

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**INVESTIGATION INTO OBLIGATIONS
OF INCUMBENT LOCAL EXCHANGE
CARRIERS TO UNBUNDLE
NETWORK ELEMENTS**

Docket No. I-00030099

**AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC.'S
FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO VERIZON PENNSYLVANIA INC.**

Pursuant to 52 Pa. Code §§ 5.341, 5.342 and 5.349, AT&T Communications of Pennsylvania, LLC. ("AT&T") hereby propounds the following Interrogatories and Requests for Production of Documents upon Verizon Pennsylvania Inc. ("Verizon", "VZ-PA" or "Respondent"), to be answered by those officers, employees or agents of the respondent as may be cognizant of the requested information and who are authorized to answer on behalf of the respondent.

These Interrogatories are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. AT&T reserves the right to propound additional Interrogatories as and if additional information is required.

ADDITIONAL INSTRUCTIONS

A. If you object to any part of an Interrogatory, answer all parts of such Interrogatories to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

B. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to an Interrogatory contained in a non-written communication, state the following with respect to the nonwritten communication:

1. the date thereof;
2. the identity of each of the participants in the non-written communication;
3. the identity of each person present during all or any part of the non-written communication;
4. a description of the non-written communication which is sufficient to identify the particular communication without revealing the information for which a privilege or protection from non-disclosure is claimed;
5. the nature of your claim of non-discoverability (e.g. attorney-client privilege); and
6. each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit AT&T to make a full determination as to whether your claim is valid.

C. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to an Interrogatory contained in a document, set forth with respect to the document:

1. the date and number of pages;

2. the identity of the author(s) or preparer(s);
3. the identity of the addressee, if any;
4. the title;
5. the type of tangible thing (e.g. letter, memorandum, telegram, chart, report, recording disc);
6. the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
7. the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
8. the identity of the present custodian(s);
9. the nature of your claim of non-discoverability (e.g. attorney-client privilege); and
10. each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit MCI WorldCom and AT&T to make a full determination as to whether your claim is valid.

D. If you claim any form of privilege or other protection from disclosure, otherwise than as set forth in Instructions B and C, as a ground for not answering any interrogatory, set forth:

1. the nature of your claim as to non-discoverability; and
2. each and every fact on which you rest your claim or privilege or other protection from disclosure, stating such facts with sufficient specificity to permit AT&T to make a full determination as to whether your claim is valid.

E. If you know of any document, communication or information but cannot give the specific information or the full information called for by a

particular Interrogatory, so state and give the best information you have on the subject and identify every person you believe to have the required information.

F. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa; the masculine form of a pronoun shall be considered to include also within its meaning the feminine and neuter forms of the pronoun, and vice versa; and the use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb. In each instance, the Interrogatory shall be construed so as to require the most inclusive answer or production.

G. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Label the written material with the number of the Interrogatory to which it pertains.

H. On each Interrogatory response, list the name and title of the person or persons who prepared the response or who is responsible for the information contained therein.

DEFINITIONS

As used in these Interrogatories, the following terms have the meaning as set forth below:

A. The 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, the respondent's former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on the respondent's behalf for any purpose. For those requests that seek information that predate the creation of

Verizon Pennsylvania Inc., such requests shall be deemed to include data for VZ-PA's predecessor company, Bell Atlantic-Pennsylvania, Inc.

B. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

C. The term "including" means "including, but not limited to."

D. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the respondent or its agents or representatives have knowledge which is relevant to the answer called for by the Interrogatory.

E. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 4009 of the Pennsylvania Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and

records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

1. are now or were formerly in your possession, custody or control; or
2. are known or believed to be responsive to these Interrogatories, regardless of who has or formerly had custody, possession or control.

F. The term "date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

G. The term "person" or "persons" means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

H. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

I. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

J. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter,

memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of the respondent or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization, for such disposition, and state the date or approximate date thereof.

K. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

L. The term "oral communication" means any utterance heard, whether in person, by telephone, or otherwise.

M. The term "identify the sources" means to identify and specify all documents and non-written communications upon which you rely in support of the allegation, contention, conclusion, position or answer in question, to state the references drawn from each such source upon which you rely in support of such allegation, contention, conclusion, position or answer and to identify all individuals whom you know to be knowledgeable with respect to the subject matter of such allegation, contention, conclusion, position or answer. Where a source is a public record (e.g., a newspaper, trade journal, judicial or administrative opinion), a quotation and page reference of the material relied upon shall be supplied.

N. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources

therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all *pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.*

O. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the Interrogatories and request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

P. Unless otherwise stated, the period of time for which these Interrogatories are requested extends from January 1, 1999 to the present.

Interrogatories

AT&T I-1. Provide the information requested on the attached spreadsheet for each MSA for which Verizon asserts that the FCC's self-provisioning test has been met for mass market switching. Provide the responses electronically on the Excel spreadsheet that accompanies this request. To the extent information provided on the Excel spreadsheet responds to any of questions 2 through 27 below, the questions for which the spreadsheet provides the requested information may be disregarded, except that, in response to any such questions, Verizon should indicate where on the spreadsheet the requested information is identified.

AT&T I-2 Provide the "Line Count Study" referenced at pages 21-22 of the Direct Testimony of Debra Berry and Michael Peduto ("Berry/Peduto Testimony").

AT&T I-3. Provide all workpapers used to compile the Line Count Study.

AT&T I-4. If not already identified in the Line Count Study, provide, by wire center and by CLEC, the number of residential voice grade loops counted in the Study.

AT&T I-5. If not already identified in the Line Count Study, provide, by wire center and by CLEC, the number of business voice grade loops counted in the Study.

AT&T I-6. If not already identified in the Line Count Study, provide, by wire center and by CLEC, the number of EELs counted in the Study. Berry/Peduto Testimony at 22.

AT&T I-7. Indicate whether any EELs are provided to residential customers and, if so, the applicable wire centers and CLEC for each.

AT&T I-8. For the EELs provided to business customers, indicate the wire center(s) where the EELs are provisioned, the number in each wire center, and the CLEC obtaining them.

AT&T I-9. For each wire center, please indicate the number of instances in which 4 or more loops are provided to a single customer address, the number of loops provided at each such address, and the identify of the CLEC serving each such address. Berry/Peduto Testimony at 22.

AT&T I-10. In each instance in which Verizon "counted affiliated carriers as a single carrier to avoid double-counting affiliates within a particular wire center" (Berry/Peduto Testimony at 22), identify each affiliate and provide, by affiliate, and by wire center, the number of voice grade loops provided to each affiliate.

AT&T I-11. Describe the process Verizon used to ensure it “did not count CLECs that provide solely data services over copper loop facilities.”
Berry/Peduto Testimony at 22.

AT&T I-12. Is it Verizon’s assertion that all loops counted in the Loop Count Study are used for voice service? If so, fully describe all facts supporting that assertion.

AT&T I-13. For each of the CLECs listed under the Allentown-Bethlehem-Easton MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the Pennsylvania wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-14. Are all of the lines shown on Attachment 2 of the Berry/Peduto Testimony for the Allentown-Bethlehem-Easton MSA located in Pennsylvania wire centers? If not, indicate the number that are in Pennsylvania, by CLEC and by wire center.

AT&T I-15. For each of the CLECs listed under the Harrisburg-Lebanon-Carlisle MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-16. For each of the CLECs listed under the Lancaster MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-17. For each of the CLECs listed under the Philadelphia MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the Pennsylvania wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-18. Are all of the lines shown on Attachment 2 of the Berry/Peduto Testimony for the Philadelphia MSA located in Pennsylvania wire centers? If not, indicate the number that are in Pennsylvania, by CLEC and by wire center.

AT&T I-19. For each of the CLECs listed under the Pittsburgh MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-20. For each of the CLECs listed under the Reading MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-21. For each of the CLECs listed under the Scranton-Wilkes-Barre-Hazleton MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

AT&T I-22. If not already indicated in response to AT&T I, Interrogatories 13 through 21 inclusive, indicate, for each MSA, and by CLEC and by wire center, the number of lines taken from Verizon's Line Count Study and the number of lines estimated from E911 database information. Berry/Peduto Testimony at 25-26.

AT&T I-23. Explain in detail the manner in which Verizon obtained access to E911 database information. Can AT&T or any other CLEC can obtain access to E911 database information in the same way? If not, explain why not, and describe how CLECs would obtain access to that information.

AT&T I-24. Indicate the number of lines Verizon provides to residential customers in Pennsylvania, and the number of lines Verizon provides to business customers in Pennsylvania.

AT&T I-25. Referencing Verizon's response to AT&T I-24, break the number of business lines into those provided to single line customers, two line customers, three line customers, four line customers, and five-lines-and-above customers.

AT&T I-26. For each wire center identified in response to AT&T I, Interrogatories 13 through 21 inclusive, indicate the number residence lines and the number of business lines Verizon provided in the same time period used to develop the CLEC data presented on Attachment 2 to the Berry/Peduto Testimony.

AT&T I-27 Provide the total number of UNE-P arrangements provisioned by Verizon in Pennsylvania as of the latest date for which such information is available. Separately, indicate, by wire center and by MSA for each MSA where Verizon contends the FCC's self provisioning trigger has been met for mass market switching, the number of UNE-P arrangements provisioned in each wire center.

AT&T I-28. Provide the study that supports the statement at page 9 of the Berry/Peduto Testimony that "extraordinary circumstances . . . do not exist in Pennsylvania."

AT&T I-29. Is it Verizon's contention that all the switches identified in the chart at page 19 of the Berry/Peduto Testimony are used to serve mass market customers? If so, fully describe all facts supporting that contention.

AT&T I-30. Provide all "public statements and filings" referenced at lines 1-3 of page 45 of the Berry/Peduto Testimony.

AT&T I-31. Provide all documents concerning the "physical inspections" of collocation space described on Page 46 of the Berry/Peduto Testimony, including, but not limited to, all forms completed and/or submitted by the inspectors.

AT&T I-32. Describe the role, if any, that Ms. Berry played in the "physical inspections" of collocation space described on Page 46 of the Berry/Peduto Testimony.

AT&T I-33. Describe the role, if any, that Mr. Peduto played in the "physical inspections" of collocation space described on Page 46 of the Berry/Peduto Testimony.

AT&T I-34. Provide all documents concerning the "rigorous controls" referenced at line 10 of page 46 of the Berry/Peduto Testimony.

AT&T I-35. Fully describe the "experience" referenced on page 47, line 15 of the Berry/Peduto Testimony

AT&T I-36. Provide all studies and other documentation supporting the assumptions set forth on page 47, line 18 through page 48, line 1, of the Berry/Peduto Testimony.

Dated: November 21, 2003

MSA - Lancaster								
		Name of CLEC						
Wire Center GEC	Wire Center Name	Total Lines Served By Self Provided Switching (C=D+G)	Total Unbundled Loops Obtained From Verizon (D=E+F)	Total Unbundled Residential Loops Obtained From Verizon	Total Unbundled Business Loops Obtained From Verizon	Total Lines Calculated From E911 Database (G=H+I)	Total Residential Calculated From E911 Database	Total Business Calculated From E911 Database

MSA - Philadelphia				

Name of CLEC		Total Lines Served By Self Provided Switching (C=D+G)	Total Unbundled Loops Obtained From Verizon (D=E+F)	Total Unbundled Residential Loops Obtained From Verizon	Total Unbundled Business Loops Obtained From Verizon	Total Lines Calculated From E911 Database (G=H+I)	Total Residential Calculated From E911 Database	Total Business Calculated From E911 Database
Wire Center CLIF	Wire Center Name							

MSA - Philadelphia								
		Name of CLEC						
Wire Center GLU	Wire Center Name	Total Lines Served By Self Provided Switching (C=D+G)	Total Unbundled Loops Obtained From Verizon (D=E+F)	Total Unbundled Residential Loops Obtained From Verizon	Total Unbundled Business Loops Obtained From Verizon	Total Lines Calculated From E911 Database (G=H+I)	Total Residential Calculated From E911 Database	Total Business Calculated From E911 Database

MSA - Pittsburgh								
		Name of CLEC						
Wire Center CLLID	Wire Center Name	Total Lines Served By Self Provided Switching (C=D+G)	Total Unbundled Loops Obtained From Verizon (D=E+F)	Total Unbundled Residential Loops Obtained From Verizon	Total Unbundled Business Loops Obtained From Verizon	Total Lines Calculated From E911 Database (G=H+I)	Total Residential Calculated From E911 Database	Total Business Calculated From E911 Database

MSA - Pittsburgh

Name of CLEC								
Wire Center CELL	Wire Center Name	Total Lines Served By Self Provided Switching (C=D+G)	Total Unbundled Loops Obtained From Verizon (D=E+F)	Total Unbundled Residential Loops Obtained From Verizon	Total Unbundled Business Loops Obtained From Verizon	Total Lines Calculated From E911 Database (G=H+I)	Total Residential Calculated From E911 Database	Total Business Calculated From E911 Database

MSA - Pittsburgh

Name of CLEC								
Wire Center CIT	Wire Center Name	Total Lines Served By Self Provided Switching (C=D+G)	Total Unbundled Loops Obtained From Verizon (D=E+F)	Total Unbundled Residential Loops Obtained From Verizon	Total Unbundled Business Loops Obtained From Verizon	Total Lines Calculated From E911 Database (G=H+I)	Total Residential Calculated From E911 Database	Total Business Calculated From E911 Database

EXHIBIT 2

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December 5, 2003

VIA UPS OVERNIGHT DELIVERY

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

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.'s Objections to AT&T Communications of Pennsylvania, LLC's First Set of Interrogatories and Requests for Production of Documents to Verizon Pennsylvania Inc., in the above captioned 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

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc.'s Objections to AT&T Communications of Pennsylvania, LLC's First Set of Interrogatories and Requests for Production of Documents to Verizon Pennsylvania Inc., 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 5th day of December, 2003.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation into the Obligations of)	
Incumbent Local Exchange Carriers to)	Docket No. I-00030099
Unbundle Network Elements)	

**OBJECTIONS TO AT&T COMMUNICATIONS OF
PENNSYLVANIA, LLC'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
ADDRESSED TO VERIZON PENNSYLVANIA, INC.**

Pursuant to 52 Pa. Code §§ 5.342 and 5.349, Verizon Pennsylvania Inc. ("Verizon") hereby objects to AT&T Communications of Pennsylvania LLC's ("AT&T") First Set of Interrogatories and Request for Production of Documents, as follows. For ease of reference, Verizon has set forth a list of Specific Objections, and then has referred to each Specific Objection by number where applicable in response to the particular questions. Verizon has then indicated for each interrogatory whether or not it will be providing a response at the appropriate time under the procedural schedule of this proceeding.

GENERAL OBJECTIONS

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, call for the production of information that Verizon does not maintain in its possession or in the requested format.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Pennsylvania Inc.'s or Verizon North Inc.'s territory, except for out of franchise operations.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC, or other third party that Verizon has an obligation to safeguard from disclosure.

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek confidential and proprietary materials relating to Verizon's customers or business practices whose probative value in this proceeding is substantially outweighed by the risk of prejudice or other potential harm to Verizon.

5. Verizon objects to the definitions in so far as they depart from the meanings ascribed in the Report and Order and Order on Remand and Further Notice of Proposed Rulemaking ("Triennial Review Order") issued by the Federal Communications Commission in CC Docket No. 01-338. Verizon will respond using the definitions the FCC adopted in the Triennial Review Order.

SPECIFIC OBJECTIONS

1. Verizon objects to the discovery request to the extent that it requires disclosure of information protected from discovery by the attorney-client privilege and/or the attorney work product doctrine.

2. Verizon objects to the discovery request to the extent that it purports to impose upon Verizon a duty to disclose information or documents that is or are outside Verizon's possession, custody or control.

3. Verizon objects to the discovery request to the extent that it seeks confidential and/or proprietary information. Any confidential or proprietary information

provided by Verizon in response to the discovery request is done so subject to the terms of the Protective Order that was entered in this proceeding.

4. Verizon objects to the discovery request to the extent that it is vague and ambiguous.

5. Verizon objects to the discovery request to the extent that it is cumulative or duplicative.

6. Verizon objects to the discovery request to the extent that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

7. Verizon objects because the discovery request seeks information that is beyond the scope of the impairment analysis at issue in the Commission's review of Verizon's case. Information regarding operational and economic factors that are relevant to a potential deployment case is irrelevant to the question of whether Verizon has satisfied the applicable "trigger" – which is the only impairment determination that is at issue in this proceeding. *See Triennial Review Order* ¶ 425, n. 1300 (economic and operational factors that are used in a potential deployment case "come into play only if . . . [the FCC's] deployment triggers are not met.").

8. Verizon objects because the discovery request seeks information regarding Verizon's retail operations. This information is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant

market *using non-incumbent LEC facilities*,” not Verizon’s retail operations. *Id.* ¶ 93 (emphasis added).

9. Verizon objects to the discovery request to the extent that it seeks operational and/or proprietary information regarding other telecommunications carriers.

10. Verizon objects to the discovery request to the extent that it calls for legal conclusions.

11. Verizon objects to the discovery request to the extent that it is argumentative.

12. Verizon objects to the discovery request to the extent that it calls for a special study.

13. Verizon objects to the discovery request on the basis that it is calls for speculation and/or conjecture.

14. Verizon objects to the discovery request to the extent that it seeks information in the public domain.

15. Verizon objects to the discovery request to the extent that it seeks information that is as readily available to the requesting party as it is to Verizon.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 1
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide the information requested on the attached spreadsheet for each MSA for which Verizon asserts that the FCC's self-provisioning test has been met for mass market switching. Provide the responses electronically on the Excel spreadsheet that accompanies this request. To the extent information provided on the Excel spreadsheet responds to any of questions 2 through 27 below, the questions for which the spreadsheet provides the requested information may be disregarded, except that, in response to any such questions, Verizon should indicate where on the spreadsheet the requested information is identified.

OBJECTION:

See Specific Objections 2, 3, 5, 6, 7, 8, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 2
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide the "Line Count Study" referenced at pages 21-22 of the Direct
Testimony of Debra Berry and Michael Peduto ("Berry/Peduto Testimony").

OBJECTION:

See Specific Objection 9. Subject to and without waiving the foregoing
general and specific objections, Verizon states that it will provide
relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 3
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide all workpapers used to compile the Line Count Study.

OBJECTION:

See Specific Objection 1. Subject to and without waiving the foregoing
general and specific objections, Verizon states that it will provide
relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 4
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

If not already identified in the Line Count Study, provide, by wire center
and by CLEC, the number of residential voice grade loops counted in the
Study.

OBJECTION:

See Specific Objections 2, 5, and 9. Subject to and without waiving the
foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 5
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

If not already identified in the Line Count Study, provide, by wire center
and by CLEC, the number of business voice grade loops counted in the Study.

OBJECTION:

See Specific Objections 2, 5, and 9. Subject to and without waiving the
foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 6
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

If not already identified in the Line Count Study, provide, by wire center
and by CLEC, the number of EELs counted in the Study. Berry/Peduto Testimony
at 22.

OBJECTION:

See Specific Objections 5 and 9. Subject to and without waiving the
foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 7
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Indicate whether any EELs are provided to residential customers and, if so,
the applicable wire centers and CLEC for each.

OBJECTION:

See Specific Objections 2, 4, 5, and 9. Subject to and without waiving the
foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 8
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For the EELs provided to business customers, indicate the wire center(s)
where the EELs are provisioned, the number in each wire center, and the CLEC
obtaining them.

OBJECTION:

See Specific Objections 2, 4, 5, and 9. Subject to and without waiving the
foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 9
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each wire center, please indicate the number of instances in which 4 or more loops are provided to a single customer address, the number of loops provided at each such address, and the identify of the CLEC serving each such address. Berry/Peduto Testimony at 22.

OBJECTION:

See Specific Objections 5 and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 10
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

In each instance in which Verizon "counted affiliated carriers as a single carrier to avoid double-counting affiliates within a particular wire center" (Berry/Peduto Testimony at 22), identify each affiliate and provide, by affiliate, and by wire center, the number of voice grade loops provided to each affiliate.

OBJECTION:

See Specific Objections 5, 6, 7, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 11
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Describe the process Verizon used to ensure it "did not count CLECs that provide solely data services over copper loop facilities." Berry/Peduto Testimony at 22.

OBJECTION:

See Specific Objections 5, 6, 7 and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 12
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Is it Verizon's assertion that all loops counted in the Loop Count Study are used for voice service? If so, fully describe all facts supporting that assertion.

OBJECTION:

See Specific Objections 6, 7, and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 13
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the CLECs listed under the Allentown-Bethlehem-Easton MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the Pennsylvania wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 14
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Are all of the lines shown on Attachment 2 of the Berry/Peduto Testimony for the Allentown-Bethlehem-Easton MSA located in Pennsylvania wire centers? If not, indicate the number that are in Pennsylvania, by CLEC and by wire center.

OBJECTION:

See Specific Objections 6, 7, and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 15
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the CLECs listed under the Harrisburg-Lebanon-Carlisle MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 16
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the CLECs listed under the Lancaster MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 17
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:

POSITION:

REQUEST:

For each of the CLECs listed under the Philadelphia MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the Pennsylvania wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 18
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Are all of the lines shown on Attachment 2 of the Berry/Peduto Testimony for the Philadelphia MSA located in Pennsylvania wire centers? If not, indicate the number that are in Pennsylvania, by CLEC and by wire center.

OBJECTION:

See Specific Objections 6, 7, and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 19
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the CLECs listed under the Pittsburgh MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 20
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the CLECs listed under the Reading MSA on Attachment 2 of the
Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC
is providing facilities-based service, and the number of unbundled loops
provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving
the foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 21
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the CLECs listed under the Scranton-Wilkes-Barre-Hazleton MSA on Attachment 2 of the Berry/Peduto Testimony, identify the CLEC, the wire center(s) where that CLEC is providing facilities-based service, and the number of unbundled loops provided to each CLEC, broken down into business and residence loops.

OBJECTION:

See Specific Objections 2, 5, 6, 9, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 22
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

If not already indicated in response to AT&T I, Interrogatories 13 through 21 inclusive, indicate, for each MSA, and by CLEC and by wire center, the number of lines taken from Verizon's Line Count Study and the number of lines estimated from E911 database information. Berry/Peduto Testimony at 25-26.

OBJECTION:

See Specific Objections 2, 5, 6, and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 23
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Explain in detail the manner in which Verizon obtained access to E911 database information. Can AT&T or any other CLEC can obtain access to E911 database information in the same way? If not, explain why not, and describe how CLECs would obtain access to that information.

OBJECTION:

See Specific Objections 10 and 13. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 24
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Indicate the number of lines Verizon provides to residential customers in Pennsylvania, and the number of lines Verizon provides to business customers in Pennsylvania.

OBJECTION:

See Specific Objections 3, 7, and 8. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 25
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Referencing Verizon's response to AT&T I-24, break the number of business lines into those provided to single line customers, two line customers, three line customers, four line customers, and five-lines-and-above customers.

OBJECTION:

See Specific Objections 3, 6, 7, 8, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 26
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each wire center identified in response to AT&T I, Interrogatories 13 through 21 inclusive, indicate the number residence lines and the number of business lines Verizon provided in the same time period used to develop the CLEC data presented on Attachment 2 to the Berry/Peduto Testimony.

OBJECTION:

See Specific Objections 3, 6, 7, 8, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 27
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide the total number of UNE-P arrangements provisioned by Verizon in Pennsylvania as of the latest date for which such information is available. Separately, indicate, by wire center and by MSA for each MSA where Verizon contends the FCC's self provisioning trigger has been met for mass market switching, the number of UNE-P arrangements provisioned in each wire center.

OBJECTION:

See Specific Objections 5, 6, 7, and 12. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 28
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide the study that supports the statement at page 9 of the Berry/Peduto
Testimony that "extraordinary circumstances . . . do not exist in
Pennsylvania."

OBJECTION:

See Specific Objections 10 and 11. Subject to and without waiving the
foregoing general and specific objections, Verizon states that it will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 29
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Is it Verizon's contention that all the switches identified in the chart at page 19 of the Berry/Peduto Testimony are used to serve mass market customers? If so, fully describe all facts supporting that contention.

OBJECTION:

See Specific Objections 10 and 11. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 30
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide all "public statements and filings" referenced at lines 1-3 of page
45 of the Berry/Peduto Testimony.

OBJECTION:

Subject to its General Objections, Verizon will provide information
responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 31
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide all documents concerning the "physical inspections" of collocation space described on Page 46 of the Berry/Peduto Testimony, including, but not limited to, all forms completed and/or submitted by the inspectors.

OBJECTION:

See Specific Objections 1, 3, 6 and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 32
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Describe the role, if any, that Ms. Berry played in the "physical inspections" of collocation space described on Page 46 of the Berry/Peduto Testimony.

OBJECTION:

See Specific Objections 1 and 11. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 33
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Describe the role, if any, that Mr. Peduto played in the "physical inspections" of collocation space described on Page 46 of the Berry/Peduto Testimony.

OBJECTION:

See Specific Objections 1 and 11. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.

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OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 34
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide all documents concerning the "rigorous controls" referenced at line
10 of page 46 of the Berry/Peduto Testimony.

OBJECTION:

See Specific objection 1, 3, and 6. Subject to these specific objections, as
well as its general objections, Verizon will provide information subject to
this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 35
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Fully describe the "experience" referenced on page 47, line 15 of the
Berry/Peduto Testimony.

OBJECTION:

See Specific Objection 11. Subject to and without waiving the foregoing
general and specific objections, Verizon states that it will provide
relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 36
OF AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC. DATED NOVEMBER 21, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide all studies and other documentation supporting the assumptions set forth on page 47, line 18 through page 48, line 1, of the Berry/Peduto Testimony.

RESPONSE:

See Specific Objections 5, 6, and 9. Subject to and without waiving the foregoing general and specific objections, Verizon states that it will provide relevant, non-privileged information, if any, responsive to this request.



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December 5, 2003

EXHIBIT 3

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 4, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (OBLIGATIONS OF ILECS TO UNBUNDLE NETWORK ELEMENTS) (APPENDIX A)

REQUEST:

For each wire center in your territory in Pennsylvania, please provide the number of business voice grade equivalent lines that CLECs are serving through own facilities.

RESPONSE:

Attached is the proprietary response detailing CLEC facilities based business access listings as of June 2003. The source of this data was the E911 database. Assuming the CLEC's have accurately entered their E911 listings, these listings should include the UNE Loops included in Appendix B. Section A - Question 2. Unbundled Loops were not broken out by Business and Residential in Appendix B A-2.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO DATA REQUEST NO. 8, DATED OCTOBER 2, 2003, SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (OBLIGATIONS OF ILECS TO UNBUNDLE NETWORK ELEMENTS) (APPENDIX A)

REQUEST:

For each wire center in your territory in Pennsylvania, please provide the estimated number of residential lines that CLECs are serving through their own facilities (complete bypass).

RESPONSE:

Attached is the proprietary response detailing CLEC facilities based residential access listings as of June 2003. The source of this data was the E911 database. Assuming the CLEC's have accurately entered their E911 listings, these listings should include the UNE Loops included in Appendix B. Section A - Question 2. Unbundled Loops were not broken out by Business and Residential in Appendix B A-2.

EXHIBIT 4



Summary of your account

November 1, 2003

TELEPORT-ACCESS MGMNT
ATTN: TOM ROONEY
2 TELEPORT DRIVE
STN SLND NY 10311-1001

Charges from last month

Amount of your last bill.....	\$20.50	
Amount transferred to Summary Bill ..	-20.50	
Amount you still owe		\$.00

Charges for this month

Our charges-See Page 2	\$20.50	
Call 1 888-847-6288 if you have a question		
Total for this month.....		\$20.50

Total amount you owe-transferred to Summary Bill		\$20.50
---	--	----------------



Monthly charges

November 1, 2003

These monthly charges are for your service from Nov 1 to Nov 30

Monthly charges

Unbundled Cross Connect		
UBTXNU830303000PA		\$.00
Unbundled Cross Connect		
UBTXNU830302000PA		+ .00
Unbundled Loop Service - Business		
UBTXNU830303000PA		+10.25
Unbundled Loop Service - Business		
UBTXNU830302000PA		+10.25

Call 1 888-847-6288 if you have a question.



Summary of your account

November 1, 2003

TELEPORT-ACCESS MGMT
ATTN: TOM ROONEY
2 TELEPORT DRIVE
STN SLND NY 10311-1001

Charges from last month

Amount of your last bill.....	\$11.00	
Amount transferred to Summary Bill ..	<u>-11.00</u>	
Amount you still owe		\$.00

Charges for this month

Our charges-See Page 2	<u>\$11.00</u>	
Call 1 888-847-6288 if you have a question		
Total for this month.....		\$11.00

Total amount you owe-transferred to Summary Bill		\$11.00
---	--	----------------



Monthly charges

November 1, 2003

These monthly charges are for your service from Nov 1 to Nov 30

Monthly charges

Unbundled Cross Connect		
UBTXNU830284000PA		\$.00
Unbundled Loop Service - Business		
UBTXNU830284000PA		+11.00
Call 1 888-847-6288 if you have a question.		



Summary of your account

November 1, 2003

TELEPORT-ACCESS MGMNT
ATTN: TOM ROONEY
2 TELEPORT DRIVE
STN SLND NY 10311-1001

Charges from last month

Amount of your last bill.....	\$14.00	
Amount transferred to Summary Bill ..	<u>-14.00</u>	
Amount you still owe		\$.00

Charges for this month

Our charges-See Page 2	<u>\$14.00</u>	
Call 1 888-847-6288 if you have a question		
Total for this month.....		\$14.00

Total amount you owe-transferred to Summary Bill		\$14.00
---	--	----------------



Monthly charges

November 1, 2003

These monthly charges are for your service from Nov 1 to Nov 30

Monthly charges

Unbundled Cross Connect		
UBTXNU830331000PA		\$.00
Unbundled Loop Service - Business		
UBTXNU830331000PA		+14.00
Call 1 888-847-6288 if you have a question.		



Summary of your account

November 1, 2003

TELEPORT-ACCESS MGMNT
ATTN: TOM ROONEY
2 TELEPORT DRIVE
STNSLND NY 10311-1001

Charges from last month

Amount of your last bill.....	\$11.20	
Amount transferred to Summary Bill ..	<u>-11.20</u>	
Amount you still owe		\$.00

Charges for this month

Our charges-See Page 2	<u>\$11.20</u>	
Call 1 888-847-6288 if you have a question		
Total for this month.....		\$11.20

Total amount you owe-transferred to Summary Bill		\$11.20
---	--	----------------



Monthly charges

November 1, 2003

These monthly charges are for your service from Nov 1 to Nov 30

Monthly charges

Unbundled Cross Connect		
UBTXNU832582000PA		\$.00
Unbundled Loop Service - Business		
UBTXNU832582000PA		+11.20
Call 1 888-847-6288 if you have a question.		



Summary of your account

November 1, 2003

TELEPORT ACCESS MGMT
2 TELEPORT DR
STATEN ISLAND NY 10311-1001

Charges from last month

Amount of your last bill.....	\$42.00	
Amount transferred to Summary Bill ..	-42.00	
Amount you still owe		\$.00

Charges for this month

Our charges-See Page 2	\$42.00	
Call 1 888-847-6288 if you have a question		\$42.00
Total for this month.....		\$42.00

Total amount you owe-transferred to Summary Bill **\$42.00**



Monthly charges

November 1, 2003

These monthly charges are for your service from Nov 1 to Nov 30

Monthly charges

Unbundled Cross Connect UBTXNU202022000PA	\$.00
Unbundled Cross Connect UBTXNU202021000PA	+ .00
Unbundled Cross Connect UBTXNU197396000PA	+ .00
Unbundled Loop Service - Business UBTXNU202022000PA	+14.00
Unbundled Loop Service - Business UBTXNU202021000PA	+14.00
Unbundled Loop Service - Business UBTXNU197396000PA	+14.00

Call 1 888-847-6288 if you have a question.

Certificate of Service
Docket No. I-00030099

The undersigned hereby certifies that true and correct copies of AT&T Communications of Pennsylvania, LLC.'s Motion to Overrule Objections and to Compel Responses to the First Set of Interrogatories and Requests for Production of Documents to Verizon Pennsylvania, Inc. were caused to be served on the persons named below by electronic and overnight or first class mail in accordance with the requirements of 52 Pa. Code §§1.52 and 1.54:

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3000 K St., NW
Washington, DC 20007



Robert C. Barber

Dated: December 9, 2003

*By overnight mail



**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office Of Administrative Law Judge
P.O. Box 3265, Harrisburg, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

December 9, 2003

In Re: **I-00030099**

(See letter dated 11/25/2003)

Incumbent Local Exchange Carriers

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

NOTICE

This is to inform you that a hearing on the above-captioned case will be held as follows:

Type: Further Hearing

Date: Friday, January 30, 2004 at 9:00 a.m. in Hearing Room Number 3

Presiding: Administrative Law Judge Michael C. Schnierle
Administrative Law Judge Susan D. Colwell
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452
Fax: (717) 787-0481

DOCUMENT
FOLDER

Please mark your records accordingly.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: 717-787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Schnierle
Judge Colwell
Steve Springer, Scheduling Officer
Beth Plantz
Docket Section
Calendar File

DOCKETED
JAN 06 2004

ORIGINAL

WolfBlock

212 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 □ Fax: (717) 237-7161 □ www.WolfBlock.com

Alan C. Kohler
Direct Dial: (717) 237-7172
Direct Fax: (717) 237-2752
E-mail: akohler@wolfblock.com

December 10, 2003

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg., 2nd
Floor, 400 North Street P.O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT

RECEIVED
2003 DEC 10 PM 3:14
SECRETARY'S BUREAU

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

Dear Secretary McNulty:

Enclosed please find the original and three (3) copies of a Confidentiality Agreement executed by Gary Hawthorn in the above-reference matter.

Thank you for your attention to this matter.

Respectfully submitted,



Alan C. Kohler

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

ACK/smw

cc: The Honorable Michael C. Schnierle
The Honorable Susan Colwell
Parties of Record

DSH:39129.1/FUL022-216383

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

WolfBlock Government Relations: Harrisburg, PA and Washington, DC
Wolf, Block, Schorr and Solis-Cohen LLP, a Pennsylvania Limited Liability Partnership

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

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Hon. Michael Schnierle
Administrative Law Judge
PA PUC
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Harrisburg, PA 17105-3265

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Jeffrey J. Heins
Aldelphia Business Solutions of PA Inc.,
d/b/a Telcove
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Coudersport, PA 16915

Date: December 10, 2003

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Ephrata, PA 17522

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Thomas Koutsky
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Suite 500
Washington DC 20036



Alan Kohler, Esq.

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SECRETARY'S BUREAU

APPENDIX A-2
PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg PA 17105-3265

ORIGINAL

Investigation into the Obligations of : Docket No. 1-00030099
Incumbent Local Exchange Carriers to :
Unbundle Network Elements :

CONFIDENTIALITY AGREEMENT

DOCKETED
JAN 08 2004

TO WHOM IT MAY CONCERN:

The undersigned is the Controller of Remi Communication, Inc. (retaining party) and is not, or has no knowledge or basis for believing that he/she is: (1) an officer, board member, stockholder, partner or owner other than stock of any competitor of any party of record (producing party) or an employee of any competitor of the producing party who is primarily involved in the pricing, development, and/or marketing of products or services that are offered in competition with those of the producing party; or (2) an officer, board member, stockholder, partner, or owner than stock of any affiliate of a competitor of the producing party. (See ¶5 of Protective Order). The undersigned has read the Protective Order and understands that it and this Confidentiality Agreement deal with the treatment of Proprietary Information and Highly Confidential Proprietary Information. The undersigned agrees to be bound by, and to comply with, the terms and conditions of said Protective Order as a condition of access to the Proprietary Information and Highly Confidential Proprietary Information. Further, the undersigned, if an independent expert, represents that he/she has complied with the provisions of ordering paragraph number 5(a)(ii) of the Protective Order prior to executing this Confidentiality Agreement.

DATE: 11/21/2003

Gary Hawthorn
Signature
GARY HAWTHORN
Print Name

Status relative to Retaining Party

Employer

Address

DOCUMENT

RECEIVED
2003 DEC 10 PM 3:14
SECRETARY'S BUREAU