



May 13, 2005

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Robert Eckenrod
Pennsylvania Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

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

Dear Mr. Eckenrod:

BTL

Please find enclosed the revised responses of MCI to the Office of Trial Staff's Interrogatories, Set I, #s 2 and 3 in the above-referenced case. Please note that MCI's responses are Confidential and Proprietary and should be treated accordingly.

Please contact me if you have any questions or concerns with this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Michelle Painter".
Michelle Painter

cc: Certificate of Service
James McNulty (cover letter and Certificate of Service only)

Enclosures

SERVICE LIST

I hereby certify that I have this day caused a true copy of MCI's Revised Responses to OTS Set I to be served upon the parties of record in Docket No C-20027195 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Ashburn, VA on May 13, 2005

VIA E-MAIL AND OVERNIGHT DELIVERY

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Michelle Painter

ORIGINAL



May 13, 2005

Via Overnight Delivery

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

MAY 13 2005

PA PUBLIC UTILITY COMMISSION
CERTIFICATE OF SERVICE

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

Dear Mr. McNulty:

Please find enclosed an original and three (3) copies of MCI's Objections to the Office of Consumer Advocate's Second Set of Interrogatories in the above-referenced case.

Please contact me if you have any questions or concerns with this filing.

Very truly yours,

DOCUMENT
FOLDER

A handwritten signature in cursive script that reads "Michelle Painter".
Michelle Painter

cc: Certificate of Service
Administrative Law Judge Cynthia Williams Fordham

Enclosure

SERVICE LIST

I hereby certify that I have this day caused a true copy of MCI's Objections to OCA's Interrogatories, Set II to be served upon the parties of record in Docket No C-20027195 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Ashburn, VA on May 13, 2005

VIA E-MAIL AND OVERNIGHT DELIVERY

MAY 13 2005

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Michelle Painter

MAY 13 2005

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
BUREAU

AT&T Communications
of Pennsylvania, Inc.

:
:

Docket Number

v.
Verizon North, Inc.

DOCUMENT
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C-20027195

MCI'S OBJECTIONS TO OCA'S SECOND SET OF INTERROGATORIES

MCImetro Access Transmission Services LLC ("MCI"), hereby objects to the Second Set of Interrogatories served April 22, 2005 by the Office of Consumer Advocate ("OCA"),¹ and states as follows:

General Objections

1. MCI is a large corporation with employees located in many different locations in Pennsylvania and in other states. In the course of its business, MCI creates countless documents that are not subject to the Commission's or the FCC's retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. MCI will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information, and will supplement its discovery responses if appropriate. To the extent that OCA's Second Set of Interrogatories purport to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.

DOCKETED
SEP 1 2005

¹ The OCA Interrogatories are attached to these Objections.

2. MCI objects to OCA's Second Set of Interrogatories to the extent they request that MCI provide information that MCI does not maintain in the ordinary course of business, and to the extent that the request requires a special study.

3. MCI objects to OCA's Second Set of Interrogatories to the extent they seek to have MCI create documents not in existence at the time of the request.

4. MCI objects to OCA's Second Set of Interrogatories to the extent they seek information not within MCI's possession, custody, or control.

5. MCI objects to OCA's Second Set of Interrogatories to the extent the requests are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of the action.

6. MCI objects to providing information to the extent that such information is already in the public record or which is already in the possession, custody, or control of OCA.

7. MCI objects to the Requests to the extent that such Requests are overly broad, unduly burdensome, expensive, oppressive, or excessively time consuming as written.

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PA PUBLIC UTILITY COMMISSION
SECRETARY/REGISTRAR

SPECIFIC OBJECTIONS

OBJECTION OF MCImetro ACCESS TRANSMISSION SERVICES LLC TO SET II,
INTERROGATORY NO. 1 OF OFFICE OF CONSUMER ADVOCATE DATED MAY 6, 2005
SUBMITTED IN DOCKET C-20027195

REQUEST: In the Verizon PA service territory provide the number of MCI local exchange residential lines as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. A sample table that you may fill in is provided below for your convenience.

MCI local exchange residential lines in Verizon PA service territory as December 31, 2004				
Provide By	Zone 1	Zone 2	Zone 3	Zone 4
Own facilities				
Resale				
UNE-L				
UNE-P				
Total				

OBJECTION: MCI hereby incorporates its General Objections. MCI further objects to this question on the basis that the interrogatory is irrelevant and burdensome. The number of MCI's local exchange residential lines is not relevant to the proper level of Verizon's access rates. Further, the information may not be available in the format request, and MCI is not required to create a special study.

OBJECTION OF MCImetro ACCESS TRANSMISSION SERVICES LLC TO SET II,
INTERROGATORY NO. 2 OF OFFICE OF CONSUMER ADVOCATE DATED MAY 6, 2005
SUBMITTED IN DOCKET C-20027195

REQUEST: In the Verizon North service territory provide the number of MCI local exchange residential lines as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. In your response to this question please the sample table provide in question 1.

OBJECTION: MCI hereby incorporates its General Objections. MCI further objects to this question on the basis that the interrogatory is irrelevant and burdensome. The number of MCI's local exchange residential lines is not relevant to the proper level of Verizon's access rates. *Further, the information may not be available in the format request, and MCI is not required to create a special study.*

OBJECTION OF MCImetro ACCESS TRANSMISSION SERVICES LLC TO SET II,
INTERROGATORY NO. 3 OF OFFICE OF CONSUMER ADVOCATE DATED MAY 6, 2005
SUBMITTED IN DOCKET C-20027195

REQUEST: In the Verizon PA service territory provide the number of MCI local exchange business lines served as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. *In your response to this question please the sample table provide in question 1.*

OBJECTION: MCI hereby incorporates its General Objections. MCI further objects to this question on the basis that the interrogatory is irrelevant and burdensome. The number of MCI's local exchange business lines is not relevant to the proper level of Verizon's access rates. Further, the information may not be available in the format request, and MCI is not required to create a special study.

OBJECTION OF MCImetro ACCESS TRANSMISSION SERVICES LLC TO SET II,
INTERROGATORY NO. 4 OF OFFICE OF CONSUMER ADVOCATE DATED MAY 6, 2005
SUBMITTED IN DOCKET C-20027195

REQUEST: In the Verizon North territory provide the number of MCI business lines as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. In your response to this question please the sample table provide in question 1.

OBJECTION: MCI hereby incorporates its General Objections. MCI further objects to this question on the basis that the interrogatory is irrelevant and burdensome. The number of MCI's local exchange business lines is not relevant to the proper level of Verizon's access rates. Further, the information may not be available in the format request, and MCI is not required to create a special study.

Respectfully submitted,



Michelle Painter, Esq.

MCI

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(703) 886-5973 – telephone

(703) 886-0633 -- facsimile

E-mail: Michelle.Painter@mci.com

Dated: May 13, 2005

OFFICE OF CONSUMER ADVOCATE'S INTERROGATORIES
SET II, DIRECTED TO MCI

DOCKET NO. C-20021795

1. In the Verizon PA service territory provide the number of MCI local exchange residential lines as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. A sample table that you may fill in is provided below for your convenience.

MCI local exchange residential lines in Verizon PA service territory as December 31, 2004				
Provide By	Zone 1	Zone 2	Zone 3	Zone 4
Own facilities				
Resale				
UNE-L				
UNE-P				
Total				

2. In the Verizon North service territory provide the number of MCI local exchange residential lines as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. In your response to this question please the sample table provide in question 1.
3. In the Verizon PA service territory provide the number of MCI local exchange business lines served as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. In your response to this question please the sample table provide in question 1.
4. In the Verizon North territory provide the number of MCI business lines as of December 31, 2004 and for the most current period for which the data are available. Indicate the number of lines that are served in each Verizon Unbundle Network Element Zone and indicate number provided by your own facilities, by resale, by UNE-P and by UNE-L. In your response to this question please the sample table provide in question 1.

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VIA FIRST CLASS and ELECTRONIC MAIL

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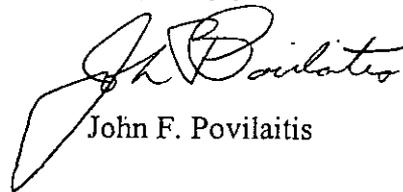
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Re: AT&T Communications of Pennsylvania v. Verizon Pennsylvania Inc.
and Verizon North Inc., Docket No. C-20027195

Dear Mr. Cheskis:

Enclosed please find two copies of Qwest Communications Corporation's Responses to the Office of Consumer Advocate's Interrogatories, Set I, Nos. 2, 5 and 6.

Very truly yours,


John F. Povilaitis

BTL

Enclosures
JFP:ck

c. Certificate of Service

Secretary McNulty
(Transmittal letter and Certificate of Service)

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2005 MAY 16 AM 9:55
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document(s) in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

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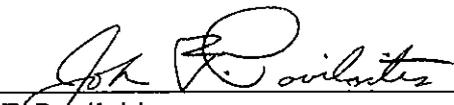
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Date: May 13, 2005



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Counsel for
Qwest Communications Corporation

Suzan DeBusk Paiva
Assistant General Counsel
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Email & UPS Overnight Delivery
Philip F. McClelland, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923

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

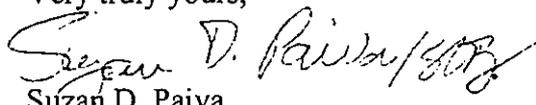
Dear Mr. McClelland:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Revised Responses to the Office of Consumer Advocate's Interrogatories I-5, I-7 and I-8 (Set 1) to Verizon Pennsylvania Inc. and Verizon North Inc., in reference to the above captioned matter. Please note that the Revised Responses contain proprietary information.

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

BTL

Very truly yours,


Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the revised responses of Verizon Pennsylvania Inc. and Verizon North Inc. to the Office of Consumer Advocate's Interrogatories, Set 1 Numbers 5, 7 and 8, 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 13th day of May, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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May 16, 2005

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PA PUBLIC UTILITY COMMISS.
SECRETARY'S BUREAU

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

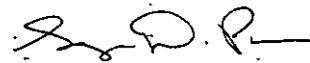
KJR

Dear Ms. Painter:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Responses to MCI metro Access Transmission Services, LLC's first set of Interrogatories to Verizon Pennsylvania Inc. and Verizon North Inc., in the above captioned matter. Please note that the Responses contain proprietary information.

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

Very truly yours,


Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the responses of Verizon Pennsylvania Inc. and Verizon North Inc. to MCImetro Access Transmission Services, LLC's first set of discovery requests, 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 16th day of May, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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& Niesen
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PA PUBLIC UTILITY COMMISSION
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PA PUBLIC UTILITY COMMISSION
OF PENNSYLVANIA BUREAU

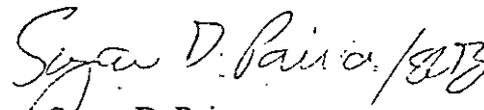
Re: AT&T Communications of Pennsylvania, Inc.
v. Verizon North Inc. and Verizon Pennsylvania Inc.
Docket No. C-20027195

Dear Mr. Eckenrod:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Responses to the Office of Trial Staff's first set of Interrogatories to Verizon Pennsylvania Inc. and Verizon North Inc., in the above captioned matter. Please note that the Responses contain proprietary information.

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

Very truly yours,


Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery

James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

KJR

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the responses of Verizon Pennsylvania Inc. and Verizon North Inc. to the Office of Trial Staff's first set of discovery requests, 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 16th day of May, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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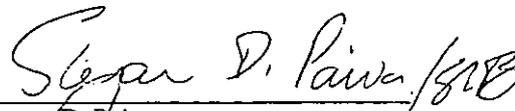
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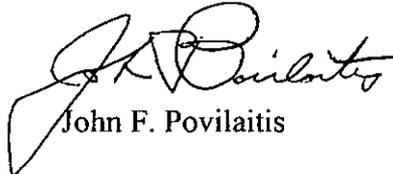
Re: AT&T Communications of Pennsylvania v. Verizon Pennsylvania Inc.
and Verizon North Inc., Docket No. C-20027195

KJR

Dear Ms. Paiva:

Enclosed please find two copies of Qwest Communications Corporation's Interrogatories and Request for Documents on Remand Set II, Nos. 1 through 5 to Verizon Pennsylvania Inc. and Verizon North Inc. in the above-referenced proceeding.

Very truly yours,


John F. Povilaitis

Enclosures
JFP:ck

c. Certificate of Service

Secretary McNulty
(Transmittal letter and Certificate of Service)

IN F.D.C.
SECRETARY'S BUREAU

2005 MAY 24 AM 9:30

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

AT&T Communications of Pennsylvania LLC :

v. :

Docket No. C-20027195

Verizon Pennsylvania Inc. and Verizon North Inc. :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document(s) in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

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Date: May 20, 2005



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Counsel for
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Suzan DeBusk Paiva
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DOCUMENT FOLDER

May 23, 2005

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MAY 23 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Email & UPS Overnight Delivery
Philip F. McClelland, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923

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

KJR

Dear Mr. McClelland:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Responses to the Office of Consumer Advocate's Set II Interrogatories to Verizon Pennsylvania Inc. and Verizon North Inc., in reference to the above captioned matter.

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

Very truly yours,

Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the responses of Verizon Pennsylvania Inc. and Verizon North Inc. to the Office of Consumer Advocate's Interrogatories, Set II, 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 23rd day of May, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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May 25, 2005

VIA FEDERAL EXPRESS AND E-MAIL

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DOCUMENT
FOLDER

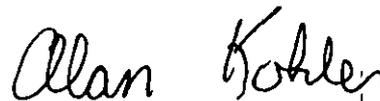
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SECRETARY'S BUREAU

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

Dear Joel:

Enclosed please find the attachments for OCA 2-2 which were inadvertently excluded from our initial response. The attachments are proprietary information and subject to the Protective Order. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,



Alan C. Kohler
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

ACK/cll
Enclosures

cc: Parties on Certificate of Service
Bob Loube (w/enc.)
James J. McNulty, Secretary (certificate of service only)

RJP

HAR:58902.3/ATT004-225805

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing documents in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

VIA FIRST CLASS AND ELECTRONIC MAIL

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Date: May 25, 2005



Alan C. Kohler

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DOCUMENT
FOLDER

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

KJR

Dear Mr. Cheskis:

Enclosed please find two copies of Qwest Communications Corporation's Interrogatories and Requests for Production of Documents Set I, Nos. 1 through 5 to the Office of Consumer Advocate.

Very truly yours,


John F. Povilaitis

Enclosures
JFP:ck

c. Certificate of Service

Secretary McNulty
(Transmittal letter and Certificate of Service)

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05 MAY 26 AM 9:20
PA.P.U.C.
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

.CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document(s) in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

VIA FIRST CLASS AND ELECTRONIC MAIL

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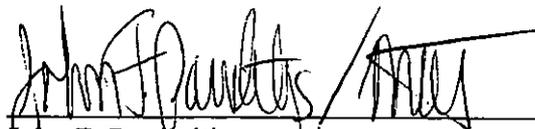
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Date: May 25, 2005



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Counsel for
Qwest Communications Corporation

Suzan DeBusk Paiva
Assistant General Counsel

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May 31, 2005

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MAY 31 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Email & UPS Overnight Delivery

John F. Povilaitis, Esquire
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800 North Third Street, Suite 101
Harrisburg, PA 17102-2025

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

Dear Mr. Povilaitis:

KJR

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s
Objections to Qwest Communication Corporation's Set II Interrogatories to Verizon
Pennsylvania Inc. and Verizon North Inc., in reference to the above captioned matter.

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

Very truly yours,



Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the objections of Verizon Pennsylvania Inc. and Verizon North Inc. to Qwest Communication Corporation's Interrogatories, Set II, 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 31st day of May, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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& Niesen
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June 1, 2005

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2005 JUN - 1 PM 4: 10
SECRETARY'S BUREAU

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

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

Dear Mr. Povilaitis:

Enclosed please find Objections of the Office of Consumer Advocate to Qwest Interrogatories, Set I.

If you have any questions, please feel free to contact me.

Sincerely,

Joel H. Cheskis
Assistant Consumer Advocate

RJP

Enclosures
cc: James McNulty/Secretary
All parties of record
*84531

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AT&T Communications of
Pennsylvania, Inc.

v.

Verizon North, Inc. and
Verizon Pennsylvania, Inc.

:
:
:
:
:
:
:

Docket No. C-20027195

SECRETARY'S BUREAU

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OBJECTIONS
OF THE OFFICE OF CONSUMER ADVOCATE
TO QWEST INTERROGATORIES SET I

Pursuant to Section 5.342 of the regulations of the Pennsylvania Public Utility Commission, 52 Pa. Code § 5.342, the Pennsylvania Office of Consumer Advocate ("OCA") hereby Objects to the First Set of Interrogatories served May 25, 2005 by Qwest Communications Corporation ("Qwest") and states as follows:

OBJECTIONS

Interrogatory I-1:

How many Pennsylvania consumers in the Verizon service area subscribe to wireless service? How much on average do they pay for wireless service a month for the time period January 1, 2000 through December 31, 2004? Of those consumers with wireless service, how many also have a traditional wireline service? Please provide any work papers, formulas or documents used to develop and/or support your response.

Objection:

The OCA objects to Interrogatory I-1 on the ground that it is overly burdensome to produce the answer. The information sought in this question is not available.

Section 5.361(a)(2) of the Commission's regulations provides that "no discovery or deposition is permitted which would cause unreasonable ... burden or expense to the deponent, a person or participant." 52 Pa. Code § 5.361(a)(2). Furthermore, section 5.361(a)(4) provides that "no discovery or deposition is permitted which would require the making of an unreasonable investigation by the deponent, a participant or witness." 52 Pa. Code § 5.361(a)(4).

Public data concerning the number of consumers in Pennsylvania that subscribe to wireless service is not segregated according to Pennsylvania local telephone companies. As such, how much Verizon PA and Verizon North customers pay for wireless and how many of Verizon's local telephone customers with wireline service also have wireless service is not available. Therefore, it would be unduly burdensome to require the OCA to answer the propounded interrogatory.

Interrogatory I-2:

How many Pennsylvania consumers in the Verizon service area subscribe to VoIP service? How much on average do they pay for VoIP service a month for the time period January 1, 2000 through December 31, 2004? Of those consumers with VoIP service, how many also have a traditional wireline service? Please provide any work papers, formulas or documents used to develop and/or support your response.

Objection:

The OCA objects to Interrogatory I-2 on the ground that it is overly burdensome to produce the answer. The information sought in this question is not available.

Section 5.361(a)(2) of the Commission's regulations provides that "no discovery or deposition is permitted which would cause unreasonable ... burden or expense to the deponent, a person or participant." 52 Pa. Code § 5.361(a)(2). Furthermore, section 5.361(a)(4) provides that "no discovery or deposition is permitted which would require the making of an unreasonable investigation by the deponent, a participant or witness." 52 Pa. Code § 5.361(a)(4).

Public data concerning the number of consumers in Pennsylvania that subscribe to VoIP service would not be segregated according to Pennsylvania local telephone companies. As such, how much Verizon PA and Verizon North customers pay for VoIP and how many of these local telephone customers with wireline service also have VoIP service is not available. Therefore, it would be unduly burdensome to require the OCA to answer the propounded interrogatory.

Interrogatory I-3:

How many Pennsylvania consumers in the Verizon service area subscribe to cable telephony service? How much on average do they pay for cable telephony service a month for the time period January 1, 2000 through December 31, 2004? Of those consumers with cable telephony service, how many also have a traditional wireline service? Please provide any work papers, formulas or documents used to develop and/or support your response.

Objection:

The OCA objects to Interrogatory I-3 on the ground that it is overly burdensome to produce the answer. The information sought in this question is not available or is restricted against disclosure.

Section 5.361(a)(2) of the Commission's regulations provides that "no discovery or deposition is permitted which would cause unreasonable ... burden or expense to the deponent, a person or participant." 52 Pa. Code § 5.361(a)(2). Furthermore, section 5.361(a)(4) provides that "no discovery or deposition is permitted which would require the making of an unreasonable investigation by the deponent, a participant or witness." 52 Pa. Code § 5.361(a)(4).

Public data concerning the number of consumers in Pennsylvania that subscribe to cable telephony service would not be segregated according to Pennsylvania local telephone companies. As such, how much Verizon PA and Verizon North customers pay for cable telephony service and how many of these local telephone customers with wireline service also have cable telephony service is not available. Therefore, it would be unduly burdensome to require the OCA to answer the propounded interrogatory.

Objections of the Office of Consumer Advocate to Set I, Interrogatories of Qwest Communications Corporation, dated May 25, 2005, submitted in Docket No. C-20027195

Interrogatory I-4:

Please provide by utility the average monthly charges Pennsylvania consumers in the Verizon service area paid during the time period from January 1, 2000 through December 31, 2004 for the following utilities:

- a. Electricity
- b. Water/Sewage
- c. Cable/Satellite
- d. Other

Objection:

The OCA objects to Interrogatory I-4 on the ground that it is overly burdensome to produce the answer. The information sought in this question is not available.

Section 5.361(a)(2) of the Commission's regulations provides that "no discovery or deposition is permitted which would cause unreasonable ... burden or expense to the deponent, a person or participant." 52 Pa. Code § 5.361(a)(2). Furthermore, section 5.361(a)(4) provides that "no discovery or deposition is permitted which would require the making of an unreasonable investigation by the deponent, a participant or witness." 52 Pa. Code § 5.361(a)(4).

Any average monthly charges Pennsylvania consumers paid for electricity, water/sewage, cable/satellite or "other" utility service would not be segregated according to Pennsylvania local telephone companies. As such, how much Verizon PA and Verizon North customers pay for these utility services is not available. Therefore, it would be unduly burdensome to require the OCA to answer the propounded interrogatory.

Objections of the Office of Consumer Advocate to Set I, Interrogatories of Qwest Communications Corporation, dated May 25, 2005, submitted in Docket No. C-20027195

Interrogatory I-5:

Please identify separately how many of the consumers utilizing the Lifeline, Lifeline 150 or any other telephone assistance programs also have wireless phone service, cable television service, or paging service. Please provide any work papers, formulas or documents used to develop and/or support your response.

Objection:

The OCA objects to Interrogatory I-5 on the ground that it is overly burdensome to produce the answer. The information sought in this question is not available.

Section 5.361(a)(2) of the Commission's regulations provides that "no discovery or deposition is permitted which would cause unreasonable ... burden or expense to the deponent, a person or participant." 52 Pa. Code § 5.361(a)(2). Furthermore, section 5.361(a)(4) provides that "no discovery or deposition is permitted which would require the making of an unreasonable investigation by the deponent, a participant or witness." 52 Pa. Code § 5.361(a)(4).

Public data concerning the number of consumers in Pennsylvania utilizing Lifeline, Lifeline 150 or any other telephone assistance programs that also subscribe to wireless phone service, cable television service or paging service is not readily available. The OCA is unaware of the location where such information would be kept, if such information is, in fact, kept. Therefore, it would be unduly burdensome to require the OCA to answer the propounded interrogatory.

WHEREFORE, the Pennsylvania Office of Consumer Advocate respectfully objects to the aforementioned interrogatories propounded by Qwest Communications Corporation on May 25, 2005.

Respectfully submitted,



Philip F. McClelland
Senior Assistant Consumer Advocate
Joel H. Cheskis
Assistant Consumer Advocate

For: Irwin A. Popowsky
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048

Dated: June 1, 2005
*84517

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, Objections of the Office of Consumer Advocate to Qwest Interrogatories, Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 1st day of June, 2005.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Robert Eckenrod, Esq.
Office of Trial Staff
Pa. Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

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June 6, 2005

Via Email & UPS Overnight Delivery

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FOLDER

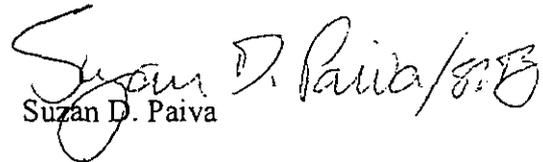
Re: AT&T Communications of Pennsylvania, Inc.
v. Verizon North Inc. and Verizon Pennsylvania Inc.
Docket No. C-20027195

Dear Mr. Povilaitis:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Responses to Qwest Communication Corporation's Set II Interrogatories to Verizon Pennsylvania Inc. and Verizon North Inc., in reference to the above captioned matter.

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

Very truly yours,


Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery

James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RJP

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the responses of Verizon Pennsylvania Inc. and Verizon North Inc. to Qwest Communication Corporation's Interrogatories, Set II, 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 6th day of June, 2005.

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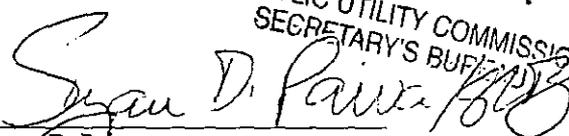
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Harrisburg, PA 17102

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PA PUBLIC UTILITY COMMISSION
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June 6, 2005

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VIA FIRST CLASS and ELECTRONIC MAIL

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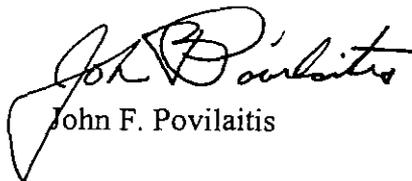
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Re: AT&T Communications of Pennsylvania v. Verizon Pennsylvania Inc.
and Verizon North Inc., Docket No. C-20027195

Dear Mr. Cheskis:

Enclosed please find two copies of Qwest Communications Corporation's Supplemental Responses to Set I, Nos. 2 and 6 and Set II, No. 5 to the Office of Consumer Advocate.

Very truly yours,


John F. Povilaitis

Enclosures
JFP:ck

c. Certificate of Service

Secretary McNulty
(Transmittal letter and Certificate of Service)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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AT&T Communications of Pennsylvania LLC :
v. :
Verizon Pennsylvania Inc. and Verizon North Inc. :
PA.P.U.C.
SECRETARY'S BUREAU
Docket No. C-20027195

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document(s) in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

VIA FIRST CLASS AND ELECTRONIC MAIL

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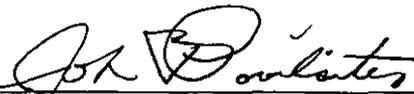
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Date: June 6, 2005



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June 8, 2005

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JUN 08 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Ms. Painter:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s First Set of Interrogatories to MCImetro Access Transmission Services, LLC, in reference to the above captioned matter.

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

Very truly yours,

Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc. and Verizon North Inc.'s Interrogatories to MCImetro Access Transmission Services, LLC. Set 1, 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 8th day of June, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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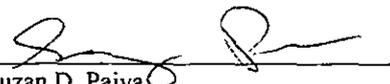
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June 8, 2005

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Via E-mail and Overnight Delivery

The Honorable Cynthia I. Fordham
Pennsylvania Public Utility Commission
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, Pennsylvania 19130

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Judge Fordham:

Enclosed please find both public and proprietary versions of the Direct Testimony on Remand, Statement 1.0 Remand, of Michael D. Pelcovits submitted on behalf of MCI Metro Access Transmission Services LLC ("MCI") in the above-referenced matter.

Please contact me if you have any questions or concerns with this filing.

Very truly yours,

**DOCUMENT
FOLDER**

Michelle Painter
Michelle Painter

cc: Certificate of Service
James McNulty, Cover Letter and Certificate of Service only

Enclosure

SERVICE LIST

I hereby certify that I have this day caused a true copy of MCI's Direct Testimony on Remand to be served upon the parties of record in Docket No C-20027195 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Ashburn, VA on June 8, 2005

VIA E-MAIL AND OVERNIGHT DELIVERY

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JUN 08 2005

PA PUBLIC UTILITY COMMISSION
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Philadelphia, PA 19103

Tel: (215) 963-6068
Fax: (215) 563-2638
Suzan.D.Paiva@Verizon.com

June 8, 2005

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

The Honorable Cynthia W. Fordham
Administrative Law Judge
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

RECEIVED

JUN 08 2005

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:

Enclosed is a copy of the Direct Testimony on Remand of James J. Kane on behalf of Verizon Pennsylvania Inc. and Verizon North Inc. in reference to the above captioned case. Please note that this testimony contains proprietary information.

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

Very truly yours,



Suzan D. Paiva

DOCUMENT
FOLDER

SDP/slb

cc: Via Email and UPS Overnight Delivery
Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc. and Verizon North Inc.'s Direct Testimony on Remand, 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 8th day of June, 2005.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

Patricia Armstrong, Esquire
Regina L. Matz, Esquire
Thomas, Thomas, Armstrong
& Niesen
212 Locust Street, Suite 500
Harrisburg, PA 17108

Philip F. McClelland, Esquire
Barrett Sheridan, Esquire
Joel Cheskis, Esquire
Shaun A. Sparks, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
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Michelle Painter, Esquire
MCI WorldCom Communications, Inc.
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C2-2-105
Ashburn, VA 20147-6105
Counsel for MCI

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Office of Trial Staff
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Robert C. Barber, Esquire
AT&T Communications of PA
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Washington, DC 20036

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Harrisburg, PA 17102

Alan Kohler, Esquire
Daniel Clearfield, Esquire
Wolf, Block, Schorr & Solis-Cohen
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Harrisburg, PA 17101-1236

Kristin L. Smith, Esquire
Qwest Communications Corporation
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Kathleen Misturak-Gingrich, Esquire
Daley, Zucker & Gingrich, LLC
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John F. Povilaitis, Esq.
Ryan, Russell, Ogden & Seltzer LLP
800 North Third Street, Suite 101
Harrisburg, PA 17102-2025
Counsel for Qwest

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JUN 08 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


Suzan D. Paiva
Attorney for Respondents
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Verizon North Inc.
1717 Arch Street, 32NW
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Alan C. Kohler
Direct Dial: (717) 237-7172
Direct Fax: (717) 237-2752
E-mail: akohler@wolfblock.com

June 10, 2005

VIA FEDERAL EXPRESS AND E-MAIL

Joel H. Cheskis
Assistant Consumer Advocate
Office of Consumer Advocate
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5th Floor, Forum Place
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DOCUMENT
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RECEIVED
05 JUN 13 AM 9:59
F.A.P.U.C. BUREAU
SECRETARY'S BUREAU

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

Dear Joel:

Enclosed please find two copies of the Response of AT&T Communications of Pennsylvania, LLC to Set III of Office of Consumer Advocate's Interrogatories. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,



Alan C. Kohler
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

ACK/cll
Enclosures

cc: Parties on Certificate of Service
Bob Loube (w/enc.)
James J. McNulty, Secretary (certificate of service only)

HAR:58902.4/ATT004-225805

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing documents in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

VIA FIRST CLASS AND ELECTRONIC MAIL

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05 JUN 13 AM 9:59
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roeckenrod@state.pa.us

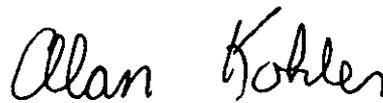
Philip R. McClelland, Esquire
Barrett C. Sheridan, Esquire
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Date: June 10, 2005

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Direct Fax: (717) 237-2752
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June 20, 2005

DOCUMENT
FOLDER

VIA FEDERAL EXPRESS AND E-MAIL

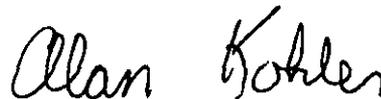
Suzan DeBusk Paiva
William B. Petersen
Verizon Pennsylvania Inc.
1717 Arch Street, 32 N
Philadelphia, PA 19103

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

Dear Ms. Paiva:

Enclosed please find two copies of the AT&T Communications of Pennsylvania, LLC's Responses to Verizon Pennsylvania Inc.'s and Verizon North Inc.'s First Set of Interrogatories. Copies have been served in accordance with the attached Certificate of Service.

Respectfully submitted,



Alan C. Kohler

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

ACK/cll
Enclosures

cc: Parties on Certificate of Service
✓ James J. McNulty, Secretary (certificate of service only)

SECRETARY'S BUREAU
PA P.U.C.

RJP
2005 JUN 21 AM 10:33

HAR:59663.1/ATT004-225805

Boston, MA ■ Cherry Hill, NJ ■ Harrisburg, PA ■ New York, NY ■ Norristown, PA ■ Philadelphia, PA ■ Roseland, NJ ■ Wilmington, DE

WolfBlock Government Relations - Harrisburg, PA ■ WolfBlock Public Strategies - Boston, MA and Washington, DC

Wolf, Block, Schorr and Solis-Cohen LLP, a Pennsylvania Limited Liability Partnership

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2005 JUN 21 AM 10: 23

PA P.U.C.
SECRETARY'S BUREAU

AT&T Communications of Pennsylvania LLC :

v. :

Docket No. C-20027195

Verizon North Inc. and Verizon Pennsylvania, Inc. :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing documents in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

VIA FIRST CLASS AND ELECTRONIC MAIL

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Date: June 20, 2005

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kristin.smith@qwest.com



Alan C. Kohler



June 22, 2005

ORIGINAL

Via Overnight Delivery

James McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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

Dear Mr. McNulty:

Please find enclosed an original and three (3) copies of a Motion for Admission Pro Hac Vice filed in the above-referenced matter.

Please contact me if you have any questions or concerns with this matter.

Very truly yours,


Michelle Painter

Enclosure

cc: The Honorable Cynthia Williams Fordham
Certificate of Service

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JUN 22 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**DOCUMENT
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BTL

WJA

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

AT&T Communications
of Pennsylvania, Inc.

v.
Verizon North, Inc.

Docket Number

C-20027195

MOTION FOR ADMISSION PRO HAC VICE

NOW COMES, Michelle Painter, Esquire ("Movant"), a member in good standing, of the bar of this Commonwealth and respectfully moves for the admission of the following individual to appear as an attorney on behalf of MCImetro Access Transmission Services LLC ("MCI") in the above-captioned proceeding:

Richard Fipphen, Esquire
MCI
200 Park Avenue, 6th Floor
New York, NY 10166
Phone -- 212-519-4624
E-mail – Richard.Fipphen@mci.com

In support thereof, Movant states:

1. I am an active member of the Pennsylvania Bar (Attorney No. 91760) and practicing at MCI, 22001 Loudoun County Parkway, Ashburn, Virginia 22001.
2. Richard Fipphen, Esquire, is a member in good standing of the bars of New York, Massachusetts and Connecticut.
3. Richard Fipphen has been in-house counsel for MCI and its predecessor and affiliates for approximately sixteen (16) years. Because of his employment by MCI, he is uniquely qualified to represent and identify the interests of the company.

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DOCKETED
JUN 27 2005

1

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JUN 22 2005
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

WHEREFORE, I move that Richard Fipphen, Esquire, be admitted to practice Pro Hac Vice on behalf of MCImetro Access Transmission Services LLC in the above-captioned proceeding.

Respectfully Submitted,



Michelle Painter, Esq.

MCI

22001 Loudoun County Parkway

Ashburn, VA 20147

(703) 886-5973

(703) 886-0633 – facsimile

Michelle.Painter@mci.com

Dated: June 22, 2005

SERVICE LIST

I hereby certify that I have this day caused a true copy of MCI's Motion for Admission Pro Hac Vice to be served upon the parties of record in Docket No C-20027195 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Ashburn, VA on June 22, 2005

VIA E-MAIL AND OVERNIGHT DELIVERY

Patricia Armstrong
Thomas, Thomas, Armstrong & Niesen
212 Locust Street, Suite 500
Harrisburg, PA 17108
Phone – 717-255-7627

Bill Petersen
Verizon
1717 Arch Street, 32N
Philadelphia, PA 19103
Phone – 215-963-6065

Robert Eckenrod
Pennsylvania Public Utility Commission
Office of Trial Staff – 2nd Floor
Commonwealth Keystone Building
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Phone – 717-787-1976

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JUN 22 2005

Michelle Painter
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU
Michelle Painter



June 22, 2005

Via E-mail and Overnight Delivery

Suzan Paiva
Verizon Pennsylvania
1717 Arch St, 32NW
Philadelphia, PA 19103

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

Dear Suzan:

Please find enclosed the responses of MCI to Verizon Pennsylvania Inc. and Verizon North Inc.'s Interrogatories, Set I, in the above-referenced case. Please note that the response to Interrogatory No. 2 is Proprietary and should be treated accordingly.

Please contact me if you have any questions or concerns with this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Michelle Painter".

Michelle Painter

cc: Certificate of Service
James McNulty (cover letter and Certificate of Service only)

Enclosures

**DOCUMENT
FOLDER**

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JUN 22 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RJP

SERVICE LIST

I hereby certify that I have this day caused a true copy of MCI's Responses to Verizon Set I (Remand) to be served upon the parties of record in Docket No C-20027195 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Ashburn, VA on June 22, 2005

VIA E-MAIL AND OVERNIGHT DELIVERY

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Harrisburg, PA 17101
Phone - 717-237-7172

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JUN 22 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Michelle Painter

Michelle Painter

LAW OFFICES
RYAN, RUSSELL, OGDEN & SELTZER LLP

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WYOMISSING, PENNSYLVANIA
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June 23, 2005

VIA OVERNIGHT DELIVERY AND ELECTRONIC COPY

Suzan DeBusk Paiva, Esquire
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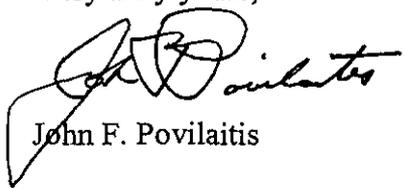
DOCUMENT
FOLDER

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

Dear Ms. Paiva:

Enclosed please find two copies of Qwest Communications Corporation's Responses to Verizon Pennsylvania Inc. and Verizon North Inc. Interrogatories First Set, Nos. 1, 2 and 3.

Very truly yours,


John F. Povilaitis

Enclosures
JFP:ck

c. Certificate of Service

Secretary McNulty
(Transmittal letter and Certificate of Service)

PA P.U.C.
SECRETARY'S BUREAU

2005 JUN 27 AM 10:30

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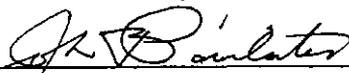
Philip R. McClelland, Esquire
Barrett C. Sheridan, Esquire
Joel H. Cheskis, Esquire
Shaun A. Sparks, Esquire
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Fax: (717) 657-4996
kgingrich@dzglaw.com

Bob Loube
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Silver Spring, MD 20901
(301) 681-0338
bobloube@earthlink.net

Date: June 24, 2005


John F. Povilaitis
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Counsel for
Qwest Communications Corporation

PA P.U.C.
SECRETARY'S BUREAU

2005 JUN 27 AM 10:30

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Suzan DeBusk Paiva
Assistant General Counsel
Law Department



DOCUMENT FOLDER

Verizon Pennsylvania Inc.
1717 Arch Street, 32NW
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Tel: (215) 963-6068
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Suzan.D.Paiva@Verizon.com

June 24, 2005

Via Email & UPS Overnight Delivery
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Office of Trial Staff
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RECEIVED

JUN 24 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

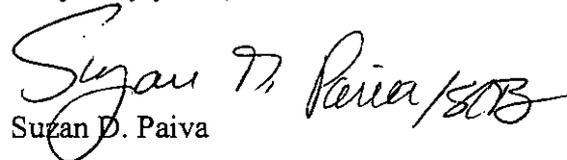
Re: AT&T Communications of Pennsylvania, Inc.
v. Verizon North Inc. and Verizon Pennsylvania Inc.
Docket No. C-20027195

Dear Mr. Eckenrod:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Revised Response to the Office of Trial Staff's Interrogatory 1 from Set I, to Verizon Pennsylvania Inc. and Verizon North Inc., in the above captioned matter. Please note that the Revised Response contains proprietary information.

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

Very truly yours,


Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service

Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the revised response of Verizon Pennsylvania Inc. and Verizon North Inc. to the Office of Trial Staff's Interrogatory I-1 from OTS's first set of discovery requests to Verizon, 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 24th day of June, 2005.

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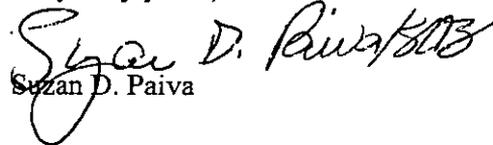
Re: AT&T Communications of Pennsylvania, Inc.
v. Verizon North Inc. and Verizon Pennsylvania Inc.
Docket No. C-20027195

Dear Mr. Gray:

Enclosed please find Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Revised Responses to the Office of Small Business Advocate's Interrogatory 4 from Set 1, to Verizon Pennsylvania Inc. and Verizon North Inc., in reference to the above captioned matter. Please note that the revised answer to I-4 includes proprietary information.

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

Very truly yours,


Suzan D. Paiva

SDP/meb

Via Email and UPS Overnight Delivery
cc: Attached Certificate of Service
Via UPS Overnight Delivery
James J. McNulty (cover letter and certificate of service only)
ALJ Cynthia W. Fordham (cover letter and certificate of service only)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the Revised Response of Verizon Pennsylvania Inc. and Verizon North Inc. to the Office of Small Business Advocate's Interrogatory 4 of Set 1, 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 24th day of June, 2005.

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June 24, 2005

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
400 North Street - 2nd Floor
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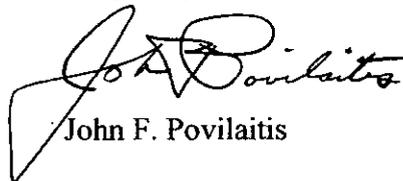
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Re: AT&T Communications of Pennsylvania, Inc. v. Verizon North Inc.
and Verizon Pennsylvania Inc., Docket No. C-20027195

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of the Motion of Qwest Communications Corporation to Strike Portions of the Remand Testimony of Verizon Pennsylvania Inc. and the Office of Consumer Advocate and the Entire Remand Testimony of the Office of Trial Staff in the above-captioned proceeding. Copies of the Motion have been served in accordance with the attached Certificate of Service.

Very truly yours,


John F. Povilaitis

BTL

Enclosures
JFP:ck

c. Certificate of Service
The Honorable Cynthia W. Fordham

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BEFORE THE
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

AT&T Communications of
Pennsylvania, Inc.

v.

Verizon Pennsylvania Inc. and
Verizon North Inc.

Docket No. C-20027195

**MOTION OF QWEST COMMUNICATIONS CORPORATION
TO STRIKE PORTIONS OF THE REMAND TESTIMONY OF VERIZON
PENNSYLVANIA INC. AND THE OFFICE OF CONSUMER ADVOCATE AND
THE ENTIRE REMAND TESTIMONY OF THE OFFICE OF TRIAL STAFF**

To The Honorable Cynthia W. Fordham:

Qwest Communications Corporation ("Qwest"), by and through its counsel in the above-captioned matter, hereby files this Motion to strike portions of the remand testimony of Verizon Pennsylvania, Inc. ("Verizon PA") and Verizon North Inc. ("Verizon North")(collectively "Verizon") and the Office of Consumer Advocate ("OCA") and to strike the entire remand testimony of the Office of Trial Staff ("OTS"), pursuant to Section 5.103 of the Pennsylvania Public Utility Commission's ("Commission") regulations.

I. Introduction

1. As an introductory matter, Qwest emphasizes the importance of a ruling on this Motion that is consistent with the Commission's characterization of the scope of this remand. In this remand, the Commission is seeking a recommendation by the Administrative Law Judge ("ALJ") on issues that have already been the subject of

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testimony and argument, e.g. phasing in further access rate reductions, elimination of the carrier line charge and the appropriateness of mirroring interstate access rates. The remand was not intended to provide opportunity for parties to litigate new issues outside the scope of this remand, such as how access charge reductions should impact IXC long distance rates or whether access charge reductions must result in a mandated “flow-through” to end-users.¹ Indeed, it is important to note that Section 3018 of the Public Utility Code prohibits the Commission from prescribing IXC long-distance rates and requiring a “flow-through”.

For these reasons and the arguments that follow, Qwest’s Motion should be granted.

II. Background

2. By Order entered on July 28, 2004 at the above-captioned docket, the Commission implemented the restructuring of access charges pursuant to the Verizon merger conditions, as adopted in the Petition for Resolution filed by Verizon, the OCA and the Office of Small Business Advocate (“OSBA”). The Commission essentially established parity between Verizon PA and Verizon North’s Traffic Sensitive Access Charges and the Carrier Charge rate, without a significant rate increase for residential or business local exchange customers.

3. The Commission viewed adopting the Petition as the first step in modifying access charges in Pennsylvania and remanded specific matters back to the Office of Administrative Law Judge (“OALJ”) for consideration of actual access charge

¹ The “flow-through of access charge reductions” is effected by passing access charge rate reductions through to end-users in the form of reductions in Interexchange Carrier (“IXC”) toll rates.

reform. By Order entered on January 18, 2005 at the above-captioned docket, the Commission has also directed that the remand be completed in an expedient manner.

4. Pursuant to the deadlines established at the April 4, 2005 prehearing conference, direct testimony in the remand was due on or before June 8, 2005. Direct remand testimony was filed by Qwest, Verizon, OCA, OSBA, the Office of Trial Staff, AT&T Communications of Pennsylvania, LLC (“AT&T”) and MCIMetro Access Transmission Services, LLC (“MCI”). Rebuttal testimony is due on or before June 29, 2005.

5. At page 18, lines 1-12 of Verizon’s direct remand testimony, the Verizon witness addresses the issue of passing access charge reductions through to end-users, though admits that raising the issue of “flow-through” would be inappropriate in this remand.

6. At page 24, line 9 through page 28 of OCA’s direct remand testimony, line 11, the OCA witness addresses the impact of access charge reductions on long-distance rates.

7. In the OTS direct remand testimony, the OTS witness focuses exclusively on the “flow-through” issue and calls for a mandated “flow-through” of access charge reductions.

III. Argument

A. This Motion should be granted because any discussion and consideration of long distance rates and “flow-through” is beyond the scope of the remand.

8. The remand phase of this proceeding was not intended to provide an opportunity for parties to freshly litigate issues outside the scope of this remand. The

level of long distance rates both inside and outside Pennsylvania are not at issue in this remand, and thus, are beyond the scope of proper testimony. Attempting to raise this type of issue or argument as part of this remand litigation is not only inappropriate, but is a clear effort to cloud the distinct issue in this remand—proper reductions to Verizon’s access rates in Pennsylvania.²

B. The Commission does not possess legal authority to require “flow-through”.

9. Furthermore, the Commission no longer sets the competitive long distance rates of IXCs on a cost of service basis under the Act 183. *See* 66 Pa. C. S § 3018(b)(1). Under Section 3018(a), the General Assembly declares that interexchange services provided by IXCs are competitive. Under Section 3018(b), the Public Utility Code provides the following with respect to Commission jurisdiction over IXC rates:

The commission may not fix or prescribe the rates, tolls, charges, rate structures, rate base, rate of return, operating margin or earnings for interexchange competitive services or otherwise regulate interexchange competitive services except as set forth in this chapter.

66 Pa. C. S § 3018(b)(1). Thus, Section 3018(b)(1) prohibits the Commission from setting IXC long distance rates, which would bar the Commission from ordering a “flow-through” of access charge rate reductions to end users. Therefore, any remand testimony, which addresses the impact of access charge reductions on IXC long distance rates or the “flow-through” of access charge reductions to end-users, should be excluded from the record of this remand.

² The “flow-through” of access charge rate reductions was not discussed as part of the ALJ’s decision in phase 1 of this case, nor was “flow-through” addressed in Exceptions to that decision or the Commission’s July 28, 2004 Order entered at the above-captioned docket.

IV. Conclusion

10. For the foregoing reasons, Qwest respectfully requests that the Commission grant its Motion to Strike Portions of the Remand Testimony of Verizon Pennsylvania, Inc. and the Office of Consumer Advocate and the Entire Remand Testimony of the Office of Trial Staff addressing the impact of access charge reductions on IXC long distance rates and any resulting mandated "flow-through", and grant any other such relief as is deemed just and reasonable under the circumstances.

Dated: June 24, 2005

Respectfully submitted,


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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document(s) in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

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Date: June 24, 2005



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