

October 31, 2003

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: *Development of an Efficient Loop Migration Process*
Docket No. M-00031754

Dear Mr. McNulty:

Enclosed for filing is Cavalier Telephone Mid-Atlantic, LCC's response to the questions at Appendix B to the Commission's Procedural Order of October 2, 2003 in the referenced matter.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

Richard U. Stubbs

cc: Janet Tuzinski, FUS Telecom Manager

Enclosure

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg PA 17105-3265**

Development of an Efficient Loop)
Migration Process)

Docket No. M-00030099

RESPONSE OF CAVALIER TELEPHONE MID-ATLANTIC, LLC (“Cavalier”)

Appendix B, Section B
“Questions for Other Participants”

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

Cavalier Response: Cavalier believes it cannot render a full, fair and accurate response to this question prior to review and evaluation of Verizon’s responses to its corresponding questions. Notwithstanding such objection and limitation, please see Attachment “A”. This "batch" process is utilized by Cavalier for all hot cut installations today, without regard to number of installations by market or by central office. This process appears to comport with the process defined in Verizon's Exhibit II-C, filed in NY PSC Case 02-C-1425.

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.

Cavalier Response: Cavalier believes it cannot render a full, fair and accurate response to this question prior to review and evaluation of Verizon’s responses to its corresponding questions. Notwithstanding such objection and limitation, Cavalier believes this question is inapplicable to Cavalier.

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.

Cavalier Response: Cavalier believes it cannot render a full, fair and accurate response to this question prior to review and evaluation of both the responses of other competitive local exchange carriers (CLECs) to these questions and Verizon’s responses to its corresponding questions.

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.

Cavalier Response: Cavalier believes it cannot render a full, fair and accurate response to this question prior to review and evaluation of both the responses of other competitive local exchange carriers (CLECs) to these questions and Verizon's responses to its corresponding questions.

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.

Cavalier Response: Cavalier believes it cannot render a full, fair and accurate response to this question prior to review and evaluation of both the responses of other competitive local exchange carriers (CLECs) to these questions and Verizon's responses to its corresponding questions. Notwithstanding such objection and limitation, Cavalier believes this question is inapplicable to Cavalier.

Respectfully submitted,

CAVALIER TELEPHONE
MID-ATLANTIC, LLC

Richard U. Stubbs
General Counsel
Cavalier Telephone Mid-Atlantic,

LLC

Date: October 31, 2003

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