

**COVAD COMMUNICATIONS COMPANY
COMMONWEALTH OF MASSACHUSETTS
DTE 99-271**

**Respondents: Bogdan Szafraniec
and James Katzman
Date: August 14, 2000**

REQUEST: [Checklist item # 4] See Supplemental Declaration of Szafraniec and Katzman at ¶¶ 43, 47: For each xDSL-capable loop order placed by Covad with BA-MA from January 31, 2000 to February 2, 2000, please provide following information.

1. total number of orders placed during that period
2. due date
3. rescheduled due date, if appropriate
4. date BA-MA notified Covad when BA-MA would go to the customer's premise for installation and the date BA-MA actually went to the customer's premise
5. date Covad notified its customer regarding BA-MA technician's visit
6. whether and when (date) BA-MA notified Covad that the order was not completed and the reason why the order could not be completed
7. whether there was no access situation
8. date Covad did truck-roll

ITEM: DTE-CVD-5

RESPONSE:

1. The total number of orders placed during the period was 106.
2. Please see the attached documentation for the due date of each order, which is **PROPRIETARY**.
3. Please see the attached documentation for the rescheduled due date, if appropriate, which is **PROPRIETARY**.
4. Please see the attached documentation, which is **PROPRIETARY**, for the date BA-MA notified Covad when BA-MA would go to the customer's premise for installation (which is marked as "First FOC Date Set"). It

would require a special study to determine the date BA-MA actually went to the customer's premise.

5. It would require a special study to determine the date that it notified its customer of the BA-MA technician's visit.
6. It would require a special study to determine whether and when (date) BA-MA notified Covad that the order was not completed and the reason why the order could not be completed.
7. It would require a special study to determine whether there was a no access situation with each order.
8. Please see the attached documentation for the date Covad performed its truck-roll, which is **PROPRIETARY**.

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**Respondents: Bogdan Szafraniec
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REQUEST: [Checklist item # 4] See Supplemental Declaration of Szafraniec and Katzman at ¶ 60: Please provide all necessary documentation to support Covad's claims of poor BA-MA performance for all loops provisioned in June 2000 (or May 2000 if June data is not yet available).

ITEM: DTE-CVD-8

RESPONSE: Please see the attached documentation, which is **PROPRIETARY.**

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REQUEST:

[Checklist item # 4] In response to record request 197, Covad indicated that it was unable to provide PON numbers, date submitted, date rejected, date order supplemented, last due date given, delivery date, whether a CNR or no access situation existed, facilities issue and type of facilities issue for Covad's November 1999 xDSL orders. If Covad is now able to do so, please provide that information for its xDSL orders for June 2000. In addition, please note any instances of BA-MA's failure to complete central office wiring or loop installation work on time.

ITEM: DTE-CVD-11

RESPONSE:

Please see the attached documentation, which is **PROPRIETARY**. The requested PON numbers, date submitted, and last due date given are highlighted in yellow in the spreadsheet. For the information regarding facilities issues, please see the spreadsheet provided in response to DTE-CVD-8 (with the cancellation information highlighted in yellow and reasons given for cancellations).

It would require a special study to determine information regarding date rejected, date order supplemented, delivery date, whether a CNR or no access situation existed, and type of facilities issue.