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RECEIVED

December 17, 2003

VIA UPS OVERNIGHT DELIVERY

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

DOCUMENT

DEC 17 2003
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: *Investigation into the Obligation of Incumbent Local Exchange Carriers to
Unbundle Network Elements, Docket No. I-00030099*

Dear Secretary McNulty:

I enclose for filing the original and three copies of Verizon Pennsylvania Inc. and Verizon North Inc.'s Joint Response to MCI Worldcom Network Services, Inc.'s Motion to Compel in the above named matter.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Suzan D. Paiva

SDP/slb

Enclosure

cc: Via E-Mail and UPS Overnight Delivery
Honorable Michael Schierle
Honorable Susan Colwell
Attached Service List

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION
DEC 17 2003
PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Investigation into the Obligations of)
Incumbent Local Exchange Carriers to)
Unbundle Network Elements)

Docket No. I-00030099

DOCKETED
JAN 08 2004

**VERIZON PENNSYLVANIA INC.'S
AND VERIZON NORTH INC.'S JOINT RESPONSE TO
MCI WORLDCOM NETWORK SERVICES, INC.'S MOTION TO COMPEL¹**

INTRODUCTION

MCI expresses surprise that Verizon has objected to its First Set of Interrogatories and Request for Production of Documents.² MCI should not be surprised, because its requests in this proceeding suffer from the same fundamental flaw that Verizon has pointed out to MCI in other state Triennial Review Order ("TRO") proceedings: MCI's requests *have nothing to do with the objective triggers case that Verizon is presenting*. Instead, MCI has recycled the same irrelevant discovery it has served in other jurisdictions. Indeed, MCI Requests 17 and 67 seek information for the District of Columbia.

As Verizon has informed the Commission and interested parties, it is relying *solely* on the FCC's objective triggers to demonstrate that there is no impairment regarding the network elements at issue in this proceeding.³ Verizon has declined to bring a potential deployment case during this nine-month case. Nonetheless, MCI has chosen to disregard this fact, and has propounded lengthy and unduly burdensome discovery that has nothing to do with the FCC's triggers. In fact, it is telling that MCI did not attach the specific requests to which Verizon

¹ Verizon Pennsylvania Inc. and Verizon North Inc. are collectively referred to herein as "Verizon." MCI WorldCom Network Services, Inc. is referred to herein as "MCI."

² MCI's Motion at 1.

³ See, e.g., Verizon's Petition to Initiate at 3, Verizon Direct Testimony at 5, lines 2-5.

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objected to its Motion to Compel. The reason is that their irrelevance and burdensome nature are clear on their face.⁴ These requests appear intended to harass Verizon rather than gather information that is relevant or likely to lead to relevant information for this proceeding.

Contrary to MCI's vague claims of relevance, the FCC has unequivocally stated that "states should examine [the] triggers first in their analyses"⁵ and if the triggers are satisfied "a state must make a finding of non-impairment."⁶ These trigger examinations are based on "objective criteria" and "bright-line rules" so as to "avoid the delays caused by protracted proceedings and [to] minimize administrative burdens."⁷ MCI's discovery requests are nothing more than an attempt to force irrelevant operational and economic factors into this proceeding in order to distort the FCC's trigger review, to obscure Verizon's satisfaction of the triggers, and to delay the Commission's consideration of Verizon's straightforward case. Generally, the information that MCI seeks is information that the FCC has expressly stated is not relevant to any trigger analysis, and is only relevant – if at all – to a potential deployment case – which Verizon has declined to bring as part of this proceeding.⁸

If the Commission is to conduct a review that is consistent with the FCC's mandatory guidelines, it cannot allow this process to be twisted into an unfocused analysis of subjective issues that are not at all relevant to the "bright-line rules" that the Commission is called upon to apply. If the Commission were mistakenly to accept MCI's invitation to do so, the

⁴ Verizon has attached the requests that are the subject of this Motion as Exhibit "A" hereto.

⁵ *Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338; *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98; *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, FCC 03-36 (rel. August 21, 2003) ("TRO"), at para. 461.

⁶ *Id.* at para. 411.

⁷ *Id.* at para. 498.

⁸ *See, e.g., id.* at para. 425, n. 1300 ("[[S]tates must first employ triggers that examine actual deployment; **only if triggers are not met** must the states apply criteria to assess whether entry is uneconomic.") (emphasis added).

Commission's ability to complete a timely and appropriate triggers review would be seriously jeopardized, and it would fail to act in a manner consistent with the FCC's mandatory "federal guidelines." Accordingly, for all of these reasons, which are more fully explained below, MCI's Motion to Compel should be denied.

MCI'S MOTION TO COMPEL SHOULD BE DENIED IN ITS ENTIREITY

A. Pennsylvania's Discovery Standard Requires That MCI's Motion Be Denied.

MCI purports to look to the discovery standard in Pennsylvania to support its Motion to Compel. However, this standard provides no support whatsoever for MCI's Motion.

Section 5.231(c) of the Pennsylvania Code states that "a participant may obtain discovery regarding any matter, not privileged, *which is relevant to the subject matter involved in the pending action*" (emphasis added). Applying this rule, the Commission has previously held that it "is not required to allow discovery and receive evidence on non-relevant issues."⁹

Likewise, section 5.361 of the Pennsylvania Code ("Limitation of scope of discovery and deposition") provides that "[n]o discovery or deposition is permitted which . . . [w]ould cause unreasonable annoyance, embarrassment, oppression, burden or expense . . . [or which] [w]ould require the making of an unreasonable investigation by the deponent, a participant or witness." In other words, under Pennsylvania's discovery standard, MCI is *not* permitted to harass Verizon by seeking voluminous discovery on issues and facts that are not relevant to Verizon's triggers case – as it has done in its First Set of Interrogatories and Request for Production of Documents.

⁹ *Pike County Light & Power Co. et al.*, Docket Nos. R-00016849C0001 to R-00016857C0001, Material Question Order, (May 9, 2002), 2002 Pa.PUC Lexis 14 at *11.

B. MCI's Justifications For Its Discovery Requests Are Without Merit.¹⁰

MCI Requests 2, 3 and 8

As MCI's parenthetical description of these requests admits,¹¹ these questions seek information regarding collocation. In seeking this information, these requests are plainly irrelevant to the Commission's trigger analysis.

MCI claims that "the rates, terms and conditions of collocation are directly relevant to [the] trigger analysis for mass market switching."¹² But MCI fails to provide any convincing reason why this is so. This proceeding is not a pricing docket in which MCI gets to reargue the rates that this Commission has already set. Contrary to MCI's claims, the triggers do not call for an evaluation of the "rates, terms, and conditions" of collocation in Pennsylvania. Instead, collocation is relevant only to a *subsequent* "exceptional circumstances" evaluation and/or a potential deployment review.¹³

The FCC was explicit in stating that "we require the states to apply triggers that look only at actual deployment as the principal mechanism for evaluating impairment in a particular market. If the deployment triggers are met, the states must find no impairment."¹⁴ Therefore, exceptional circumstances evaluations and/or potential deployment reviews will occur only – if at all – *after* the Commission has completed its trigger reviews. Moreover, the Commission's

¹⁰ MCI devotes five pages of its Motion to taking issue with Verizon's objections without putting them in the context of its requests. MCI's Motion at 3-8. The Commission should disregard this unfocused diatribe as nothing more than make-weight argument and should consider Verizon's objections in the specific context of MCI's irrelevant and burdensome requests.

¹¹ MCI's Motion at 9.

¹² *Id.* at 10.

¹³ TRO at para. 462.

¹⁴ *Id.*, para. 502, n. 1561.

exceptional circumstances review will occur *only if* the Commission concludes that Verizon has satisfied the self-provisioning trigger, and *only if* a carrier comes forward with evidence of “some significant barrier to entry” to those carriers that already self-provision switching.¹⁵

Furthermore, even *if* the Commission decides to consider such exceptional circumstances, the TRO does not require that this review be completed in nine months, nor can the Commission use these exceptional circumstances to overturn a satisfied self-provisioning trigger. Instead, the Commission can only petition the FCC “for a waiver of the application of the trigger.”¹⁶

In addition, even if the “exceptional circumstances” review were part of the Commission’s trigger analysis – which it is not – the relevance of collocation to this review would be limited to whether “there is *no* collocation space available” in “a particular market.”¹⁷ This review has nothing to do with the information MCI seeks in its requests: for example, “whether Verizon is considering changing the type(s) of documents that controls [sic] collocation rates, terms and conditions” (MCI Request 2); and “all recurring rates that Verizon will charge the CLEC for each type of collocation” (MCI Request 3). In fact, these are exactly the types of considerations that the FCC said could only be examined as part of a potential deployment case. Verizon has already indicated that it does not plan on making a potential deployment showing in this proceeding, so this type of review will not be part of this case.

In the same vein, it is worth noting that although Verizon answered MCI Request No. 8 by stating that it would provide responsive information for the carriers identified in its initial

¹⁵ *Id.*, para. 503.

¹⁶ *Id.*

¹⁷ *Id.*, para. 462 (emphasis added).

testimony as meeting the FCC’s triggers, MCI claims that Verizon should not be able to limit its production to this information. However, since Verizon is *solely* relying on a triggers case, any further information regarding “all collocation arrangements” would clearly be irrelevant – and burdensome – because it would not be related to a triggers case.

For all of these reasons, MCI’s collocation requests, which seek information related to “exceptional circumstances” and “potential deployment,” are irrelevant to the Commission’s trigger analysis, and are not likely to lead to the discovery of admissible evidence in this proceeding. MCI’s request to compel answers to these requests should therefore be denied.

MCI Request 11

MCI attempts to distinguish this request from its collocation questions by listing it separately under the parenthetical “Cross Connection.”¹⁸ However, this request is simply another collocation-related request, as MCI admits further down in its discussion (“[T]his question is seeking details about CLECs’ existing *collocation* cross connection arrangements to determine alternatives to transport in the event that UNE transport is lost . . .”).¹⁹ Indeed, MCI’s admission that this request seeks information concerning what *may* happen “*in the event UNE transport is lost*” clearly shows that this request has nothing to do with the Commission’s triggers analysis. For this reason, and the reasons stated above, MCI’s request to compel an answer to this interrogatory should be denied.

MCI Request 13

This request, which has ten subparts, seeks numerous details regarding EEL arrangements for each *Verizon* – *i.e.*, not just Verizon PA or Verizon North – central office.

¹⁸ MCI’s Motion at 11.

¹⁹ *Id.* (emphasis added).

Indeed, MCI's definitions do not limit its requests to Verizon Pennsylvania Inc. or Verizon North.²⁰ Even its Motion, MCI admits that it is seeking "information on Verizon's activities in other states" purportedly on the grounds that this information is "relevant to an examination of what Verizon is capable of doing to support the provision of UNEs in Pennsylvania."²¹

Thus, as a threshold matter, this request is vastly overbroad, since it seeks information for every single wire center in Verizon's entire footprint. It is also irrelevant, because the question of whether Verizon has satisfied the applicable trigger is the only impairment determination that is at issue in this proceeding. Moreover, the Commission should not be misled by MCI's claim that this request must be relevant because it "is part of a two-part set" of questions the first of which Verizon answered. Verizon's answer to MCI request 12 stated – without waiving Verizon's objections of burdensomeness and relevance – that:

The Company is unable to determine which EELs are formed *with or without* Collocations and the Company is unable to tell which Wire Center the EEL is created or which Wire Center was where the EEL was connected without a special Stud[y]. Also, the Company is unable to provide information on what the EELs are connected to.

(emphasis added). In other words, Verizon responded that the information that MCI requested is not available.

²⁰ The definitions section of MCI's requests states that "[t]he terms 'Verizon,' 'Verizon-Pennsylvania, Inc.,' 'VZ-PA,' 'Verizon North, Inc.,' 'the respondent,' or 'you' or 'your company' shall include Verizon Pennsylvania Inc., Verizon North, Inc. and all of their subsidiaries and affiliates, including those associated in any way with any affiliated entity . . ."

²¹ MCI's Motion at 5.

Finally, in the TRO, the FCC rejected MCI's proposal to establish rules that CLECs may obtain concentrated EELs at the DSO level, and any attempt to resurrect this request in this proceeding cannot be heard.²²

MCI Requests 14, 16 and 17

MCI claims that it needs responses to these requests so the Commission can “determine the proper enterprise/mass market crossover point . . .”²³ There are several fundamental problems with these requests.

First, MCI request 17, which refers back to MCI request 14, seeks information regarding Verizon's operations in the District of Columbia. These requests are, therefore, irrelevant on their face. Indeed, if MCI cannot be bothered with editing its boilerplate discovery to focus it on Pennsylvania, it is more than reasonable for the Commission to conclude that these requests were not crafted to obtain information within the proper scope of this proceeding.

Second, some of these requests do not seek *facts*, but rather “definitions” and “views” (MCI Requests 14 & 16), and such requests are inappropriate. Third, and more problematic, is the fact that these requests seek information regarding Verizon's retail operations. Verizon's retail operations have no bearing on determining the “crossover point,” because it is “requesting carriers” of unbundled switching (such as MCI) about whom this determination must be made, based on information provided by these carriers. Any information that Verizon could provide regarding its own retail operations would have absolutely no bearing on the Commission's “crossover point” determination. Therefore, these requests are irrelevant and improper as

²² TRO at para. 492 (“WorldCom proposes to establish rules ensuring that competitive LECs may obtain concentrated EELs at the DSO level. . . . We decline, however, to establish at this time rules requiring concentration.”).

²³ MCI's Motion at 13.

directed to Verizon. Indeed, MCI should direct these questions to other CLECs, and should be prepared to provide this information itself.

MCI Requests 18-20

MCI's purported justification for these requests again clearly shows that they are irrelevant to the triggers case before the Commission. MCI claims these requests are proper because "[t]he FCC recognized that different classes of customers are served by different loop types and 'resulting [sic] in different economic considerations for competitive carriers seeking to self-deploy.'"²⁴ But "different economic considerations" for "competitive carriers" have absolutely nothing to do with the FCC's triggers. Instead, these questions address issues that might be relevant in a potential deployment case, which Verizon has declined to bring in this proceeding.

Moreover, these requests seek information regarding loops, not the switching triggers. Although MCI claims that it needs this information "to understand the technical characteristics that Verizon associates with voice grade and/or DS-0 loops so that MCI may properly evaluate Verizon's assertions in its testimony and at hearing,"²⁵ it is difficult to understand how MCI's justification is related to Verizon's triggers case for unbundled switching. Nor is it appropriate to seek to require Verizon to "provide any relevant public and/or confidential technical publications and any other documents that describe" the "characteristics and capabilities" of a "DSL-capable loop." (MCI Request 20). This request, for example, would require Verizon to somehow provide all public documents from equipment manufacturers on this product.

²⁴ MCI's Motion at 15.

²⁵ *Id.* at 14.

Simply stated, these requests have nothing to do with the switching trigger, and certainly do not support a massive search and production for technical publications which MCI could obtain publicly through its own efforts.

MCI Request 22-25

MCI broadly attempts to justify these requests by claiming that they are “relevant to a variety of issues mandated by the TRO for state commission review.”²⁶ But these requests do not seek information about Verizon’s triggers case; to the contrary, in MCI’s own words they allegedly seek information which may “provide[] a baseline for estimating churn” and “market potential.”²⁷ As a threshold matter, churn rates, which have nothing to do with whether the FCC’s triggers are satisfied, are an issue in a potential deployment case and perhaps as part of the Commission’s review of the hot cut process. But even in these situations, it is the churn rate *of CLECs, not ILECs, that is relevant* – a fact that MCI implicitly conceded before the FCC when it put into the record its own churn rate.²⁸ Therefore, these requests are improper as directed to Verizon, since Verizon’s retail churn rate is completely irrelevant to this proceeding.

MCI also asserts that this information is relevant to the crossover determination, but as explained above, the information needed for the crossover analysis is in the hands of “requesting carriers” such as MCI itself. Indeed, MCI and other CLECs make this crossover determination every day in the marketplace, and they do not review Verizon’s churn rates before deciding whether to serve a multi-line customer with a DS0 or DS1 loop. The data that MCI seeks in

²⁶ *Id.*

²⁷ *Id.* at 15-16.

²⁸ TRO, n. 1451.

these requests has no relevance to a trigger analysis, which is by definition focused on and limited to “actual *competitive* deployment.”²⁹

Furthermore, these requests seek information regarding line sharing and line splitting (see, e.g., MCI requests 23 and 24). However, any suggestion that the Commission must evaluate these topics as part of its impairment analysis is clearly incorrect. Instead, as the FCC stated in the TRO, it expects the carriers “to commence negotiations” to establish a “long-term arrangement” to replace line sharing.³⁰ In fact, the FCC imposed a three-year transition period for new line sharing arrangements to provide CLECs with the time “to implement new internal processes and procedures, design new product offerings, and negotiate new arrangements with incumbent LECs to replace line sharing.”³¹ With regard to line splitting, the FCC encouraged “incumbent LECs and competitors to use existing state commission collaboratives” to address issues related to line splitting.³²

Finally, it is worth noting that MCI fails to disclose in its Motion that these requests seek historical data going back more than *two years*. MCI does not even attempt to justify this portion of the requests, nor can it. MCI also fails to acknowledge that the requests are not limited to “Verizon Pennsylvania,” but instead are directed to “Verizon,” and seek information “on a statewide basis” for Verizon’s entire national footprint. MCI cannot justify such a broad and unfocused geographic scope and has not attempted to do so. Accordingly, MCI’s request to compel answers to these requests should also be denied.

²⁹ *Id.* at para. 506 (emphasis added).

³⁰ TRO para. 265.

³¹ *Id.*, para. 264.

³² *Id.* para. 252.

MCI Requests 28-31

As MCI admits, “[t]his series of questions seek basic information about the ILEC’s loop plant” and “possible difficulties using UNE loops to customer premises served by IDLC . . .”³³ Again, this information is totally irrelevant to the triggers determination at issue in this proceeding. These requests, as reflected by MCI’s own words, seek details regarding operational factors and possible “future” issues which the FCC specifically stated could not be part of a triggers analysis. “[S]tates must *first* employ triggers that examine actual deployment[.]”³⁴ “[A]ctual deployment is the best evidence of impairment [and] [operational and economic factors] come into play *only* if [the FCC’s] deployment triggers are not met.”³⁵ MCI’s request that Verizon be compelled to provide answers to these requests should be denied.

MCI Request 32

This request asks that Verizon provide “all documentation showing where dark fiber in the loop plant is currently available in each wire center in Verizon’s territory for use by CLECs.” This request is not limited to Pennsylvania, nor is it even limited to the entire Verizon Pennsylvania or Verizon North footprint. Therefore, it is clearly overbroad and overly burdensome. Moreover, MCI cannot justify this request as relevant to the mass market switching trigger analysis because, as noted above, this analysis must look at whether the switching triggers are met by actual deployment. MCI’s request is seeking information regarding potential deployment (*i.e.*, transport “that could be available to CLECs”)³⁶ and, thus, is beyond the scope of the impairment analysis at issue in the Commission’s review of Verizon’s case.

³³ MCI’s Motion at 16.

³⁴ TRO, n. 1300 (emphasis added).

³⁵ TRO, n. 1405 (emphasis added).

³⁶ MCI’s Motion at 18.

MCI Request 33

This request seeks “the percentage of working loops used or available to support Verizon *retail* services that are configured as ‘connect through’/‘warm line’” (emphasis added). As noted above, Verizon’s retail operations are not at issue in this triggers proceeding. Indeed, MCI’s suggestion that this information will be “valuable” to the Commission is refuted by the TRO.³⁷ To the contrary, the FCC stated that triggers determinations should look to “granular evidence that new entrants are providing retail services in the relevant market using *non-incumbent LEC facilities*.”³⁸ That is because “this kind of evidence demonstrates better than any other kind what business decisions actual market participants have made regarding whether it is feasible to provide service without relying on the incumbent LEC.”³⁹ Accordingly, this request is not relevant to this triggers proceeding and the Commission should deny MCI’s request to compel a response to it.

MCI Requests 40-42

MCI Requests 40 and 42 seek Verizon’s demand growth or decline for each of the last three years, and each of the next three years, for various UNE loops, UNE-P local exchange service and resold ILEC business and residential services.⁴⁰ MCI claims it needs this information to show “the various factors affecting competitors’ ability to target, serve and compete. . .”⁴¹ This information is not relevant to a triggers case. Instead, it is part of the

³⁷ MCI’s Motion at 18.

³⁸ TRO para. 93 (emphasis added).

³⁹ *Id.*

⁴⁰ Verizon provided a response to MCI Request 41, with the exception of part (b), which asks for line split configurations for UNE loops used for DSL services. This information is irrelevant for the reasons discussed above concerning MCI’s other line splitting and line sharing requests.

⁴¹ MCI’s Motion at 19-20.

economic and operational factors that would only relate to a potential deployment case. Since Verizon is not presenting a potential deployment case in this proceeding, requesting this information for each the last three years, and for each of the next three years, is irrelevant and overly burdensome.

MCI Request 44

This request asks Verizon to describe “in detail the approach and manner in which Verizon segments its sales and marketing efforts and personnel on the basis of customer size, type [and revenue].” MCI claims that this request is “carefully tailored to obtain the data that the Commission must have to issue a determination consistent with the [TRO].”⁴² This claim is ludicrous because this request plainly seeks economic information wholly unrelated to a triggers determination. Verizon does not concede that these economic factors would even be relevant in a potential deployment case. Nonetheless, they clearly are not relevant here, because Verizon is not presenting a potential deployment case.

MCI Requests 51, 54, 57, 60 and 63

Verizon responded to these requests, subject to its objections.⁴³ Therefore, MCI’s Motion to Compel as to these requests should be denied as moot.

MCI Request 64

MCI claims that this requests relates to “the time and resources required to transition services off of ILEC UNEs which are to be withdrawn . . .”⁴⁴ The Commission should note that MCI does not even attempt to link these questions to the trigger analysis. That is because it

⁴² MCI’s Motion at 20.

⁴³ See Attachment “B” hereto.

⁴⁴ MCI’s Motion at 22.

cannot do so. These requests are not about the FCC's mandatory triggers. Indeed, paragraph 417 of the TRO states that the FCC expects "states will require an appropriate period for competitive LECs to transition from any unbundled transport that the state finds should no longer be unbundled." Therefore, these topics are all inappropriate avenues for discovery. MCI's request that Verizon be compelled to answer these data requests should be denied.

MCI Requests 65 and 66

MCI claims that these requests for historical and future cost data for installing fiber and conduit "are directly relevant, and within the scope of this proceeding."⁴⁵ However, this claim is directly refuted by one of the very TRO paragraphs MCI cites for support. Paragraph 411 of the TRO clearly states that:

In applying the self-provisioning trigger, we find that actual competitive deployment is the best indicator that requesting carriers are not impaired and, therefore, emphasize that this quantitative trigger is the primary vehicle through which no-impairment findings will be made. However, we recognize that this trigger identifies only the existence of *actual* competitive facilities and does not address the *potential* ability of competitive LECs to deploy transport facilities along a particular route. Therefore, when conducting its analysis, a state must also consider and may also find no impairment on a particular route that it finds is suitable for "multiple, competitive supply," but along which this trigger is not facially satisfied. States must expressly base any such decision on the following economic characteristics . . . [which include] the cost of underground or aerial laying of fiber . . .

(Emphasis in original).

Simply put, the information MCI requests here relates to a potential deployment case that could only arise if the triggers are not met. Verizon is not presenting a potential deployment case, as such, MCI's Requests 65 and 66 are irrelevant.

⁴⁵ MCI's Motion at 23.

MCI Request 67

This request seeks “copies of contracts, agreements, tariffs, or other governing documents by which Verizon sells, rents, leases or otherwise provides [or acquires] transport services . . . *in the District of Columbia.*” Thus, on its face, it is irrelevant to this proceeding.

Moreover, even if this request was properly tailored to Pennsylvania, which it is not, it is clearly burdensome. In addition, MCI states that its purpose is to, among other things, “check on . . . CLEC information about their own routes.”⁴⁶ That information should be obtained from the CLEC parties, not Verizon.

MCI Requests 69-73

This is another variant of MCI’s prior cutover and transitioning requests. For the reasons stated above, they are irrelevant to this proceeding. (Contrary to MCI’s claims, Verizon did object to these requests on the grounds of relevance.).

⁴⁶ MCI’s Motion at 24.

CONCLUSION

For all of the foregoing reasons, MCI's Motion to Compel should be denied.



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Counsel for Verizon Pennsylvania Inc.
and Verizon North Inc.

December 17, 2003

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DEC 17 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT A

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 2 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

With respect to MCI-2, please state whether Verizon is considering changing
the type(s) of document that controls collocation rates, terms and conditions
(e.g. using interconnection agreements instead of tariffs). If Verizon is
considering such change, please provide all documents that address such
change.

OBJECTION:

See Specific Objections 1, 5, 6, 7, and 10. Based on these objections,
Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 3 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

If a CLEC orders collocation from Verizon in Pennsylvania, please list all
recurring and non-recurring rates that Verizon will charge the CLEC for each
type of collocation (Note - do not merely refer to the tariff - break out the
charges individually).

OBJECTION:

See Specific Objections 5, 6, and 7. Based on these objections Verizon will
not be providing a response to this interrogatory, but notes that its
collocation rates are publicly available.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 8 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each CLEC or other carrier collocation arrangement in each Verizon wire center in Pennsylvania, please provide the following information, reported by CLLI code, street address and zip code:

- (a) name of CLEC or other carrier;
- (b) type of collocation arrangement (e.g. caged, cageless, virtual, etc.);
- (c) size of collocation arrangement;
- (d) amount of power (including both "A" and "B" DC feeds and AC power) supplied to the collocation arrangement;
- (e) number of 2-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (f) number of 4-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (g) all equipment installed in the collocation arrangement, including make, model, and total installed capacity for each piece of equipment;
- (h) type(s) of Verizon transport connected to the collocation arrangement (e.g., special access, UNE transport, etc.);
- (i) capacity(ies) of Verizon transport connected to the collocation arrangement (e.g., DS-1, DS-3, OC-3, etc.), and number of circuits at each level of capacity.

OBJECTION:

See Specific Objections 2, 3, 6, and 7. Subject to and without waiving the foregoing General and Specific Objections, Verizon will provide information on the carriers with fiber-based collocation arrangements in Verizon wire centers that Verizon identified in its initial testimony as meeting one or both of the FCC's triggers.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 11 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

With regard to all CLEC to CLEC cross connections you have provisioned,
please identify the following, reported by wire center:

- (a) number of such cross connections that you have provisioned;
- (b) the identity of both CLECs for whom you provisioned the cross connect
- (c) the type of collocation arrangement of both CLECs;
- (d) the minimum, maximum and average provisioning time for CLEC to CLEC cross
connections;
- (e) the identity of the entity or personnel who performs the cross connect
(e.g. ILEC central office technician, certified CLEC technician, etc.)

OBJECTION:

See Specific Objections 6 and 7. Based on this objection Verizon will not be
providing a response.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 13 OF MCI
WORLDWIDE NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each Verizon central office or wire center at which loops and transport
are connected to form EELs *without* using collocation, please provide the
following information:

- (a) the CLLI code, street address, zip code, and V&H coordinates of the
Verizon central office or wire center where such EELs are created;
- (b) the CLLI code, street address, zip code, V&H coordinates, and owner(s) of
the switch(es) to which such EELs are connected;
- (c) number of such EELs that comprise DS-0/voice grade transport connected to
DS-0/voice grade loops;
- (d) number of such EELs that comprise DS-1 transport connected to multiplexed
DS-0/voice grade loops;
- (e) number of such EELs that comprise DS-1 transport connected to multiplexed
and concentrated DS-0/voice grade loops, and the loop-to-transport
concentration ratio;
- (f) number of such EELs that comprise DS-3 transport connected to multiplexed
DS-0/voice grade loops;
- (g) number of such EELs that comprise DS-3 transport connected to multiplexed
and concentrated DS-0/voice grade loops, and the loop-to-transport
concentration ratio;
- (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
- (i) number of such EELs that comprise DS-3 transport connected to multiplexed
DS-1 loops;
- (j) number of such EELs that comprise DS-3 transport connected to multiplexed
and concentrated DS-1 loops, and the loop-to-transport concentration
ratio.

OBJECTION:

See Specific Objections 6 and 7. Based on these objections, Verizon will not
be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 14 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide the definition you use internally for business purposes for
the following terms: (1) "mass market customer" and (2) "enterprise
customer," in terms of type of customer (e.g., residential vs. business),
number of lines per customer, use of analog loop facilities vs. DS-1s, or any
other basis you use to distinguish these terms. Provide any documentation to
support your answer.

OBJECTION:

See Specific Objections 6, 7 and 8. Based on these objections, Verizon will
not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 16 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide your calculation, estimate, or view of the economic crossover point, in terms of number of DS-0/voice grade lines to a single customer premises, at which you offer service at a DS-1 level rather than using a number of analog lines, and provide the basis for that crossover point (e.g., equivalency point of analog service rates and DS-1 service rates, consideration of whether the customer premises equipment can accept a DS-1 interface, etc.).

OBJECTION:

See Specific Objections 6, 7 and 8. Based on these objections, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 17 OF MCI
WORLDWIDE NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

With respect to each of the two customer categories identified in response to
014, please provide the following information and all supporting
documentation:

- (a) the number of customers in each category, reported by central office/wire
center for each month since July 1, 2001;
- (b) the percentage of your total customer base in the District of Columbia in
each of the two categories;
- (c) whether you target your business plans or marketing to particular sub-
sets of customers within each of the two categories identified in
response to MCI-14.

OBJECTION:

See Specific Objections 6, 7 and 8. Based on these objections, Verizon will
not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 18 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please state the technical characteristics and capabilities of all loops that
you consider to be a DS-0 and/or voice grade loop, and provide any relevant
public and/or confidential technical publications and any other documents
that describe these characteristics and capabilities.

OBJECTION: :

See Specific Objection 6. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 19 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please state the technical characteristics and capabilities of a DSL-capable
loop, and provide any relevant public and/or confidential technical
publications and any other documents that describe these characteristics and
capabilities.

OBJECTION: :

See Specific Objections 6 and 7. DSL service is not relevant to this
proceeding. Based on this objection, Verizon will not be providing a
response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 20 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please state the technical characteristics and capabilities of loops capable
of supporting 1) line sharing and 2) line splitting (i.e. voice service and
DSL service carried on a single wire pair entering the customer's premises),
and provide any relevant public and/or confidential technical publications
and any other documents that describe these characteristics and capabilities.

OBJECTION:

See Specific Objections 6 and 7. Line sharing and line splitting are not
relevant to this proceeding. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 22 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide, a) on a statewide basis, and b) on a CLLI-code-specific
basis, broken out on a monthly basis for each month since July 1, 2001, the
number of loops carrying standalone DSL service on all of the following
bases: 1) total loops in service 2) residential loops in service; 3) business
loops for business with 1-3 loops in service to a single customer premises;
4) business loops for businesses with more than 3 loops in service to a
single customer premises; 5) UNE loops.

OBJECTION:

See Specific Objections 6 and 7. DSL service is not relevant to this
proceeding. Based on this objection, Verizon will not be providing a
response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 23 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, broken out on a monthly basis for each month since July 1, 2001, the number of loops carrying line shared Verizon voice plus CLEC DSL service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises; 5) UNE loops.

OBJECTION:

See Specific Objections 6 and 7. DSL service is not relevant to this proceeding. Based on this objection, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 24 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, broken out on a monthly basis for each month since July 1, 2001, the number of loops carrying line split voice plus DSL service on all of the following bases: 1) total loops in service 2) residential loops in service; 3) business loops for business with 1-3 loops in service to a single customer premises; 4) business loops for businesses with more than 3 loops in service to a single customer premises; 5) UNE loops.

OBJECTION:

See Specific Objections 6 and 7. Line splitting is not relevant to this proceeding. Based on this objection, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 25 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide, a) on a statewide basis, and b) on a CLLI-code-specific
basis, broken out on a monthly basis for each month since July 1, 2001, the
number of loops carrying Verizon voice plus Verizon/Verizon affiliate DSL
service on all of the following bases: 1) total loops in service 2)
residential loops in service; 3) business loops for business with 1-3 loops
in service to a single customer premises; 4) business loops for businesses
with more than 3 loops in service to a single customer premises.

OBJECTION:

See Specific Objections 6, 7 and 8. DSL service is not relevant to this
proceeding. Based on this objection, Verizon will not be providing a
response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 28 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide, on a CLLI-code-specific basis, any and all documentation that
shows copper feeder plant that 1) has been retired since January 1, 2000 or
2) Verizon plans to or is considering retiring in the next three years.

OBJECTION:

See Specific Objections 6 & 7. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 29 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide, on a CLI-code-specific basis, any and all documents showing
Verizon's plans over the next three years to use copper feeder plant that has
been replaced with fiber-feeder plant, for reinforcement to meet growth needs
on shorter all-copper feeder routes.

OBJECTION: :

See Specific Objections 6 & 7. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 30 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide a detailed description of Verizon's current policy regarding maintenance of copper outside plant facilities once those facilities have been retired. Please provide a copy of all documents, including Methods and Procedures, guidelines, bulletins, business rules and/or business analysis on which you relied, or that are relevant to this Request. Also please state whether Verizon is considering revising this policy, and if so, when such revision is anticipated.

OBJECTION:

See Specific Objections 6 & 7. Based on this objection, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 31 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide any and all documents regarding Verizon's plans, incentives,
justification, benefits and/or analysis of upgrading its loop plant in
Pennsylvania by installing additional 1) hybrid copper/fiber loops; 2) all-
fiber loops.

OBJECTION: :

See Specific Objections 1, 2, 6, 7 & 8. Based on this objection, Verizon will
not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 32 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide all documentation showing where dark fiber in the loop plant
is currently available in each wire center in Verizon's territory for use by
CLECs.

OBJECTION:

See Specific Objections 6 and 7. Based on this objection, Verizon will not
be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 33 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

On a statewide and CLLI-code-specific basis in Pennsylvania, please state the percentage of working loops used or available to support Verizon retail services that are configured as "connect through"/"warm line" (i.e., loops that have electrical continuity between the customer premises and the Verizon switch, and over which a person at the customer premises can call 911 and Verizon repair (service)).

OBJECTION:

See Specific Objections 6, 7 and 8. Based on this objection, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 40 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

On a CLLI-code-specific basis in Pennsylvania, please provide Verizon's demand growth or decline for each of the last three years for each of the following: a) UNE loops used for circuit switched voice service, b) UNE loops used for DSL service (including line split configurations), c) UNE-P residential local exchange service, d) UNE-P business local exchange service, e) resold ILEC business local exchange service and f) resold ILEC residential local exchange service.

OBJECTION:

See Specific Objections 6 and 7. Based on this objection, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 41 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

On a CLLI-code-specific basis in Pennsylvania, please provide Verizon's current in-service quantities for each of the following: a) UNE loops used for circuit switched voice service, b) UNE loops used for DSL service (including line split configurations), c) UNE-P residential local exchange service, d) UNE-P business local exchange service, e) resold ILEC business local exchange service and f) resold ILEC residential local exchange service.

OBJECTION:

See Specific Objections 6 and 7. Based on this objection, Verizon will not be providing a response to subsection (b) of this interrogatory. Verizon will provide a response to the other subsections.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 42 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

On a CLLI-code-specific basis in Pennsylvania, please provide the Verizon's
expected, estimated or forecasted demand growth or decline for each of the
next three years for each of the following: a) UNE loops used for circuit
switched voice service, b) UNE loops used for DSL service (including line
split configurations), c) UNE-P residential local exchange service, d) UNE-P
business local exchange service, e) resold ILEC business local exchange
service and f) resold ILEC residential local exchange service.

OBJECTION:

See Specific Objections 6 and 7. Based on this objection, Verizon will not
be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 44 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please describe in detail the approach and manner in which Verizon segments
its sales and marketing efforts and personnel on the basis of customer size,
type (e.g., residential, small business, medium business, large business),
monthly level of revenues, and/or service(s) taken by customer (individually
or as part of a bundle), and provide the basis on which such segmentation is
made.

OBJECTION:

See specific objections 6, 7 & 8. Based on this objection, Verizon will not
be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 51 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each route listed in your response to MCI-49, please provide the
following information:

- (a) The type of terminating facility (e.g., collocation) used at each end of the route and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DSL transport along the particular route.
- (d) The terms, including copies of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

OBJECTION:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General and Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to subpart (c) of this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 54 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each route listed in your response to MCI-52, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated DS-3 transport along the particular route.

OBJECTION:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General or Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 57 OF MCI
WORLDWIDE NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:

POSITION:

REQUEST:

For each route listed in your response to MCI-55, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS-3 transport along the particular route.
- (d) The terms, including copies of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

OBJECTION:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General and Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 60 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each route listed in your response to MCI-58, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement).
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated Dark Fiber transport along the particular route.

OBJECTION:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General or Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 63 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each route listed in your response to MCI-61, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated Dark Fiber transport along the particular route.
- (d) The terms, including copies of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

OBJECTION:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General or Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 64 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 23, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each route identified in your responses to MCI-49 through MCI-63, please
provide the following information:

- (a) All forecasts of Verizon expected, estimated, anticipated, or forecasted
demand growth or decline for all classes of transport service. To the
extent you have information disaggregated by type of customer or demand
(e.g., "business", "data", "UNE", "special access", or other categories)
please provide such disaggregated figures. To the extent different
documents may provide differing figures, estimates, or forecasts based
upon the impact or implementation of any regulatory or judicial action
(including, but not limited to, the Triennial Review Order and related
proceedings) provide all such figures, estimates, and forecasts,
identifying which relate to which different regulatory or judicial
outcomes;
- (b) Verizon's current transport capacity utilization, including total number
and type of fibers or copper cabling
- (c) number of "unlit" or "dark" fibers;
- (d) number of "lit" fibers with the current operational level implemented for
each (i.e., which OC level);
- (e) current utilization of copper wire, if any, including identification and
capacity of implemented digital and analog transmission capability
- (f) identification of unused copper facilities, if any.

OBJECTION:

See Specific Objections 1 and 6. Based on this objection, Verizon will not
be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 65 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide the following information for each fiber or conduit deployment
project by Verizon in Pennsylvania since January 1, 2000:

- (a) type, size, and capacity of conduit installed along all or any separate
portion of the route;
- (b) type and number of fibers initially installed along all or any separate
portion of the route,
- (c) type and number of fibers for each and every subsequent installation
along all or any portion of the route;
- (d) all available budgetary and actual cost data for both initial and any
subsequent installations, including all costs for permits, authority,
ROW, lobbying, public policy, excavation, trenching, boring, backfill,
surface repair, remediation, vault construction, termination, payments-
in-kind, related usage rights, materials (including conduit and
cabling), and any other expenses necessary to the project.

OBJECTION:

See Specific Objections 1 and 6. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 66 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide the following information for each planned fiber or conduit deployment project by Verizon in Pennsylvania for the next 3 years: (Include in this response any current projects not included in MCI-65, as well as future projects.)

- (a) type, size, and capacity of conduit to be installed along all or any separate portion of the route;
- (b) type and number of fibers to be initially installed along all or any separate portion of the route,
- (c) type and number of fibers for each and every planned subsequent installation along all or any portion of the route;
- (d) all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project.

OBJECTION:

See Specific Objections 1 and 6. Based on this objection, Verizon will not be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 67 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please provide copies of contracts, agreements, tariffs, or other governing
documents by which Verizon:

- (a) sells, rents, leases, or otherwise provides telecommunications transport
services between its switches and/or wire centers to others in the
District of Columbia;
- (b) buys, rents, leases, or otherwise acquires telecommunications transport
services between its switches and/or wire centers from others in the
District of Columbia.

OBJECTION:

See Specific Objections 6 and 14. Based on this objection, Verizon will not
be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 69 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For this and the immediately following four questions, the phrase "lit
enterprise circuit(s)" means one or more circuits at the DS-1, DS-3, or OC-x
capacity levels. Please describe all your current procedures for moving
portions of lit enterprise circuits from your own network to a CLEC or IXC
network. Include all procedures for circuits which serve multiple end-users
by virtue of connection to multiple Verizon "tail circuits" or "loops" via
Verizon provided MUX or DACS equipment.

OBJECTION:

See Specific Objections 4 and 6. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 70 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

When a lit enterprise circuit provided by Verizon under UNE procedures or
Special Access tariffs serves multiple end-user customers through Verizon
provided MUX or DACS equipment, will Verizon perform a "hot cut" of all or
part of the lit enterprise circuit portion to non-Verizon provided transport?

(a) If no, why not?

(b) If yes, will Verizon perform this function based on a single Access
Service Request ("ASR") submission by the carrier customer or does
Verizon require multiple ASRs? If the answer is that a single ASR is
acceptable, please identify any prior periods when multiple ASRs were
required.

OBJECTION:

See Specific Objections 4 and 6. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 71 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

As part of any required transition from UNE enterprise circuit transport to
non-Verizon transport, will Verizon perform a "hot cut" of all or part of any
lit enterprise circuit portion to non-Verizon provided transport?

(a) If no, why not?

(b) If yes, will Verizon perform this function based on a single service
request, or will Verizon require separate requests for each end-user
circuit?

OBJECTION:

See Specific Objections 4 and 6. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 72 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Has Verizon ever imposed restrictions on the number of lit enterprise
circuits it would transition from the Verizon network to the networks of
others? If yes, state all such restrictions imposed and all terms of such
restrictions (i.e., any specifics as to numbers of such transitions within a
specific time and/or region; conditions as to time "out of service"; any
required impositions of unfavorable customer conditions; any mandatory
classification of any such transition as "project work" [or other non-
standard undertaking] thereby changing or avoiding any otherwise applicable
service guarantees, performance standards, or terms ensuring quality of
service, etc.). Provide all supporting documentation.

OBJECTION:

See Specific Objections 4 and 6. Based on this objection, Verizon will not be
providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 73 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Please produce all internal methods & procedures, business rules, memoranda,
communications, e-mail, reports, etc. which describe in any way issues
related to the migration of lit enterprise circuits or circuit portions from
the Verizon network to any non-Verizon network. In addition, if not already
encompassed in the prior sentence, include all such documents which discuss
any potential means of discouraging such moves, or any complaints or comments
received relating to procedures used to undertake such moves, or any refusals
of such moves.

OBJECTION:

See Specific Objections 1, 4, and 6. Based on this objection, Verizon will
not be providing a response to this interrogatory.

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Counsel for Verizon Pennsylvania Inc.
And Verizon North Inc.

December 5, 2003

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT B

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 51 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY: Carlo Michael Peduto, II
POSITION: INDEPENDENT CONSULTANT

REQUEST:

For each route listed in your response to MCI-49, please provide the
following information:

- (a) The type of terminating facility (e.g., collocation) used at each end of the route and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DSL transport along the particular route.
- (d) The terms, including copies of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

VERIZON STATED THE FOLLOWING OBJECTION ON 12/05/03:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General and Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to subpart (c) of this request.

RESPONSE:

- (a) In all cases, the originating and terminating point is a CLEC collocation arrangement. Concerning the governing authority, see objections. Verizon's tariffs are publicly available.
- (b) Verizon does not have this information.
- (c) This information was provided as part of Verizon's filing.
- (d) See objections. Verizon's tariffs are publicly available.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 57 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET-
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY: Carlo Michael Peduto, II
POSITION: INDEPENDENT CONSULTANT

REQUEST:

For each route listed in your response to MCI-55, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS-3 transport along the particular route.
- (d) The terms, including copies of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

VERIZON STATED THE FOLLOWING OBJECTION ON 12/05/03:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General and Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

RESPONSE:

- (a) In all cases, the originating and terminating point is a CLEC collocation arrangement. Concerning the governing authority, see objections. Verizon's tariffs are publicly available.
- (b) Verizon does not have this information.
- (c) This information was provided as part of Verizon's filing.
- (d) See objections. Verizon's tariffs are publicly available.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 60 OF MCI
WORLDCOM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY: Carlo Michael Peduto, II
POSITION: INDEPENDENT CONSULTANT

REQUEST:

For each route listed in your response to MCI-58, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement).
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated Dark Fiber transport along the particular route.

VERIZON STATED THE FOLLOWING OBJECTION ON 12/05/03:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General or Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

RESPONSE:

- (a) In all cases, the originating and terminating point is a CLEC collocation arrangement. Concerning the governing authority, see objections. Verizon's tariffs are publicly available.
- (b) Verizon does not have this information.
- (c) This information was provided as part of Verizon's filing.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 63 OF MCI
WORLD.COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY: Carlo Michael Peduto, II
POSITION: INDEPENDENT CONSULTANT

REQUEST:

For each route listed in your response to MCI-61, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated Dark Fiber transport along the particular route.
- (d) The terms, including copies of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

VERIZON STATED THE FOLLOWING OBJECTION ON 12/05/03:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General or Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

RESPONSE:

- (c) This information was provided as part of Verizon's filing.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 54 OF MCI
WORLD COM NETWORK SERVICES, INC. DATED NOVEMBER 25, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY: Carlo Michael Peduto, II
POSITION: INDEPENDENT CONSULTANT

REQUEST:

For each route listed in your response to MCI-52, please provide the
following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated DS-3 transport along the particular route.

VERIZON STATED THE FOLLOWING OBJECTION ON 12/05/03:

See Specific Objections 1 and 6. Subject to and without waiving the foregoing General or Specific objections, Verizon will provide relevant, non-privileged information, if any, responsive to this subpart (c) of this request.

RESPONSE:

- (a) In all cases, the originating and terminating point is a CLEC collocation arrangement. Concerning the governing authority, see objections. Verizon's tariffs are publicly available.
- (b) Verizon does not have this information.
- (c) This information was provided as part of Verizon's filing.

CERTIFICATE OF SERVICE

RECEIVED
DEC 17 2003
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania and Verizon North Inc.'s Joint Response Response to MCI Worldcom Network Services, Inc.'s Motion to Compel, 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 17th day of December, 2003.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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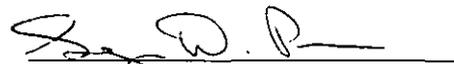
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DOCUMENT

December 17, 2003

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DEC 17 2003
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

Re: Investigation into the Obligation of Incumbent Local
Exchange Carriers to Unbundle Network Elements
Docket No. I-00030099

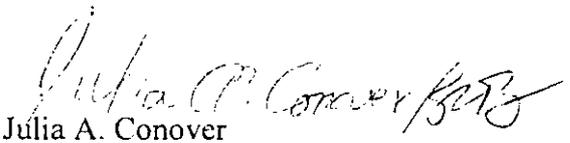
To All Parties In Docket No. I-00030099:

Enclosed please find Verizon Pennsylvania Inc. and Verizon North Inc.'s (Verizon) Second Set of Interrogatories to Competitive Local Exchange Carriers (CLECs) that order unbundled loops from Verizon. These CLECs are specifically identified in the attached interrogatory.

The purpose of this interrogatory is to obtain information in the possession of CLECs that purchase unbundled loops from Verizon, in order to respond to an order entered by Administrative Law Judges Michael J. Schnierle and Susan Colwell earlier today. In that Order, a copy of which is attached, Verizon was ordered to provide a breakdown of the number of unbundled loops that it provides to carriers in the wire centers that we contend meet the FCC switching "triggers," disaggregated by business and residence. Verizon was required to provide this information within 7 days from the entry of the order, or by December 24, 2003. Since Verizon does not maintain this information, we are requesting that those carriers that purchase loops from Verizon provide us with this information regarding the loops they purchase so that we can comply with the ALJs' Order.

We request that you provide us with this information *no later than close of business on December 23*. If you have already provided this information in response to the Commission's data requests nos. 3 and 5 (which requested such a breakdown by wire center), please reference that information and provide a copy with your response. If you have any questions about this matter, please contact Suzan Paiva (215 963-6068) or me. Thank you in advance for your cooperation.

Very truly yours,


Julia A. Conover

JAC/slb
Enc.

Via UPS Overnight Delivery
cc: Secretary James J. McNulty (cover and certificate only)
Honorable Michael Schnierle
Honorable Susan Colwell
Attached Certificate of Service

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DEC 17 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

RECEIVED

I, Julia A. Conover, hereby certify that I have this day served a copy of Verizon Pennsylvania and Verizon North Inc.'s Second Set of Interrogatories to Competitive Local Exchange Carriers, upon the participants listed below in accordance with the requirements of 52 Pa. Code Sect. 171.1 (related to service by a participant) and 1.55 (related to service upon attorneys).

DEC 17 2003
PA PUBLIC UTILITIES COMMISSION
SECRETARY'S BUREAU

Dated at Philadelphia, Pennsylvania, this 17th day of December, 2003.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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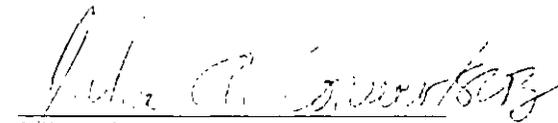
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DEC 17 2003



PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

December 17, 2003

Via E-mail and Overnight Delivery

Barrett C. Sheridan, Esq.
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Harrisburg, PA 17101

DOCUMENT

Re: *Investigation into the Obligations of Incumbent Local Exchange Carriers to
Unbundle Network Elements, Docket No. I-00030099*

Dear Barrett:

Please find enclosed the responses of MCI WorldCom Network Services, Inc. ("MCI") to the Interrogatories of Office of Consumer Advocate, Set I, in the above-referenced case.

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

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 Responses to OCA Interrogatories, Set I to be served upon the parties of record in Docket Nos. I-00030099 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 Washington, DC on December 17, 2003

VIA E-MAIL AND FIRST CLASS MAIL OR OVERNIGHT DELIVERY

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Michelle Painter

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December 17, 2003

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BY OVERNIGHT MAIL AND ELECTRONIC MAIL

Barrett C. Sheridan, Esq.
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, Pennsylvania 19103

DOCUMENT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Investigation into the Obligation of Incumbent Local
Exchange Carriers to Unbundle Network Elements,
Docket No. I-000 30099

Dear Ms. Sheridan:

Enclosed please find the PROPRIETARY responses of RCN Telecom Services, Inc., and RCN Telecom Services of Philadelphia, Inc., to the Office of Consumer Advocate's Second Set of Interrogatories in the above-captioned proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Robin F. Cohn

cc: James J. McNulty, Secretary (cover letter and service list)
Service List

I hereby certify that on this 17th day of December, 2003, I served a copy of the foregoing **PROPRIETARY Responses of RCN Telecom Services, Inc., and RCN Telecom Services of Philadelphia, Inc., to Office of Consumer Advocate's Second Set of Interrogatories** in Docket Number I-00030099, by electronic mail and by U.S. first class mail, postage prepaid (except where otherwise noted), on the following individuals:

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A handwritten signature in black ink, appearing to read 'R. Cohn', written over a horizontal line.

Robin F. Cohn

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December 17, 2003

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

DOCUMENT

Re: Investigation into the Obligation of Incumbent Local
Exchange Carriers to Unbundle Network Elements,
Docket No. I-000 30099

Dear Ms. Paiva:

Enclosed please find the PROPRIETARY responses of CTSI, LLC, to Verizon-Pennsylvania, Inc.'s First Set of Interrogatories in the above-captioned proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Robin F. Cohn

cc: James J. McNulty, Secretary (cover letter and service list)
Service List

I hereby certify that on this 17th day of December, 2003, I served a copy of the foregoing **PROPRIETARY Responses of RCN Telecom Services, Inc., and RCN Telecom Services of Philadelphia, Inc., to Office of Consumer Advocate's Second Set of Interrogatories** in Docket Number I-00030099, by electronic mail and by U.S. first class mail, postage prepaid (except where otherwise noted), on the following individuals:

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Robin F. Cohn



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I-00030099

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

December 18, 2003

VIA E-MAIL AND OVERNIGHT MAIL

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December 18, 2003

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Michele Painter
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1133 19th Street, N.W.
Washington, D.C., 20036

Re: Docket I-0030099
Joint Parties Initial Discovery Requests

Dear Ladies and Gentlemen:

Enclosed, on behalf of BullsEye Telecom, InfoHighway Communications Corporation,
McGraw Communications, Inc. and Metropolitan Telecommunications, Inc.

December 18, 2003

Page Two

("Joint Parties") are the Joint Parties' initial discovery requests to Allegiance Telecom, AT&T, Broadview Networks, Conversant Communications, WorldCom, and XO Communications.

Regards,



Ross A. Buntrock

Enc.

cc: James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Service list (by electronic and U.S. mail)

STATE OF PENNSYLVANIA
COMMISSION OF PUBLIC UTILITIES

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DEC 18 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Investigation into the
Obligation of Incumbent
Local Exchange Carriers
to Unbundle Network Elements

Docket No. I-00030099

DOCKETED
FEB 04 2004

JOINT PARTIES' FIRST SET OF DISCOVERY REQUESTS TO CLECS

Pursuant to 52 Pa. Code §§ 5.341, 5.342 and 5.349 *et seq.*, BullsEye Telecom, InfoHighway Communications Corporation, McGraw Communications, Inc., Metropolitan Telecommunications, Inc. ("MetTel") (hereinafter the "Joint Parties") hereby propound the following discovery requests upon the "trigger candidates" identified by Verizon Pennsylvania, Inc. in their November 3, 2003 filing, that are active participants in this docket: Adelphia, AT&T, Allegiance Telecom, Broadview Networks, Choice One, WorldCom, Corecomm, CTSI, D&E, Focal Communications, RCN, US LEC, Broadstreet, Cavalier, Connect!, HTC Communications, PaeTec, Penn Telecom, and XO Communications, to be answered by those officers, employees or agents of such CLEC (or its affiliates or parent companies) as may be cognizant of the requested information and who are authorized to answer on behalf of such CLEC. Responses to these requests shall be served in accordance with the procedural schedule adopted by the Pennsylvania Public Utility Commission ("Commission").

DOCUMENT

INSTRUCTIONS

Please answer each question separately and in the order that it is asked. The number of the answers should correspond to the number of the Discovery Request being answered. Please copy each question immediately before the answer. Following each answer, please identify the person or persons responsible for the answer and indicate what person or witness provided responsive information or documents, and where applicable, what witness will sponsor each answer in testimony.

In response to any Discovery Request seeking the production of documents, please produce all responsive documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business and organize and label them to correspond to the categories in this request. If the requested documents are kept in an electronic format, you shall produce the requested document in such format. If any part of a document is responsive to any request, the whole document is to be produced. If there has been any alteration, modification or addition to a document (whether in paper form or electronic), including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts, revisions or redlines, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

In response to Discovery Requests requesting you to identify documents or other items, information or materials for disclosure, please identify the document(s) or other item(s), information or material(s) in sufficient detail so that they can be produced in response to a separate Discovery Request for production. Such identification shall contain the number (and subpart, if applicable) of the Discovery Request requesting the identification and the page count or description of the document or item. Additionally, to the extent known, the listing shall

include the author, publisher, title, date, and any “Bates” or other sequential production numbering for the document or item. When responding to any request for production of documents, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to “identify for disclosure” in Joint Parties’ Discovery Requests. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the “identification for disclosure”.

Please produce the requested information at the most granular level you possess. If a Discovery Request seeks information at a level more granular than you possess, please do not object or decline to answer or produce on that basis, but rather state that you do not possess information at that level and produce the information requested at the most granular level that you possess. Joint Parties is not asking for the creation of new data, but is seeking all available data for the specific categories and sub-categories described.

Please produce all information requested on any table by filling in the table provided in these Discovery Requests. If additional explanation is required, please copy the question and provide your response below.

If you are unable to respond fully and completely to a document request, explain the reasons why you are unable to do so. The terms defined herein and the individual Discovery Requests should be construed broadly to the fullest extent of their meaning, in a good faith effort to comply with all applicable rules.

This request is directed to all documents and information in your possession, custody or control. A document is deemed to be in your possession, custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably

available to you (including those documents or communications in the custody or control of your company's present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents contained in these Discovery Requests, you shall produce the documents, including all appendices, exhibits, schedules, and attachments, that are most relevant to the request.

If you are unable to produce a document or information based on a claim that the document is not in your possession, custody or control, state the whereabouts of such document or information when it was last in your possession, custody or control, and provide a detailed description of the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

These Discovery Requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer you have supplied, then in such case, you should change or modify such answer and submit such changes answer as a supplement to the original answer. Further, should a subsequent version(s) of a document be created or exist after the date of these Discovery Requests, such version(s) must be produced. Where prior versions or drafts of documents exist, please produce all such documents in your possession, custody or control.

The Joint Parties request that you answer these Discovery Requests under oath or stipulate in writing that your Discovery Request responses can be treated exactly as if they were filed under oath.

If you claim a privilege, or otherwise decline to produce or provide, any document or information responsive to one or more Discovery Requests, then in addition to, and not in lieu of, any procedure that you must follow under law to preserve your objection(s) and/or

privilege(s), within the time allowed for responding to these Discovery Requests, the attorney asserting the privilege shall:

- a. identify in the objection to the request for information, or sub-part thereof, detailed reasons for your claim of privilege or other basis for protecting the document or information from disclosure; and the nature of the privilege (including work product) that is being claimed; and
- b. provide the following information in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:
 - (i) for documents: (1) the type of document; (2) subject matter of the document; (3) the date of the document; (4) the number of pages in the document; (5) the location or custodian of the document; (6) such other information as is sufficient to identify the document for a subpoena *duces tecum*, including, where available, the names(s), address(es) and telephone number of the author(s) of the document and all recipient(s), and, where not apparent, the relationship of the author and addressee to each other;
 - (ii) for oral communications: (1) the name(s), address(es) and phone number(s) of the person making the communication and the name(s), address(es) and phone number(s) of the persons present while the communication was made; (2) the relationship of the person(s) present to the person(s) making the communication; (3) the date and place of each communication; (4) the general subject matter of the communication.

In the event that any requested information is considered by you to be confidential, the attorney asserting such confidential status shall inform Joint Parties of this

designation as soon as he or she becomes aware of it, but in any event, prior to the time the responses to the Discovery Request are due to discuss or attempt to negotiate a compromise. However, the confidential documents should be produced pursuant to the protective order and/or non-disclosure agreement executed in this proceeding.

Answers to these Discovery Requests are to be provided within the time period set forth by the Commission. Service of responses, and all notifications, shall be made in person or by facsimile or email to:

Genevieve Morelli
Ross A. Buntrock
Heather Hendrickson
Kelley Drye & Warren LLP
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036
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DEFINITIONS

1. The term “analog” refers to electrical signals representing sound or data which are transmitted in a linear, non-digital format.
2. The terms “and” and “or” as used herein shall be construed as both conjunctive and disjunctive.
3. The term “any” shall be construed to include “all,” and “all” shall be construed to include “any.”
4. The acronym “CLEC” refers to competitive local exchange carriers.

5. The acronym “CLLI” refers to common language location identifier, a multi-character code generally composed of numerals and letters that provides a unique identifier for circuit switches used by ILECs and CLECs.
6. The acronym “CO” refers to central office, the single physical ILEC building that houses one or more Class 5/end office ILEC switch(es), and in which end user customers’ loops are cross connected to ILEC switching equipment or CLEC collocation arrangements.
7. The term “communication” includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.
8. The terms “cost study,” “cost studies,” “cost model” and “cost analyses” means the detailed development of a rate element or of rate elements through a methodology based upon engineering, operational, economic, accounting, or financial inputs, plus support for the sources of the inputs or support for the derivations of the inputs, that enables a person using the study, studies, model or analyses to start with the support for each input and to then trace the support to the input, and to then be able to trace the input through the methodology to the resulting cost and then to the resulting rate element.
9. The term “cross connect/jumper” refers to a copper pair that connects at the vertical and horizontal sides of the ILEC MDF.

10. The term “customer location” refers to a building or set of connected, contiguous, or adjacent buildings in a common area, used by residential, commercial, and/or governmental customers that share a primary street address or group of street addresses. It includes multi-unit residential, commercial, and/or governmental premises.
11. The term “customer premises” refers to the physical point at which the end user customer assumes responsibility for telecommunications wiring (i.e., the network interface device (“NID”) for single unit dwellings, and the individual point of demarcation at the end user customer’s unit for multi-unit buildings such as office buildings and apartment buildings).
12. The term “digital” refers to electrical or optical signals representing sound or data which are transmitted in a binary, discontinuous, non-linear format.
13. The term “DLC” refers to Digital Loop Carrier and includes UDLC, IDLC, and NGLDC.
14. The term “document,” as used herein, shall include, without limitation, all written, reported, recorded, magnetic, graphic, photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices,

statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.

15. The term "DS-0" refers to a loop or circuit operating at Digital Signal Level Zero, and capable of transmitting information at 64 kilobits per second.

16. The term "DS-0/voice grade" includes all loops or circuits normally used for the provision of a service to transmit human voice alone. In particular, it includes analog circuits and digital circuits capable of transmitting at levels greater than 2400 baud, up to and including 64 kilobits per second.

17. The term "DS-1" refers to Digital Signal Level 1, which has a transport speed of 1.544Mbps, and can be either unchannelized or channelized into 24 voice grade channels.

18. The term "identify" or "identifying" means:

(a) When used in reference to natural persons: (1) full name; (2) last known address and telephone number; (3) whether the person is currently employed by, associated or affiliated with SWBT; (4) that person's current or former position; and (5) dates of employment, association or affiliation.

(b) When used in reference to a document: (1) its author; (2) actual or intended recipient(s); (3) date of creation; and (4) brief description of its contents.

(c) When used in reference to a communication: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.

19. The acronym "IDF" refers to an intermediate distribution frame, a physical frame located between an MDF and (1) an ILEC switch in a central office or wire center over which end user customer loops are transited for connection to the ILEC switch, or (2) a CLEC collocation arrangement.

20. The term "ILEC" refers to an incumbent local exchange carrier, and includes the ILEC's parent or any subsidiary or affiliate, and all current or former officers, directors, employees, agents, representatives, contractors or consultants of ILEC, as well as any persons or other entities who have acted or purported to act on its behalf.

21. The term "LATA" means "Local Access and Transport Area" as that term is defined in the *Modification of Final Judgment, United States v. Western Elec. Co.*, 552F. Supp. 131 (D.D.C. 1982), *aff'd sub nom., Maryland v. United States*, 460 U.S. 1001 (1983).

22. The term "MSA" refers to a Metropolitan Statistical Area as defined by the US Census Bureau and the Office of Management and Budget.

23. The term "qualifying service" refers to all telecommunications services, whether voice or data, and whether analog or digital, that have ever been offered or provided by an ILEC pursuant to tariff or an interconnection agreement.

24. The acronym “MDF” refers to main distribution frame, a physical frame located in a central office or wire center that connects loops coming from an end user customer premises to (1) an ILEC switch located in the central office or wire center, and (2) facilities leading to a CLEC collocation arrangement.
25. The past tense includes the present tense and vice-versa.
26. “Relate, mention, reference, or pertain” shall be used to mean documents or communications containing, showing, relating, mentioning, referring or pertaining in any way, directly, or indirectly to, or in legal, logical or factual way connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by such request.
27. The singular form of a word shall be interpreted to include the plural, and the plural form of a word shall be interpreted to include the singular whenever appropriate.
28. The term “residential end user” refers to an end user customer, typically an individual or family, who purchases voice or data services at his, her or their place of residence, or household. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.
29. The term “wire center” is synonymous with the term “central office,” and refers to the single physical building that houses one or more Class 5/end office ILEC switch(es) and in which end user customer’s loops are cross connected to the Class 5/end office ILEC switch(es).

30. The term “you,” “your,” “yours,” or “your company” refers to the company responding to these Discovery Requests and its predecessors, parents, successors, subsidiaries, divisions and related or affiliated organizations.

JOINT PARTIES-1:

Please state whether you are either an incumbent local exchange provider (“ILEC”) providing telecommunications service in the state of Pennsylvania or an affiliate of such an ILEC. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

JOINT PARTIES-2:

Please state whether you are either a competitive local exchange carrier (“CLEC”) providing telecommunications service in the state of Pennsylvania or an affiliate of such a CLEC. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

JOINT PARTIES-3:

Do you lease analog voice-grade loops from Verizon to provide local exchange service in the state of Pennsylvania? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a T1 circuit or a DS1 or above circuit.)

JOINT PARTIES-4:

Do you use non-ILEC switches to provide local exchange service to Pennsylvania customers via analog voice-grade loops? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.)

JOINT PARTIES-5:

To the extent that you have not already provided this information in response to the Pennsylvania Commission's October 27, 2003 Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Pennsylvania customers

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- b. street address, city and zip code;
- c. currently equipped line side capacity in
 - i. DS-0/voice grade circuits and
 - ii. DS-1 circuits;
- d. currently utilized line side capacity in
 - i. DS-0/voice grade circuits and
 - ii. DS-1 circuits;
- e. current switch processor capacity in CCS;
- f. busy hour and busy season utilized switch processor capacity in CCS;
- g. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

JOINT PARTIES-6:

Please provide the following general information regarding any local exchange service that you currently offer to customers in Pennsylvania using analog voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

- a. Do you currently provide local exchange service to residential customers in Pennsylvania using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].
- b. Do you currently provide local exchange service to business customers in Pennsylvania using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.
- c. Please provide a description of each of the residential and/or business local exchange products that you currently provide to Pennsylvania customers using

analog voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers?	Available to Bus. Customers?	Retail Price?	Bundle with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?
[Name of product]	[Yes/No]	[Yes/No]	[\$X.XX]	[Yes/No]	[Yes/No]	[Yes/No]	[Yes/No]

JOINT PARTIES-7:

If you offer cable telephony service in Pennsylvania, please state:

- a. To what percent of your cable telephony customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the typical or average retail price for this service?
- b. To what percent of your cable telephony customers do you provide local exchange service and broadband service but not cable television service? What is the typical or average retail price for this service?
- c. To what percent of your cable telephony customers do you provide local exchange service and cable television service but not broadband service? What is the typical or average price for this service?
- d. To what percent of your cable telephony customers do you provide local exchange service, cable television service, and broadband service? What is the typical or average price for this service?

JOINT PARTIES-8:

If you are a CLEC offering circuit-switched local exchange service in Pennsylvania, for each month or quarter over the most recent 12-month period for which data is available, please provide the following for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis::

- a. The number of newly installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);

- i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- b. *The number of newly installed business lines served by UNE-P;*
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- c. *The number of newly installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);*
 - i. *Number or percentage of such lines that were migrated from the ILEC's retail service.*
 - ii. *Number or percentage of such lines that were migrated from a CLEC's retail service.*
- d. *The number of newly installed residential lines served by UNE-P.*
 - i. *Number or percentage of such lines that were migrated from the ILEC's retail service.*
 - ii. *Number or percentage of such lines that were migrated from a CLEC's retail service.*

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

JOINT PARTIES-9:

Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- a. Installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches
- b. Installed business lines served by UNE-P;
- c. Installed business lines served by non-circuit switches;
- d. Installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches
- e. Installed residential lines served by UNE-P;
- f. Installed residential lines served by non-circuit switches.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

JOINT PARTIES-10:

For each switch your company operates in Pennsylvania, , please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

TABLE 1A

CLEC Switch CLLI	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers¹	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers²	
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100	
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100	
	2		Residential				
	2		Business				
	3		Residential				
	3		Business				
	... (continue pattern as above)						
	18		Residential				
	18		Business				

¹ This category includes loops used for fax and/or modem-only traffic.

² This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

TABLE 1B

ILEC Wire Center	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers³	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers⁴	
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100	
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100	
	2		Residential				
	2		Business				
	3		Residential				
	3		Business				
	... (continue pattern as above)						
	18		Residential				
	18		Business				
	19-24		Residential				
	19-24		Business				
	one DS-1		Residential				
	one DS-1		Business				
	more than one DS-1		Business				

³ This category includes loops used for fax and/or modem-only traffic.

⁴ This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

TABLE 1C

State Of Pennsylvania	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ⁵	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ⁶
	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

JOINT PARTIES-11:

For each switch that your company operates in Pennsylvania other than circuit switches, please provide the following:

- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;
- b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

⁵ This category includes loops used for fax and/or modem-only traffic.

⁶ This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

JOINT PARTIES-12:

Do your Pennsylvania intrastate tariffs limit in any way the availability of your local exchange service products to particular customer segments, either by geography, class of customer, number of lines purchased, or otherwise? If so, please describe the service offering and explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

JOINT PARTIES-13:

Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating "Yes" or "No" in each box.

	TO VZ voice only	TO VZ voice plus DSL	TO VZ DSL only	TO CLEC UNE- P voice only	TO CLEC switch -based voice only	TO CLEC line sharin g	TO CLEC line splittin g	TO CLEC DSL only
FROM VZ voice only								
FROM VZ voice plus DSL								
FROM VZ DSL only								
FROM CLEC UNE-P voice only								
FROM CLEC								

switch-based voice only								
FROM CLEC line sharing								
FROM CLEC line splitting								
FROM CLEC DSL only								

JOINT PARTIES-14:

Please explain whether you have always been able to obtain a customer service record (“CSR”) from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

JOINT PARTIES-15:

Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

JOINT PARTIES-16:

Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

JOINT PARTIES-17:

Please explain whether you currently have in place and use electronic automated systems to:

- a. Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c. Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

JOINT PARTIES-18:

Please state:

- a. Whether your company has ever applied for Eligible Telecommunications Carrier ("ETC") status in Pennsylvania.
- b. If there answer to (a) is yes, please state whether ETC status was granted, the Commission case number in which it was granted, and the date of the order approving the status.