

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 1, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

For the period of time from January 1, 2000 through June 30, 2003, on a monthly basis for every wire center, provide, in an electronic format, the number of UNE-P lines at the beginning of the month, added during the month, disconnected during the month and at the end of the month.

RESPONSE:

The data are not readily available in the format requested, and a special study would therefore be required to obtain the data. This interrogatory calls for approximately 49,000 separate data points, and it would be unduly burdensome gather this data to provide Adds and Disconnects by Central Office for the time period. In addition, it should be noted that difference in UNE-P volumes from month to month are not fully explained by Adds and Disconnects because these data do not include net transfers which are Retail to UNE-P and UNE-P to Retail migrations.

Attached is a proprietary response, which details Total UNE-P Lines in-service by wire center as of June 2003.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 2, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC (Development of an Efficient Loop Migration Process)

REQUEST:

For the period of time from December 31, 2000 through June 30, 2003, on a monthly basis for every wire center, provide, in an electronic format, the number of UNE-L lines at the beginning of the month, added during the month, disconnected during the month and at the end of the month.

RESPONSE:

The data are not readily available in the format requested, and a special study would therefore be required to obtain the data. This interrogatory calls for approximately 49,000 separate data points, and it would be unduly burdensome gather this data to provide Adds and Disconnects by Central Office for the time period.

Attached, is a proprietary response, which details the Unbundled Loops (excluding EELs) in service as of June 2003. ~~RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 3, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC (Development of an Efficient Loop Migration Process)~~

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REQUEST:

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

RESPONSE:

Verizon currently uses two separate, though closely related, hot cut processes: a “basic” hot cut process and a “Large Job,” or “Project” process. These processes, used successfully for years by numerous CLECs across the Verizon region, hold ISO 9001:2000 certification.

In addition, Verizon has developed a new process that we refer to as a “Batch” hot cut process.

A description of each process can be found in Attachment for PA PUC data request #3,

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 4, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

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.

RESPONSE:

Please see Attachment for PA PUC data request #3, for detail concerning the current and proposed Hot Cut processes.

Please reference also the Verizon-Pennsylvania Wholesale Non-Recurring Cost Model and associated testimony filed December 2001, in Docket No. R-00016683. Hotcuts were addressed in Tabs B, D, E, G, H, N of the Non-Recurring Panel Direct Testimony.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 5, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC (Development of an Efficient Loop Migration Process)

REQUEST:

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

RESPONSE:

Verizon has developed a Batch Hot Cut Process in order to gain the benefits that are associated with the current Large-Job-type process, already in place, in cases where CLECs were not willing or able to submit orders grouped by central office and due date. The Batch Hot Cut process also facilitates the processing of orders that are submitted by multiple CLECs.

In essence, under the batch process, a CLEC will be permitted (but not required) to earmark specified hot cuts for batch processing. In each central office, orders submitted for batch processing will be held until a "critical mass" of such orders is reached. The size of the critical mass will vary from office to office. The manager of each individual central office, based on the volume of cuts and the optimum level of frame staffing, will determine the number of lines that will constitute a critical mass *in that office*.

For example, "critical mass" for an extremely busy staffed office might be based solely on the number of lines included in hot cut orders received in a single day, while a remote, less active office might accumulate orders until a technician makes a scheduled visit to the office.

The CLECs will be notified by Verizon of the actual cutover date prior to the scheduled due date and would be required before the cut to have dialtone available and to notify NPAC that the number will be ported when the cut is complete.

As a condition of utilizing the batch process, CLECs would be required to authorize Verizon to submit the final number-port notification to NPAC. This will eliminate the need for coordination with the CLEC at the time of the cutover and will enable Verizon to utilize its work force more efficiently by making cuts at times when Verizon's work might be otherwise underutilized, and when CLEC personnel may not be available for coordination.

Once the cut and the number port are complete, Verizon's translations for the retail or UNE-P service previously provided to serve the customer will be removed from the switch. Upon completion of each cut, Verizon will notify the CLEC through WPTS. Verizon will also complete the service orders, thus generating a Provisioning Completion Notice ("PCN") and Billing Completion Notice (BCN) to the CLEC.

As part of the batch process, a CLEC would have the option of transferring the customer to UNE-P if they believe the cut interval to be too long. . This would be accomplished simply by submitting a UNE-P order for the customer before the batch hot cut order is submitted. For

batch cut orders submitted in market areas in which Verizon is relieved of its obligation to provide mass market local switching on an unbundled basis, a service functionally similar to UNE-P would be provided, but only, as noted above, for the holding period of the order.

Please see Attachment for PA PUC data request #3, for detail concerning the Batch Hot Cut processes.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 6, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

List each task that is part of the batch hot cut process described in the answer to the above question regarding a batch 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.

RESPONSE:

Please see Attachment for PA PUC data request #3 for detail concerning the Batch Hot Cut processes.

The cost information associated with the batch hot cut tasks have not yet been fully collected and analyzed. It will be provided upon the actual filing of any Verizon proposal.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 7, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

List each task that is part of the batch hot cut process that is not included in the current hot cut process.

RESPONSE:

Please see Attachment for PA PUC data request #3 for detail concerning the Batch Hot Cut processes. Red highlights on the Batch chart note steps that are not part of the current Hot Cut process. The major differences are:

1. The batch hot cut process provides for the accumulation of hot orders so that orders of multiple CLECs can be batched for efficient processing.
2. Communication using WPTS is required, which eliminates the need for coordination using telephonic communication at key checkpoints in the process.
3. Verizon acts on behalf of the CLEC to activate the number port with NPAC following completion of the hot cut.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 8, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

List each task that is part of the current hot cut process that is not included in the batch hot cut process.

RESPONSE:

Please see Attachment for PA PUC data request #3, for detail concerning the Batch Hot Cut processes.

Essentially the major differences between a Basic or Project cut and a Batch cut are:

1. The CLEC specifies the frame due time for the Basic cut and negotiates the due dates for a Project.
2. The RCCC obtains the GO/NO GO decision from the CLEC on the due date for Basic and Project cuts.
3. The RCCC coordinates the cut with the Frame and, if applicable, the outside field forces for Basic and Project cuts.
4. The CLEC activates the port in the NPAC for Basic and Project cuts.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 9, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

For each wire center as of December 31, 2002 and June 30, 2003, provide the total number of residential lines served and the number of residential lines served using integrated digital line carriers. Provide separately for every wire center the number of Verizon retail residential lines, UNE served residential lines, and Wholesale served residential lines.

RESPONSE:

We are unable to separate integrated digital line carrier information into residence and business components. Attached, are the percentage of working lines on IDLC by wire center. This information is as of August, 2003.

For number of Verizon retail residential lines, please refer to Attachment 9 in the column labeled #5.

For number of Verizon UNE-P residential lines, please refer to Attachment 9 in the column labeled #7.

For number of Verizon Resale residential lines, please refer to Attachment 9 in the column labeled #6.

THESE ATTACHMENTS CONTAIN VERIZON PROPRIETARY DATA.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 10, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

For each wire center as of December 31, 2002 and June 30, 2003, provide the total number of business mass-market lines served and the number of business mass-market lines served using integrated digital line carriers. Provide separately for every wire center the number of Verizon retail business mass-market lines, UNE served business mass-market lines, and Wholesale served business mass-market lines. Explain how Verizon determined which business lines were mass-market lines and which are enterprise lines.

RESPONSE:

We are unable to separate integrated digital line carrier information into residence and business components. Please refer to Appendix B A-9 for working lines on IDLC by wire center. This information is as of August, 2003.

For number of Verizon retail business lines, please refer to Attachment 9 in the column labeled #1.

For number of Verizon UNE-P business lines, please refer to Attachment 9 in the column labeled #3

For number of Verizon Resale residential lines, please refer to Attachment 9, in the column labeled #2.

THESE ATTACHMENTS CONTAIN VERIZON PROPRIETARY DATA.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 11, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC (Development of an Efficient Loop Migration Process)

REQUEST:

If the tasks related to the hot cut process for lines served using integrated digital line carriers differs from the process used for other lines, discuss how the process is different and list the tasks that must be added specifically for the lines served using integrated digital line carriers. Include the time required to accomplish those tasks, the labor cost and loaded labor cost associated with those tasks.

RESPONSE:

IDLC is a loop provisioning technology. In IDLC-equipped loops, the electrical signal generated by the end user's customer premises equipment is converted into a channelized, digital, DS0 format at a Remote Terminal ("RT"). The DS0 channels are then multiplexed, in groups of 24, into DS1 signals, and are transported to the central office over a fiber feeder or other high-speed digital feeder facility. At the central office, the feeder facility is terminated and IDLC traffic is routed as DS1-level signals directly to the digital line ports on the switch. Since in IDLC technology voice traffic is delivered to the central office and into the switch as a multiplexed, DS1-level signal, there is no direct appearance of individual analog voice grade loops in the central office.

There is no technically feasible, practicable means of obtaining access to the individual voice-grade loops when provisioned over an IDLC system. Accordingly, before a customer served by an IDLC-equipped loop can be cut over to a switch-based CLEC, the customer must be shifted from an IDLC-equipped loop to an all-copper loop or to a loop served via Universal Digital Loop Carrier ("UDLC") technology.

In the case of IDLC-equipped loops, a technician must be dispatched to the Serving Area Interface ("SAI") associated with the copper distribution pair that serves the customer. (Because the SAI is part of the outside loop plant, such dispatches are referred to as "outside" dispatches.) In order to permit a hot cut to be made, the distribution pair must be moved at the SAI so that it will be cross-connected either to a pair in a copper feeder system, or to a sub-feeder pair associated with a UDLC system in the RT.

If spare copper or UDLC facilities are not available at the SAI, then a "line and station transfer" ("LST"; also known as a "pair swap") may be required. In an LST, the technician moves *another* Verizon retail customer from copper or UDLC facilities to IDLC equipment. The customer for whom the hot cut was requested can then be moved to the freed-up copper or UDLC facilities.

Generally, two dispatches will be required for a hot cut on an IDLC-equipped loop, the first to confirm the availability of suitable replacement facilities and the second, on the due date, to actually move the customer's service to the new facilities. The outside dispatch that is required

must be coordinated with the other activities involved in the cut to ensure that the cut can be made on the due date. For example, a hot cut for an IDLC-equipped loop will be scheduled for a specified four-hour period (morning or afternoon), rather than for a specific time, because of variability in the travel conditions and other factors that may affect the time required for the outside technician to reach the SAI.

The different tasks for a hot cut that involve IDLC technology are:

1. The customer must be shifted from an IDLC-equipped loop to an all-copper loop or to a loop served via UDLC prior to the cut requiring an outside dispatch
2. On IDLC cuts, the frame technician will wire the CLEC dial tone to the alternative facility identified by the Assignment Provisioning Center (APC). The final cutover will then take place in the field at the SAI.

Please see Attachment for PA PUC data request #11 for detail concerning the Basic Hot Cut processes with IDLC.

Please refer to the Verizon-Pennsylvania Wholesale Non-Recurring Cost Model and associated testimony filed in Docket No. R-00016683. Hotcuts were addressed in Tabs B, D, E, G, H, N of the Non-Recurring Panel Direct Testimony.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 12, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

On a monthly basis for the time period from January 2000 through June 2003, provide the average time a customer's service was disconnected due to the hot cut process.

RESPONSE:

This question is confusing in that all Hot Cuts involve the near-simultaneous disconnection of a Verizon working loop from a port on one carrier's switch, and the reconnection of that loop to a port on a different carrier's switch, without any significant out-of-service period. The actual movement of the loop from the Verizon switch to the CLEC collocation facility typically takes no more than a minute or two and a little as a few seconds.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 13, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

On a monthly basis for the time period from January 2000 through June 2003, provide the number of technicians during each month who have transferred a line from an ILEC switch to the CLEC facility as part of the hot cut process. Count only those employees who perform the manual process.

RESPONSE:

Verizon is attempting to gather this information and, to the extent it is available, will provide the information in a supplemental response at a later date.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 14, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

On a monthly basis for the time period from January 2000 through June 2003, provide the number of technicians trained and capable of transferring a line from an ILEC switch to the CLEC facility as part of the hot cut process. Count only those employees who can perform the manual process. Do not include management or supervisory personnel who can perform these tasks but do not do so as part of their regular work effort.

RESPONSE:

Please see exhibit #14. The data contained in this exhibit is proprietary and confidential.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 15, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

For the period of time from January 1, 2000 through June 30, 2003, on a monthly basis for every wire center, provide, in an electronic format, the number of hot cuts performed.

RESPONSE:

The attached proprietary files contain the number of Verizon Retail to UNE Loop hot cut orders and lines worked, by wire center in PA. Each file covers one year and is broken down by monthly tabs. Year 2000 data begins with April as no data is available before that month. The numbers do not reflect CLEC to CLEC orders or lines.

Verizon PA exhibit #1 for data request #15 PA-15 Hotcuts 2000.xls
Verizon PA exhibit #2 for data request #15 PA-15 Hotcuts 2001.xls
Verizon PA exhibit #3 for data request #15 PA-15 Hotcuts 2002.xls
Verizon PA exhibit #4 for data request #15 PA-15 Hotcuts 2003.xls

THESE ATTACHMENTS CONTAIN VERIZON PROPRIETARY DATA.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 16, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

Provide a list of all carriers with which Verizon has an interconnection agreement for the provision of local service in Pennsylvania.

RESPONSE:

Please see exhibit #16. The data contained in this exhibit is PROPRIETARY AND CONFIDENTIAL TO VERIZON.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 17, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

Provide a list of all carriers to which Verizon has sold collocation services in Pennsylvania. For each carrier, list the wire centers where the carrier is collocated.

RESPONSE:

Attached, is A PROPRIETARY response detailing collocation in-service by CLEC by wire center as of June, 2003.

Please note, this response reflects in-service arrangements. It does not include Terminations, which are collocation arrangements previously provided but no longer in-service.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 18, DATED
OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC
(Development of an Efficient Loop Migration Process)

REQUEST:

Provide a list of Verizon wire centers with indicators that identify whether the office is unstaffed, has a technician on duty but the technician can not perform hot cuts, or has a technician on duty and the technician can perform hot cuts. For unstaffed offices and offices where the technician can not perform hot cuts, specify the number of miles that the technician must drive and driving time to reach that office from the closest office where a technician who can perform hot cuts is normally on duty.

RESPONSE:

Please see exhibit #18. THE DATA CONTAINED IN THIS EXHIBIT IS PROPRIETARY AND CONFIDENTIAL. The exhibit provides a list of Verizon wire centers in PA and the information requested about the wire centers. For all staffed Verizon wire centers in PA there is at least one trained technician on duty who can perform hot cuts.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 19, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC (Development of an Efficient Loop Migration Process)

REQUEST:

Compare and contrast electronic loop provisions (as contemplated by the *PA PUC's Functional Structural Separation Order*) and the batch cut process (contemplated by the *Triennial Review Order*).

RESPONSE:

The batch hot cut process treated in the FCC's Triennial Review Order and the electronic loop provisioning (ELP) concept addressed in the PA PUC's Structural Separation Order differ in both scope and application. PA ELP, as originally envisioned, was intended to apply to a specific subset of loops and had no specific relationship to the batch hot cut process.

PA ELP deals with the provisioning of loops assigned to integrated digital loop carrier (IDLC) systems which represent a relatively small percentage of the overall number of working loops in PA. As a prerequisite for PA ELP, loops must be provisioned over a Next Generation Digital Loop Carrier (NGDLC) system, in order to offer the potential for automating the migration of a loop between carriers. Consequently, the vast majority of loops (provisioned over copper, legacy digital loop carrier and other non-NGDLC technologies) would not be impacted by the ELP process contemplated by the PA PUC's *Functional Structural Separation Order*

The batch hot cut process, contemplated by the FCC in the Triennial Review Order, is intended to address the migration of the loops between carriers, but its application is significantly broader than the base of loops provisioned over IDLC technology. In addition, the overall scope of the contemplated batch cut process goes beyond the "mechanized" electronic provisioning of loop electronics, which represents just one step in the overall hot cut process.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 20, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET M-00031754 BEFORE THE PA PUC (Development of an Efficient Loop Migration Process)

REQUEST:

If a batch cut process is developed, does that make it more or less likely that an electronic loop provisioning process will be implemented.

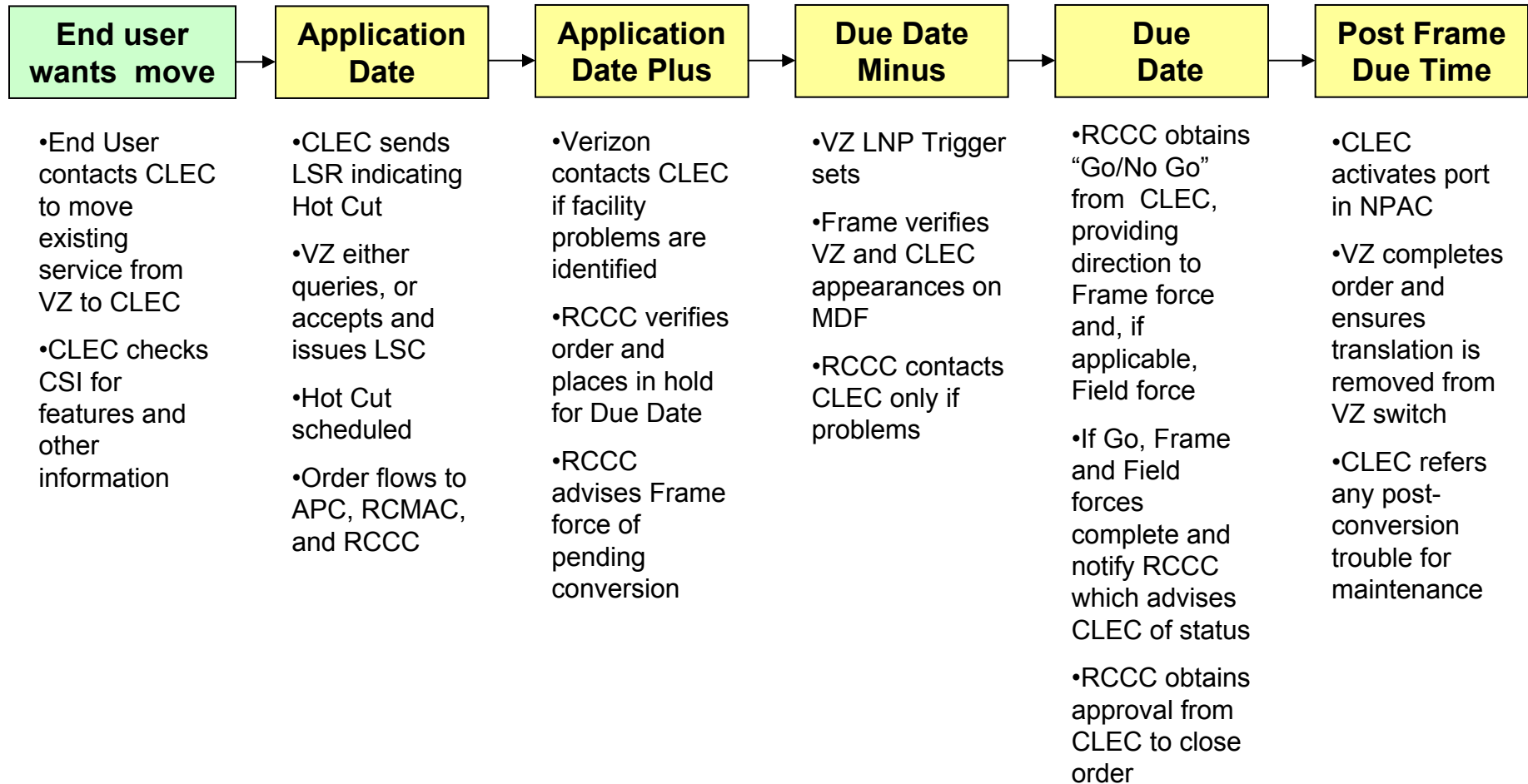
RESPONSE:

Implementation of the electronic loop provisioning process (as contemplated in the PA PUC Structural Separation Order) is not dependent on the outcome of the batch hot cut process. Consideration of any proposal to automate loop provisioning is only one part of the batch hot cut process, and in the case of PA ELP, only addresses a relatively small percentage of the base of working loops in PA. Therefore, it is envisioned that a batch hot cut process could be developed without the implementation of an electronic loop provisioning process.

The FCC, in its Triennial Review proceeding, considered a proposal for electronic loop provisioning. The FCC concluded that the feasibility of electronic loop provisioning had not been established and noted that an effective electronic loop provisioning process would require a fundamental change in the manner in which local switches are provided and dramatic and extensive alterations to the overall architecture of every ILEC network costing more than \$100 billion. The FCC accordingly rejected the proposal to require electronic loop provisioning. So as the FCC established a requirement for the batch hot cut process, it rejected the need for electronic loop provisioning.

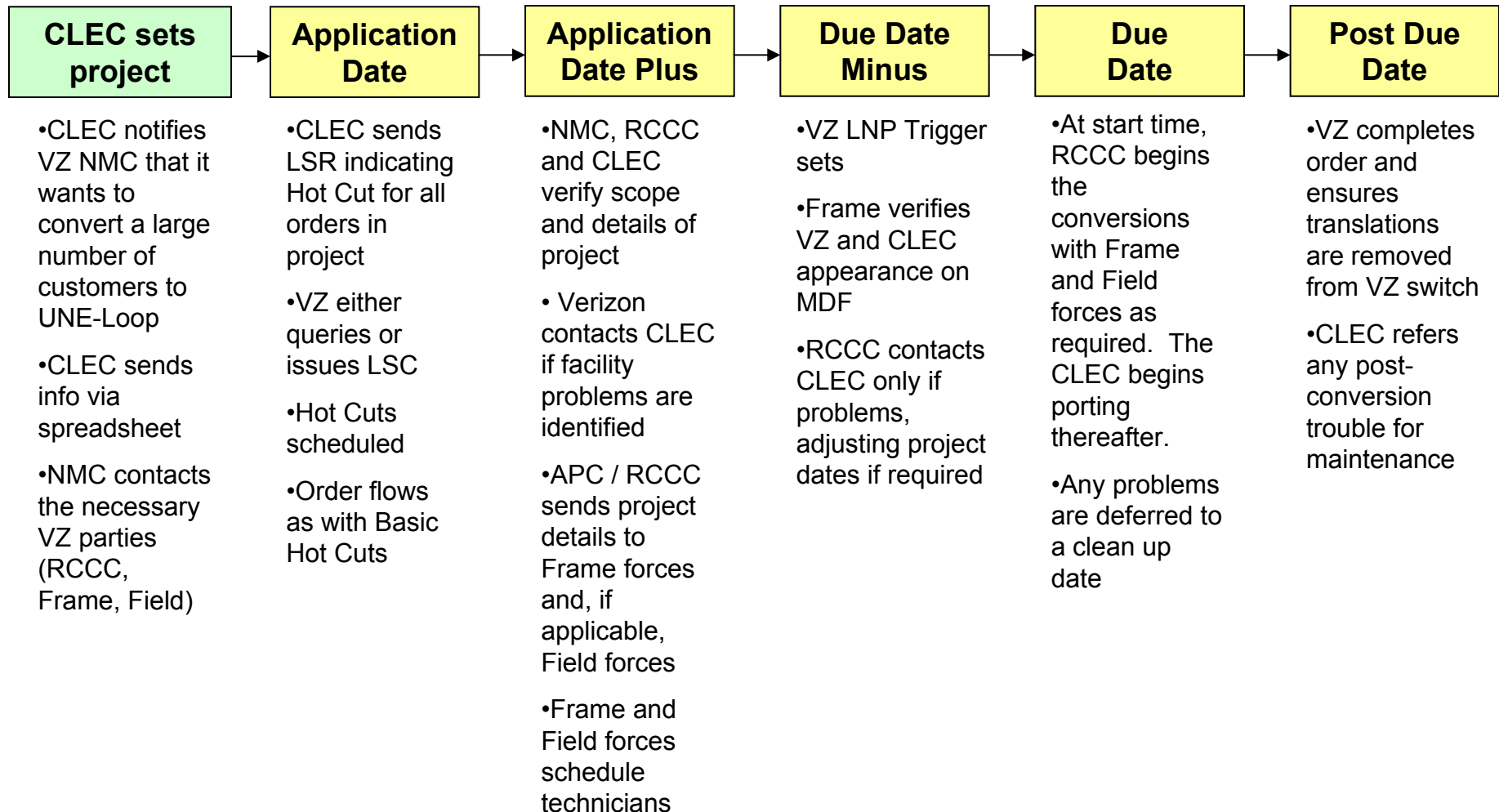
Verizon Hot Cut Processes

Basic Hot Cut



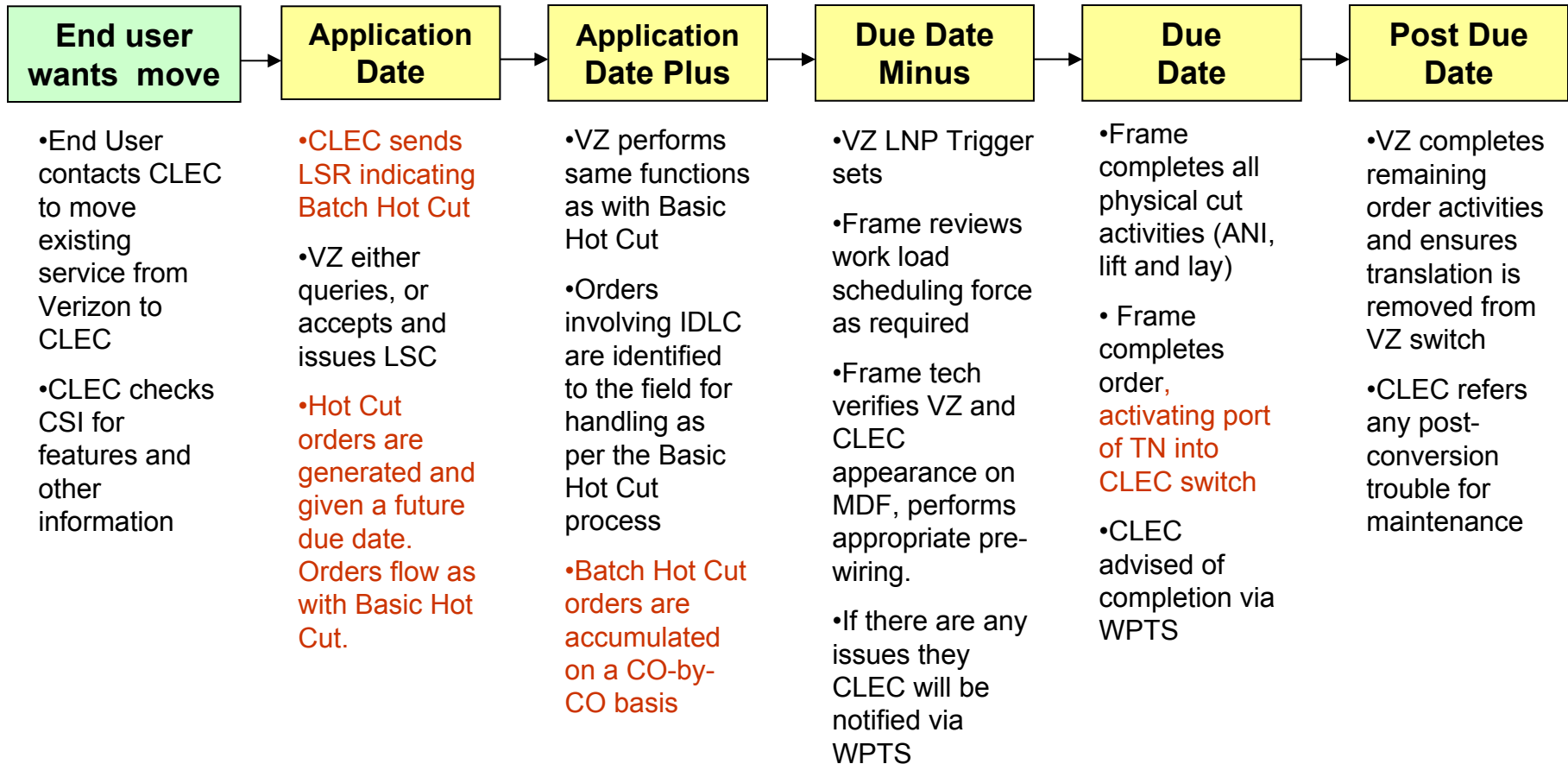
Verizon Hot Cut Processes

Project Hot Cuts



Verizon Hot Cut Processes

Batch Hot Cut



Verizon Hot Cut Processes

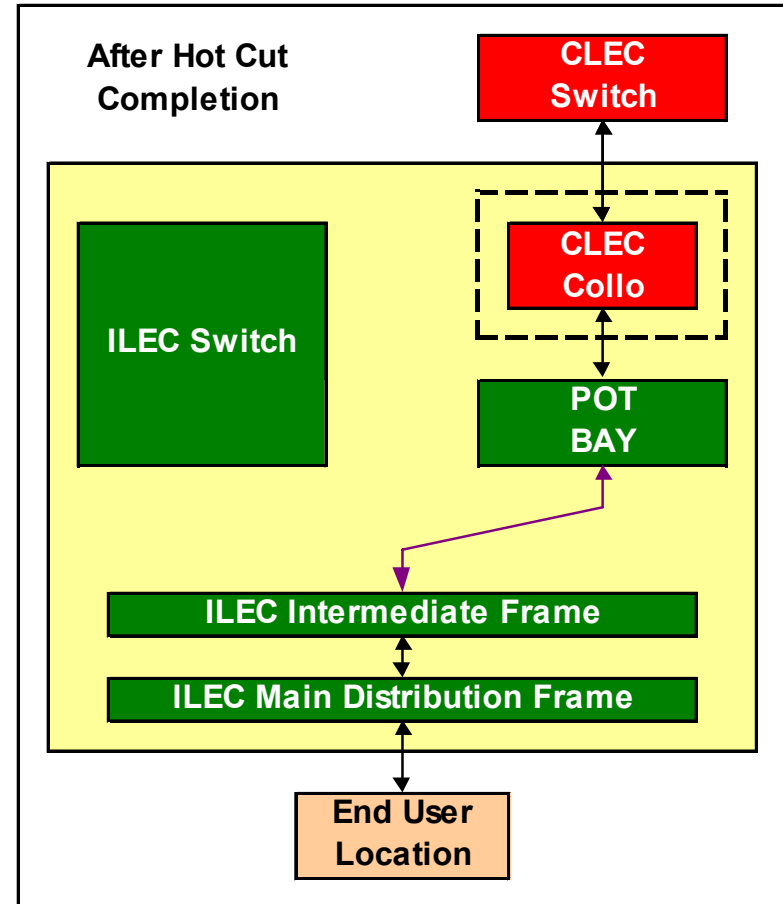
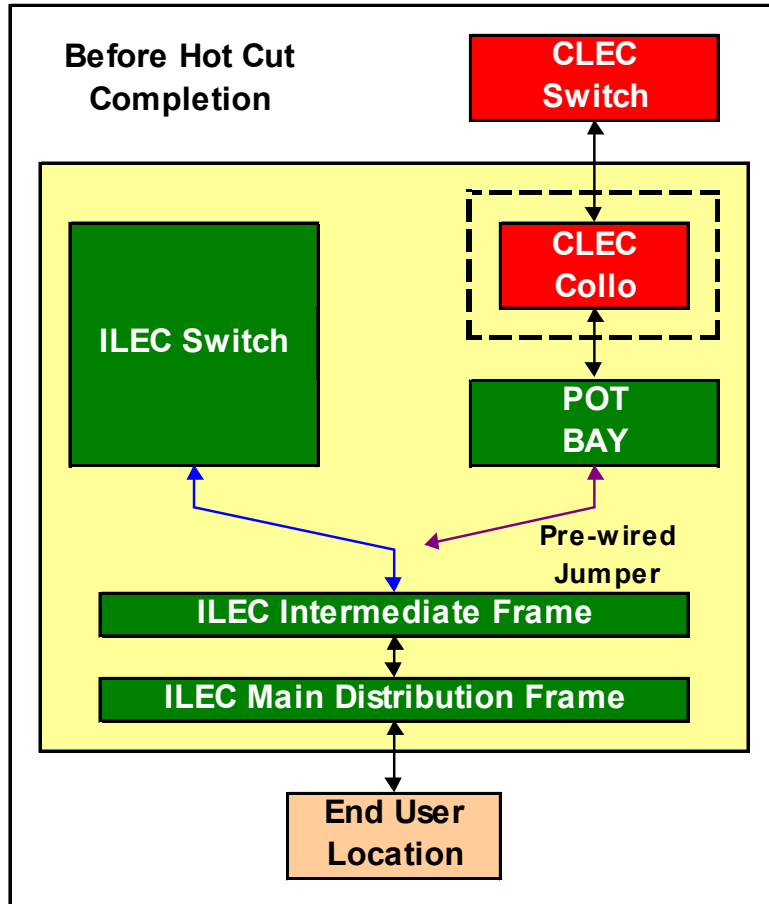
Key to Acronyms



Acronym	Definition
UNE	Unbundled Network Element
ILEC	Incumbent Local Exchange Carrier
CLEC	Competitive Local Exchange Carrier
VZ	Verizon
CSI	Customer Service Information (aka Customer Service Record or CSR)
NMC	VZ National Market Center
LSR	Local Service Request
LSC	Local Service Request Confirmation
APC	VZ Assignment Provisioning Center
RCMAC	VZ Recent Change Memory Administration Center
RCCC	VZ Regional CLEC Coordination Center
LNP	Local Number Portability
MDF	VZ Main Distribution Frame
Frame	VZ Central Office organization
Field	VZ Outside service technicians

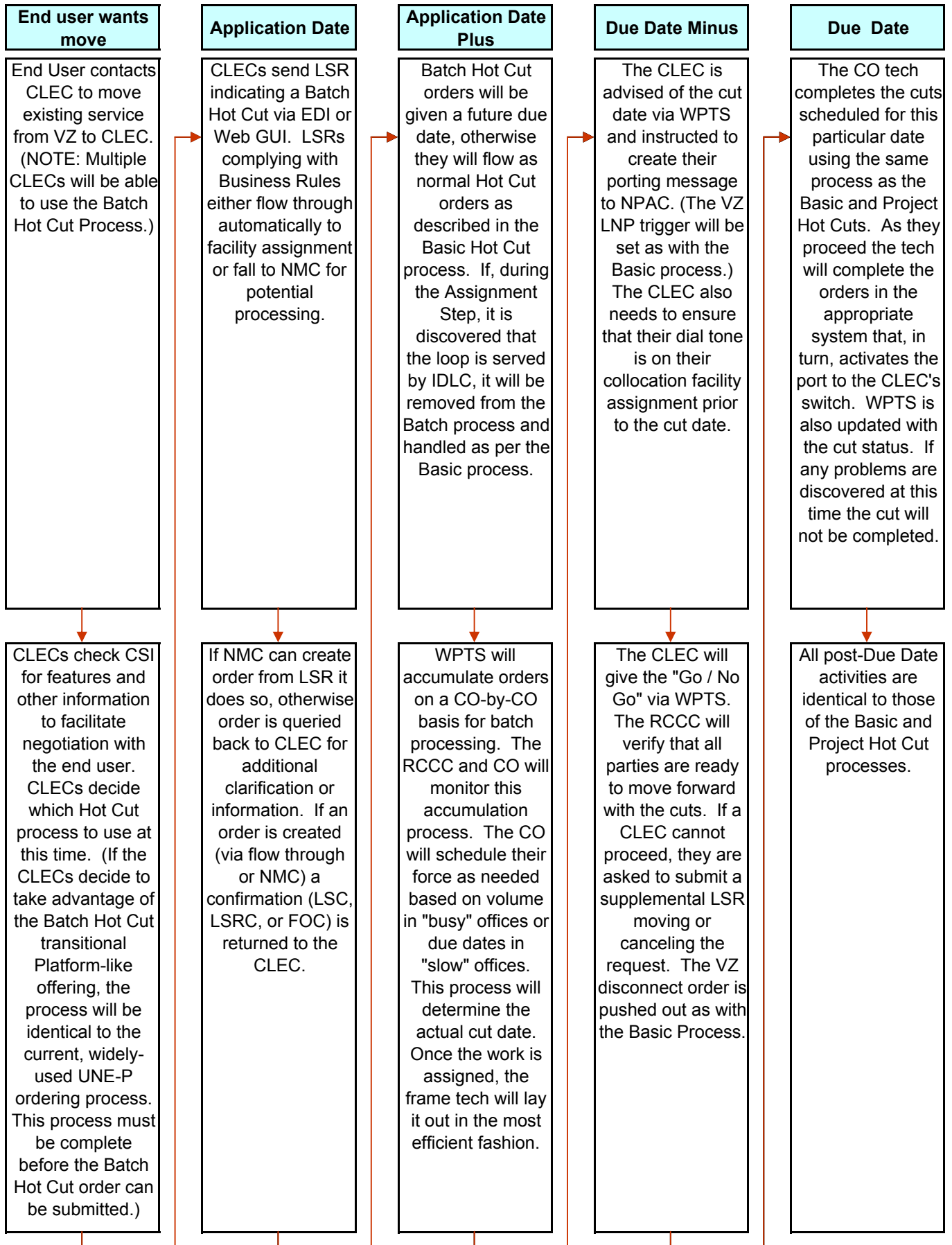
Hot Cut Schematic

Verizon PA – Appendix B,
Responses #3-4

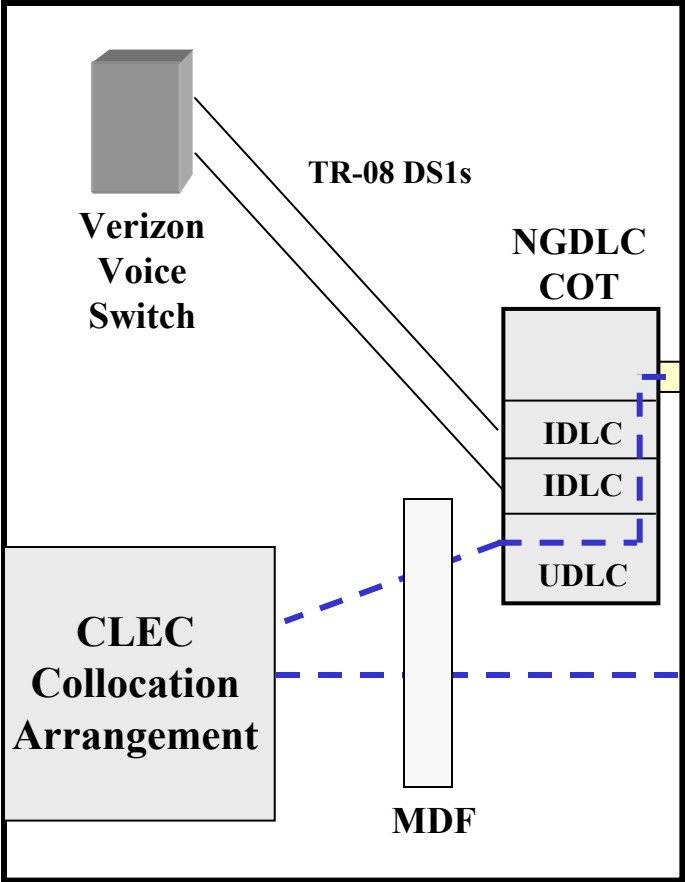


- ILEC Equipment
- CLEC Equipment
- Central Office

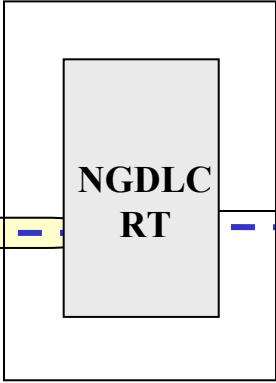
Verizon Proposed Batch Hot Cut Process Flow



Central Office



Remote Terminal



Sub-feeder

Copper Distribution

SAI



Customer for which hot cut requested

Fiber Feeder

Copper Feeder

Outside Dispatch required to move copper distribution pair connection at SAI from existing IDLC pair count to either an UDLC pair count or copper feeder pair from C.O.