart indicates where data has revised.

In addition, the chart has been expanded to include second quarter results.

Attachment
DTE-ATT 1-86
NET #95

Massachusetts – Internal Process Measures

				January	February	March	April	May	June
Function	**Metric #**	**Product**	**Metric**	**CLEC**	**CLEC**	**CLEC**	**CLEC**	**CLEC**	**CLEC**
Ordering –									
Order Confirmation Timeliness	OR-1-02	POTS	% On Time LSRC - Flow Through	-	100.00	99.17	98.93	99.59	95.56
	OR-1-04	POTS	% On Time LSRC - < 10 Lines (E)	~~48.15~~ ***80.39***	90.89	~~81.69~~ ***80.56***	73.45	64.31	83.22
		Specials	% On Time LSRC - < 10 Lines (E)	58.06	50.00	~~58.59~~ ***52.70***	70.45	54.28	58.82
	OR-1-06	POTS	% On Time LSRC - >/= 10 Lines (E)	~~22.02~~ ***50.00***	100.00	100.00	90.00	91.66	90.00
		Specials	% On Time LSRC - >/= 10 Lines (E)	-	100.00	-	-	100.00	-
Reject Timeliness	OR-2-02	POTS	% On Time LSR Reject - Flow Through	-	100.00	100.00	100.00	100.00	100.00
	OR-2-04	POTS	% On Time LSR Reject - < 10 Lines (E)	~~-~~ ***78.68***	93.13	~~75.51~~ ***75.37***	73.73	62.91	67.13
		Specials	% On Time LSR Reject - < 10 Lines (E)	100.00	-	100.00	100.00	100.00	80.00
	OR-2-06	POTS	% On Time LSR Reject - >/= 10 Lines (E)	~~78.68~~ -	-	100.00	87.50	90.00	100.00
		Specials	% On Time LSR Reject - >/= 10 Lines (E)	-	-	~~100.00~~ ~~-~~	-	-	-
Completion Notification	OR-4-02		Completion Notice - % On Time	100.00	99.77	100.00	100.00	100.00	100.00

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-87 Referring to paragraph 35 of the Miller affidavit, how does BA-MA ensure that confirmations and completion notices are received by CLECs? Does BA-MA verify that a positive acknowledgment is received from the CLEC?

REPLY: BA-MA ensures that the CLECs receive all transmissions (acknowledgements, confirmations and completions) by providing transaction control for files that are sent. The majority of CLECs use File Transfer Protocol (FTP) to exchange files with BA-MA and the error detection and retry logic is included in the FTP process. In the event that an attempt to transmit a file to the CLEC fails for any reason, BA-MA will retry the submission every hour for three hours. In the event that the file still fails transmission, a human operator is automatically notified and brought in to correct the root problem, regardless of the source of the error. Once the error is corrected, the transmission is re-submitted. In this way, BA-MA ensures that the files are received by the CLEC and the handling of the transaction is then up to the CLEC. Although EDI protocol allows the CLEC to notify BA-MA of successful EDI translation through the mechanism of the positive acknowledgement, BA-MA does not use the acknowledgement for error detection, relying instead on the transaction control around FTP. The positive acknowledgement is used as a backup verification manually in the event of problems. To ensure file receipt for those remaining CLECs who have chosen to use a VAN for file exchange, BA-MA relies on the Value Added Network to guarantee delivery of the files.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-88 Referring to paragraph 38 of the Miller affidavit, does Bell Atlantic provide a Jeopardy notification to CLECs via the EDI ordering interface when a customer due date cannot be met because of work force shortage, unavailable facilities or no access to customer premises? How are the completed steps in the provisioning process updated via the EDI ordering interface?

REPLY: Jeopardy notifications via the EDI ordering interface are currently under discussion with CLECs in the Bell Atlantic Change Management process. When the requirements are finalized, Bell Atlantic will develop and implement a jeopardy notification process via the EDI interface. Until then, at the request of CLECs, BA-MA notifies CLECs electronically of potential jeopardies on service orders utilizing daily reports. More specifically, at least twice a day, Open Query System (OQS) Reports are loaded onto a server where they can be retrieved by CLECs using File Transfer Protocol (FTP) access. These reports provide status and jeopardy information on both orders to be provisioned and on maintenance trouble tickets.

Once a service order has been entered into the Service Order Processor, it is sent to various work groups and systems within BA-MA to complete the provisioning process, just like BA-MA retail orders. The provisioning function includes numerous systems and work groups which, based on individual service requirements, assign facilities to an order, update translations in a switch, and dispatch technicians where required. As a service order completes each step in the provisioning process, a status is returned for posting on the pending service order and is available to the Competing Carrier via an inquiry transaction using either the EDI interface or

the Web GUI.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-89 Referring to paragraph 45 of the Miller affidavit, what is the basis for Bell Atlantic's conclusion that the T1M1 standards are not expected to support the functionality available through RETAS and are unlikely to be economically feasible? Has Bell Atlantic implemented an electronic application to application interface in the Bell Atlantic-South region? If so, why?

REPLY: The only industry standard adopted thus far for local maintenance and repair using electronic bonding is the mechanized loop testing function for local POTS services. RETAS, on the other hand, provides for mechanized loop testing, electronic trouble reporting, status information, estimated time to repair information, as well as trouble history information and the ability to fix features on line. Despite the complications, Bell Atlantic is currently working with AT&T and MCIW to implement electronic bonding in the Bell Atlantic North states.

Regarding economic feasibility, paragraph 45 of my Affidavit indicated that electronic bonding is unlikely to be economically feasible for more than a few very large carriers. The basis for this conclusion is Bell Atlantic's current understanding of the cost to be in excess of one million dollars and its knowledge of the limited number of interexchange carriers that have implemented a similar interface.

An electronic bonding interface for maintenance and repair has been in production specifically for MCI in BA-South, since April 1999, as per the BA-MCI interconnection agreement. This interface provides only limited functionality enabling Bell Atlantic to receive

REPLY DTE-ATT 1-89 cont'd:

CLEC generated trouble tickets. This interface does not allow CLECs to access trouble ticket history or to engage in the testing, which are functions that RETAS currently provides to CLECs in Massachusetts.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-90 Referring to paragraph 51 of the Miller affidavit, how many of the RETAS transactions were for Massachusetts customers?

REPLY: RETAS transactions are processed and counted through a common system serving the entire Bell Atlantic region. The system is not currently programmed to isolate individual states in the counting process, and therefore, Massachusetts-specific transaction counts are not available.

NET# 99

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-91 Referring to paragraph 51 of the Miller affidavit, does Bell Atlantic require CLECs to conduct a line test before submitting a trouble ticket?

REPLY: Bell Atlantic does not require the CLEC to conduct a line test before submitting a trouble ticket, however, it is in the CLEC's best interests to do so. If a CLEC makes a decision to request a BA-MA dispatch within the central office or out to the field, the CLEC accepts the consequences of that decision including incorrect dispatch charges.

As described in the CLEC Handbook, once the CLEC tests the circuit to determine the trouble condition and isolates which network element is not functioning, it evaluates whether the trouble is with the UNE itself or the portion of service provided using the CLEC network element. The UNE trouble report must describe the fault condition. The CLEC must also determine whether the fault condition is located within the Bell Atlantic central office or the outside network.

It is important that CLECs properly isolate trouble conditions. If BA-MA dispatches a technician based on the CLEC's request and the dispatch is erroneous, BA-MA issues an Incorrect Dispatch Charge/Customer Not Ready (IDC/CNR) to the CLEC.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-92 Referring to paragraph 62 of the Miller affidavit, does Bell Atlantic have a separate test environment available in Massachusetts for CLECs? How many CLECs have used the test environment?

REPLY: Yes, a separate test environment was made available for CLECs in Massachusetts beginning on October 4, 1999. CLECs were notified of this availability on September 27, 1999, and were requested to provide test account scenarios for use in the new test environment. Bell Atlantic is currently awaiting the CLEC's response.

NET# 101

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-93 Referring to paragraph 70 of the Miller affidavit, explain why Bell Atlantic retail representatives do not use the GUI to access preorder, order and related OSS functions?

REPLY: The Web GUI provides a simple, single system that enables CLEC representatives to perform pre-order and order functions with a minimum of training. BA-MA retail representatives do not use the GUI to access pre-order, order and related OSS functions because they have been trained to use the multiple different Operations Support System interfaces.

NET# 102

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-101 Referring to paragraph 20 of the Stern affidavit, provide all documents that support Stern's statement that BA-MA has the ability to meet future demand for physical collocation arrangements.

REPLY: Ms. Stern's conclusion that BA-MA has the ability to meet future demand is not based on specific documents, but is based on BA-MA's proven track record in effectively meeting increased demand for collocation over the years, where space was available, as well as on general knowledge of BA-MA's plans to continue to augment and train force to meet increasing collocation demand.

For example, as reported in Ms. Stern's affidavit, BA-MA completed 97 physical collocation arrangements in the first quarter of 1999, which represented a sixteen-fold increase over the volume completed in first quarter 1998. Ms. Stern also reported (in her May 24, 1999 affidavit) that BA-MA had provisioned seven SCOPE arrangements and was in the process of completing an additional 115 such arrangements. Since March 1999, BA-MA has now completed an additional 152 physical cages and 185 SCOPE arrangements. In total, BA-MA has completed 742 physical cage and SCOPE collocation nodes as of September 30, 1999. BA-MA also has completed 84 augments (to existing physical nodes) and three CCOE (cageless) arrangements. Moreover, BA-MA is in the process of constructing an additional 50 physical cages, 185 SCOPE arrangements, 45 CCOE arrangements, and 66 augments.

REPLY: DTE-ATT 1-101 BA-MA does not anticipate problems completing these pending jobs in a timely manner. Further, BA-MA does not foresee problems meeting future demand for collocation where space is available.

Attached is a summary of collocation arrangements by type and by CLEC as of September 30 1999. The attachment shows that, as of September 30, 1999, including virtual and all forms of physical collocation arrangements, BA-MA had completed 746 collocation arrangements and was in the process of completing 290 additional collocation arrangements for 32 CLECs. The attachment does not include an additional 84 augments that have been completed or 66 augments that are in process (to physical collocation arrangements).

NET# 110

MASSACHUSETTS

COLLOCATION STATUS BY CLEC

AS OF SEPTEMBER 30, 1999

	PHYSICAL		**SCOPE**		**CAGELESS**		**VIRTUAL**	
	COMPLETE	IN PROGRESS	COMPLETE	IN PROGRESS	COMPLETE	IN PROGRESS	COMPLETE	IN PROGRESS
CLEC A	57		6	4		2		2
CLEC B	21	2		1				1
CLEC C	84	2		3		1	1	2
CLEC D			1					
CLEC E	1		1					
CLEC F	74		11		1	2		1
CLEC G			104	2				
CLEC H				5		6		
CLEC I	2							
CLEC J	13	1						
CLEC K	96							

	PHYSICAL		SCOPE		CAGELESS		VIRTUAL	
	COMPLETE	IN PROGRESS	COMPLETE	IN PROGRESS	COMPLETE	IN PROGRESS	COMPLETE	IN PROGRESS
CLECL	35	7	16	5				2
CLECM	24	5		14				1

CLECN	18	16		10				
CLECO	3			1				
CLECP	54		11	3				1
CLECQ	4							
CLECR	4					1		
CLECS	3	1	38	78		13		
CLECT	16	1	4	9				
CLECU	8	3		6				
CLECV	23	2		42				
CLECW	3	1						
CLECX				1				
CLECY	1							
CLECZ	6	9		1	2	20		
TOTAL	**550**	**50**	**192**	**185**	**3**	**45**	**1**	**10**

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-102 Referring to paragraph 21 of the Stern affidavit, identify the number (actual number and percentage of total) of central offices where space is currently unavailable for standard physical collocation arrangements.

REPLY: As of September 10, 1999, there were five central offices (or 1.7%) in BA-MA where space was unavailable for physical collocation arrangements.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-103 Referring to paragraph 35 of the Stern affidavit, describe in detail any circumstances that would prevent BA-MA from performing maintenance in a nondiscriminatory manner.

REPLY: Remote monitoring of the BA-MA facility network from an Operations Center is performed in a nondiscriminatory, non-intrusive manner. Monitoring is performed on all network infrastructure (facilities), and DS3 and above customer services. The remote monitoring system identifies network infrastructure with facility designations, and customer services with circuit IDs. These identifications relate to bandwidth, not specific customers. BA-MA prioritizes repair in a major network failure based on bandwidth. Specific services, which have identified priority, are 911 and SS7 trunks. The only external services that have priority identification are government services, which are labeled Telecommunication Priority Service (TPS) within the Support Systems.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-105 Does BA-MA offer (1) microwave collocation or (2) collocation (either virtual or physical) at the remote terminal?

REPLY: BA-MA offers microwave collocation. See DTE – Mass. – No. 17, Part E, Section 4. Requests for collocation (either virtual or physical) at remote terminals would be processed through the bona fide request (BFR) process. BA-MA will provide such collocation pursuant to applicable law.

NET# 114

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-106 Has BA-MA rejected any collocation applications? If so, what reasons were given for each such rejection?

REPLY: Yes. Please see BA-MA's replies DTE-ATT 1-49 and 1-52.

NET# 115

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-107 Does BA-MA have any prescribed methods, procedures and pricing for providing cabling between two collocation cages? If so, provide all supporting documentation and identify how many cages has BA-MA connected under these methods.

REPLY: BA-MA provides Dedicated Cable Support (DCS) as set forth in DTE – Mass. - No. 17, Part E, Section 5.2. BA-MA has received 17 requests for DCS. Nine jobs are complete and eight jobs are pending completion.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-108 Regarding collocation intervals:

(a) What percent of cages were completed within 76 days?

(b) What percent of acknowledgment letters were sent on time?

(c) What percent of cost estimates were sent on time?

(d) What percent of due dates were met on time with appropriate CFA information?

REPLY:

(a) Please see BA-MA's reply to DTE-ATT 1-51.

(b) BA-MA does not track this data although it is BA-MA's policy to send acknowledgement letters to CLECs immediately upon receipt of an application.

(c) The information requested has been tracked since January 1999. The results are as follows:

- January 1999: 6.67%
- February 19999: 34.62%
- March 1999: 64.10%
- April 1999: 37.66%
- May 1999: 22.93%
- June 1999: 97.02%
- July 1999: 96.55%
- August 1999: 100%
- September 1999: 100%

REPLY: DTE-ATT 1-108 (cont'd)

Please note that during April and May, personnel responsible for processing applications, which includes providing cost estimates to CLECs, were transitioning from New York to Boston, which caused the drop in the results. Once the transition was completed, the results continued on their positive trend to reach 100%.

(d) Tracking of Cable Facility Assignment (CFA) information in the collocation database began in May 1999. 100% of the jobs completed between May 1, 1999 and September 28, 1999 were provided with the appropriate CFA information.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-109 What is the BA-MA procedure for cage/facility acceptance?

REPLY: The BA-MA Local Collocation Coordinator (LCC) contacts the CLEC to schedule a collocation acceptance meeting at the central office. Prior to the acceptance meeting, BA-MA inspects the installation in order to ensure that the job is complete and complies with the requirements listed on the CLEC's application. BA-MA's LCC and Central Office Engineer meet with the CLEC representative to review the CLEC's collocation area. The LCC provides a MOP (Method of Procedure), which is signed by both the CLEC representative and LCC. A CLEC's signature on the MOP indicates acceptance of the collocation arrangement.

See also the attachments to DTE-MCIW 1-1, which include three pre-acceptance checklists (Attachments 2, 3 and 4).

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-110 How does BA-MA notify a CLEC that a collocation facility is ready?

REPLY: One week prior to job completion, a BA-MA LCC notifies the CLEC by phone that the job will be completed on a specified date and the collocation acceptance meeting can be scheduled.

NET# 119

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-111 What is the BA-MA procedure for provision of Maintenance Operating Procedure and Network Validation Test.

REPLY: BA-MA is unable to respond to this question because it is too vague. There is no reference to the provision of "Maintenance Operating Procedure" or "Network Validation Test" in Ms. Stern's testimony. In order to respond to the request BA-MA would require a specific reference where the above terms are used.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-112 What is BA-MA's procedure for Special Billing Numbers (SBNs)?

REPLY: BA-MA establishes an SBN for each type of loop service requested by the CLEC for each central office where the CLEC has collocation. The collocation application contains a form on which the CLEC can request the types of SBNs it requires.

BA-MA's commitment is to have all SBNs for new arrangements to the CLECs two weeks prior to the due date for the arrangement and methods are now in place to accommodate that. This procedure depends on BA-MA knowing which types of services the CLEC needs/wants. If a CLEC does not provide that information, then BA-MA establishes the SBNs BA-MA thinks it can use based upon the type of arrangement the CLEC has ordered.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-113 How many times in the past 2 years has BA-MA changed any collocation procedure (e.g. Application, Acceptance, Change Notification)?

REPLY: Please see BA-MA's reply to DTE-ATT 1-55.

NET# 122

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-116 For each month from January 1, 1997 to present:

(a) Identify the total number of service orders for BA-MA retail customers;

(b) Identify the number of those orders that were completed, the number of orders that were rejected (and reason for rejections), and the number of those orders that required manual intervention (after the point of initial entry by a BA-MA service representative) for completion of the order;

(c) To the extent that any of the customer service orders required manual intervention after initial entry by a BA-MA representative, describe the reasons why manual intervention was necessary for the completion of the order, and identify the percentage of manually processed orders attributed to each reason; and

(d) Produce all documents that describe, or from which one can calculate, the number and percentage of orders for BA-MA's retail customers that flowed through BA-MA's legacy systems, without manual intervention, after initial submission by the BA-MA representative.

REPLY: (a) Consistent with the Consolidated Arbitration, the Company has not compiled any data prior to January 1998. The data below represent BA-MA-Retail POTS and Specials completed service orders for the period January 1998 – July 1999. The data that are displayed are consistent with the data required for reporting

Consolidated Arbitrations results. See Exhibit 9, Book 1, Tab 1.

REPLY: DTE-ATT 1-116
(cont'd)

	1998	1999
January	259,146	211,424
February	**259,551**	**201,698**
March	313,813	271,902
April	268,832	376,293
May	219,630	227,964
June	257,046	233,730
July	273,602	241,525
August	264,979	
September	262,491	
October	230,589	
November	200,485	
December	197,688	

(b) The number of completed service orders is shown in response to part (a). There is no comparable step in the retail system for "rejections". BA-MA retail representatives cannot release an order into the service order processor system until the order is error free. "Manual intervention" for BA-MA retail is handled by the BA-MA representative prior to release into the service order systems.

Some examples of orders that require manual intervention include special services, POTs centrex, POTs orders that require facility checks (example orders with line size greater than 5) and ISDN.

In addition BA-MA representatives must resolve potential conflicts with any pending orders that may exist on the line. This manual intervention occurs prior to order entry in the legacy systems.

(c) See response to part (b).

(d) As noted above, the retail and wholesale processes are not identical. BA-MA does not have the data requested.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-117 Does BA-MA plan to reduce the level of manual intervention in processing CLEC transactions to the level of manual intervention in processing BA-MA transactions? If so, when will this reduction occur? If not, why not?

REPLY: It is in BA-MA's own interest as well as the CLEC's to provide the most efficient methods and systems to process the flow of wholesale orders. BA-MA will continue to monitor the volumes associated with the order types received from CLECs to determine whether flow-through capability can and should be introduced. Introduction of new changes for flow-through will be implemented in accordance with the Change Management Process.

NET# 126

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-118 State whether BA-MA has agreed, or committed itself to provide FOCs for loop orders to CLECs within a specified time. If yes, describe the time interval.

REPLY: Yes, BA-MA has committed to provide order confirmations (FOC or LSRC) within times specified by the Department. Order Confirmation timeliness was reviewed by the Department in the internal process performance portion of the Consolidated Arbitrations proceeding. The Phase 3-E order states on page 33…

> "…the Department has reviewed Bell Atlantic's proposed internal process performance standards and finds them to be in conformance with the Phase 3 Order. Accordingly, we adopt all of the measures proposed by Bell Atlantic and direct it to file a compliance filing in which those measures are presented with accompanying proposed monitoring reports and proposed performance payments for deviations from the standards presented."

The order-confirmation performance data presented in the affidavit of Mr. Garbarino (paragraphs 20 through 23) is based on the measurements and standards ordered by the Department. A summary of the intervals can be found on pages 6 and 7 of the supporting guidelines (Exhibit 9, Book 1, Tab 9).

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-123 Referring to paragraph 43 of the Stern affidavit:

(a) Why is BA-MA restricting spectrum to 3000Hz?

(b) Does the restriction apply to BA-MA or its affiliates?

(c) What is BA-MA doing with the remaining spectrum range?

(d) Is there different pricing for different spectrum ranges?

(e) Does BA-MA offer access to loops with the same bandwidth capability to that available to itself or affiliates?

REPLY:

(a) This is a standard definition of the analog voice band loop. When an analog voice band service uses digital loop carrier (DLC), frequencies over 4000Hz are filtered out. In addition, loops over 18k ft that support analog voice band services require loading. When a cable is loaded, the frequencies below 3000 Hz have less attenuation but frequencies above 3000 are significantly attenuated. BA-MA is provisioning analog unbundled loops within specific guidelines to be in compliance with ANSI Standards.

(b) Yes.

(c) As stated above, BA-MA's analog (Voice grade) loops are not designed to support telecommunications services in bandwidths above 3000Hz. When properly conditioned,

however, some BA-MA loops will support retail and

REPLY: DTE-ATT 1-123
(cont'd)

wholesale (UNE loop) ADSL services ranging from the voice grade bandwidth 300 – 3,000Hz up to the 1.2MHz bandwidth.

(c) 2W analog loops are priced differently than 2W ADSL loops.

(d) Yes.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-124 Referring to paragraph 44 of the Stern affidavit, what provisions are made in those instances when two-wire digital ISDN-BRI cannot be provisioned because the facilities have bridged taps greater than 6000 feet in place?

REPLY: If the loop is under 18k ft, bridged tap beyond 6k ft. will be removed at no additional charge.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-127 Referring to paragraph 47 of the Stern affidavit:

(a) Describe the "sufficient progress" that has been made to make xDSL-compatible loops available to requesting carriers.

(b) What technical issues still remain unresolved regarding the provision of xDSL technology?

REPLY:

(a) ADSL and HDSL compatible unbundled loops are available to the CLECs in the entire BA footprint (even though BA has deployed its retail service in only selected areas of its footprint). In addition, BA will soon be developing an IDSL and SDSL compatible unbundled loop offering in response to CLEC requests. CLECs currently provision these two types of xDSL using other loop types, i.e., ADSL-compatible loops are being used for the provisioning of SDSL and 2W Digital ISDN loops are being used for the provisioning of IDSL.

Pre-qualifications of loops for ADSL and HDSL are being done more effectively than when the loops were first deployed.

New testing and turn-up provisioning processes have been identified which are helping to make these loops available to requesting carriers. This has been a challenge due to the fact that the majority of these loops do not carry dial tone and because CLECs use different equipment and have different requirements for the performance parameters of their xDSL services.

REPLY: DTE-ATT 1-127

Therefore, new turnup and testing processes needed to be developed to ensure that BA-MA is providing a useful loop upon provisioning.

Unique ordering codes have been developed to clearly identify loops being ordered for the provisioning of ADSL and HDSL and also help in the trouble resolution process.

Dedicated workforces have been put in place to address the unique requirements of digital loops, as well as to handle the anticipated volumes.

(b) Technical issues remain regarding:

- Fiber/DLC equipped lines capable of supporting a DSL signal
- Development of DLC equipment that will enable the multiple varieties of DSL service to be provisioned over the same DLC systems
- Multi-hosting or sharing of DSL required equipment, i.e., DSLAMs
- Remote terminal solutions
- Interfaces and handoffs
- Spectrum Management.

These issues are complex and the solutions differ from vendor to vendor.

Other technical issues exist which may not have been identified here because they could relate to specific scenarios or network configurations.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-129 Referring to paragraph 49 of the Stern affidavit:

(a) Is there a cost for the "conditioning component" referenced in this paragraph?

(b) Is there an additional cost for the xDSL-compatible loop?

REPLY:

(a) Yes. The cost of conditioning depends upon what is specifically being requested by the CLEC. For example, a CLEC could request that all bridged taps be removed from the loop in order to meet the technical parameters of their specific equipment.

(b) Like other unbundled loops, a recurring and non-recurring charge is assessed on xDSL-compatible unbundled loops. A loop qualification charge also applies since digital loops require that the loop be provided on pre-defined facilities and therefore need to be pre-qualified (unlike analog loops) before the loop order is written and provisioned.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-130 Referring to paragraph 50 of the Stern affidavit:

(a) Are there other means of obtaining information for pre-qualification/qualification?

(b) Is the information provided at the line level or at a higher level (i.e., wire center, zip code)?

(c) Are the processes to obtain this information manual or automated?

(d) How many line numbers can be processed at the same time?

(e) Does the manual process impair CLECs from obtaining information/timely information? If so, how?

(f) Does BA-MA use the same process? If not, what does BA-MA use?

(g) Is the spectrum management information provided when requested?

(h) Why is BA-MA limiting its loop length for advanced services to 12K feet?

(i) Will BA-MA deny CLEC xDSL service requests for loops between 12-18K feet?

(j) What number and what percentage of BA-MA's loops are longer than 12,000 feet? 12,000 to 18,000 feet?

REPLY: DTE-ATT 1-130 (cont'd)

(a) Paragraph 50 speaks to the mechanized ADSL pre-qualification database that is currently being built. The other means of obtaining information regarding whether a loop qualifies for xDSL is through a manual pre-qualification. This method is used in areas where the central office has not been pre-qualified yet. An Engineering Query can also be performed where more detailed loop characteristic information is being requested. This method is manual as well.

(b) Pre-qualification information can be provided based on TN or end user address.

(c) See response to item (a) above.

(d) One, regardless of whether the mechanized pre-qualification database is used or whether a manual or engineering query is requested.

(e) No. The manual process provides a greater level of detail back to the CLEC than the mechanized process does currently. A manual qualification should be returned to the CLEC within 72 hours.

(f) BA-MA only offers ADSL in offices that have been pre-qualified and where pre-qualification information can be obtained through the database; BA-MA does not manually qualify loops for its Retail ADSL service.

(g) Clarification is needed to answer this question. BA's Spectrum Management Guidelines are available to CLECs. ADSL is currently the only DSL where we qualify/not qualify a loop based on spectrum interference. This would only occur where T-1 is present in the same binder group.

(h) BA-MA has Network Interface requirements which are negotiated with the particular vendors with which BA-MA is doing business. BA-MA has chosen to use loops no longer than 12 and in some cases 15k ft (including bridged tap) for its own Retail offering.

(i) 2W ADSL compatible unbundled loops will be qualified, where

facilities are available, out to 18k ft (including bridged tap); 2W/4W HDSL compatible unbundled loops will be qualified, where facilities are available, out to 12k ft (including bridged tap). These loop lengths are based on industry standards.

(j) 44% of BA-MA's loops are longer than 12k ft.
25% of BA-MA's loops are between 12-18k ft.
The number of loops in each of these ranges varies by Central Office.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-132 Referring to paragraph 54 of the Stern affidavit, when requested, has loop been provisioned in an integrated manner with the NID? If not, explain why.

REPLY: Yes, assuming the question is "Are UNE loops normally provisioned with NIDs?"

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-133 Regarding multi-tenant buildings with BA-MA owned riser cable:

(a) Does BA-MA permit a CLEC to access its house and riser cable and provide a CLEC with a point of interconnection where BA-MA's house and riser facilities terminate?

(b) How many times has this been requested?

(c) Describe the order on which requests are handled for CLECs and BA-MA.

(d) When the BA-MA does not own the riser-cable, but it has an agreement with the MTE owner, what provisions are made to permit a CLEC to access this cable?

REPLY:

a. Yes, this access is provided in accordance with the terms of the pending DTE– Mass – No. 17 UNE tariff. The CLEC has access to its end-user customer via BA-MA's house and riser cable, but BA-MA will perform all cross connection on the network side of BA-MA's house and riser facilities.

b. BA-MA has not yet received orders for access to its house and riser cable.

c. Requests will be handled on a first come, first served basis.

d. BA-MA cannot respond to this question because it is too vague. BA-MA does not understand what types of agreements are

REPLY: DTE-ATT 1-133 (cont'd)

referenced. BA-MA does not restrict access to any house and riser cables, whether it owns them or not.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E.. 99-271

Respondent: Stuart Miller
Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-142 How are maintenance and repair service dispatches scheduled, initiated and reported for CLEC customers?

REPLY: It is the CLEC's responsibility to take all trouble information from its end user. The CLEC is responsible for identifying and testing the fault and the location of the trouble within the unbundled network element (UNE) prior to contacting BA-MA. The CLEC sends the trouble information to BA-MA through the RETAS system or by manual phone calls placed by the CLECs who do not use RETAS.

Once a trouble, either retail or wholesale, is put into the dispatch pool, either dispatch-in or dispatch-out, it is handled the same as any other trouble. Tickets are prioritized based on whether the customer is out of service and on the commitment time.

CLEC UNE trouble reports are placed in the same work queues as BA-MA retail troubles, and are prioritized based on service impact and type of service without regard to the carrier. Out-of-service conditions are given a higher priority than service-affecting troubles, also without regard to the carrier.

Once the UNE trouble is resolved, BA-MA notifies the CLEC and closes the trouble report. The CLEC can view closed trouble reports using the history function within RETAS.

NET# 151

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-143 Describe how BA-MA determines the order in which it provides service to its own retail customers. To the extent that BA-MA does not provide service strictly on a first-come, first-served basis, please describe, and produce documents that describe:

(a) the circumstances, class of service, or class of customers that are served on other than a first-come, first-served basis;

(b) the extent to which BA gives some customers priority, precedence or preference over others in terms of the installation or repair of service, including the reasons for any such prioritizing, preference, or precedence;

(c) the extent to which BA-MA has an established system for assigning some customers priority, preference or precedence over others in the installation or repair of service, including the assignment of codes to designate such prioritized, preferred customers or services; and

(d) the extent to which CLEC customers are treated equally to BA-MA retail customers.

REPLY: (a-d) In normal situations, BA-MA customers are served on a first-come, first-served basis within a customer class (e.g., residence, business). Ordering and maintenance intervals can be different between customer class. A small number of BA-MA customers have contracts that specify service.

level details from ordering intervals to repair intervals. Also, there are circumstances where field management

REPLY: DTE-ATT 1-143 (cont'd)

personnel will expedite an installation or repair (normally an emergency situation).

For the most part, business customers are given priority in repair situations over residence customers. Since BA-MA is unable to distinguish UNEs from Residence or Business, BA-MA has classified all UNEs as "business" for this purpose, thereby giving them preference over BA-MA's residence customers in repair situations -- even if the UNE is in fact serving a residential customer.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-148 (a) Identify how many employees BA-MA has currently assigned to process orders and arrange for provisioning of local service for its own retail customers.

(b) Identify how many of the existing employees BA-MA has currently assigned to process orders and arrange for provisioning of local service for its own retail customers are entry level employees. Indicate how many have from 1-5 years of service, how many have 6-10 years, how many have more than 10 years.

REPLY: BA-MA objects to this request on the grounds that the request is overly broad, unduly burdensome and would require a special study to produce information responsive to the question. BA-MA further objects to this request on the grounds that the request seeks information that is not relevant to BA-MA's compliance with the Act's Competitive Checklist.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-150 For all CLEC orders received since January 1, 1997, identify by month: (1) each order for which a jeopardy notice was sent; (2) the number and percentage of jeopardy notifications that were sent before the order completion due date specified on the FOC; and (3) the number and percentage of orders that were not completed by the FOC due date, for which BA-MA did not send a jeopardy notification before the FOC due date. For each instance, describe reasons why a jeopardy notification was not sent before the FOC due date.

REPLY: BA-MA cannot provide the requested data because, as noted in BA-MA's Phase 3-E compliance filing, jeopardy notifications are not measurable in BA-MA systems. Notifications are made verbally or by fax and are not recorded in BA-MA's systems. Jeopardy notifications are made to CLECs when BA-MA knows that it can not complete a service order by the scheduled time. Although BA-MA maintains an operational standard for jeopardy notifications (2 hours before committed time frame), it is unable to track and report on this standard.

It should also be noted that, CLECs can obtain the status of pending orders through the DCAS interface as described in Mr. Miller's affidavit (paragraph 19). In addition, reported data on provisioning performance includes the percent of missed installation appointments for both BA-MA retail and on services ordered by CLECs. As indicated in attachment I of Mr. Garbarino's affidavit, the on-time performance on CLEC orders is consistently better than BA-MA retail performance.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-155 Referring to paragraphs 86 et seq. of the Stern affidavit, provide all documentation regarding the Network Design Request process.

REPLY: Documentation for the NDR process appears in Volume 1, Sections 6.4.2 and 8.5.7 of the CLEC Handbook Series. This Volume is Exhibit 3 to BA-MA's 271 filing with the Department made on May 24, 1999. It includes CLEC profile forms and information concerning the three phases of the NDR process: Pre-NDR, NDR and NDR implementation.

Attached to this request are the following types of documentation:

- Operator Services Questionnaire (OSQ), via which a CLEC indicates Operator Services requirements [Attachment 1];
- Line Class Code (LCC) Provisioning forms, used for documenting specific CLEC blocking requirements, configuring the switch and establishing an office dialing plan in accordance with the CLEC's request [Attachments 2 and 3];
- Network Operations Test Process and associated forms used by BA-MA Network Operations Center (NOC) personnel to test the CLEC's presence in a switch [Attachments 4 and 5];
- Network Design Process flow chart [Attachment 6].

BA-MA has further documentation concerning the NDR process that provides BA-MA Telecom Industry Services Operations Center (TISOC) personnel with the methodology to process a CLEC's request to establish a presence in a BA-MA switch. BA-

REPLY: DTE-ATT 1-155 (cont'd)

considers this information proprietary because it involves internal methods and procedures. It will be provided to the Department only and to the parties pursuant to a Protective Agreement. The list of these proprietary documents is as follows:

- TISOC Method and Procedure – NDR
- TISOC Methods and Procedure – NDR Exhibits

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-157 **MODIFIED.** Referring to paragraph 91 of the Stern affidavit, provide a summary of all documents not included in Exhibit 7 concerning Bell Atlantic's Massachusetts operational trial.

REPLY: As stated in paragraph 91 of the Stern affidavit, BA-MA performed a comprehensive operational trial of its processes and support systems used to provide unbundled network element ("UNE") offerings to CLECs. Numerous order scenarios were developed and tested, covering a range of unbundled order types and customer migration patterns. In addition to the unbundling switching scenarios described in the Stern affidavit, BA-MA tested order scenarios for unbundled loops, unbundled transport, and the UNE-platform.

Specifically, the unbundled loop orders tested included installing new 2-wire analog loops to CLEC physical and virtual collocation arrangements, performing a migration or "hot-cut" of an existing BA-MA POTs customer to a 2-wire analog loop at a CLEC collocation cage, and installing ISDN and ADSL qualified loops to CLEC collocation arrangements. Unbundled transport orders tested included installing DS1s and DS3s between two different CLEC collocation arrangements, and installing DS1s between a CLEC's physical or virtual collocation arrangement and a CLEC central office location. UNE-platform scenarios tested included migration of a BA-MA end user customer to a CLEC unbundled switch port arrangement provided as part of a UNE-platform combination.

BA-MA has maintained the same type of documentation for the unbundled loop, unbundled transport, and UNE-platform

REPLY: DTE-ATT 1-157
(cont'd)

scenarios that appears in Exhibit 7 for unbundled switching, and includes:

(1) copies of relevant paper or "screen" outputs that a CLEC would receive/view in order to determine the status of an order, and copies of screens that BA-MA service representatives or other BA personnel would receive/view;

(2) an implementation status sheet for each test scenario that shows the key milestone events and expected and actual completion dates for the particular order type; and

(3) a summary tracking sheet containing all test scenarios that also identifies key milestone events.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Amy Stern
Title: Director-Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-159 Referring to paragraph 93 of the Stern affidavit, identify the "minor exceptions" between the ability to provision switching in commercial volumes in Massachusetts and in New York.

REPLY: See BA-MA's reply to DTE-MediaOne 1-10.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-160 Referring to paragraph 10 of the Crawford affidavit:

(a) Describe the function of each group within the TIS organization.

(b) State the number of employees staffing each TIS group and their average tenure at Bell Atlantic.

(c) State the number of temporary employees staffing each group within TIS and their average tenure at Bell Atlantic.

(d) State the average number of employees staffing each TIS group between the hours of I. 8:00 a.m. and 4:00 p.m., II. 4:00 p.m. and 12:00 a.m., III. 12:00 a.m. and 8:00 a.m.

(e) Identify and produce any guidelines, manuals, scripts or other materials used by employees at each TIS group to respond to CLEC inquiries.

(f) Describe the methods used by each such TIS group employee to resolve CLEC inquiries in the event the initial TIS group contact is unable to resolve the CLEC inquiry.

REPLY: (a) The functions of each group within the TIS organization are as follows:

REPLY: DTE-ATT 1-160 (cont'd)

Interconnection Services/Policy and Planning – This group is responsible for managing the negotiations of new interconnection

agreements, as well as, renegotiating existing interconnection agreements for CLECs, Resellers, and Wireless Carriers. In addition, this group is responsible for developing, directing and analyzing Wholesale Marketing regulatory issues and providing support for relevant state and federal proceedings concerning CLEC, Reseller and Wireless Carrier issues.

Account Management - This group serves as the Reseller's, CLEC's or Wireless Carrier's advocate within Bell Atlantic. The group is the primary point of contact for the Reseller, CLEC or Wireless Carrier for all issues, except for the daily intercompany operational issues, which are handled by the Operations Centers. The Account Manager also provides carriers with information concerning products/services, explains Bell Atlantic's business procedures, and assists carriers in working with other Bell Atlantic organizations.

Product Development/Management - This group develops products and services for Resellers, CLECs, and Wireless Carriers and serves as subject matter experts for those products/services. The group develops product documentation for the Resale and CLEC Handbook Series, develops communications regarding new retail products and services for Resale, and develops communications regarding Bell Atlantic policies and processes. In addition, the group provides the interface the independent payphone providers ("IPP") market for Bell Atlantic.

Segment Marketing and Customer Communications – Segment Marketing coordinates and compiles forecasting information from CLECs and Resellers. The group serves as the primary point of contact for carriers regarding the forecasting process. Monthly tracking of TIS products and revenues is performed by this organization. The Customer Communications group publishes documentation for TIS customers, which includes key events within Bell Atlantic and the telecommunications industry.

REPLY: DTE-ATT 1-160
(cont'd)

External Interfaces and CLEC Testing – This group assists CLECs and Resellers with the testing of interfaces with Bell

Atlantic. The group tracks test orders from the CLECs and Resellers to ensure that all processes are working properly. The group is also responsible for implementing new billing and service order systems.

Attestation and Staff Support – This group is responsible for supporting Bell Atlantic's attestation efforts involving Bell Atlantic's Billing processes. This group identifies and implements billing systems improvements to better serve the CLEC and Reseller markets.

Local Interconnection Billing – This group is responsible for managing reciprocal compensation, including bill receivables, billing discrepancies, and billing disputes.

Billing and Collections Operations Centers ("B&COC") – This group is responsible for all bills rendered for Resale and UNE products and services provisioned by the TISOC. The B&COC processes customer inquires and customer claims, investigates claims, provides adjustments to customer accounts when necessary and performs appropriate collection activities as required.

The Telecommunications Industry Services Operations Center ("TISOC") Methods and Procedures – This group is responsible for the development and publication of internal Methods and Procedures used by the TISOC to fulfill TIS requirements.

There are two additional work groups, which are not part of the TIS organization, but that work directly with the TIS. These are the Systems Support Group and the Operations Center. See BA-MA's responses to DTE-ATT 1-161 and 1-162.

(b) The following chart identifies the number of employees in each of the above-mentioned groups:

REPLY: DTE-ATT 1-160
(cont'd)

Interconnection Services/Policy Planning	25
Account Management	88
Product Development/Product Management	47

Segment Marketing & Customer Communications	23
External Interfaces and CLEC Testing	5
Attestation and Staff Support	16
Local Interconnection Billing	10
Billing Operations	46
TISOC Methods and Procedures	10

The average tenure with Bell Atlantic of the employees in the TIS organization is 18.2 years.

(c) The number of temporary employees within each TIS group is as follows:

Interconnection Services/Policy and Planning	1
Account Management	2
Product Development/Product Management	5
Segment Marketing & Customer Communications	3
External Interfaces and CLEC Testing	5
Attestation and Staff Support	10
Local Interconnection Billing	0
Billing Operations	2
TISOC Methods and Procedures	12

The average tenure of temporary employees in the TIS organization is 1 year. In general, these temporary employees are responsible for administration functions.

(d) The majority of TIS employees are in staff positions with scheduled hours of 8 a.m. to 5 p.m., Monday through Friday.

(e) Due to the nature of the work performed by the TIS organizations, there are no standard scripts used to respond to CLECs' and Resellers' questions. Rather, questions are responded to on a case-by-case basis. In order to provide answers to carrier inquiries, the employees within TIS frequently rely upon publicly available documentation, such as Tariffs, interconnection agreements, industry mailings, Web-Site documentation and the Bell Atlantic Resale and CLEC Handbooks.

(f) If a TIS employee is unable to respond to an inquiry from a

CLEC or Reseller, he/she would escalate the inquiry to the next level of management or refer the matter to the appropriate group within the TIS organization.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-161 Referring to paragraph 11 of the Crawford affidavit:

(a) Describe the function of the Systems Support Group.

(b) State the number of employees staffing the Systems Support Group and their average tenure at Bell Atlantic.

(c) State the number of temporary employees staffing the System Support Group and their average tenure at Bell Atlantic.

(d) State the average number of employees staffing the System Support Group between the hours of I. 8:00 a.m. and 4:00 p.m., II. 4:00 p.m. and 12:00 a.m., III. 12:00 a.m. and 8:00 a.m.

(e) Identify and produce any guidelines, manuals, scripts or other materials used by employees at the System Support Group to respond to CLEC inquiries.

(f) Describe the methods used by System Support Group employees to resolve CLEC inquiries in the event the initial System Support Group contact is unable to resolve the CLEC inquiry.

REPLY: (a) The Bell Atlantic System Support Help Desk ("BASSHD") provides first point of contact services for CLECs or Resellers who access Bell Atlantic's OSS platforms. The BASSHD is responsible for providing the following services:

REPLY: DTE-ATT 1-161 (cont'd)

Systems Administration for logon ID requests
Outage Management
Crisis Notification and paging
24 x 7 support coverage
Trouble reporting and resolution
Problem status, escalation and tracking
Order exception handling using EDI format

(b) The BASSHD has 7 employees with an average tenure with Bell Atlantic of 12.3 years.

(c) The BASSHD is staffed with 8 temporary employees with an average tenure with Bell Atlantic of 5.1 months.

(d) The average number of employees staffing the BASSHD are as follows:
2 employees from 6:00 a.m.-3:00 p.m.
4 additional employees from 7:30 a.m.-4:30 p.m.
4 additional employees from 8:00 a.m.-5:00 p.m.
4 additional employees from 9:00 a.m.-6:00 p.m.
1 additional employee from 12:00 p.m.-9:00 p.m.
From: 9:00 p.m-6:00 a.m. coverage at the BASSHD is provided by employees equipped with pagers.

(e) The BASSHD follows ISO9000 (International Organization Standardization) processes for controlling documentation, guides and scripts. All the documentation is controlled and stored in the ISO9000 Quality database. The following ISO documentation is available on the database:
1. Call Agent Process
2. Status and Tracking Process
3. Trouble Ticket Input Process
4. Service Order Exception Handling Process
5. BA Firewall Access Process
6. Interface Outage and Type 1 Notification Process

The ISO documentation is proprietary. The data will be made available to the extent provided for in a mutually agreeable Protective Agreement

REPLY: DTE-ATT 1-161 (cont'd)

(f) The following escalation procedures are used by the BASSHD in responding to a CLEC's or Reseller's trouble. Day 1, the BASSHD employee must respond to the CLEC or Reseller within 24 hours and provide a status report. Day 3, if trouble is not cleared, the trouble will be escalated to team leader for resolution. The Team leader evaluates the trouble to ensure that the appropriate internal Bell Atlantic support staff or help desk personnel are involved in the resolution process. Day 4, if trouble is not cleared, the team leader will escalate to Manager. Day 5, if trouble is not cleared, the manager will escalate to a Director. In some circumstances, the BASSHD staff may decide, at their discretion, to escalate more quickly than the aforementioned guidelines.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-162 Referring to paragraph 11 of the Crawford affidavit:

(a) Describe the function of the Operations Center.

(b) State the number of employees staffing the Operations Center and their average tenure at Bell Atlantic.

(c) State the number of temporary employees staffing the Operations Center and their average tenure at Bell Atlantic.

(d) State the average number of employees staffing the Operations Center between the hours of I. 8:00 a.m. and 4:00 p.m., II. 4:00 p.m. and 12:00 a.m., III. 12:00 a.m. and 8:00 a.m.

(e) Identify and produce any guidelines, manuals, scripts or other materials used by employees at the Operations Center to respond to CLEC inquiries.

(f) Describe the methods used by Operations Center employees to resolve CLEC inquiries in the event the initial Operations Center contact is unable to resolve the CLEC inquiry.

REPLY: (a) As stated in paragraph 11 of my affidavit, the function of the Operations Center located at 185 Franklin Street, Boston, MA, is to handle resale provisioning and billing for Resellers doing business in New England. The Operations Center is responsible for provisioning orders for resold services, including service order processing and account inquiry.

REPLY: DTE-ATT 1-162 (cont'd)

(b) There are 66 employees who staff the Operations Center with an average tenure with Bell Atlantic of 10 years.

(c) The Operations Center has 1 temporary employee who has been with the Center for 2.5 years.

(d) The Operations Center at 185 Franklin St., Boston, MA is staffed from 7 a.m. to 6 p.m. Monday through Friday. The following information provides a breakdown of the scheduled work hours and the number of Operations Center employees assigned to those hours :

7 a.m. to 4 p.m.	25 employees
8 a.m to 5 p.m.	30 employees
8:30 a.m. to 5:30 p.m.	8 employees
9:30 a.m. to 6 p.m.	3 employees

Repair coverage is available to the Resellers 7 days a week, 24 hours a day.

(e) Various reference materials are used by the employees at the Operations Center in order to respond to Resellers' inquiries including:

- Business Service Representative Initial training
- Continuation Training-Phase 1
- Continuation Training-Phase 2
- Data Services
- Centrex for Service Representative
- Centrex Plus for Service Representative
- BRI ISDN Implementation

These references are proprietary and voluminous, and BA-MA is therefore only providing a copy to the Department. After parties have executed a protective agreement, a copy of the references will be made available for inspection by participants at the Company's offices at 125 High Street, Boston, Massachusetts, at a mutually agreeable time.

(f) The escalation procedures vary based on the issue being reported. The Bell Atlantic Escalation Process for Resellers can be found on the Bell Atlantic Web-Site, http://www.bell-atl.com/tis/escreseller.htm.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-163 Referring to paragraph 12 of the Crawford affidavit:

(a) Describe the function of each group within the Account Management Group.

(b) State the number of employees staffing each Account Management Group and their average tenure at Bell Atlantic.

(c) State the number of temporary employees staffing the Account Management Group and their average tenure at Bell Atlantic.

(d) State the average number of employees staffing the Account Management Group between the hours of I. 8:00 a.m. and 4:00 p.m., II. 4:00 p.m. and 12:00 a.m., III. 12:00 a.m. and 8:00 a.m.

(e) Identify and produce any guidelines, manuals, scripts or other materials used by employees at the Account Management Group to respond to CLEC inquiries.

(f) Describe the methods used by Account Management Group employees to resolve CLEC inquiries in the event the initial Account Management Group contact is unable to resolve the CLEC inquiry.

REPLY:

a) The Account Manager serves as the Reseller's advocate within Bell Atlantic. The Account Manager is the primary point of contact for Resellers for all issues, except for the daily

REPLY: DTE-ATT 1-163

intercompany operational issues, which are handled by the Operations Center. The Account Manager provides carriers with information concerning products and services, explains Bell Atlantic's business procedures, and assists carriers in working with other Bell Atlantic organizations.

(b) The Account Management group has 88 employees with an average tenure with Bell Atlantic of 19 years.

(c) There are two temporary employees on the Account Management team. These temporary employees have an average tenure with Bell Atlantic of 2 years.

(d) Account Managers are scheduled to work Monday through Friday 8 a.m. to 5 p.m.

(e) Due to the nature of the Account Manager position, there are no standard scripts used to respond to Resellers' questions. Rather, questions are responded to on a case-by-case basis. In order to provide answers to resellers' inquiries, the Account Managers frequently rely upon publicly available documentation, such as Tariffs, interconnection agreements, industry mailings, Web-Site documentation and the Bell Atlantic Resale Handbooks Series.

(f) If an Account Manager needs to resolve a Reseller inquiry, he/she would contact and work with the Bell Atlantic organization in the best position to provide a response and thereafter communicate the information to the Reseller.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. No. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-164 Referring to paragraph 13 of the Crawford affidavit, provide copies of documentation provided to CLECs to assist in their efforts to resell BA-MA's retail services.

REPLY: As stated in paragraph 13 of my affidavit the documentation which is referenced was provided as Exhibits 4 and 6 of BA-MA's May 24, 1999 filing in Docket 99-271. Exhibit 4 is a copy of a complete set of the Reseller Handbook Series and Exhibit 6 provides a copy of the OSS documentation designed to assists Resellers and CLECs in ordering services from BA-MA and in accessing BA-MA's OSS. The Reseller Handbooks and the OSS documentation are available on the Bell Atlantic TIS web site. The Bell Atlantic TIS web site provides other useful information such as Resale Center contact lists, hours of operation, critical phone numbers, information regarding resale product offerings, escalation procedures and industry correspondence.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-165 Referring to paragraph 14 of the Crawford affidavit, identify how often during the year Bell Atlantic offers each training module, and state the number of employees who are available for training CLECs.

REPLY: Based upon input from the Resellers, the training schedule varies from year-to- year. Bell Atlantic provides a schedule of class offerings and the applicable training dates on the Bell Atlantic TIS Web-site, 3-6 months in advance. Most classes are offered monthly throughout the year.

Listed below are the classes that were made available to Resellers in 1999:

Basic Products and Services-Non-Complex
Directory Listings
Complex Products and Services
RETAS for Resellers (Maintenance and Repair)

Bell Atlantic has four trainers assigned to the various Reseller training courses.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-166 **MODIFIED** Referring to paragraph 24 of the Crawford affidavit, provide a summary of all documentation that supports Ms. Crawford's statement that "BA-MA's resale performance is generally better than or equivalent to its retail provisioning performance."

REPLY: Ms. Crawford's statement refers to the Resale provisioning performance results displayed in Attachment I of Mr. Garbarino's affidavit and discussed in paragraphs 37 through 49 of Mr. Garbarino's affidavit.

The assessment is based on the performance measurements and standards that were ordered by the Department in Phase 3 of the *Consolidated Arbitrations* proceeding. Therefore, the documentation that supports the statement includes the *Consolidated Arbitration* performance reports that are provided in Exhibit 9, Book 1, Tabs 2 through 6, which are summarized in Attachment I of Mr. Garbarino's affidavit. Additional performance results will be provided in response to DTE 2-46.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino
Title: Director

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-167 **MODIFIED** Referring to paragraph 25 of the Crawford affidavit, describe the ways in which BA-MA's Resale POTS Maintenance results do not exceed BA-MA's resale performance. Provide a summary of all documentation relied upon to answer this request.

REPLY: There are very few instances from January 1998 through February 1999 when Resale POTs maintenance performance did not exceed BA-MA's retail performance (performance as defined by the Department in the *Consolidated Arbitrations*).

The data are summarized in pages 4 and 5 of Attachment I to Mr. Garbarino's affidavit. There are eighteen (18) POTs Resale maintenance metrics that are reported for a fourteen (14) month period for a total of 252 (18 x 14) observations. For 220 of these observations, or 87.3%, Resale performance was better than retail. The only metric where performance results for CLECs did not exceed BA-MA retail was Network Trouble Report Rate-CO (metric number 54 on Attachment I).

NTRR-CO results for Resale exceeded BA-MA Retail in 6 of the 14 observations. In two observations the results were the same, that is, Resale results were the same as BA-MA Retail. In the six instances when Resale results were poorer than BA-MA, retail the difference was never more than 0.13 troubles per one hundred lines (or 0.13%).

Additional performance results will be provided in response to BA-MA's response to DTE 2-46.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-168 Referring to paragraph 27 of the Crawford affidavit:

(a) How does a totally facilities based carrier initiate orders since they do not have access to the service order process?

(b) What is a stand-alone listing request?

(c) When would a stand-alone listing request be used?

REPLY:

(a) A totally facilities based carrier initiates orders for directory listings by sending a facsimile to Bell Atlantic. Requests for simple straight line listing are sent by the CLEC via facsimile to the BA Customer Listings Organization. As of October 1, 1999, CLEC orders for additional listings and complex listings must be submitted electronically via a Local Service Request ("LSR"). CLECs were initially advised of the October 1st requirement in an industry notification sent on July 7, 1999. On September 24, 1999, another industry notification was sent to CLECs informing them that Bell Atlantic would continue to accept faxed orders for simple, straight line listings and confirming the October 1st LSR requirement for additional listings and complex listings.

(b) A stand-alone listing request is a request for only a directory listing and no other service.

(c) A stand-alone listing request would used by a CLEC requesting directory maintenance only, for example, a listed name change, or for a facilities-based CLEC to list an end user.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-169 Referring to paragraph 28 of the Crawford affidavit:

(a) Do CLEC's have access to a current copy of the listing to verify that it is an "as is" order?

(b) Can it be accessed electronically?

(c) How does a totally facilities based carrier submit an order?

REPLY:

(a) Yes. As part of the pre-order process, CLECs may review a copy of the retail Customer Service Record ("CSR") to verify that the listing is an "as is" order. CLECs can also utilize the DCAS Directory Listing Request ("DLR") to ensure the accuracy of a listing.

(b) Yes. Both the CSR and DLR can be viewed through DCAS electronically.

(c) See BA-MA's response DTE-ATT 1-168.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-170 Referring to paragraph 29 of the Crawford affidavit, describe how non-published and unlisted numbers are treated by BAYPC? Is address information available for CLECs who may wish to publish their own directory?

REPLY: Paragraph 29 of my affidavit does not address non-published and unlisted numbers. Descriptions of Non-Directory Listed Service, Non-published Service, Special Non-Listed Service and Special Non-Published Service can be found in the CLEC Handbook Series, Volume III, Section 6.4.2 and the Resale Handbook Series, Volume III, Section 8.4.2. These documents were provided with BA-MA's May 24, 1999 filing.

Independent Publisher Data is a product offering of the Bell Atlantic Operator Service Marketing organization which provides the information required by independent publishers to produce directories. The data provided to the independent publishers does not include data that cannot be published due to privacy rules. Address information is only available for published listings.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-171 Referring to paragraph 30 of the Crawford affidavit:

(a) Will an error code identifying the type of error be included to assist the originating carrier in correcting the error?

(b) How timely is the process?

(c) How will this process work for a totally facilities based carrier?

REPLY:

(a) Paragraph 30 of my affidavit does not address errors. Assuming that AT&T is referring to paragraph 34, BA-MA and BAYPC attempt to rectify any errors. For example, if an order for a listing for a CLEC end user stated "For Toll Free Dial 800" BAYPC would modify the phrase to the standard format of "For Toll Free Dial 1& Then 800." If BAYPC and BA-MA are unable to rectify the error, BA-MA contacts the CLEC, describes the specific error, and assists the CLEC in resolving the problem.

(b) BAYPC and BA-MA attempt to resolve all errors as quickly as possible. In circumstances where the error is so severe that the listing cannot be updated in the database, a query to the CLEC is generated within 24 hours.

(c) The error correction process for a totally facilities-based carrier works in exactly the same fashion described in part (a).

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-172 Referring to paragraph 36 of the Crawford affidavit:

(a) Do all carriers receive the same amount of directory space in the introductory pages?

(b) How much space is allotted?

(c) Is CLEC information also provided in another language if the ILEC's information is?

REPLY:

(a) Yes. Each CLEC or Reseller is offered 1/8 of a page, free of charge, with room for a company logo and up to seven end user customer contact telephone numbers. Information regarding the Other Local Service Provider ("OLSP") Information Pages can be found in the CLEC Handbook Series, Volume 3, Section 6.3.4 and the Resale Handbook Series, Volume III, Section 8.3.4. These documents were provided with BA-MA's May 24, 1999 filing.

(b) See response to part (a).

(c) The OLSP section appears only in the English language. However, where an entire directory is published in another language, the OSLP will appear in that language.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-173 Referring to paragraph 18 of the Crawford affidavit, provide a description of how a totally facility-based carrier with no LSR initiates an order to add, delete or change a listing in the directory listings database.

REPLY: See BA-MA's response to DTE-ATT 1-168.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-174 Referring to paragraph 34 of the Crawford affidavit:

(a) Provide documentation showing the number of errors for Bell Atlantic, AT&T, and other CLECs.

(b) How many were corrected?

(c) How many were deleted?

REPLY:

a) BA-MA does not track the requested information. As stated in paragraph 34 of my affidavit, the system edits that detect listing errors apply to all accounts, regardless of initiating carrier. If an error is identified, BAYPC and BA-MA work to resolve the problem in an identical manner without regard to whether the listing belongs to a CLEC end user or a BA-MA retail end user.

(b) BA-MA does not track this information.

(c) BA-MA does not track this information.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-175 Referring to paragraph 35 of the Crawford affidavit, with respect to the Listings Verification Report, provide the error rates for Bell Atlantic, AT&T and the CLECs.

REPLY: BA-MA does not produce a Listings Verification Report ("LVR") for itself. The LVR is a tool for the CLECs to identify any listings errors prior to directory publication. BA-MA does not track error rates on the LVRs for individual CLECs nor does BA-MA track error rates on the LVRs for the aggregate CLEC market. In fact, corrective activity generated from CLEC LVR reviews is not distinguishable from normal maintenance activity for CLECs or BA-MA retail.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-176 Referring to paragraph 47 of the Crawford affidavit:

(a) Identify the total number of orders for unbundled access to BA-NY's signaling network.

(b) Identify the number of those orders that were completed, the number of those orders that were rejected (and the reasons for the rejections).

REPLY: (a) BA-NY now has 39 CLECs accessing its SS7 network. Of these, 26 utilize third-party hub providers and 13 directly access BA-NY's SS7 network. In responding to this request an inadvertent mistake was discovered in paragraph 47 of my affidavit. There are now 25 CLECs accessing BA-MA's SS7 network. Of these, 16 utilize third-party hub providers and 9 CLECs directly access BA-MA's SS7 network.

(b) Access to BA-MA's SS7 network is obtained through the completion of the signaling questionnaire. The questionnaire is completed at a joint working session of CLEC technical personnel and Bell Atlantic technical and marketing personnel. This process does not generate order rejections.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. No. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-177 Referring to paragraph 56 of the Crawford affidavit:

(a) How many of the identified 96 million billing verifications queries were for CLECs?

(b) Identify the error rates for processing billing verification queries for CLECs.

REPLY:

(a) In New England there is only one CLEC that is directly accessing Bell Atlantic's LIDB, however, it should be noted that this CLEC stores its LIDB records with a third party hub provider rather than Bell Atlantic. All of the other New England CLECs access Bell Atlantic's LIDB through a third party hub provider. At this time, due to a point code issue, Bell Atlantic is unable to separately identify the LIDB queries from the one CLEC, identified above, from Bell Atlantic's own LIDB queries. BA-MA is aware of 16 CLECs utilizing third party hub providers for access to its BA-MA's signaling network. (See BA-MA's response to DTE-ATT 1-176) Over 29 million of the 96 million queries were generated by third party hub providers.

(b) BA-MA is not aware of any complaints from CLECs regarding error in its LIDB.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director – Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-178 Referring to paragraph 59 of the Crawford affidavit:

(a) How many of the 4.9 billion Toll Free database queries were for CLECs?

(b) Identify the error rate for the processing of Toll Free database queries for CLECs.

REPLY:

(a) At this time, Bell Atlantic has not developed the systems necessary to separately identify the Toll Free Database queries from CLECs. BA-MA's SS7 signaling network commingles CLEC queries, with all other queries, including Bell Atlantic queries, and process them on a first-come, first-served basis.

(b) BA-MA does not track the error rates for processing Toll Free Database queries. However, BA-MA is not aware of any complaints from CLECs regarding the processing of queries to the Toll Free Database.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-179 Referring to paragraph 75 of the Crawford affidavit, how long after a request for a specific trigger is a meeting between the BA-MA certification team and the CLEC AIN team arranged?

REPLY: The certification process is a cooperative process between the two parties and their respective team members. The initial meeting would be scheduled at a mutually agreed upon time, generally within two weeks, unless the parties agree otherwise.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Barbara Crawford
Title: Director-Resale Product Development

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-180 Referring to paragraph 75 of the Crawford affidavit, how many days after the certification team meeting does it take until implementation of the cooperative certification and testing plan?

REPLY: It depends upon the agreement of the parties. Implementation of the certification and testing plan begins with the initial meetings of the teams to discuss and agree on the activities required for certification of the particular trigger/service combination.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Gloria Harrington
Title: Manager

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-181 **MODIFIED** Referring to paragraph 7 of the Harrington affidavit, provide a summary of documentation on all complaints BA-MA received directly from requesting companies.

REPLY: Except for the Greater Media complaint in 1991 and the formal complaint filed with the Department on September 23, 1999, by NEVD of Massachusetts, Inc., no formal complaints have been received by BA-MA. However, requesting companies have raised issues directly to BA-MA relating to attachments. The following is a summary of such "complaints" received by BA-MA directly from requesting companies:

- Limitation of 2,000 poles on all applications which are pending approval by BA-MA at any one time within a single plant construction district of BA-MA (see attachment 1A to Harrington affidavit [article VII (B)] of aerial license agreement)

- Performance of survey and make ready work should be carried out by workforces other than Bell Atlantic employees or by contractors working under the direction of Bell Atlantic

- BA-MA should eliminate agreement preparation fees

- BA-MA should not utilize a height stick to determine space allocation when performing a pole survey

- Make-ready work takes too long

REPLY DTE-ATT 1-181 cont'd

- Licensees should not have to secure permission from municipality to be in the public way
- Difficult to obtain manhole zero information and distances from manhole zero to cage locations for purposes of ordering cable

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Gloria Harrington
Title: Manager

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-182 Referring to paragraph 13 of the Harrington affidavit, provide information relative to the staffing requirements and qualifications of the License Administration Group ("LAG") center employees.

REPLY: The License Administration Group is composed of:

- 1 Manager
- 1 Team Leader
- 4 Specialists currently (1more to be added 10/10/99)
- 12 Associates

Staffing levels are based on the volume and complexity of licensee activity. The LAG interfaces with six BA-MA Reimbursable Construction Engineers in the field who are the single Point of Contact (SPOC) for coordinating the physical Engineering and Construction activity associated with providing requesting parties with access to poles, ducts, conduit and rights of way.

Ms. Harrington is the second level Manager responsible for the LAG. Her qualifications are outlined in her Affidavit.

There are currently four Specialists in the LAG, with one more specialist to be added to the group on October 10th, 1999. Two Specialists handle conduit feasibility study requests and manage all large and complex projects for BA-MA. One specialist performs this function for the remaining four New England States. The other two Specialists handle the preparation and execution of the aerial and underground license agreements. One Specialist handles Massachusetts, the other Specialist handles the remaining four New England States.

REPLY: DTE-ATT 1-182 (cont'd)

The Specialist scheduled to join the group on October 10th, will manage conduit feasibility studies for Massachusetts.

Specialists have project management skills, knowledge of contracts, and familiarity with Engineering and Construction practices to the extent they pertain to the licensing of poles and conduit.

The Team Leader supervises the work quality and productivity of the Associates, provides training and direction, performs follow up and escalation activity on aerial license applications to the field RCE's to secure timely survey and make ready information.

Associates receive formal training to enable them to appropriately interface with all licensees and process pole and conduit license applications.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Gloria Harrington
Title: Manager-Facilities Management

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-183 Referring to paragraph 13 of the Harrington affidavit, are LAG coordinators assigned to applications at random, or do specific coordinators handle Bell Atlantic requests versus the requests of others?

REPLY: The License Administration Group (LAG) is composed of two groups: Managers who provide support to customers on a geographic specific basis, and Associates who provide clerical support and process the actual license applications from customers on a first come first served basis without regard to geography.

The LAG does not receive or coordinate any requests for Bell Atlantic, but rather is a single point of contact for CLECs and other entities who wish to access Bell Atlantic's poles, conduits, and rights of way.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Gloria Harrington
Title: Manager-Facilities Management

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-184 Referring to paragraph 14 of the Harrington affidavit, how many days after a request does it take a LAC to meet with the requesting party to clarify information contained in its records or provided in the drawings and to discuss any requests for further information?

REPLY: Within five business days of receipt of a request, the LAC will arrange a meeting between the requesting party and the appropriate BA-MA contact to clarify information contained in records.

Requests for "further information" are interpreted to mean "additional records". Requests for additional records should follow the process outlined in BA-MA's reply to DTE-NEVD 1-31.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Gloria Harrington
Title: Manager

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-185 Referring to paragraph 17 of the Harrington affidavit:

(a) How many of the requests identified in 1998 and during the first quarter of 1999 were rejected, and what were the reasons for the rejection?

(b) For those requests that were accepted, how long on average did it take until the request was fulfilled?

(c) How many of the 1,170 requests in 1998 were for pole attachments?

(d) How many of the 367 requests during the first quarter of 1999 were for pole attachments?

REPLY:

(a) Two requests were rejected in the first quarter 1999 for capacity reasons. BA-MA did not track this information in 1998.

(b) For those requests that were accepted, it took an average of 132 days for pole makeready work and an average of 94 days for conduit makeready work.

(c) There were 1,049 requests for pole attachments in 1998. Virtually all of these requests covered multiple poles.

(d) There were 326 requests for pole attachments in the first quarter of 1999. Virtually all of these requests covered multiple poles.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Gloria Harrington
Title: Manager

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-ATT 1-186 **MODIFIED** Referring to paragraph 18 of the Harrington affidavit, provide a summary of all documents supporting BA-MA's assertion that BA-MA completed work on average faster for licensees than it did for itself.

REPLY: BA-MA is able to extract a report, "Cycle Times for CLEC/CATV vs. Bell Atlantic Jobs" out of Bell Atlantic's Engineering and Construction Record Inventory System (ECRIS). ECRIS is the system used to track time and material used for all engineering and construction work. The licensee jobs are identified in ECRIS with an indicator code (C-38). The report tracks totals and then averages the number of days for all cable and pole work for two categories:

1. Bell Atlantic work
2. Work for licensees including CATV, CLECs, and other licensees.