

Suzan DeBusk Paiva
Assistant General Counsel
Law Department



DOCUMENT FOLDER

September 3, 2003

Verizon Pennsylvania Inc.
1717 Arch Street, 32NW
Philadelphia, PA 19103

Tel: (215) 963-6068
Fax: (215) 563-2658
Suzan.D.Paiva@Verizon.com

VIA HAND DELIVERY AND E-MAIL

The Honorable Cynthia Williams Fordham
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia State Office Building
Broad and Spring Garden Streets
Philadelphia, PA 19130

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SEP 03 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: AT&T Communications of Pennsylvania, LLC v. Verizon
North Inc. and Verizon Pennsylvania Inc., Docket No.
C-20027195

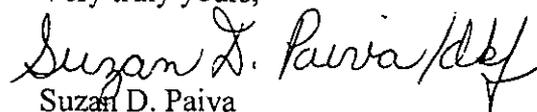
Dear Judge Fordham:

Verizon Pennsylvania Inc. and Verizon North Inc. ("Verizon") respectfully move for the admission into the record of two responses to in-hearing data requests as late-filed exhibits. Specifically, Verizon moves for the admission of the Response of AT&T Communications of Pennsylvania, LLC ("AT&T") to In-Hearing Data Request and attachments thereto as Verizon Cross Examination Exhibit 11. Verizon moves for the admission of the Response of MCI WorldCom Network Services Inc. ("MCI") to In-Hearing Data Request as Verizon Cross Examination Exhibit 12.

Counsel for AT&T has indicated that AT&T has no objection to the admission of Verizon Cross Examination Exhibit 11 and counsel for MCI has indicated that MCI has no objection to the admission of Verizon Cross Examination Exhibit 12.

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

Very truly yours,


Suzan D. Paiva

cc: Certificate of Service (with enclosures)
James J. McNulty (letter and certificate of service only) ✓
John Kelly, Commonwealth Reporting

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon's letter requesting admission of two late filed exhibits, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 3rd day of September, 2003.

RECEIVED

SEP 03 2003

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Patricia Armstrong, Esquire
Regina L. Matz, Esquire
Thomas, Thomas, Armstrong
& Niesen
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Harrisburg, PA 17108

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Barrett Sheridan, Esquire
Joel Cheskis, Esquire
Shaun A. Sparks, Esquire
Office of Consumer Advocate
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1133 19th Street, NW
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Zsuzanna Benedek, Esquire
Sprint Communications Company LP
240 North Third Street, Suite 201
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Daniel Clearfield, Esquire
Alan Kohler, Esquire
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Harrisburg, PA 17102-2025

Kristin L. Smith, Esquire
Qwest Communications Corporation
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Denver, CO 80202



Suzan DeBusk Paiva
Attorney for Respondents
Verizon Pennsylvania Inc.
Verizon North Inc.
1717 Arch Street, 32NW
Philadelphia, PA 19103
(215) 963-6068

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PLEASE DOCKET

Commonwealth of Pennsylvania
Public Utility Commission

Date: September 3, 2003

Subject: AT&T Communications of Pennsylvania, Inc. v. Verizon North,
Inc.
Docket Number C-20027195

To: Wanda Zeiders
Docket Management

From: Cynthia Williams Fordham, Administrative Law Judge *C.W.F./G.R.*
Office of Administrative Law Judge

I have attached exhibits which have been filed in the above-captioned case.

Please have these exhibits docketed and placed in the red document folder.

If you have any questions, please contact me at (215) 560-2105.

Attachments



Robert C. Barber
Senior Attorney

Room 3D
3033 Chain Bridge Road
Oakton, VA 22185
703 691-6061
FAX 703 691-6093
EMAIL rbarber@att.com

September 2, 2003

BY OVERNIGHT MAIL

The Honorable Cynthia W. Fordham
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia State Office Building
1400 Spring Garden Street
Philadelphia, PA 19130

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Re: AT&T Communications of Pennsylvania, LLC
v. Verizon North Inc.
Docket No. A-310236F0002

C-200 27195

Dear Judge Fordham:

AT&T Communications of Pennsylvania, Inc. respectfully requests that the attached responses of Verizon Pennsylvania, Inc. and Verizon North, Inc. to certain in-hearing data requests made by AT&T and other parties at the hearings in this matter conducted on August 25, 2003. Specifically, AT&T moves for the admission of Verizon's responses to In-Hearing Data Requests Nos. 1, 3, 4, and 6, and requests that these responses be admitted into the record in the above-referenced proceeding as late-filed exhibits designated as AT&T Cross Examination Exhibits 4, 5, 6 and 7 respectively.

Counsel for Verizon has indicated that they do not object to this request. **Please note that Verizon has designated the response to In-Hearing Data Request No. 6 (to be designated as AT&T Cross Examination Exhibit 7) as "proprietary."**

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Public Utility Commission
Philadelphia Office
Administrative Law Judge

The Honorable Cynthia W. Fordham
September 2, 2003
Page 2 of 2

Copies of this request and the attachments are being served on all parties of record as indicated on the attached certificate of service. Please contact me if you have any questions regarding the enclosures.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert C. Barber". The signature is written in a cursive style with a large initial "R".

Robert C. Barber

Enclosures

cc: Service List (w/ encl)
James McNulty, Secretary (cert. of service only)

Certificate of Service
Docket No. C-20027195

The undersigned hereby certifies that true and correct copies of AT&T Communications of Pennsylvania, LLC.'s Request for Admission of Late-filed Exhibits were caused to be served on the persons named below by electronic and overnight mail in accordance with the requirements of 52 Pa. Code §§1.52 and 1.54:

Patricia Armstrong
PO Box 9500
Harrisburg, PA 17108
Fax – 717-236-8278
Phone – 717-255-7600
e-mail – parmstrong@ttanlaw.com
(for Rural Telephone Company Coalition)

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MCI WorldCom, Inc.
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Washington, DC 20036
Fax – 202-736-6242
Phone – 202-736-6204
e-mail – Michelle.Painter@wcom.com
(for MCI WorldCom, Inc.)

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Office of Consumer Advocate
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5th Floor, Forum Place
Harrisburg, PA 17101-1923
Fax – 717-783-7152
Phone – 717-783-5048
e-mail – pmcclelland@paoca.org
(for Office of Consumer Advocate)

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Carlisle, PA 17013-0905
Fax – 717-245-6213
Phone – 717-245-6346
e-mail – sue.e.benedek@mail.sprint.com
(for Sprint Communications Company, L.P. and
The United Telephone Company of
Pennsylvania)

Alan Kohler
Daniel Clearfield
Wolf Block Schorr & Solis-Cohen
Locust Court, Suite 300
212 Locust Street
Harrisburg, PA 17101
Fax – 717-237-7161
Phone – 717-237-7160

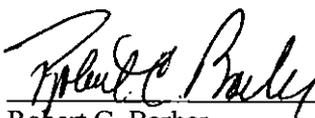
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Kenneth Mickens, Esq.
Pennsylvania Public Utility Commission
Office of Trial Staff
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Phone – 717-783-6155

John F. Povilaitis, Esq.
Ryan Russell Ogden & Seltzer LLP
800 North Third Street, Suite 101
Harrisburg, PA 17102-2025

Kristin L. Smith, Esq.
Qwest Communications Corp.
1801 California St. Suite 4900
Denver, CO 80202



Robert C. Barber

Dated: September 2, 2003

RESPONSE OF VERIZON PENNSYLVANIA INC. TO IN-HEARING DATA REQUEST NO. 1,
SUBMITTED IN DOCKET C-20027195 BEFORE THE PA PUC (ACCESS CHARGE)

REQUEST:

Provide the workpapers supporting the \$17 million of revenue to be generated by the new port rate elements cited on page 14, line 16 of the Berry/Wirl Surrebuttal testimony.

RESPONSE:

Please see the attached spreadsheet.

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SEP 11 2003

C-200 27195

Proposed Port Revenue

	Current Vz PA	Current Vz - North	Combined Total
Dedicated at Access Tandem	\$5,787,048	\$546,144	\$6,333,192
Dedicated at End Office	\$7,386,828	\$979,884	\$8,366,712
Shared at End Office	\$1,999,007	\$335,842	\$2,334,849
Total	\$15,172,883	\$1,861,870	\$17,034,753

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SEP 11 2003

RESPONSE OF VERIZON PENNSYLVANIA INC. TO IN-HEARING DATA REQUEST NO. 3,
SUBMITTED IN DOCKET C-20027195 BEFORE THE PA PUC (ACCESS CHARGE)

REQUEST:

Identify the number of residence lines that would be subject to a rate increase under the Verizon/OCA settlement proposal. Identify the categories of lines excluded and the reason for that exclusion.

RESPONSE:

The number of residence lines that will be subject to a rate increase (to the basic dial tone line) is approximately 3,624,000 (based on 2002 data). The only category of residence lines excluded are package lines, which are priced at the various package rates, not the basic dial tone line rates.

Verizon will update line volumes at the time of implementation of an access reduction and revenue neutral offset.

DOCKETED
SEP 11 2003

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C-200 27195

RESPONSE OF VERIZON PENNSYLVANIA INC. TO IN-HEARING DATA REQUEST NO. 4,
SUBMITTED IN DOCKET C-20027195 BEFORE THE PA PUC (ACCESS CHARGE)

REQUEST:

Identify the number of business lines that would be subject to a rate increase under the Verizon/OCA settlement proposal. Identify the categories of lines excluded and the reason for that exclusion.

RESPONSE:

The number of business lines that will be subject to a rate increase is approximately 773,000 (based on 2002 data). Lines associated with business competitive services (i.e., Centrex and Hi-cap), contracts, and package lines, which are priced at the various package rates not the basic dial tone line rates, are excluded.

Verizon will update line volumes at the time of implementation of an access reduction and revenue neutral offset.

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SEP 11 2003

C - 200 271 95

Suzan DeBusk Paiva
Assistant General Counsel
Law Department



Verizon Pennsylvania Inc.
1717 Arch Street, 32NW
Philadelphia, PA 19103

September 3, 2003

Tel: (215) 963-6068
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Suzan.D.Paiva@Verizon.com

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Public Utility Commission
Philadelphia Office
Administrative Law Judge

Re: AT&T Communications of Pennsylvania, LLC v. Verizon
North Inc. and Verizon Pennsylvania Inc., Docket No.
C-20027195

Dear Judge Fordham:

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Counsel for AT&T has indicated that AT&T has no objection to the admission of Verizon Cross Examination Exhibit 11 and counsel for MCI has indicated that MCI has no objection to the admission of Verizon Cross Examination Exhibit 12.

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

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Very truly yours,

Suzan D. Paiva
Suzan D. Paiva

cc: Certificate of Service (with enclosures)
James J. McNulty (letter and certificate of service only)
John Kelly, Commonwealth Reporting

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon's letter requesting admission of two late filed exhibits, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 3rd day of September , 2003.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

Patricia Armstrong, Esquire
Regina L. Matz, Esquire
Thomas, Thomas, Armstrong
& Niesen
212 Locust Street, Suite 500
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Harrisburg, PA 17102-2025

Kristin L. Smith, Esquire
Qwest Communications Corporation
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Denver, CO 80202



Suzan DeBusk Paiva
Attorney for Respondents
Verizon Pennsylvania Inc.
Verizon North Inc.
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(215) 963-6068

**RESPONSE OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC TO
THE IN-HEARING DATA REQUEST OF VERIZON PENNSYLVANIA INC.,
Submitted in PaPUC Docket No. C-20027195, August 26, 2003.**

REQUEST:

Provide tariff pages showing the carrier access rates currently being charged by AT&T in Pennsylvania. Provide a calculation of the effective AMOU rate charged by AT&T, comparable to the AMOU rate calculated for VZ-PA and VZ North and set forth in AT&T Stmt. 1.0.

RESPONSE:

Excerpts from the following tariffs are attached: AT&T Communications of Pennsylvania, LLC Pa. P.U.C.-No. 17, and TCG Delaware Valley, Inc. Pa. P.U.C. No.5. The access rates reflected in both tariffs are in effect in both VZ-PA's and VZ North's service territories. In addition, a spreadsheet providing estimated access minute of use (AMOU) rates from each tariff, and comparing them to estimated AMOU rates for both VZ-PA and VZ North, is attached. The estimated AMOU rates are based on the same assumptions concerning transport mileage and percentage use of tandem transport and termination used to derive the VZ-PA and VZ North AMOU rates.

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ACCESS SERVICES AND NETWORK INTERCONNECTION SERVICES

15. DIGITAL LINK ACCESS SERVICE RATES

15.1. Tandem-Switched Transport

	<u>Monthly Rate</u>	<u>Per MOU</u>	
A. Tandem-Switched Transport Termination			
Per Access Minute		\$0.000195	
B. Tandem-Switched Transport Facility			
Per Access Minute per mile		\$0.000045	
15.2. Switching Charge			
A. Originating Switching Charge			
Per Access Minute		\$0.016686	(D)
B. Terminating Switching Charge			
Per Access Minute		\$0.016686	(D)

ACCESS AND INTERCONNECTION SERVICES

SECTION 3 - SWITCHED ACCESS SERVICES, (Cont'd.)

3.5 RATES AND CHARGES, (cont'd.)

3.5.4 Local Transport, (cont'd.)

.2 Direct Trunked Transport

	1 Year MRC	3 Year MRC	5 Year MRC
DS1			
Fixed	\$57.00	\$48.00	\$43.00
Per Mile	\$17.00	\$14.00	\$10.00

DS3			
Fixed	\$729.00	\$643.00	\$612.00
Per Mile	\$145.00	\$118.00	\$64.00

.3 Common Switched Transport

	Per Access Minute
Local Transport Fixed (C)	.000195
Tandem Transport Mileage/per mile (C)	.000045
3.5.5 800/Tandem Switching (C)	
Toll Free Data Base Query	.000983 (C)
Available with Feature Group D equipped with out of band signaling	
Per Query	\$.0075

Issued May 17, 2000

Effective: May 18, 2000

Jean Halloran
Tariff Analyst
Two Teleport Drive
Staten Island. NY 10311

ACCESS AND INTERCONNECTION SERVICES

SECTION 3 - SWITCHED ACCESS SERVICES, (Cont'd.)

3.5 RATES AND CHARGES

	NRC	ADD'L NRC*
3.5.1 Service Implementation		
DS1 Interface	\$200.00	\$100.00
3.5.2 Carrier Common Line		
Per Minute of Use		\$.005335 (I)
3.5.3 End Office Local Switching		
Per Minute of Use		\$.014175 (I)
3.5.4 Local Transport		
.1 Entrance Facility		

<u>DS1</u>	<u>Monthly Recurring</u>	<u>Non- Recurring</u>	<u>ADD'L Non- Recurring*</u>	(C)
1 yr	\$ 300.00	\$ 500.00	\$ 500.00	
*				
5 yrs \$	\$ 210.00	\$ 500.00	\$ 500.00	
 <u>DS3</u>				
1 yr	\$5,400.00	\$2,500.00	\$2,500.00	
*				
5 yrs	\$3,780.00	\$2,500.00 I	\$2,500.00 I	(C)

ADD'L NRC applies to additional services installed at the same time and at the same location as the initial service.

Issued May 17, 2000

Effective: May 18, 2000

Jean Halloran
 Tariff Analyst
 Two Teleport Drive
 Staten Island, NY 10311

COMPARISON OF VERIZON SWITCHED ACCESS RATES WITH AT&T TARIFFED RATES

Intrastate Rate Element	VZ-PA Current Intrastate Access Rates	VZ-North Current Intrastate Access Rates	AT&T Digital Link Access Rates	TCG Switched Access Rates
Carrier Charge/ Carrier Common Line [Note 1]	0.0070217	0.0558641	0.0000000	0.0053350
Avg. Transport	0.0017620	0.0004594		
Common Transport - Fixed Mile [Note 2] -- Blended			0.0000390	0.000039
Common Transport -Per Mile [Note 2] -- Blended			0.0000900	0.00009
Local Switching	0.0090000	0.0060000	0.0166860	0.014175
Estimated Access Minute of Use (AMOU)	0.0177837	0.0623235	0.0168150	0.0196390

Note 1: VZ CC rates are calculated based on 2003 actual billed expenses and minutes from Verizon.

Note 2: Assumes 10 miles and 20% tandem switched transport facility & termination..

*The AT&T/TCG Access Rates apply in both VZ-PA's and VZ North's territories

Source:

1. Rates for AT&T Digital Link Access are from AT&T Comm. Of PA, LLC PA P.U.C. No. 17, First Revised Sheet 23.
2. Rates for TCG Switched Access are from TCG Delaware Valley PA P.U.C. No. 5, Second Revised Page 66.

RESPONSE OF MCI WORLDCOM NETWORK SERVICES, INC. TO IN-HEARING DATA
REQUEST NO. 1, SUBMITTED IN DOCKET C-20027195 BEFORE THE PA PUC (ACCESS
CHARGE)

REQUEST:

Provide MCI's per minute charges for a conversation minute of use for
both Verizon Pennsylvania, Inc. and Verizon North, Inc. comparable to
the numbers in AT&T Statement 1.0 at pages 4-5.

RESPONSE:

MCI's conversation minute of use for Verizon Pennsylvania, Inc. is
approximately 3.6 cents. For Verizon North, Inc., MCI's conversation
minute of use is approximately 11.5 cents.

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C-20027195

VERIZON EX. 12