

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: December 7, 1999

ITEM: DTE RR 221 The total number of loop orders from October and November 1999, including the PON, the BA service number, and TXNU for orders in which MCI WorldCom experienced an untimely response for facilities check from Bell Atlantic.

REPLY: The information sought here is extremely competitively sensitive and proprietary in nature. As such, MCI WorldCom submits copies of this information to Bell Atlantic and the Department only and subject to a proprietary agreement.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan
Title: Senior Local Implementation
Specialist

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-222 **The total number of loop orders from October, November and December 1999, including information relating to the Local Service Request Confirmations (“LSRCs,” often referred to as the Firm Order Completion Notices, or FOCs) associated with those orders, namely, the date on which a Local Service Request was sent to Bell Atlantic, the date a responsive LSRC was received from Bell Atlantic, and whether or not the LSRC was received in a timely manner.**

REPLY: **The information sought here is extremely competitively sensitive and proprietary in nature. As such, MCI WorldCom submits copies of this information to Bell Atlantic and the Department only and subject to a proprietary agreement.**

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: December 7, 1999

ITEM: DTE RR 224: Please provide documentation supporting paragraph 42 and footnote 17 of your testimony that MCI WorldCom has experienced situations where there are no alternative facilities to IDLC in Bell Atlantic's Massachusetts network.

AMENDED REPLY: The attached email correspondence describes an instance where facilities alternative to IDLC were not available in Bell Atlantic's Massachusetts network for an MCI WorldCom business customer. Please note that the IDLC-related discussion in the first attachment begins on the second page, with the words, "Finally, with regard to your Southboro, MA order which involved the presence of IDLC..."

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-261 Copies of third party electronic bonding testing plans from other jurisdictions that utilize preexisting CLEC interfaces.

REPLY: Annexed hereto is a copy of California PUC 271 Project: CapGemini/MCI Electronic Bonding Testing Plan

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Manager, OSS Testing and Facilities
Development

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-265 Quantification of the costs associated with EDI or GUI unavailability to MCI WorldCom.

REPLY: The information sought herein is extremely competitively sensitive and proprietary in nature. As such, MCI WorldCom submits copies of this information to the Department only and subject to the Protective Order adopted by the Department in this proceeding.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Sivori
Title: Manager, ILEC Interface Project and
Requirements Management

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-266 The "Flash Announcements" submitted by Bell Atlantic to MCI WorldCom in September, 1999.

REPLY: Annexed hereto are copies of 59 "Bulletins" (i.e., Flash Announcements) received by MCI WorldCom in September 1999.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan
Title: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-269 Identify the number of orders placed by MCI WorldCom with Bell Atlantic-Massachusetts that are currently backlogged.

REPLY: As MCI WorldCom has already communicated to the Department in the past, MCI WorldCom has not entered the “mass market” for residential consumer business in Massachusetts chiefly because the current pricing structure makes market entry cost prohibitive. Given that MCI WorldCom is not placing UNE-P orders at this time there is no backlog of such orders placed with Bell Atlantic.

With respect to “business markets” (e.g., loop orders), MCI WorldCom does not believe there to be a backlog of orders at this time.

MCI WORLDCom, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-273 Reconciliation of statements made in MCI WorldCom's *ex parte* FCC filing dated November 24, 1999, with statements made by MCI WorldCom witnesses in Joint Declarations filed with Department of Telecommunications and Energy and dated November 30, 1999.

REPLY: MCI WorldCom's November 24, 1999 *ex parte* filing with the FCC (the "*Ex Parte* Filing"), authored by Lori Wright, Senior Manager, Regulatory Affairs, identified two New York-specific topics that MCI WorldCom had discussed with the FCC: (1) that MCI WorldCom had "resolved the problems with the differences in the pre-order and order field sizes for the two functions (CSR and address validations) that are currently up and running," and (2) that MCI WorldCom had "satisfactorily resolved the concerns raised in [MCI WorldCom's Reply Comments to the FCC in the matter of Bell Atlantic-New York's §271 Application] about the GUI III only permitting the sales representative who created an order to edit it or the representative who opened a trouble ticket to check its status."

Nothing in the *Ex Parte* Filing, which pertains to two discrete issues involving Bell Atlantic-New York, is at all inconsistent with the contents of either the November 30, 1999 Joint Declaration of Annette Guariglia, Karen Kinard, Sherry Lichtenberg and Arlene Ryan, or the November 30, 1999 Joint Declaration of Sherry Lichtenberg and John Sivori, both of which were provided to the Department to address the performance of Bell Atlantic-

Massachusetts. Indeed, with respect to the CSR and address validation issue, the Joint Lichtenberg and Sivori Declaration specifically confirms the first issue in the *Ex Parte* Filing by stating (at ¶ 27) that MCI WorldCom “implemented parsed CSR in September and limited address validation functionality in November [1999].” Moreover, the *Ex Parte* Filing was submitted for the limited purpose of alerting the FCC that of the multitude of deficiencies in Bell Atlantic’s operations, those two issues no longer required the scrutiny of the FCC. Inasmuch as there are no statements in the Joint Declarations that are in conflict with the statements in the *Ex Parte* Filing, there is no need for inconsistent statements to be reconciled.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Sivori
Title: Manager, ILEC Interface Planning and
Project Management

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-274 Clarification of written testimony appearing in ¶29 of the Joint Declaration of Sherry Lichtenberg and John Sivori dated November 30, 1999 (the "Joint Declaration"). Specifically, MCI WorldCom was asked to supply additional information, including documentation, relating to MCI WorldCom's requests to Bell Atlantic to obtain definitive information concerning the limitations of parsed-Customer Service Record ("CSR") functionality.

REPLY: In attempting to answer this Record Request, I have reviewed both Paragraph 29 of the Joint Declaration and the relevant portion of the transcript of the December 9, 1999 technical session. Having done so, I am left to conclude that the information I was offering in response to Hearing Officer Carpino's questioning is not precisely what she was asking for.

As I now understand it, Hearing Officer Carpino was primarily (if not exclusively) interested in written correspondence between MCI WorldCom and Bell Atlantic relating to our attempts to get a definitive answer from Bell Atlantic on the types of orders that can and cannot be processed via parsed-CSR. What I had offered to provide was not correspondence, but rather a schedule listing all CSR-related issues that MCI WorldCom has identified in the many months that we have been working with Bell Atlantic to make parsed-CSR functionality commercially viable and a consistent set of Bell Atlantic business rules. That schedule, or "log" as I referred to it in my live testimony, would be of little assistance in providing the Department with an understanding of the specific issue at hand (although its sheer heft goes far in demonstrating the volume of errors, inconsistencies and deficiencies that MCI WorldCom has thus far uncovered in Bell Atlantic's parsed-CSR systems; all told there are over 1800 issues listed on the log, over 120 of which still remain open (meaning Bell Atlantic has not responded to them) or pending (meaning Bell Atlantic has acknowledged the issue but has yet to resolve it)).

Should the Department still wish to see the issues log I referred to in my testimony MCI WorldCom can provide it, although I believe the attached correspondence is more along the lines of what Hearing Officer Carpino was looking for. (Moreover, the information contained in the issues log, in addition to being extremely competitively sensitive in nature, is also densely technical, and would likely require further explanation and/or reference to other documentation to be of any real value.)

Turning to the issue (and supporting documentation) of MCI WorldCom's attempts to learn the limits of parsed-CSR functionality, the short answer is that MCI WorldCom has never been given a definitive answer by Bell Atlantic identifying all customer types that will and will not appear in a parsed-CSR format. The only restriction of which the CLEC community was generally aware was that parsed-CSR would be available for non-complex residential and business accounts, but would be unavailable for complex business accounts (i.e., accounts with Customer Service Records containing greater than 10,000 lines of text). Attached hereto are copies of emails exchanged between MCI WorldCom and Bell Atlantic, as well one BA Flash Announcement, one BA "Transaction Explanation" and portions of BA's business rules. The documented chronology of events¹ (i.e., not including oral statements made by BA representatives in phone calls, technical sessions, collaboratives or other informal fora) is roughly as follows:

July 7, 1999	BA issues Flash Announcement concerning Parsed CSR; the Announcement does not identify ISDN limitation.
September 9, 1999	MWCOM alerts BA that it experienced error message not identified in BA's business rules when submitting parsed-CSR requests for residential ISDN type customers; requests "appropriate investigation and appropriate industry announcement."
September 29, 1999	BA Change Control informs MWCOM: (1) error message will be included in next release of Error

¹ MCI WorldCom has attempted to locate all relevant correspondence between itself and Bell Atlantic on this subject, and the attached represents the results of that effort. There are, however, instances when all or part of an email has been included only as part of a string of emails (i.e., the original email has not yet been located, but we know about it because it remained attached to a subsequent email either replying to the sender or forwarding the initial message to another recipient). Should MCI WorldCom discover additional relevant documentation it will supplement this response accordingly.

Message documentation; (2) ISDN is not available for parsed-CSR, and; (3) ISDN will be defined for parsed-CSR “in an upcoming release.”

MWCOM requests whether parsed-CSR will be available in the February release.

October 26, 1999

Bell Atlantic partially responds, as follows, to three questions previously submitted by MWCOM:

Q1: What services is BA providing parsed CSR, including business, residence and complex services?

A: Parsed CSR provides information for all Residence and Business, Non Complex accounts.

Q2: If services are not offered on the parsed CSR, what is the plan to offer parsed CSR?

A: The Bell Atlantic current plan is to provide with June release.

Q3: We know that ISDN is not offered in a parsed CSR. Per Lissa’s email below, will the parsed CSR for ISDN be offered in the 2/2000 release?

A: As a result of additional account information received from MCIW, Bell Atlantic will have additional information Wednesday (10/27).

October 27, 1999

“Bell Atlantic is continuing to investigate your ISDN question. I hope to have and answer tomorrow. Sorry for delay.”

October 28, 1999

BA confirms that ISDN is not included with the current parsed-CSR and reports that BA plans to include ISDN with the June 2000 release.²

²

The following day, October 29, 1999, MWCOM requested that Bell Atlantic identify which complex services would be included in the June release. Bell Atlantic responded by stating that the classes of complex services to be included in the June release had not yet been determined, and by requesting information on MCI WorldCom’s priorities. But asking a CLEC that does not know which customer types are and are not available for parsed-CSR to rank its priorities puts the cart before the horse. The CLECs should

November 8, 1999	BA shares MWCOM's discovery re: ISDN unavailability with the industry and issues "Parsed CSR Transaction Explanation" in which BA states that "Parsed CSR transaction is intended for non-complex accounts. The transaction supports POTS accounts and currently does not support complex accounts including ISDN and Centrex Accounts."
November 15, 1999	MWCOM reminds BA that "[f]ollowing up on the 10/29 Pre-Order open issues conference call with Bell Atlantic, NY PSC, and MCI WorldCom, Bell Atlantic committed to provide a resolution to this issue." MWCOM reiterates earlier request for "a complete itemization of any exceptions to securing a parsed CSR."
November 16, 1999	BA responds that the information MWCOM seeks had already been sent to MWCOM (presumably the October 26-28 correspondence discussed above).
November 30, 1999	MWCOM submits to Department the Joint Declaration (not attached hereto) that spawned this Record Request.
December 14, 1999	BA releases Pre-Order Business rules v. 2.6.1 - North. It includes a new section, 1.4, entitled "Parsed Customer Service Record Transaction Overview." It states: "The Bell Atlantic Parsed CSR transaction is intended for non-complex accounts. The transaction supports POTS accounts and currently does not support complex accounts including ISDN and Centrex Accounts."

first be informed as to what is on each list, and can then prioritize the list of unavailable customer types. Indeed, that is exactly what MCI WorldCom has suggested. We have offered (were we to obtain the definitive list we have been asking for) to work with other CLECs and provide Bell Atlantic with the industry's prioritization. To date, Bell Atlantic has not taken MCI WorldCom up on its offer, which remains outstanding.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Sivori
Title: Manager, ILEC Interface Project and
Requirements Management

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-275 Identification of the types of transactions that are available in a parsed CSR and the types that are not.

REPLY: See MCI WorldCom's response to Record Request RR-274.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-277 PONS for instances when Bell Atlantic has unilaterally changed the telephone numbers of new customers of MCI WorldCom's local telephone service in New York (i.e., instances where the number had been changed after MCI WorldCom has already reserved a telephone number for the new customer).

REPLY: Annexed hereto is a list of eighty-four instances in which Bell Atlantic changed the telephone number that had been reserved by MCI WorldCom for a new customer of MCI WorldCom's residential local service in New York. The list consists of the original (MCI WorldCom-reserved) ANI, the new (BA-assigned) ANI and the PON. The list is current through February 21, 2000. However, MCI WorldCom did not begin formally tracking this data until December 23, 1999 -- after the date on which I initially testified about this phenomenon. As such, MCI WorldCom does not have data available for instances of this phenomenon occurring prior to December 23, 1999.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John Sivori
Title: Manager, ILEC Interface Planning and
Project Management

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-280 Identification of the ways in which BA's interim test environment was different than the permanent test environment implemented in September 1999.

REPLY: As I stated in my live testimony, the record in the New York §271 proceeding contains discussion (including comparisons) of the interim test environment and the permanent test environment. Attached are copies of MCI WorldCom's Comments on BA-NY's Proposed CLEC Test Environment, dated May 4, 1999, MCI WorldCom's Supplemental Comments on BA-NY's CLEC Test Environment, dated June 17, 1999, and KPMG Exception Closure Reports 21 and 22 (both of which focus on carrier-to-carrier testing).

A comparison of BA's interim test environment with its permanent test environment reveals a number of differences. The most obvious difference is that the interim environment was not even designed for carrier-to-carrier testing; rather, BA made its internal QA test environment available to CLECs (on an extremely limited basis) until the permanent environment (which was created expressly for the purpose of carrier-to-carrier testing) was up and running. The mere fact that the permanent environment is a physically separate environment created for CLEC testing underscores that while there may also be differences in degree (e.g., the interim environment was offered for stretches of only 30 hours, whereas the permanent environment contemplates testing periods of 30 days) the fundamental difference between the interim and permanent environments is in kind. It is a completely different animal, and for that reason MCI WorldCom advocated so strenuously (although unsuccessfully) for KPMG testing of the permanent environment in New York. (Note that both KPMG closure reports are dated July 26, 1999 -- well before the permanent test environment was even made available.) And given that the permanent environment has yet to be put through the rigors of an independent review by KPMG, it is why MCI WorldCom is advocating that KPMG's Massachusetts test specifically include testing of the permanent environment.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 9, 1999

ITEM: RR-281 Trouble tickets for the four MCI WorldCom customers identified by MCI WorldCom who were unable to receive incoming telephone calls, and with respect to whom Bell Atlantic identified the problems as "translation issues."

REPLY:

(1)	Customer:	***REDACTED***
	Telephone Number:	***REDACTED***
	Trouble Ticket Number:	1AA95241
	PON:	299826
	SOID#:	C1JA7328
(2)	Customer:	***REDACTED***
	Telephone Number:	***REDACTED***
	Trouble Ticket Number:	1AG13724
	PON:	309593
	SOID#:	N1KE4549
(3)	Customer:	***REDACTED***
	Telephone Number:	***REDACTED***
	Trouble Ticket Number:	1AC90239
	PON:	321236
	SOID#:	C1KK4990
(4)	Customer:	***REDACTED***
	Telephone Number:	***REDACTED***
	Trouble Ticket Number:	1Y865987
	PON:	297105
	SOID#:	N1HZ4826

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy, Record
Requests

DATED: December 21, 1999

ITEM: DTE RR 298 Please provide us with the total number of new loop orders for each month from August through November and the number of orders with demarcation-information problems for each month; and for each such case, the PON number.

REPLY: MCI WorldCom does not track this data in the manner requested.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: December 21, 1999

ITEM: DTE RR 299: Please provide the number of new loops ordered by MCIW and the number of orders where defects on the loops were found and turned out to be open conditions in the central office or I-Code reports on the new loops on a month by month basis. Please include the PON information and the related trouble ticket.

REPLY: MCI WorldCom does not currently track this data in the manner requested.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: December 21, 1999

ITEM: DTE RR 300: Please provide the Department with the data on the number of orders for August, September, October, and November that had a late facilities check, along with the PON number for each case, the date the PON was submitted, the date MCI WorldCom was notified, and the due date.

REPLY: MCI WorldCom does not track this data.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

**REQUEST: Department of Telecommunications and Energy, Record
Requests**

DATED: December 21, 1999

**ITEM: DTE RR 301 Please indicate the number of hot cuts that MCI WorldCom has
ordered from Bell Atlantic for August, September, October and
November 1999.**

**AMENDED REPLY: MCI WorldCom does not track this data in the manner
requested, i.e., the total number of orders placed is not
disaggregated to distinguish between hot cuts and new loops.
Please see MCI WorldCom response to DTE RR 221 for the
total number of orders placed from October through December
1999.**

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan

Position: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: December 21, 1999

ITEM: DTE RR: 302: Please provide the number of LSRCs received, the number MCI WorldCom believes are inaccurate, and the specifics of why each of those are inaccurate--missing information, wrong information, incomplete for each month from August through November.

REPLY: MCI WorldCom does not track this data in the manner requested.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-303 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶11: "In what situations is Bell Atlantic not obligated to make EEL available to CLECs?"

REPLY: Currently, the FCC requires ILECs to provide requesting carriers combinations of unbundled loops and transport network elements (sometimes referred to as EELs) if those combinations are used "to provide a significant amount of local exchange service, in addition to exchange access service, to a particular customer." Both the Telecommunications Act of 1996 and the Federal Communication Commission's rules allow states to require ILECs to provide unbundled network elements more expansively than the FCC does.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-304 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶¶12 and 17, fn. 9: “what does [MCI WorldCom] think would constitute a significant amount of local-exchange service? And would there be any other way for Bell Atlantic to verify this, other than auditing?”

REPLY: No local service provider should be required to monitor the usage patterns of its customers or to have access to UNEs based on those patterns. The essential factor – and the appropriate standard – is whether the CLEC’s customer can receive and place local calls from and to other telephone users (whether customers of the CLEC, of other CLECs, or of the ILEC) within the exchange area the CLEC has defined in its local tariff. If the CLEC assigns to a customer a local number that anybody can dial to reach that customer, then the unbundled loop and transport that supports that local phone number is significantly there for the provision of local service. Said another way, when a CLEC has expended resources to deploy or obtain switching and to implement interconnection, and has established for the customer a local number that others can call (which provides the customer with an “address” within the North American Numbering Plan that is recognized by other carriers and relates to a given local switch), those steps should be viewed as prima facie evidence that the CLEC’s intent is to provide a significant amount of local exchange service.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Daren Moore
Title: Director, Eastern Line Cost
Management

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-305 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶17: “The fourth line from the bottom, isn’t it a fact that by definition EEL does not include Bell Atlantic’s switch? And why would the exclusion of switch in the EEL offering be a problem?”

REPLY: The reference in ¶17 that the BA proposed tariff require “that the EEL not be connected to any BA-MA switch” was included to provide background and context relating to the tariff’s terms. Thus it is true that EELs are not connected to BA switches, and it is not problematic. However, as the sentence in ¶17 continues, the proposed tariff also prohibits the use of EELs in conjunction with any other BA-MA service. That plainly is anticompetitive because it establishes a blanket prohibition against connecting EELs to BA multiplexing equipment, which would severely restrict the practical and economical use of EELs as a service delivery method.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-306 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶18: MCI WorldCom “mentioned that the FCC’s order clearly requires ILECs to provide these elements and combinations when those combination of elements have already been provided to a customer as service. Can you tell us where we can locate this quote in the FCC order?”

REPLY: See *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking (released November 5, 1999), ¶¶480-81, and *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Supplemental Order (released November 24, 1999), ¶5.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-307 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶21: "Can you provide us with Information on terms and conditions and prices on provisioning UNE-P in New York, Bell Atlantic?"

REPLY: The terms and conditions by which BA-NY provisions UNE-P to MCI WorldCom are contained in Bell Atlantic-North's "New York Telephone Company" Tariff P.S.C. No. 916 Telephone Section 5. The specific page numbers are listed below with the rates.

UNE	RATE	TARIFF REFERENCE
Unbundled Loop:		
Zone 1A	\$11.83	6 th Rev 36
Zone 1B	\$12.49	6 th Rev 36
Zone 2	\$19.24	6 th Rev 36
Switch Port:	\$2.50	5 th Rev 69
Three Way Calling	\$0.16	5 th Rev 70.3
UNE Switching (Per Minute):		
Ubl Local Switching (ULSC)	\$0.002986	1 st Rev 73
Ubl Common Transport (UCTC)	\$0.002280	1 st Rev 21.1
Ubl Shared Trunk Port (USTPC)	\$0.000601	3 rd Rev 24
Ubl Tandem Transport (UTTC)	\$0.001341	1 st Rev 21.1
Tandem Shared Trunk Port (TSTP)	\$0.0001341	N/A
Tandem Switching (TS)	\$0.000983	3 rd Rev 24
SS7 Signaling (per orig. call)	\$0.000297	2 nd Rev 73.18

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-308 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶23: “the sixth line from the bottom, [MCI WorldCom] mentioned that the combination of elements Bell Atlantic provides to new installs is identical to that which it uses to provide service to existing customers; indeed, that in many cases in which the new install represents a second line, Bell Atlantic is usually already serving the same customer using the same combination of elements at least up to the loop. If the loop is not already combined with the rest of the part of UNE-P, isn’t it true that it’s not UNE-P by definition?”

REPLY: UNE-platform represents a combination of UNEs ordinarily available and therefore must be made available for second lines as well as migration and first lines.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-309 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶24: “please define new and old lines.”

REPLY: A “new” line is a brand new customer installation where the customer never had service before and no network facilities exist to the closest switching point (usually the pedestal) to the customer premise. New lines would primarily exist in new development – without any service at all – and would require special construction for both the ILEC or the CLEC. An “old line” is a pre-existing circuit, whether live or dormant (i.e., facilities available but not in use).

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-310 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶27: “does the quick-flip charge apply to conversion from resale to UNE-P by the same CLEC or from Bell Atlantic retail to the CLEC UNE-P within six months or both?”

REPLY: Bell Atlantic itself stated in its June 18, 1999 Compliance Submission on Unbundled Network Element Provisioning (at page 6) that the service “flip” to which the Quick Flip Charge is intended to be applied could involve either resale or retail service. As such, it is MCI WorldCom’s understanding that the charge is intended to apply to both.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Sherry Lichtenberg
Title: Senior Manager, OSS Testing and
Facilities Development

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-311 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶ 30: “Has [MCI WorldCom] ever tried to get UNE-P service from a CLEC who collocated in Bell Atlantic’s central office?”

REPLY: No.

MCI WORLDCOM, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Arlene Ryan
Title: Senior Local Implementation Specialist

REQUEST: Department of Telecommunications and Energy

DATED: December 21, 1999

ITEM: RR-312 Regarding November 30, 1999 Joint Guariglia, Kinard, Lichtenberg and Ryan Declaration, ¶31: “Has [MCI WorldCom] ever been unable to collocate due to unavailability of space in a central office?”

REPLY: No.