

September 17, 1999

**VIA FACSIMILE AND E-MAIL**

Mary L. Cottrell, Secretary  
Massachusetts Department of  
Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: New England Telephone and Telegraph Company, d/b/a Bell Atlantic  
Massachusetts; D.T.E 99-271

Dear Ms. Cottrell:

Enclosed for filing in the above referenced proceeding please find the First Set of  
Technical Session Discovery Requests of NEXTLINK Massachusetts, Inc.

Thank you for your attention to this matter.

Sincerely,

Paul B. Dexter

cc: Service List

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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

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**First Set of Technical Session Discovery Requests of  
NEXTLINK Massachusetts, Inc.**

In Bell Atlantic's Compliance Filing, the affidavit of Paul L. Brown cited statistical evidence about CLECs to support Bell Atlantic's ("BA") claim that the market is open. NEXTLINK believes that the record should contain corresponding information about BA.

All of these requests related to checklist items 1-6.

1. How many miles of fiber does BA have?
2. To what number of buildings is the fiber connected?
3. In how many buildings is BA providing service?
4. How many voice grade equivalent lines does BA have?
5. How many trunks does BA have?
6. How many million, billion or trillion minutes of use ("MOUs") per month does BA handle?
7. How many central offices does BA have?

8. Which group within BA is in charge of leased duct policy.
9. Who within BA sets the engineering rates for leased duct and how are they determined?
10. Excluding wireless services, how much has BA spent in advertising in the last three years?
11. Excluding wireless services, submit written copy of all of BA advertisements for the last three years.
12. Describe **in detail** BA's provisioning standard operating procedures for hot cut loops, LNP and xDSL upon request by a CLEC.
13. Describe **in detail** BA's standard operating procedures once a trouble ticket is opened and how you ensure that it is SUCESSFULLY closed out.
14.
  - A) How many trouble tickets were opened in April, May and June of 1999?
  - B) How many of those trouble tickets were from CLECs and how many were from BA's retail customers?
  - C) What was the turnaround time for closing a trouble ticket on a retail customer in those months?
  - D) What was the turnaround time for closing a trouble ticket for a CLEC in those months?
15.
  - A) Are trouble tickets given a priority? If so how is the priority determined?
16.
  - A) Of the 21,600 numbers ported over to CLECs using LNP as of March 1999, how many were ported on their **exact** (first) firm order commitment ("FOC") date.
  - B) How many were ported before the FOC date?
  - C) How many were ported after the first FOC date?
17. Is LNP available currently in all of BA's switches?