

NOTICE OF INTENT TO PARTICIPATE IN PROCEEDING

Development of an Efficient Loop
Migration Process

Docket No. M-00031754

To: Janet Tuzinski
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The following company intends to participate in the above-docketed proceeding:

COMPANY NAME: ATX Licensing, Inc. _____
ADDRESS: 50 Monument Rd. _____
Bala Cynwyd PA, 19004 _____

CONTACT NAME: Billie-Jo Warrick _____
TITLE: Business analyst _____
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DATE: 10-31-03 _____

PA PUC Procedural Order, Docket No. M-00030099

Appendix B

B. Questions for Other Participants

1. Describe the hot cut process currently used to transfer lines from the ILEC switch to the CLEC facilities.

ATX does not currently use Verizon's DS0 hot-cut process in the state of Pennsylvania.. As a result, ATX is unfamiliar with Verizon's current methods and procedures to transfer lines from the ILEC switch to a CLEC switch.

2. List each task that is part of the current process. Provide the average time it takes to complete the task, the typical occurrence of the task during the process, the labor rate for the task, and the common overhead loading associated with the labor rate. Indicate the source of the data; i.e. time/motion studies, SME analysis, etc.

See answer to question #1 above.

3. Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Include an estimate of the maximum number of lines per batch.

ATX is unfamiliar with the current Verizon hot-cut process used in the state of Pennsylvania and as a result is unable to respond with specific procedures to improve the process at this juncture of the proceeding.

4. List each task that is part of the batch hot cut process described in the answer to the preceding question. Provide the average time it takes to complete the task, the typical occurrence of the task during the process, the labor rate for the task, and the common overhead loading associated with the labor rate.

See answer to question #3 above.

5. If UNE-P is no longer available, what monthly volumes of hot cuts would be required: (a) to migrate existing UNE-P customers to another form of service and (b) to connect new customers in the ordinary course of business. Provide supporting documentation for these volume estimates.

- a) In the absence of UNE-P, ATX would be required to convert more than 30,000 current UNE-P lines to alternative arrangements requiring the use of Verizon's batch hot-cut process.
- b) ATX estimates that it would have approximately 800 conversions per month at present monthly volumes.