

Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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| New England Telephone and Telegraph Company | : | D.T.E. 99-271 |
| d/b/a Bell Atlantic-Massachusetts -- | : | |
| Section 271 of the Telecommunications Act of 1996 | : | |
| Compliance Filing | : | |

**MCI WORLDCOM, INC.'S SECOND SET OF DISCOVERY REQUESTS DIRECTED
TO BELL ATLANTIC-MASSACHUSETTS**

The following questions explore Bell Atlantic witness Paula Brown's general discussion in her affidavit of the competitiveness of the local exchange market in Massachusetts.

1. On p. 3 para 5. of Ms. Browns testimony she states, "BA-MA estimates that CLECs have more than a quarter million voice grade equivalent lines throughout the state" How many "voice grade equivalent lines" does BA-MA serve?
2. On p. 3 para 6 of Ms. Brown's testimony she states, "Additionally, in a recent survey, 59% of business customers *in the Bell Atlantic region* have either been solicited by or switched to, a local service competitor." (emphasis added)
 - A) Please provide the news release cited as a source for this claim.
 - B) What percentage of business customers in Massachusetts have been either solicited by or switched to a local service competitor? Please provide documentation to support your answer.
 - C) What percentage of residential customers in Massachusetts are currently served by a carrier other than Bell Atlantic? Please provide all available documentation to support your answer.
3. On p. 12 of Ms. Brown's testimony she discusses UNE-P and states that "...regardless of the outcome of the FCC decision, in order to 'jump start' competition, BA-MA is willing to provide UNE-P under certain terms and conditions coincident with its obtaining interLATA relief." Is it BA's position that BA will not provide UNE-P in Massachusetts until it has been granted FCC authority to provide interLATA long distance services? Please explain your

answer fully.

4. Has Bell Atlantic entered into any agreements or contracts (interconnection agreements or any other agreement or contract) with any telecommunications provider doing business in Massachusetts that includes a commitment by the telecommunications provider to either 1) not contest, or 2) to affirmatively support, Bell Atlantic's §271 application either before the Department or the FCC? If the answer is yes, please provide copies of those agreements, and identify the relevant terms.

The Following Questions Relate to Checklist Item #1 - Interconnection and/or Checklist Item 13 - Reciprocal Compensation

5. With respect to the first chart on p. 10, para. 21 of Bell Atlantic witness Mr. Howard's affidavit, how many of the interconnection trunks included in this chart are in place for the transfer of ISP- bound traffic?
6. With respect to the chart on p. 10 para 23 of Mr. Howard's affidavit, how many minutes of use from BA to CLECs listed in the chart are for ISP-bound traffic, or for traffic presumed by Bell Atlantic to be ISP-bound traffic?
7. Please provide a chart demonstrating the following:
 - A) The number of MOUs originated by BA-MA customers and terminated by CLECs since February, 1999
 - B) The number of MOUs originated by CLEC customers and terminated by BA-MA since February, 1999
 - C) The number of MOUs for which BA-MA has paid CLECs reciprocal compensation for terminating calls from BA customers
 - D) The number of MOUs for which CLECs have paid BA-MA reciprocal compensation for terminating calls from CLEC customers

The Following Questions Relate to Checklist Item #1 - Interconnection

8. p. 11 of Mr. Howard's affidavit addresses installation intervals for interconnection trunks.

- A. Do the results as indicated in the chart at para. 24 represent local trunks only or do they represent a combination of both local and access trunks?
- B. please explain why are there no trunk intervals listed in the chart for December 1998 and February 1999.
- C. Please update this chart to supply current data.
- D. Please provide all performance standards and metrics for trunking intervals that have been developed in New York and identify which ones are also applicable in MA.

The Following Questions Relate to the Topic of UNE Provisioning (Checklist Items 2, 4, 5, 6, 7, & 10)

- 9. Is BA currently offering UNE-P in Massachusetts?
- 10. How many UNE-P orders has BA filled since the DTE ordered it to provide UNE-P.
- 11. Has BA modified any of its interconnection agreements to incorporate the Department's requirement that it provide UNE-P? If so, please provide copies of those agreements with references to where the terms and conditions and rates governing UNE-P are included.
- 12. In New York, does BA require CLECs who purchase UNE-P to pay glue fees or "Quick flip" charges?
- 13. Please define every system in the process flow for migrating an existing Bell Atlantic customer to a CLEC UNE-P customer and compare that system/process to BA's process in New York.
 - A. Are the New York and Massachusetts systems and process flows identical ? (for the purposes of this question, identical means that it is the exact same system and process flow, with no programming differences or changes to accommodate Massachusetts)
 - B. If the answer to A. is anything other than an unqualified "Yes", please provide a detailed list of all process flows and systems that are different and please explain those differences fully.
 - C. Do Massachusetts and New York use the same work centers and the same personnel to work orders.

- D. In all cases where the processes/systems are different in any way, is it BA's intention to conduct third party testing? If yes, does this include testing the following:
1. Interface development,
 2. Test the work required to modify an in-place New York interface to work in Massachusetts.
 3. All UNE-P processes and procedures
14. At paragraph 9 p. 5 of Ms. Stern's affidavit she states, "BA does not concede that any or all of the network elements identified by the FCC meet the necessary or impair criteria". Now that the FCC's 319 remand proceeding is complete, is it BA's intention to withdraw any of the UNEs originally ordered by the FCC? If so, please identify those UNEs and explain under what circumstances BA will not provide them to CLECs.
15. On p. 6 at para. 11, of Ms. Stern's affidavit she states that BA-MA, "...provides nondiscriminatory access to unbundled network elements through physical and virtual collocation and *through other technically feasible means*." (emphasis added). Please explain in detail what other "technically feasible means" BA-MA currently has in place to provide CLECs with non-discriminatory access to UNEs.
16. At para.. 12 on p. 7, of Ms. Stern's testimony she states that, "in addition to the collocation options currently available in Massachusetts, BA-MA will make more options available in the near future." Please elaborate on exactly what additional options BA is contemplating in this statement and when they are expected to become available.
17. In footnote 24 at p. 15 of Ms. Stern's testimony she states that BA-MA does not currently unbundle IDLC. Please provide, in detail, BA-MA's process for handling CLEC requests for a loop that BA determines is served via IDLC. Please include in detail all phases of the preordering, ordering and provisioning process.
18. Is BA's IDLC provisioning process the same as it is in New York?
19. What are BA's plans for unbundling loops served off of IDLC at the 24 channel level in Massachusetts?
20. When a BA customer served off of loops served off of IDLC switches to a CLEC and no alternate facilities are available, how does BA intend to make those loops available to CLECs.
21. Is it true that as a result of the Big Dig, BA has removed alternate facilities in Boston?

22. In every instance where IDLC loops have been deployed in Boston, have alternative facilities also been deployed as well? Please explain your answer fully.
23. On what date did BA begin implementation of its policy of deploying UDLC alternate facilities when it deploys IDLC?
24. Is it true that BA is not deploying any new copper facilities in Massachusetts?
25. What percentage of Boston loops are served via IDLC
26. What percentage of loops in Massachusetts are served via IDLC
27. Is it BA's position that unbundling loops served off of IDLC to the DS-1 level is technically feasible? If not, why not?
28. If in the previous answer BA has stated that there are impediments to unbundling loops served off of IDLC to the DS-1 level, are those technical impediments (i.e. is it a matter of technical feasibility) or are they operational impediments? (i.e such as changes in methods of ordering and provisioning). Please identify all impediments to unbundling IDLC to the DS-1 level perceived by BA.
29. How many optical remotes does BA deploy in Boston?
30. How many optical remotes does BA deploy throughout Massachusetts?
31. How many of the optical remotes deployed in Massachusetts are located in central offices?
32. How many of the optical remotes deployed in Boston are deployed in central offices
33. How many loops in Boston are served via optical remotes? (Please provide both the total number of loops and the percentage of loops in Boston that are served via optical remotes)
34. How many loops in Massachusetts are served via optical remotes? (Please provide both the total number of loops and the percentage of loops in Massachusetts that are served via optical remotes)
35. Is it BA's position that unbundling loops served via optical remotes is technically feasible? If not, please explain your answer fully.
36. When loops are served via optical remotes, do alternative facilities to those loops exist and if so, under what circumstances?

37. On p. 17, para 38 of Ms. Stern's testimony she states that, "in summary, provisioning, maintenance and repair activities for CLECs *usually* involve the same processes, systems and facilities used to provide service to BA-MA end user customers and carriers." (Emphasis added). Please identify and describe all instances in which provisioning maintenance and repair activities *do not* use the same processes systems and facilities used to provide service to BA-MA end user customers and carriers.
38. Can UDLC transmit data as fast as IDLC? If your answer is anything other than an unqualified "no" then explain your answer fully.
39. What degree of voice modem degradation occurs as a result of downgrading facilities from IDLC to UDLC?
40. Please identify each type of xDSL service that can be provisioned via UDLC (i.e. aDSL, hDSL, xDSL, iDSL, sDSL)
41. In the last sentence of para. 34 (p. 15) of Ms. Stern's testimony she states, "BA-MA's facilities assignment procedures reuse facilities from the "bundled" service wherever possible." Does this mean that BA-MA customers who are served via loops served off of IDLC and then migrate to a CLEC's UNE-P service will remain on IDLC?
42. On p. 17 para 38 of Ms. Stern's testimony she states, "provisioning, maintenance, and repair activities for CLECs usually involve the same processes, systems, and facilities used to provide service to BA-MA end user customers and carriers." Please identify each process, system and facility that is *not* the same for CLECs and BA.
43. Referring to p. 18, para. 42, of Ms. Stern's testimony, does BA require CLECs to collocate to access 2-wire, 4-wire analog loops and loops qualified to transmit high capacity digital signals?
44. Please identify the full suite of xDSL capable loops that BA makes available to CLECs (i.e. IDSL, SDSL, HDSL, ADSL, VDSL).
45. Please provide a copy of BA's proposed xDSL tariffed service offerings (both its wholesale and retail offerings)
46. What are the recurring charges that BA proposes to charge for CLECs xDSL capable loops in Massachusetts?
47. In New York, BA has proposed "conditioning costs" for xDSL capable loops that can run up to \$4,000 dollars per loop. Has BA proposed similar "conditioning costs" in Massachusetts? If not, does BA intend to propose "conditioning charges, " and does it anticipate that those

charges would be similar to the rates it has proposed in New York?

48. On p. 20 of Ms. Stern's testimony she states that, "xDSL is an emerging technology". What does Ms. Stern mean by this statement. Are carriers other than BA-MA offering xDSL services to their retail customers?
49. On p. 20 of Ms. Stern's testimony she states, "there are unresolved technical issues surrounding xDSL..." please identify and elaborate on those "unresolved technical issues"
50. On p. 22 of Ms. Stern's testimony she discusses the xDSL pre-qualification database and state that the database is being populated on a "central office by central office basis." How many central offices in Massachusetts have been completely populated into this database to date?
51. What loop makeup information is provided in this mechanized database? Please specify whether the mechanized database includes the following loop makeup information:
 - 1) Loop length
 - 2) Wire Gauge and changes in the wire gauge
 - 3) Number and location of bridged taps
 - 4) Number and location of load coils
 - 5) whether the loop is served via DLC
 - 6) Number of repeaters
 - 7) presence of pair gain devices
52. Does the mechanized database provide all loop make-up information for every loop in the central office? If not, please explain your answer in detail.
53. With respect to paragraph 48 of Ms. Stern's testimony, please provide a copy of the spectrum management guidelines used by BA-MA. As industry standards are adopted, is it BA's intention on implementing those standards?
54. What are the costs that BA proposes to charge CLECs for the following:
 1. Access and use of the mechanized loop qualification database
 2. Access and use of the manual qualification process
 3. The conditioning component
 4. Cost associated with BA-MA's digital designed loop offering
55. Regarding paragraph 50 of Ms. Stern's testimony, how does BA measure the loop length

(specifically, is it a capacitive or resistant measurement?)

56. Regarding new loops, is BA providing demarcation information for new loops at the install?
57. On p. 25 of Ms. Stern's testimony she discusses the hot-cut procedures that BA has implemented in New York. Is this procedure fully implemented in Massachusetts? If so, please provide this procedure.
58. Please provide the provisioning intervals for local transport in Massachusetts. Please provide the same for New York
59. Is BA providing GR-303 in its Massachusetts network today?
50. What are BA-Massachusetts's plans for deploying GR-303 in its Massachusetts network? Please provide all documents, analyses, reports, studies or other memoranda, describing Bell Atlantic's planned implementation of GR-303 in Massachusetts or in any other Bell Atlantic state.

The following questions relate to Performance Metrics, and the general requirement that Bell Atlantic provide Non-discriminatory Access to Network Elements to CLECs (Checklist Items 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14)

51. What intervals does BA-MA propose for Hot-Cuts for Loops with ILP? What penalties does BA propose to apply for failure to meet those intervals?
52. What sort of "backsliding Plan" does BA propose in Massachusetts?
53. Please provide a side by side comparison identifying the performance standards (including sub-metrics) that have been ordered/volunteered in New York in both the Carrier-to-carrier collaborative as well as Bell Atlantic's Backsliding Plan the interval that has been adopted/offered in New York, and whether or not that same metric has been ordered by the DTE or volunteered by BA for Massachusetts.
54. Please provide a copy of the most recent version of BA's New York backsliding plan
55. At paragraph 10 of page 7 of his affidavit, BA witness Garbarino states:

"In its Internal Performance Standard filing of August 19, 1997 BA-MA indicated that it would provide two categories of Preordering measurements -- Customer Service Record and All

Other Preordering Activity consisting of Product and Service Availability, Address Validation Requests, Telephone Number Availability and Reservation, and available Due Date. However, BA-MA has agreed in other jurisdictions to measure each of the “Other” functions separately, and therefore, I am presenting results for the five types of Preordering Transactions.” (Cites omitted)

56. Why did BA originally choose to commit only to providing aggregated data to the Massachusetts Department for Preordering Measurements discussed above but agreed to provide more disaggregated data in other jurisdictions?
57. Is BA-MA committing to provide this disaggregated data to Massachusetts CLECs and the Department as part of its on-going performance reporting requirements?
58. Is BA-MA committing to provide, on an on-going basis, measures for the following: Order confirmation timeliness, reject notice timeliness, and timeliness of completion notification for resale, trunks and UNEs as it is required to do in New York or are these measures simply provided on a one-time basis here as support for BA-MA’s §271 application?
59. At pp. 37-38 of Mr. Garbarino’s affidavit he discusses providing “supplemental information on UNE Provisioning Performance.” Specifically Mr. Garbarino discusses the following measures:
 - *Percent On time performance for UNE-hot cuts
 - *Percent on time performance for UNE LNP
 - *Average delay days
 - *Percent UNE missed appointments -- facilities
 - *Missed Appointments for facilities over 15 days.
 - A. Is BA planning to report on these measures to the Department on an on-going basis, or are these measures simply provided on a one-time basis here as support for BA-MA’s §271 application?
 - B. If Bell Atlantic intends to report these measures to the Department on an on-going basis, what standards and penalties is Bell Atlantic proposing to accompany these measurements?
60. On pp. 47-48 of Mr. Garbarino’s testimony he discusses additional measurements for billing: 1) timeliness of the Daily Usage Feed (“DUF”) and Timeliness of Carrier Bill. Does BA intend to report these measurements to the Department on an on-going basis? If so, what standards and penalties is BA proposing to accompany these measurements?
61. In the Department’s Order in D.T.E. 99-42/43 the Department established a number of

additional performance standards for Bell Atlantic to report. When is Bell Atlantic planning to begin providing these reports for all CLECs to the Department?

62. Why should the measurements adopted in the New York Carrier to Carrier collaborative not be applied in Massachusetts?
63. Is Bell Atlantic going to measure all OSS interfaces used by CLECs for preorder and system availability ? If not, please explain why.
64. Is BA's current emulation testing for pre order based on the EIF interface? If so, why isn't BA disaggregating by query type.
65. Is BA planning to add a metric for "provisioning completion notice"?
66. Mr. Garbarino discusses in his testimony the differences in order mix as a rationale for their average intervals not being at parity. Did KPMG agree that this was an issue in New York?
 - A. Did BA-MA give KPMG data on your own studies of order mix differences?
67. Regarding the "Hot-Cut" and LNP on time metrics, KPMG in New York found that these did not capture all the problems CLECs have in cutovers. Will BA-MA incorporate the final New York metric that examines early, late and defective loop cuts into the Massachusetts metrics?
68. Why won't BA bring the NY billing metrics, including billing accuracy, to MA?
69. Does BA have state specific billing metrics or does it simply use the FCC data in its state reporting?
70. Why has BA not developed the flow through metric yet required by the DTE last year?

The Following Questions relate to Bell Atlantic's OSS -- Checklist Items 2, 4, 5, 6, 7, 8, 10, 11, & 12

71. Please identify all test points where KPMG concluded that Bell Atlantic-New York's OSS and processes received a rating of "satisfied with qualifications"
72. Is it Mr. Miller's opinion that KPMG's definitions (as discussed in footnote 1 p. 2 of his August 27 affidavit) exclude the possibility that a rating of "satisfied with qualifications could have a

business impact?

73. Regarding paragraph 6, p. 3 of Mr. Miller's August 27 affidavit, in his discussion of EDI Certification Testing, he states that in response to KPMG's two exceptions in this area, BA "introduced new procedures to address the routine needs of software release joint testing and new entrant testing."
- A. Are these procedures interim or permanent in nature?
 - B. Have these procedures been tested by KPMG?
 - C. If Mr. Miller's answer to B is yes, has KPMG determined that these procedures resolve the outstanding problems that generated KPMG's exceptions in this area?
 - D. If Mr. Miller's answer to B. above is "no" will KPMG be testing these procedures in New York?
 - E. Does BA recommend that KPMG test these items as part of its Massachusetts OSS Test? If not, please explain your answer fully.
74. On p. 4 at paragraph 6 of Mr. Miller's August 27 affidavit he states that "In September, BA-New York will make available to CLECs a physically separated test environment that will allow them a longer period of time to test new releases before they move into production."
- A. Has this new physically separated test environment yet been implemented?
 - B. If the answer to A is yes, have these procedures been tested by KPMG?
 - C. If the answer to B is yes, has KPMG tested this new test environment in New York and reached a determination that implementation of this new test environment has actually resolved the outstanding problems that generated KPMG's exceptions in this area?
 - D. Does BA recommend that this "new physically separated test environment" be tested as part of KPMG's Massachusetts OSS test?
75. On p. 5 at para 11 of Mr. Miller's May 24, 1999 testimony he states that, "Currently, there are 40 active competing carriers ordering services from BA-MA. Thirty-seven are using the GUI and the other three are using an EDI interface for certain transactions and the Web GUI for

other transactions.”

- A. Are these all orders for Massachusetts services?
- B. Are any of these orders for UNE-P? If so, how many are for UNE-P?
- C. What types of orders are the three carriers who use the EDI interface using that interface for and in what volumes?

76. On pp. 11-12 para 20 of Mr. Miller’s testimony he states that:

“during 1998, the Company received and processed more than 1.4 million pre-order transactions in the region. In the first quarter of 1999, Bell Atlantic has already received and processed more than 485,000 preorder transactions. In January 1998 the Company received and processed more than 58,000 transactions. In March, 1999, more than 202,000 transactions were processed representing a 250% increase over January 1998.”

- A. Please replace all of the regional numbers recited in the above paragraph them with Massachusetts specific numbers. (Specifically, the number of preorder transactions received and processed in Massachusetts for all of the time periods recited in the above paragraph)

77. On p. 31 para. 63 of Mr. Miller’s May 24, 1999 testimony he states that “Bell Atlantic’s systems are capable of handling current and *reasonably expected demand*.” (Emphasis added).

- A. Please explain what BA means by “reasonably expected demand” (i.e. what percentage over existing demand can BA’s systems handle and how long does BA anticipate it will take to exhaust that expected demand growth.)

78. Please identify each and every one of the differences between the Massachusetts OSS systems and processes and the New York OSS systems and processes.

79. With respect to BA’s OSS, are the “business rules” for both Massachusetts and New York identical? If not, please identify all differences between the Massachusetts and New York business rules.

80. With respect to BA’s OSS, is the “documentation” for both Massachusetts and New York identical? If not, please identify all differences between Massachusetts and New York

documentation.

81. Is it BA's position that LSOG 2 or LSOG 4 for Ordering should be tested by KPMG. Please explain your answer fully.