

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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

DATA REQUESTS OF RCN-BECOCOM, LLC.

Pursuant to the *Hearing Officer Decisions on AT&T's Motion to Suspend and the Joint Petition for a Roadmap; Revised Procedural Schedule* (August 19, 1999), RCN-BecoCom, LLC. ("RCN") hereby submits the following data requests to be posed to Bell Atlantic-Massachusetts ("BA-MA") prior to the technical sessions in this case.

INSTRUCTIONS

1. All references herein to "BA-MA" necessarily apply only to operations within the Commonwealth of Massachusetts.
2. Each Request is continuing in nature. Thus, if BA-MA acquires additional information with respect to data after any Request has been initially answered, BA-MA is required to supplement its response following the receipt of such additional information, giving the additional information to the same extent as originally requested. If BA-MA is unwilling to supplement its responses, please so state.
3. In the event that BA-MA asserts that any information requested herein is privileged, BA-MA should identify any such information and any supporting documents in its written response, by date, and provide a general description of its content. BA-MA should also identify all persons who participated in the preparation of the document and all persons, inside or outside BA-MA, who received a copy, read or examined any such document. In addition, BA-MA should describe, with particularity, the grounds upon which privilege is claimed.
4. In the event that BA-MA asserts that any requested data are not available in the form requested, BA-MA, in its written respect thereto, should disclose the following:
 - a. The form in which the requested data currently exists (identifying documents by title or description);

- b. The earliest dates, time period, and location that representatives of RCN may inspect the BA-MA files, records or documents in which the requested data currently exist.
- 5. In answering each Request, please restate the entire Request above the response.
- 6. For each Request answered, provide the name of the person or persons answering, the title of such person(s), and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document produced.
- 7. The term “extended loop” refers to combinations of the loop, transport, and (if necessary) multiplexing.

DATA REQUESTS

- 1. **Checklist Item Nos. 4 & 5:** Please state whether BA-MA has provided competitive local exchange carriers (“CLECs”) with the extended loop.
- 2. **Checklist Item Nos. 4 & 5:** If the answer to the previous question is yes, please state the number of such extended loops that BA-MA has provided to CLECs.
- 3. **Checklist Item Nos. 4 & 5:** Please provide citations to *all* BA-MA tariff provisions that would govern an order for an extended loop.
- 4. **Checklist Item Nos. 4 & 5:** Please identify all types of charges that BA-MA would apply to an order for the extended loop.
- 5. **Checklist Item Nos. 4 & 5:** Please list and explain any service restrictions that BA-MA currently applies or will apply to the extended loop.
- 6. **Checklist Item Nos. 4 & 5:** Please indicate whether there are any BA-MA processes or procedures that CLECs must undergo before ordering an extended loop from BA-MA. If so, please explain these BA-MA processes or procedures.
- 7. **Checklist Item Nos. 4 & 5:** Please state what ordering mechanisms are available to CLECs seeking to access BA-MA’s extended loops.
- 8. **Checklist Item Nos. 4 & 5:** Please state whether CLECs may enter trouble reports associated with BA-MA’s extended loops electronically.
- 9. **Checklist Item Nos. 4 & 5:** Please provide a brief record of all troubles associated with BA-MA’s extended loops over the past 12 months.

10. **Checklist Item No. 4:** Please indicate whether BA-MA provides house and riser cable to CLECs.
11. **Checklist Item No. 4:** If the answer to the previous question is yes, please state the number of such house and riser cable arrangements that BA-MA has provided to CLECs.
12. **Checklist Item No. 4:** Please provide a citation to the BA-MA tariff containing rates, terms and conditions for house and riser cable.
13. **Checklist Item No. 4:** If BA-MA has not tariffed rates, terms and conditions for house and riser cable, please state whether BA-MA has any plans to do so.
14. **Checklist Item No. 4:** Please state what ordering mechanisms are available to CLECs seeking to access BA-MA's house and riser cable.
15. **Checklist Item No. 4:** Please state whether CLECs may enter trouble reports associated with BA-MA's house and riser cable electronically.
16. **Checklist Item No. 4:** Please indicate whether BA-MA permits any CLEC to place the cross-connect between its loop plant and BA-MA's house and riser cable.
17. **Checklist Item No. 4:** If the answer to the previous question is no, please indicate whether BA-MA is willing to permit a requesting CLEC to place the cross-connect between its loop plant and BA-MA's house and riser cable on a trial basis.
18. **Checklist Item No. 11:** Provide the number of residential Local Number Portability order requests that BA-MA received by month from CLECs for the period January 1, 1998 to September 17, 1999.
19. **Checklist Item No. 11:** Provide the number of residential Local Number Portability order requests that BA-MA completed by month from CLECs for the period January 1, 1998 to September 17, 1999.
20. **Checklist Item No. 11:** Provide the number of residential Local Number Portability order requests that BA-MA received by month from CLECs for the period January 1, 1998 to September 17, 1999 by City and Town for the Town of Arlington, City of Boston, and the City of Somerville.
21. **Checklist Item No. 11:** Provide the number of residential Local Number Portability order requests that BA-MA completed by month for the period January 1, 1998 to September 17, 1999 by City and Town for the Town of Arlington, City of Boston, and the City of Somerville.

22. **Checklist Item No. 2:** Please state whether BA-MA allows CLECs to access a BA-MA central office via the electrical manhole zero and the electrical vault.
23. **Checklist Item No. 2:** If the answer to the previous question is “no,” please provide all of BA-MA’s justifications for refusing to provide CLECs access to its central office via the electrical manhole zero and the electrical vault.
24. **Checklist Item No. 2:** Please list all of the different modes of entry that BA-MA has permitted CLECs to use when bringing fiber optic cable into a BA-MA central office.