

Subject: M-00031754

Janet:

Full Service Network and Remi Communications wish to participate in the batch hot-cut ELP proceeding. Attached please find answers to the Appendix B questions as required by the Oct 10, 2003 secretarial letter.

Thank you

David B. Schwencke

Answers to questions for Other Participants:

1. Despite having a dial tone switch in the Pittsburgh LATA capable of delivering DSO level dial tone to the public, FSN does not provision DSO or voice-grade dial tone to any customers other than those served directly by our own serving wire center. This lack of build-out is due to Verizon's refusal to provide EEL concentration despite being ordered by the Commission to do so. As a temporary economic matter, voice grade service off of our switch is not cost effectively deployed out into the LATA using EELs until Verizon begins providing concentration. Therefore, we are presently unfamiliar with the process in place at Verizon (if one exists) to facilitate a true voice grade hot cut in Pennsylvania. But, that does not mean we don't want to participate in this proceeding. We anticipate resolution of the concentration issue. At which time batch cuts and ELP will become an important role in migrating business to our switch
2. We are without knowledge as to the steps taken in any present hot cuts as we have not been a party to those trials
3. Having no batch or hot cut experience at the DS 0 level we defer to the experts for our initial suggestions. At this opening stage, we recommend that the processes be adopted as outlined by QSI President Michael Starkey and SHS President Earle Jenkins in their direct testimony on behalf of MCI. In their testimony, they recommend:

“For all-copper loops, Verizon should make use of Automated Distribution Frames (“ADF”), such as the “ControlPoint” product which it is currently purchasing from NHC. For fiber-fed loops, Verizon should make use of the electronic unbundling capabilities resident in the Litespan remote terminal equipment that it is deploying throughout New York. This involves electronic unbundling of loops via OR303-compliant IDLC systems.”

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Although these are the best processes we have seen to date, we want to remain as a participant in these proceedings. We ask not to be locked into this as our one-time proxy and

only choice. We would like to evaluate all proposals and respectfully reserve the right to reverse our position in favor of an alternate proposal submitted by another party or to develop and submit our own proposal based upon the general provisioning experiences we had had over the past fifteen years in Pennsylvania.

4. & 5. With respect to the tasks and number of customers, at this time we concur with the direct testimony from the two expert witnesses above to the extent it applies and reserve the right to comment further on the specifics once our review of Verizon's proposals are complete.

