Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: <u>John Livecchi</u>
Title: <u>Director</u>

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-18   Does VZ-MA operate, in its real network, some loop facilities that were placed more than 30 years ago?

REPLY: A very small percentage, less than approximately 7%, of all cable placed in service in the Verizon-East territory has been in service for more than thirty years.

VZ # 579

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: <u>John Livecchi</u>
Title: <u>Director</u>

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-19   Does VZ-MA operate, in its real network, some loop facilities that were placed more than

       a.   30 years ago;
       b.   40 years ago;
       c.   50 years ago.
       d.   60 years ago; and
       e.   70 years ago?

REPLY: Verizon MA objects to this request on the grounds that the requested information is not reasonably calculated to lead to the discovery of admissible evidence and is not readily available but would require a burdensome special study to derive the data.

VZ # 580

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-20   Section 5.2.4 of VZ's Facility Management Letter, provided in response to ATT-3-5, discusses the traffic load as identified by CCS. Please explain in detail the following:

a. In VZ-MA's actual network, are CCS considerations used to determine the concentration ratio for the IDLC?
b. In VZ-MA's actual network, what is the purpose of considering CCS – what engineering aspects of the loop are affected?
c. In VZ-MA's actual network, what changes are caused in the loop design if there is a high CCS?
d. In VZ-MA's actual network, what changes are caused in the loop design if there is low CCS?

REPLY: a. Section 5.2.4 of Verizon's Facility Management Letter 1998-00397-OSP discussion of CCS is only meant to assist the OSP Design Engineer in alerting her/him to traffic loading [CCS] with respect to the impacts on the Central Office Switch's capacity which terminates the OSP RT IDLC system[s] – not to determine concentration ratios for the IDLC.

b. To properly manage the hardware resources required and traffic loading, a coordinated plan of IDLC systems deployment, by the OPE, and Switch systems, involving Switch Planning, Capacity Management and the Network Administration Center is required. Balance of assignment of access lines across the IDLC system[s] based on a number of factors including CCS level is an Engineering Design principal for ensuring quality customer service.

REPLY: CC 10-20
(cont'd)

    c. Verizon OSP Loop Guidelines do not currently address what changes, if any, are caused in the loop design if there is a high CCS.

    d. Verizon OSP Loop Guidelines do not currently address what changes, if any, are caused in the loop design if there is a low CCS.

VZ # 581

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: <u>John Livecchi</u>
Title: <u>Director</u>

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-25   Please provide any documents that discuss the MACS system, as identified in Section 11.2.8 of VZ's Facility Management Letter, provided in response to ATT-3-5.

REPLY: The Metallic Automated Cross Connect System [MACS] identified in Section 11.2.8 of Verizon's Facility Management Letter 1998-00397-OSP is a robotic like controlled interface device used at SAIs. This system was to be deployed, but further testing did not provide a compelling network benefit to do so. The referenced FML prematurely identified this product as an "approved for use" item.

VZ # 586

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-26   Please identify what percentage of loops are administered by MACS in
                      VZ-MA network for the end of each of the following years: 1998, 1999,
                      and 2000. Also, discuss what plans VZ-MA has to deploy this system
                      further.

REPLY: As stated in Verizon MA's response CC 10-25, the MACS product has
                      not been deployed or approved for use within Verizon –MA's territory.

VZ # 587

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: <u>John Livecchi</u>
Title: <u>Director</u>

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-28   In VZ-MA's real network, are feeder facilities ever provided over
                    SONET facilities that are of a higher capacity than OC3, such as OC12s
                    or OC48s? Also, please discuss whether VZ-MA will be deploying
                    SONET OC12 facilities in its outside loop plant in the future.

REPLY: Feeder facilities that are provided to OSP RT sites are currently provided
                    over SONET OC-3 ODLC systems. Additional SONET systems of
                    higher bandwidth capacity (*i.e.*, OC-12) may be provided to the same
                    Carrier Serving Area if the bandwidth demand is justified, based on
                    current Engineering and Planning Guidelines.
                    Next Generation DLC [NGDLC] systems that have OC-12 capacity have
                    been investigated by Verizon but have not yet been approved for use in
                    Verizon –MA's territory.

VZ # 589

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: <u>John Livecchi</u>
Title: <u>Director</u>

REQUEST: CLEC Coalition, Set #10

DATED: June 25, 2001

ITEM: CC 10-32   Please provide all studies, workpapers, and analyses, that demonstrate that the assumption in LCAM that a building with 160 or more customers will be served by a fiber fed RT on the premises (or nearby) is cheaper than using copper feeder facilities *at all distances from the CO.* If this assumption is based on engineering judgment, then please provide all studies, workpapers, and analyses that support this engineering judgment. Also, provide all engineering guidelines used by network engineers that support this practice

REPLY: Verizon MA has no documents responsive to this request.

VZ # 593