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December 2, 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

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2003 DEC -2 PM 3:22
PA PUC
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 the Confidentiality Agreement,
executed by Christopher Honeywell, 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 D. Colwell
Parties of Record

DSH:39002.1/FUL022-216383

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

SECRETARY'S BUREAU

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

CONFIDENTIALITY AGREEMENT

DOCKETED
JAN 07 2004

TO WHOM IT MAY CONCERN:

The undersigned is the Director of Business Development of Full Service Computing Corporation t/a/Full Service Network (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: 11-19-2003



Signature

Christopher Honeywill

Print Name

Employee of Retaining Party

Status relative to Retaining Party

Full Service Network

Employer

1420 Centre Avenue, Pittsburgh

PA 15219

Address

DOCUMENT

ORIGINAL

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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Date: December 2, 2003

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Alan Kohler, Esq.

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A Limited Liability Partnership Including Professional Corporations

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December 2, 2003

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Via Federal Express

Mr. James J. McNulty
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Commonwealth Keystone Building
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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-00030099
Responses of Metro Teleconnect Companies, Inc. to the Commission's October 2, 2003 Procedural Order**

Dear Mr. McNulty:

Transmitted herewith on behalf of our client, Metro Teleconnect Companies, Inc. ("Metro Teleconnect"), are an original and seven (7) copies of Metro Teleconnect's responses to the Preliminary Discovery Requests set forth in Appendix A of the Commission's Procedural Order, issued October 2, 2003 in the above-referenced proceeding. In compliance with the Commission's December 2, 2003 Order Concerning Service of Responses to Commission Data Requests, Metro Teleconnect has served a copy of this filing on all parties to this proceeding.

Please date-stamp the enclosed Receipt copy of this filing and return it to the undersigned in the enclosed self-addressed, stamped envelope. Please refer all questions and correspondence regarding this filing to the undersigned.

Very truly yours,

Susan M. Hafeli
Counsel for Metro Teleconnect Companies, Inc.

Enclosures
cc: Service List

Washington, DC
Northern Virginia
New York
Los Angeles
London

**RESPONSES OF METRO TELECONNECT COMPANIES, INC.
TO PRELIMINARY DISCOVERY REQUESTS**

Metro Teleconnect Companies, Inc. responds as follows to the Preliminary Discovery Requests set forth in Appendix A of the Commission's October 2, 2003 Procedural Order in Docket No. I-00030099, *Investigation into the Obligation of Incumbent Local Exchange Carriers to Unbundle Network Elements*:

A. Requests for Information submitted to CLECs in Response to Petitioning ILEC

Switching

1. Provide a list of all switches that you currently use to provide a qualifying service (as defined in 47 C.F.R. § 51.5, as that section will be amended by the Final Rules issued by the FCC pursuant to the *Triennial Review Order*) anywhere in Pennsylvania, regardless of whether the switch itself is located in Pennsylvania. Do not include ILEC switches utilized by you on an unbundled basis in the ILEC's service territory or through the resale of the incumbent's services at wholesale rates.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

2. Identify each ILEC wire center district (*i.e.*, the territory served by a wire center of the ILEC) in which you provide qualifying service to any end user customers utilizing any of the switches identified in your response to Question 1. Wire centers should be identified by providing their name, address, and CLLI code.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

3. For each ILEC wire center identified in response to Question 2, identify the total number of voice-grade equivalent lines you are providing to customers in that wire center from your switch(es) identified in response to Question 1. For purposes of this question, "voice-grade equivalent lines" should be defined consistent with the FCC's use of the term. *See, e.g. FCC Form 477, Instructions for the Local Competition and Broadband Reporting Form.*

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

4. For each switch identified in response Question 1, identify the approximate capacity of the switch – that is, the maximum number of voice-grade equivalent lines it is capable of serving – based on that switch’s existing configuration and component parts.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

5. With respect to the voice-grade equivalent lines identified in response to Question 3, separately indicate the number being provided to (a) residential customers; (b) business customers to whom you provide only voice-grade or DS0 lines; and (c) business customers to whom you provide DS1, ISDN-PRI, or other high capacity lines. For purposes of this question, “high capacity” means DS1 or equivalent or higher capacity lines, including, but not limited to DS1, ISDN-PRI, DS3, OCn.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

6. For each of the switches identified in your response to Question 1, state whether the switch is owned by you, or whether you have leased the switching capacity or otherwise obtained the right to use the switch on some non-ownership basis. If the facility is not owned by you, identify the entity owning the switch and (if different) the entity with which you entered into the lease or other arrangement, identify the nature of the arrangement, and state whether such entity or entities are affiliates of yours, in the sense defined in ¶ 408, footnote 1263 of the *Triennial Review Order*.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

7. Provide a list of all switches from which you offer or provide switching capacity to another local service provider for use in providing qualifying service anywhere in Pennsylvania.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

Transport

1. For each ILEC, Identify, by name, address, and CLLI code, each ILEC wire center (by the name, address, and CLLI code of that wire center) in which you have established a collocation arrangement or in which such arrangements have been ordered.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

2. For each wire center identified in your response to Question 1, provide the number of arrangements by wire center, identify the transport facilities that currently serve such collocation arrangement (or that will serve such arrangement and that you are currently in the process of constructing, ordering, purchasing, or arranging for the use of). For purposes of this Question, "transport facilities" (a) does not include unbundled facilities obtained from the petitioning ILEC, and (b) does include dark fiber.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

3. For each transport facility identified in the response to Question 2, identify the transport technology utilized (e.g., fiber optic (specify whether dark or lit), microwave, radio, or coaxial cable), and the quantity/capacity of the facility deployed.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

4. For each wire center and transport technology identified in the responses to Questions 1-3, identify the type of termination equipment utilized in the collocation arrangement.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

5. For each transport facility identified in your response to Question 2, state whether the facility is owned by you or whether you acquired rights to utilize it under a lease or other some other form of non-ownership arrangement. (If the facility was provisioned through the use of dark fiber that you acquired and subsequently "lit," answer separately for the fiber and the optronics utilized.) If the facility is not owned by you, identify the entity that owns the facility and (if different) the entity with which you entered into the lease or other arrangement, identify the nature of the arrangement, and state whether such entity or entities are affiliates of yours, in the sense defined in ¶ 408, footnote 1263 of the *Triennial Review Order*.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

6. Identify and describe any arrangements into which you have entered with another entity for such other entity's use of transport facilities in Pennsylvania that you own or control, on a lease or other basis.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

7. Provide a list of all recurring and non-recurring rate elements and rates when a CLEC purchases UNE-Loop and special access, EEL, DS1, or DS3 transport from the ILEC rate center to the CLEC rate center.

Response: Not applicable. Metro Teleconnect Companies, Inc. has provided and currently provides service to Pennsylvania residential customers on a resale basis only.

Responsible Person: Tom Gregson, Director of Operations, Metro Teleconnect Companies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this, the 2nd day of December 2003, I caused to be served a true copy of the foregoing "Responses of Metro Teleconnect Companies, Inc. to Preliminary Discovery Requests in Docket No. I-00030099" by e-mail and by U.S. Mail, postage prepaid, upon the parties named in the attached Service List.

Susan M. Hafeli

Susan M. Hafeli

DOCKET NO. I-00030099 SERVICE LIST

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December 2, 2003

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James McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Investigation Into The Obligations of Incumbent Local Exchange
Carriers To Unbundle Network Elements
Docket No. I-00030099

DOCUMENT

Dear Secretary McNulty,

Enclosed for filing with the Commission are an original and three (3) copies [Proprietary and Public Versions] of CEI Networks, Inc.'s (CEIN) responses to questions found in Appendix A in the above-referenced proceeding.

This filing was initially filed with the Commission on November 14, 2003 in accord with Commission Procedural Order entered October 3, 2003; however, in a subsequent order, Order Concerning Service of Responses To Commission Data Requests, dated November 26, 2003, CEIN is listed as having not complied.

The date-stamped receipt in my files indicates your office received the filing on November 17, 2003. A copy is enclosed. It is unclear why CEIN was listed as non-compliant in the November 26th order, and therefore, CEIN re-submits its responses to ensure their inclusion on the record.

Kindly acknowledge receipt of this filing by stamping the enclosed duplicate of this letter. A postage paid envelope is provided for your convenience.

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

Sincerely,



Joseph J. Laffey
Vice President Regulatory
717-738-8606
717-733-2364

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AFFILIATE OFFICES
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JAKARTA, INDONESIA
MUMBAI, INDIA
TOKYO, JAPAN

December 3, 2003

VIA OVERNIGHT MAIL AND ELECTRONIC MAIL

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DEC - 3 2003

Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17105

DOCUMENT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Docket No. I-00030099

Dear Mr. McNulty:

Please find attached an original and three (3) copies of executed confidentiality agreements for Joseph Gillan, consultant for Broadview Networks, Inc., Bullseye Telecom, ARC Networks, Inc. d/b/a InfoHighway Communications Corp., McGraw Communications, Inc. Metropolitan Telecommunications of PA and Talk America Inc. in the above-captioned docket.

Please date-stamp the duplicate copy of this filing and return it in the enclosed self-addressed, postage-paid envelope. If you have any questions regarding this filing, please contact the undersigned counsel at (202) 887-1284.

Respectfully submitted,



Heather T. Hendrickson

Enc.

cc: Janet Tuzinski – FUS Telecom Manager
Service List (via electronic and first class mail)

RECEIVED

DEC - 3 2003

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Docket No. I-00031754

00030099

DOCKETED

JAN 07 2004

CONFIDENTIALITY AGREEMENT

TO WHOM IT MAY CONCERN:

The undersigned is the Consultant of
Star (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 Verizon (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: 12/02/03

Joseph Gillan
Signature

Joseph Gillan
Print Name

Consultant
Status relative to Retaining Party

Gillan Associates
Employer

PO BOX 541038, Orlando, FL 32854
Address

DOCUMENT

* Broadview Networks, Inc.; Bullseye Telecom; Info Highway
Communications Corporation, McEraw Communications, Inc.;
MetTel; And Talk America Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RECEIVED

DEC - 3 2003

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

Docket No. I-00030099

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of December, 2003, served a true copy of the foregoing "Confidentiality Agreement" upon the persons below via electronic and first-class mail, in accordance with the requirements of 52 Pa. Code §1.54:

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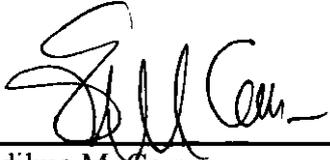
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Edilma M. Carr

CEI Networks, Inc.

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

Docket: No. 1-00030099

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APPENDIX A

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PRELIMINARY DISCOVERY REQUESTS

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

A. Requests for Information submitted to CLECs in Response to Petitioning ILEC

DOCKETED
JAN 07 2004

Switching

1. Provide a list of all switches that you currently use to provide a qualifying service (as defined in 47 C.F.R. § 51.5, as that section will be amended by the Final Rules issued by the FCC pursuant to the *Triennial Review Order*) anywhere in Pennsylvania, regardless of whether the switch itself is located in Pennsylvania. Do not include ILEC switches utilized by you on an unbundled basis in the ILEC's service territory or through the resale of the incumbent's services at wholesale rates.

DOCUMENT

SWITCH	EOP TYPE	LATA	SW STREET	SW CITY	SW STATE	SW ZIP
BRDSPAXBDS0	NORTEL DMS 500	228	202 E FIRST ST	BIRDSBORO	PA	19508
FGTPPA01DS0	NORTEL DMS 500	230	441 SCIENCE PARK RD	FERGUSON TWP (CENTRE)	PA	16803
LWBGPAXLDS0	NORTEL DMS 100	232	20 S, SECOND ST	LEWISBURG	PA	17837

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

Docket: No. I-00030099

2. Identify each ILEC wire center district (*i.e.*, the territory served by a wire center of the ILEC) in which you provide qualifying service to any end user customers utilizing any of the switches identified in your response to Question 1. Wire centers should be identified by providing their name, address, and CLLI code.

<u>Name</u>	<u>Address</u>	<u>CLLI</u>
Williamsport	404 W. 4 th St., Williamsport, PA	WLPTPAWIHPF
State College	250 S. Allen St., State College, PA	STCGPAESHPA
Altoona	1119 16 th St., Altoona, PA	ALNAPAALHPH
Bellefonte	217 N. Allegheny St., Bellefonte, PA	BLLFPABEHPC
Sinking Spring	571 Penn Ave, Sinking Spring, PA	SNSPPASSHPK
Reading	419 Washington St., Reading, PA	RDNGPAREHPG
St. Lawrence	3004 Oley Turnpike Rd., St. Lawrence, PA	SLWBPASLHPK
Shillington	216 W. Walnut St., Shillington, PA	SHLNPASHHPG
Laureldale	828 Bellvue Ave., Laureldale, PA	LRDLPALBHPF
Pottstown	235 King St., Pottstown, PA	PTTWPAPTHPE
Kutztown	45 Railroad Street, Kutztown, PA	KZTNPAAKZ

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

Docket: No. I-00030099

3. For each ILEC wire center identified in response to Question 2, identify the total number of voice-grade equivalent lines you are providing to customers in that wire center from your switch(es) identified in response to Question 1. For purposes of this question, “voice-grade equivalent lines” should be defined consistent with the FCC’s use of the term. *See, e.g. FCC Form 477, Instructions for the Local Competition and Broadband Reporting Form.*

Proprietary Information Redacted

4. For each switch identified in response Question 1, identify the approximate capacity of the switch – that is, the maximum number of voice-grade equivalent lines it is capable of serving – based on that switch’s existing configuration and component parts.

Proprietary Information Redacted

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

Docket: No. I-00030099

5. With respect to the voice-grade equivalent lines identified in response to Question 3, separately indicate the number being provided to (a) residential customers; (b) business customers to whom you provide only voice-grade or DS0 lines; and (c) business customers to whom you provide DS1, ISDN-PRI, or other high capacity lines. For purposes of this question, "high capacity" means DS1 or equivalent or higher capacity lines, including, but not limited to DS1, ISDN-PRI, DS3, OCn.

Proprietary Information Redacted

6. For each of the switches identified in your response to Question 1, state whether the switch is owned by you, or whether you have leased the switching capacity or otherwise obtained the right to use the switch on some non-ownership basis. If the facility is not owned by you, identify the entity owning the switch and (if different) the entity with which you entered into the lease or other arrangement, identify the nature of the arrangement, and state whether such entity or entities are affiliates of yours, in the sense defined in ¶ 408, footnote 1263 of the *Triennial Review Order*.

Please see the following information for switches being used by CEI networks:

FGTPPAO1DSO

State College, PA Switch – This switch is owned by CEI Networks.

BRDSPAXBDSO

Lewisburg, PA Switch – CEI Networks is leasing ports on this switch from Buffalo Valley Telephone Company. CEI Networks is affiliated with Buffalo Valley Telephone Company.

LWBGPAXLDSO

Birdsboro, PA Switch - CEI Networks is leasing ports on this switch from Conestoga Telephone Company. CEI Networks is affiliated with Conestoga Telephone Company.

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

Docket: No. I-00030099

7. Provide a list of all switches from which you offer or provide switching capacity to another local service provider for use in providing qualifying service anywhere in Pennsylvania.

None

Transport

1. For each ILEC, Identify, by name, address, and CLLI code, each ILEC wire center (by the name, address, and CLLI code of that wire center) in which you have established a collocation arrangement or in which such arrangements have been ordered.

<u>Name</u>	<u>Address</u>	<u>CLLI</u>
Williamsport	404 W. 4 th St., Williamsport, PA	WLPTPAWIHPF
State College	250 S. Allen St., State College, PA	STCGPAESHPA
Altoona	1119 16 th St., Altoona, PA	ALNAPAALHPH
Bellefonte	217 N. Allegheny St., Bellefonte, PA	BLLFPABEHPG
Sinking Spring	571 Penn Ave, Sinking Spring, PA	SNSPPASSHPK
Reading	419 Washington St., Reading, PA	RDNGPAREHPG
St. Lawrence	3004 Oley Turnpike Rd., St. Lawrence, PA	SLWBPASLHPK
Shillington	216 W. Walnut St., Shillington, PA	SHLNPASHHPG
Laureldale	828 Bellvue Ave., Laureldale, PA	LRDLPALBHPF
Pottstown	235 King St., Pottstown, PA	PTTWPAPTHPE
Kutztown	45 Railroad Street, Kutztown, PA	KZTNPAKZ

CEI Networks, Inc.

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

Docket: No. I-00030099

2. For each wire center identified in your response to Question 1, provide the number of arrangements by wire center, identify the transport facilities that currently serve such collocation arrangement (or that will serve such arrangement and that you are currently in the process of constructing, ordering, purchasing, or arranging for the use of). For purposes of this Question, “transport facilities” (a) does not include unbundled facilities obtained from the petitioning ILEC, and (b) does include dark fiber.

Proprietary Information Redacted

CEI Networks, Inc.

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

Docket: No. I-00030099

3. For each transport facility identified in the response to Question 2, identify the transport technology utilized (*e.g.*, fiber optic (specify whether dark or lit), microwave, radio, or coaxial cable), and the quantity/capacity of the facility

Proprietary Information Redacted

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

Docket: No. I-00030099

4. For each wire center and transport technology identified in the responses to Questions 1-3, identify the type of termination equipment utilized in the collocation arrangement.

WIRE CENTER	VENDOR	EQUIP. TYPE
WILLIAMSPORT	CISCO	OC-48
STATE COLLEGE	CISCO	OC-48
BELLEFONTE	CISCO	OC-48
ALTOONA	CISCO	OC-48
SINKING SPRINGS	CISCO	OC-48
READING	CISCO	OC-48
ST. LAWRENCE	CISCO	OC-48
SHILLINGTON	CISCO	OC-48
LAURELDALE	CISCO	OC-48
POTTSTOWN	CISCO	OC-12
KUTZTOWN	NORTEL	OC-3

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

Docket: No. I-00030099

5. For each transport facility identified in your response to Question 2, state whether the facility is owned by you or whether you acquired rights to utilize it under a lease or other some other form of non-ownership arrangement. (If the facility was provisioned through the use of dark fiber that you acquired and subsequently “lit,” answer separately for the fiber and the optronics utilized.) If the facility is not owned by you, identify the entity that owns the facility and (if different) the entity with which you entered into the lease or other arrangement, identify the nature of the arrangement, and state whether such entity or entities are affiliates of yours, in the sense defined in ¶ 408, footnote 1263 of the *Triennial Review Order*.

Proprietary Information Redacted

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

Docket: No. I-00030099

6. Identify and describe any arrangements into which you have entered with another entity for such other entity's use of transport facilities in Pennsylvania that you own or control, on a lease or other basis.

None

7. Provide a list of all recurring and non-recurring rate elements and rates when a CLEC purchases UNE-Loop and special access, EEL, DS1, or DS3 transport from the ILEC rate center to the CLEC rate center.

The vast majority of Transport Facilities referenced in this question are leased from Verizon-Pennsylvania. The rates CEI Networks pays to Verizon-Pennsylvania are those that appear in the Pennsylvania PUC 216 Tariff.

Suzan DeBusk Paiva
Assistant General Counsel
Law Department



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DOCUMENT

December 3, 2003

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VIA UPS OVERNIGHT DELIVERY

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

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

To All Parties In Docket No. I-00030099:

Enclosed please find Verizon Pennsylvania Inc.'s First Set of Interrogatories to Sprint Communications Company, Z-Tel Communications, Inc. and CTSI in the above-captioned matter.

Please do not hesitate to contact me if you have questions about this matter.

Very truly yours,

Suzan D. Paiva

SDP/slb
Enc.

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

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc.'s First Set of Interrogatories to Sprint Communications Company, Z-Tel Communications, Inc. and CTSI, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

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

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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SECRETARY'S BUREAU

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December 5, 2003

VIA OVERNIGHT MAIL AND ELECTRONIC MAIL

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Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17105

DEC 05 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

DOCKETED

JAN 08 2004

Re: Docket No. I-00030099

Dear Mr. McNulty:

Please find attached an original and three (3) copies of the responses of Broadview Networks, Inc., Focal Communications Corporation of Pennsylvania, SNiP LiNK LLC and XO Pennsylvania, Inc. in the above-captioned docket to Verizon's first set of interrogatories to CLEC parties issued on November 25, 2003.

Please date-stamp the duplicate copy of this filing and return it in the enclosed self-addressed, postage-paid envelope. If you have any questions regarding this filing, please contact the undersigned counsel at (202) 955-9766.

Respectfully submitted,

Erin W Emmott

Erin W. Emmott

Enclosures

cc: Janet Tuzinski – FUS Telecom Manager
Service List (via electronic and first class mail)

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VIA HAND DELIVERY

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
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400 North Street
Harrisburg, Pennsylvania 17102

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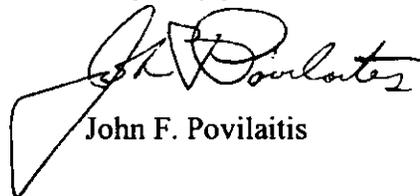
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SECRETARY'S BUREAU

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

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of Covad Communications Company's Petition to Intervene in the above-captioned proceeding. Copies of this petition have been served in accordance with the attached Certificate of Service

Very truly yours,


John F. Povilaitis

JFP/cc
Enclosures

c: The Honorable Michael C. Schnierle
The Honorable Susan D. Colwell
Certificate of Service

59

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

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

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PETITION TO INTERVENE
OF COVAD COMMUNICATIONS COMPANY

Pursuant to the regulations of the Pennsylvania Public Utility Commission ("Commission") governing intervention, 52 Pa. Code §§ 5.71-5.75, Covad Communications Company ("Covad") petitions to intervene in the above-captioned proceedings and in support thereof states the following:

1. On August 21, 2003, the Federal Communications Commission ("FCC") released its long-awaited *Triennial Review Order*.¹ In this order, the FCC adopted new rules governing Incumbent Local Exchange Carrier ("ILEC") obligations with respect to networks elements, including the establishment of a list of network elements that must be unbundled on a national basis and standards used for determining on a more granular level whether a particular network element that is not on the national list should be unbundled. The more granular analysis is to be conducted by individual state commissions and includes such factors as geography, customer class, the type of service, and the facilities used to provide the service.

DOCKETED
JAN 07 2004

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JAN 07 2004
DOCUMENT

¹ *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, FCC 03-36, Report and Order (released August 21, 2003), as corrected by errata, FCC 03-227 (issued September 17, 2003 ("*Triennial Review Order*").

2. With respect to mass market (residential and small business) customers, the *Triennial Review Order* provides state commissions with nine months from the effective date of the order (i.e., June 2, 2004) to conduct a granular analysis to determine whether ILECs must continue to provide competing carriers with unbundled access to: (1) high-capacity loops; (2) switching; and (3) dedicated transport (“9-month proceeding”).

3. By Order entered on October 3, 2003 at the above docket (“Procedural Order”), the Commission provided details regarding the process and procedure that will be used to implement the FCC’s *Triennial Review Order*. Pursuant to the Procedural Order, any party seeking a review of ILEC unbundling obligations was required to file a petition to initiate a 9-month proceeding. On or around October 31, 2003, Verizon Pennsylvania, Inc. (“Verizon”) filed such a petition. Petitions to intervene in the 9-month proceeding were due on or before November 14, 2003.

4. Pursuant to the Second Prehearing Order dated December 4, 2003, the Commission’s Office of Administrative Law Judge granted petitions to intervene filed by Allegiance Telecom of Pennsylvania, Inc., ARC Networks, Inc., d/b/a InfoHighway Communications Corporation, AT&T Communications of Pennsylvania, LLC, Bullseye Telecom, Cavalier Telephone Mid-Atlantic, LLC, Choice One Communications of Pennsylvania, Inc., CTSI, LLC, Lightship Telecom, LLC, McGraw Communications, Inc., MCI WorldCom Network Services, Inc., Metropolitan Communications of Pennsylvania, Inc., Penn Telecom, Sprint Communications Company, L.P., Talk America, Inc., and Z-Tel Communications, Inc., ATX Licensing, Inc., Full Service Computing Corporation, t/a Full Service Network, Line Systems, Inc., and Remi Retail Communications, LLC, the Pennsylvania Carriers Coalition, Broadview Networks, Inc.,

Focal Communications Corporation of Pennsylvania, Snip Link, LLC, and XO Pennsylvania, Inc., and RCN Telecom Services, Inc.

5. Procedurally and substantively, although the deadline for intervention set forth in the Procedural Order has passed, good cause exists for the ALJ to grant Covad's Petition to Intervene in this proceeding. Pursuant to Section 5.74(a) of the Commission's regulations, 52 Pa. Code §5.74(a), a petition to intervene may be granted for good cause shown prior to the conclusion of evidentiary hearings. Covad primarily provides high-speed DSL services to residential and business users in Pennsylvania through a combination of its own facilities and unbundled network elements ("UNEs") purchased from Verizon. In fact, the future of voice competition in the residential market will hinge upon the ability of competitors to provide a bundled voice and data product. Hence, with respect to the determination regarding switching for mass market customers, the Commission must not only determine whether competitors are impaired without access to unbundled local switching, but also, must determine whether competitors are impaired without non-discriminatory access to a combined voice and data service, i.e., Line Splitting where Covad partners with voice providers over the UNE-Platform to offer a bundled voice and data product. Therefore, the outcome of the 9-month proceeding directly relates to the availability of UNEs that are integral to Covad's service offerings in Pennsylvania.

6. Covad meets the substantive standard for intervention stated in Section 5.72 of the Commission's regulation. 52 Pa. Code §5.72. (Intervention is necessary or appropriate when the petitioner claims "[a]n interest which may be directly affected and which is not adequately represented by existing participants...") 52 Pa. Code §5.72(a)(3). As a carrier that specializes in offering DSL services, Covad has

consistently maintained in proceedings before the Commission the importance of allowing competitor access to ILEC network elements on an unbundled basis. The facts sought by the Commission in this proceeding and the issues it seeks to develop with respect to loops, switching, and transport have a significant bearing on the provision of high-speed DSL services in Pennsylvania. As a carrier that specializes in DSL services, no other participant in this case can adequately represent Covad's interests. Of necessity, due to limited resources, Covad must be selective in its participation in state regulatory proceedings in Pennsylvania and the other 35 states in which it maintains operations. However, in view of the issues that the FCC and the Commission have set for exploration in this case, Covad must seek intervention in this case to protect its interests.

7. Although Covad has not been ordered to respond to the Commission's Preliminary Discovery Requests set forth in Appendix A of the Commission's Procedural Order entered at the above docket, Covad submits that it may have information relevant to the Commission's inquiries in this case and if permitted to intervene, will respond in kind to the information requests. Thus, by allowing Covad to intervene in this matter, the Commission could access additional information necessary to evaluate the issues raised by Verizon's petition and necessary to fulfill the FCC's directives regarding the Commission's impairment analysis with respect to loops, transport, and switching.

8. If permitted to intervene, Covad accepts Your Honor's procedural schedule already established for this proceeding in the Second Prehearing Order. However, in view of the January 9, 2004 due date for the submission of intervenor direct testimony, Covad respectfully requests that Your Honor direct as follows:

1. that should it oppose Covad's Petition to Intervene, Verizon shall respond to this Petition on or before close of business, December 12, 2003;

2. that should Covad's Petition to Intervene be granted, Verizon shall immediately forward electronically to Covad its confidential response the Commission's Preliminary Discovery Request submitted to Verizon as part of Appendix A in the Procedural Order; Covad agrees in advance to the terms of the Protective Order approved by the ALJ;
3. that Covad agrees to submit its response to the Commission's Preliminary Discovery Request submitted to the CLECs as part of Appendix A in the Procedural Order within five business days after the order granting Covad's petition to intervene;
4. that an expedited ruling on Covad's Petition to Intervene be provided so as to permit Covad an opportunity to submit any direct testimony on or before January 9, 2004.

9. In summary, Covad's interests may be affected by the Commission's resolution of the issues in the above proceeding, and no other party can adequately represent those interests. The granting of this Petition will not unfairly prejudice Verizon or any other party; nor will it be disruptive of the expedited procedural calendar for the 9-month proceeding, consistent with the Commission's directive. Finally, as a leading competitor to Verizon in the provision of high-speed DSL services in Pennsylvania, Covad's participation in this proceeding will aid the Commission's resolution of the issues raised by Verizon's petition to initiate the 9-month proceeding.

WHEREFORE, Covad Communications Company respectfully requests that Your Honor grant the procedural and substantive relief requested in this Petition to Intervene.

Dated: December 5, 2003

Respectfully submitted,



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Counsel for Covad Communications Company

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SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation into the Obligation :
of Incumbent Local Exchange : I-00030099
Carriers to Unbundle Network Elements :

CERTIFICATE OF SERVICE

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

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(Counsel for Covad Communications Co.)

Date: December 5, 2003



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Counsel for Covad Communications Company

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December 5, 2003

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA OVERNIGHT MAIL AND ELECTRONIC MAIL

Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17105

Re: Docket No. I-00030099

DOCUMENT

Dear Mr. McNulty:

Please find attached an original and three (3) copies of the responses of BullsEye Telecom, ARC Networks, Inc. d/b/a InfoHighway Communications Corp., McGraw Communications, Inc., Metropolitan Telecommunications of PA and Talk America Inc. to Verizon's first set of interrogatories to CLEC parties issued on November 25, 2003 in the above-captioned docket.

Please date-stamp the duplicate copy of this filing and return it in the enclosed self-addressed, postage-paid envelope. If you have any questions regarding this filing, please contact the undersigned counsel at (202) 887-1284.

Respectfully submitted,

Heather T. Hendrickson

Enclosures

cc: Janet Tuzinski – FUS Telecom Manager
Service List (via electronic and first class mail)

68

RESPONSES OF BULLSEYE TELECOM

DOCKETED
JAN 08 2004

DOCUMENT

INTERROGATORIES

VZ-1 Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location. This is not applicable to BullsEye Telecom (“BullsEye”), as BullsEye has not deployed its own high-capacity loop facilities in Pennsylvania. Responsible Individual: Steve Goldman, Vice President of Regulatory.

VZ-2 Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location. This is not applicable to BullsEye, as BullsEye has not obtained high-capacity loops facilities from a supplier other than the ILEC. Responsible Individual: Steve Goldman, Vice President of Regulatory.

VZ-3 For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location. This request is not applicable, see response to VZ-1 and VZ-2. Responsible Individual: Steve Goldman, Vice President of Regulatory.

Form for Response to Questions VZ-1 & VZ-3	
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities	
Customer Address (Street, City, Zip)	Capacity
[use as many lines as needed]	

VZ-4 For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark. This request is not applicable, see response to VZ-1 and VZ-2. Responsible Individual: Steve Goldman, Vice President of Regulatory.

Form for Response to Question VZ-4			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Number of Strands	Number of Strands Lit	Number of Strands Dark
[use as many lines as needed]			

VZ-5 With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities.

With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities. This request is not applicable, see response to VZ-2. Responsible Individual: Steve Goldman, Vice President of Regulatory.

VZ-6 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct. This request is not applicable, see response to VZ-1. Responsible Individual: Steve Goldman, Vice President of Regulatory.

Form for Response to Question VZ-6			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of facility extension	Approximate construction time of facility extension
[use as many lines as needed]			
Customer Locations With Self-Deployed High-Capacity Loop Facilities Under Construction			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of planned facility extension	Approximate construction time of planned facility extension
use as many lines as needed]			

VZ-7 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip. This request is not applicable, see response to VZ-1. Responsible Individual: Steve Goldman, Vice President of Regulatory.

VZ-8 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip. This request is not applicable, see response to VZ-1. Responsible Individual: Steve Goldman, Vice President of Regulatory.

VZ-9 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch. This request is not applicable, see response to VZ-1. Responsible Individual: Steve Goldman, Vice President of Regulatory.

**RESPONSES OF ARC NETWORKS, INC. D/B/A
INFOHIGHWAY COMMUNICATIONS CORP**

INTERROGATORIES

VZ-1 Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location. This is not applicable to ARC Networks, Inc. d/b/a InfoHighway Communications Corporation (“InfoHighway”), as InfoHighway has not deployed its own high-capacity loop facilities in Pennsylvania. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

VZ-2 Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location. This is not applicable to InfoHighway, as InfoHighway has not obtained high-capacity loops facilities from a supplier other than the ILEC. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

VZ-3 For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location. This is not applicable, see response to VZ-1 and VZ-2. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

Form for Response to Questions VZ-1 & VZ-3	
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities	
Customer Address (Street, City, Zip)	Capacity
[use as many lines as needed]	

VZ-4 For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark. This is not applicable, see response to VZ-1 and VZ-2. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

Form for Response to Question VZ-4			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Number of Strands	Number of Strands Lit	Number of Strands Dark
[use as many lines as needed]			

VZ-5 With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities.

With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities. This is not applicable, see response to VZ-2. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

VZ-6 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct. This is not applicable, see response to VZ-1. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

Form for Response to Question VZ-6			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of facility extension	Approximate construction time of facility extension
[use as many lines as needed]			
Customer Locations With Self-Deployed High-Capacity Loop Facilities Under Construction			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of planned facility extension	Approximate construction time of planned facility extension
use as many lines as needed]			

VZ-7 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

VZ-8 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

VZ-9 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLI and street address including zip. Identify the third party owner of the switch. This is not applicable, see response to VZ-1. Responsible Individual: Peter Karoczkai, Senior Vice President of InfoHighway.

**RESPONSES OF MCGRAW COMMUNICATIONS,
INC.**

INTERROGATORIES

VZ-1 Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location. This is not applicable to McGraw Communications, Inc. (“McGraw”), as McGraw has not deployed its own high-capacity loop facilities in Pennsylvania. Responsible Individual: Sadia Mendez, Carrier Division Manager.

VZ-2 Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location. This is not applicable to McGraw, as McGraw has not obtained high-capacity loops facilities from a supplier other than the ILEC. Responsible Individual: Sadia Mendez, Carrier Division Manager.

VZ-3 For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location. This is not applicable, see responses to VZ-1 and VZ-2. Responsible Individual: Sadia Mendez, Carrier Division Manager.

Form for Response to Questions VZ-1 & VZ-3	
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities	
Customer Address (Street, City, Zip)	Capacity
[use as many lines as needed]	

VZ-4 For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark. This is not applicable, see responses to VZ-1 and VZ-2. Responsible Individual: Sadia Mendez, Carrier Division Manager.

Form for Response to Question VZ-4			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Number of Strands	Number of Strands Lit	Number of Strands Dark
[use as many lines as needed]			

VZ-5 With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities.

With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities. This is not applicable, see response to VZ-2. Responsible Individual: Sadia Mendez, Carrier Division Manager.

VZ-6 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct. This is not applicable, see response to VZ-1. Responsible Individual: Sadia Mendez, Carrier Division Manager.

Form for Response to Question VZ-6			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of facility extension	Approximate construction time of facility extension
[use as many lines as needed]			
Customer Locations With Self-Deployed High-Capacity Loop Facilities Under Construction			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of planned facility extension	Approximate construction time of planned facility extension
use as many lines as needed]			

VZ-7 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: Sadia Mendez, Carrier Division Manager.

VZ-8 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: Sadia Mendez, Carrier Division Manager.

VZ-9 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch. This is not applicable, see response to VZ-1. Responsible Individual: Sadia Mendez, Carrier Division Manager.

**RESPONSES OF METROPOLITAN
TELECOMMUNICATIONS OF PA**

INTERROGATORIES

VZ-1 Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location. This is not applicable to Metropolitan Telecommunications of PA, Inc. (“MetTel”), as MetTel has not deployed its own high-capacity loop facilities in Pennsylvania. Responsible Individual: David Aronow, President of MetTel.

VZ-2 Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location. This is not applicable to MetTel, as MetTel has not obtained high-capacity loops facilities from a supplier other than the ILEC. Responsible Individual: David Aronow, President of MetTel.

VZ-3 For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location. This is not applicable, see responses to VZ-1 and VZ-2. Responsible Individual: David Aronow, President of MetTel.

Form for Response to Questions VZ-1 & VZ-3	
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities	
Customer Address (Street, City, Zip)	Capacity
[use as many lines as needed]	

VZ-4 For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark. This is not applicable, see responses to VZ-1 and VZ-2. Responsible Individual: David Aronow, President of MetTel.

<u>Form for Response to Question VZ-4</u>			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Number of Strands	Number of Strands Lit	Number of Strands Dark
[use as many lines as needed]			

VZ-5 With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities.

With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities. This is not applicable, see response to VZ-2. Responsible Individual: David Aronow, President of MetTel.

VZ-6 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct. This is not applicable, see response to VZ-1. Responsible Individual: David Aronow, President of MetTel.

Form for Response to Question VZ-6			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of facility extension	Approximate construction time of facility extension
[use as many lines as needed]			
Customer Locations With Self-Deployed High-Capacity Loop Facilities Under Construction			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of planned facility extension	Approximate construction time of planned facility extension
use as many lines as needed]			

VZ-7 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: David Aronow, President of MetTel.

VZ-8 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list

of these switches, including CLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: David Aronow, President of MetTel.

VZ-9 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLI and street address including zip. Identify the third party owner of the switch.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLI and street address including zip. Identify the third party owner of the switch. This is not applicable, see response to VZ-1. Responsible Individual: David Aronow, President of MetTel.

RESPONSES OF TALK AMERICA INC.

INTERROGATORIES

VZ-1 Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have deployed your own high-capacity loop facilities, including the address of each location. This is not applicable to Talk America Inc. (“Talk America”), as Talk America has not deployed its own high-capacity loop facilities in Pennsylvania. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

VZ-2 Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location.

Provide a list of the customer locations in Pennsylvania to which you have obtained high-capacity loop facilities or services from a supplier other than an ILEC (including wholesale providers and non-certificated providers), as well as the address of each location. This is not applicable to Talk America, as Talk America has not obtained high-capacity loops facilities from a supplier other than the ILEC. Responsible Individual: Francie, McComb, Vice President of Regulatory Affairs.

VZ-3 For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, specify the capacity or capacities (e.g., DS-1, DS-3, voice-grade equivalent lines) – both activated and inactivated – deployed or obtained to each location. This is not applicable, see responses to VZ-1 and VZ-2. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

Form for Response to Questions VZ-1 & VZ-3	
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities	
Customer Address (Street, City, Zip)	Capacity
[use as many lines as needed]	

VZ-4 For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark.

For each of the facilities identified in response to Questions VZ-1 and VZ-2, identify the number of fiber strands deployed, the number of strands that are lit, and the number of strands that are dark. This is not applicable, see responses to VZ-1 and VZ-2. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

Form for Response to Question VZ-4			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Number of Strands	Number of Strands Lit	Number of Strands Dark
[use as many lines as needed]			

VZ-5 With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities.

With respect to the facilities identified in response to Question VZ-2, list the suppliers from whom you have obtained those facilities. This is not applicable, see response to VZ-2. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

VZ-6 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, were deployed as an extension of a pre-existing fiber ring and, if so, the approximate length of that facility extension and the approximate time it took to construct. This is not applicable, see response to VZ-1. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

Form for Response to Question VZ-6			
Customer Locations Currently Served with Self-Deployed High-Capacity Loop Facilities			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of facility extension	Approximate construction time of facility extension
[use as many lines as needed]			
Customer Locations With Self-Deployed High-Capacity Loop Facilities Under Construction			
Customer Address (Street, City, Zip)	Deployed as an extension of pre-existing ring (yes/no)	Approximate length of planned facility extension	Approximate construction time of planned facility extension
use as many lines as needed]			

VZ-7 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected directly to an ILEC switch, and for each of these, identify the ILEC owner or operator of the switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

VZ-8 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a self-provisioned switch. Please provide a list of these switches, including CLLI and street address including zip. This is not applicable, see response to VZ-1. Responsible Individual: Francie McComb, Vice President of Regulatory Affairs.

VZ-9 With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch.

With respect to the facilities identified in response to Question VZ-1, indicate which, if any, are connected to a switch owned by a third party other than an ILEC. Please provide a list of these switches, including CLLI and street address including zip. Identify the third party owner of the switch. This is not applicable, see response to VZ-1. Responsible Individual: Francie McComb, Vice President.

I-00030099 Investigation into the Obligation of Incumbent Local Exchange Carriers to Unbundle Network Elements.

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DEC 05 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I-00030099 Investigation into the Obligation of Incumbent Local Exchange Carriers to Unbundle Network Elements.

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December 5, 2003

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VIA UPS OVERNIGHT DELIVERY

DEC 05 2003

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

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-00030099*

Dear Secretary McNulty:

I enclose for filing the original and three copies of Verizon Pennsylvania Inc.'s
Objections to MCI WorldCom Network Services, Inc.'s First Set of Interrogatories and Request
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
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**

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

Docket No. I-00030099

DOCKETED
JAN 07 2004

**OBJECTIONS TO MCI WORLDCOM NETWORK
SERVICES, INC.'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 MCI WorldCom Network Services, Inc.'s ("MCI's") 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 MCI'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 MCI'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.

DOCUMENT

3. Verizon objects to MCI'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 MCI'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.

OBJECTIONS TO INTERROGATORIES

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 1 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 list and describe all types of collocation offered by Verizon in Pennsylvania. Identify all places (state and federal tariffs, interconnection agreements, etc.) where there are terms and conditions related to Verizon's collocation offerings in Pennsylvania.

OBJECTION:

See Specific Objections 6, 7, 10, 12, and 14. Subject to and without waiving the foregoing General and Specific Objections, Verizon will provide a response to this interrogatory.

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. 4 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 list and describe all restrictions on the types and/or quantities of
equipment or facilities that may be placed in Verizon collocation space in
Pennsylvania. For each such restriction, please provide the rationale for the
restriction and the basis for the restriction (e.g. ILEC business decision,
FCC order, PSC order, etc.). Provide all supporting documentation.

OBJECTION:

See Specific Objections 5, 6, and 7. Subject to and without waiving the
foregoing general and specific objections, Verizon will provide a response to
this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 5 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 an individual wire center basis, please provide the following for Verizon
in Pennsylvania:

- (a) total collocation space (used and unused space stated in square feet) for
each type of collocation you offer;
- (b) total collocation space currently occupied by carriers (in square feet;
for caged collocation, state the number of cages);
- (c) collocation space (stated in square feet) held by carriers who are
currently in bankruptcy proceedings;
- (d) collocation space (stated in square feet) occupied by CLECs no longer
operating;
- (e) total unoccupied collocation space (stated in square feet) available for
carriers; and
- (f) total non-collocation space available or suitable for conversion to
collocation space.

OBJECTION:

See Specific Objections 5, 6, and 7. Subject to and without waiving the
foregoing General and Specific Objections, Verizon will provide a response to
this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 6 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 list, by CLLI code and street address, the central offices in Pennsylvania where collocation space of any type has been exhausted, or for which collocation space exhaustion is anticipated in the next 3 years, including the date of exhaust or expected exhaust. Provide all supporting documentation.

OBJECTION:

See Specific Objections 5, 6, and 7. Subject to and without waiving the foregoing General and Specific Objections, Verizon will provide a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 7 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 cross-connects between CLEC collocation arrangements in your central
offices in Pennsylvania, please provide:

- (a) your Methods and Procedures, guidelines, and practices relevant to, or
describing cross-connects between CLEC collocation arrangements;
- (b) non-recurring charges;
- (c) monthly recurring charges;
- (d) applicable performance measures and penalties;
- (e) complaints from CLECs regarding any aspect of such cross-connects (e.g.,
cost, timeliness, etc.);
- (f) your response to and resolution of any such complaints.

OBJECTION:

See Specific Objections 5, 6, and 7. Subject to and without waiving the
foregoing General and Specific Objections, Verizon will provide a response to
this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 8 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 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) allequipment 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. 9 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 wire center in Pennsylvania, please identify the amount of
available unused collocation space, in terms of total square feet of space
and type(s) of collocation for which available space can be used.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving the
foregoing General and Specific Objections, Verizon will provide a response to
this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 10 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 identify all wire centers that you previously listed as out of space for collocation that now have space available. Please provide a detailed explanation of what was done to free up space, and identify for disclosure of all documents on which you relied for your response, or that are relevant to this request.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving the foregoing General and Specific Objections, Verizon will provide a response to this interrogatory.

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. 12 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 Verizon central office or wire center at which loops and transport are connected at collocation arrangements to form EELs, 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;
- (k) what equipment is required to deploy EELs;
- (l) whether collocation is required for CLECs to utilize EELs;
- (m) the concentration ratio allowed for EELs.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving the foregoing General and Specific Objections, Verizon will provide a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 13 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 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
WORLDCOM 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. 15 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 whether you view a crossover point between mass market customers and enterprise customers set at 4 DS-0/voice grade lines per single customer premises to have any economic, engineering, operational, or business basis from the perspective of your non-regulatory business purposes. If your response is not an unqualified "no," please explain such basis in detail and provide supporting documentation.

OBJECTION:

See Specific Objections 6, 7 and 8. Subject to and without waiving these General and Specific objections, Verizon will respond as to whether the answer is "no".

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 16 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 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
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 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
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 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
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 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. 21 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 DS-0/voice grade 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 12. Subject to and without waiving the foregoing General and Specific objections, Verizon will provide 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
WORLDCOM 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
WORLDCOM 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
WORLDCOM 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. 26 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 that are provisioned using: 1) all-copper facilities; 2)
hybrid fiber/copper facilities; 3) all-fiber facilities; 4) IDLC; 5) UDLC; 6)
NGDLC; 7) DAML.

OBJECTION:

See Specific Objections 6, 7 and 12. Subject to and without waiving the
foregoing General and Specific objections, Verizon will be providing a
response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 27 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 whether you currently provision UNE loops over loops provisioned using 1) IDLC and 2) NGDLC. Please provide a copy of any methods and procedures, technical service descriptions, and other technical documents that describe the service arrangement and/or identify the supported features, functions and supported throughput rates.

OBJECTION:

See Specific Objections 6, 7 and 12. Subject to and without waiving the foregoing General and Specific objections, Verizon will be providing a response to this interrogatory.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 28 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, 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 CLLI-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
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 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. 34 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 rates you charge for flat and measured local exchange service for all 1) residential and 2) business customers in Pennsylvania, and if the rate varies by location, please identify the geographic coverage of the area to which the rate applies (e.g., wire center, rate zone, etc.) and the statewide average rate you charge for each category. If the rates you charge vary by central office, please identify the rate that applies to each central office by CLLI code, and the rate zone applicable to each central office.

OBJECTION:

See Specific Objections 6, 7 and 8. Subject to and without waiving the foregoing General and Specific Objections, Verizon will be providing a response as to its tariffed rates, but not its statewide average rates.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 35 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 identify the average monthly revenue per line that you consider to constitute low revenue, average revenue and high revenue for 1) residential customers and 2) business customers. Please provide a detailed explanation of whether high revenue customers typically purchase a single service, or a bundle of services, and if they purchase a bundle, which services, features or functions are included in the bundle. Provide all documentation available to support your answer.

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. 36 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 type of digital loop carrier ("DLC") equipment deployed by Verizon,
please state the minimum and maximum configuration deployed in Pennsylvania,
in terms of number of lines supported.

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. 37 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 type of digital loop carrier ("DLC") equipment deployed by Verizon
in Pennsylvania, please provide Verizon's equipment capital costs for
minimum, average and maximum configurations, in terms of number of lines
supported.

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. 38 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 type of digital loop carrier ("DLC") equipment deployed by Verizon
in Pennsylvania, please provide Verizon's Engineered, Furnished and
Installed ("EF&I") costs for minimum, average and maximum configurations, in
terms of number of lines supported.

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. 39 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 whether you have deployed facilities of any type (e.g. switches, loops, transport, DLC, DSLAMs, splitters, etc.) to provide local services as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

- (a) all states, cities or other geographic area in which you have deployed facilities;
- (b) a detailed description of the facilities for each geographic region;
- (c) a detailed description of the criteria you used to choose the geographic areas in which you would deploy facilities;
- (d) a copy of all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
- (e) the date on which you first began providing competitive local services using your own facilities in each state, city or other geographic region outside your ILEC serving territory;
- (f) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since such operations began;
- (g) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, transport, hot cuts, OSS, signaling, etc.);
- (h) the average total monthly revenues earned per customer for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA, MSA;
- (i) the source of all revenues derived from each customer type identified in your response to subpart (h) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

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. 40 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 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. 43 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 documents that address or assess the risk of stranded
capacity on all or any portion of Verizon's existing network in Pennsylvania.

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. 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. 45 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 average total revenue for mass markets customers for each
Verizon wire center in Pennsylvania.

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. 46 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:

Of the dedicated transport routes listed in Verizon's Attachment 5 to its
testimony, please state the total number of routes that have one end in
Pennsylvania and the other end in another state. Please provide a listing of
all interstate routes.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide
non-public, non-privileged information.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 47 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 each route listed in response to MCI-46, please state whether
Verizon offers dedicated transport as an unbundled network element, at TELRIC
rates, to requesting carriers seeking transport for that route.

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. 48 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 the answers to MCI-47 is yes, please identify and provide the relevant
sections of the tariff and/or interconnection agreement under which Verizon
offers interstate dedicated transport as an unbundled network element.

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. 49 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 list each and every transport route which you contend should be removed from the list of available DS-1 UNEs pursuant to FCC Rules §51.319(e)(1)(ii). For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 50 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 alternative competitive provider listed in your response to MCI-49,
indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of
Verizon or of any other listed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon states will
provide relevant, non-privileged information, if any, responsive to this
request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 51 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-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. 52 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 list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §1.319(e)(2)(i)(A). For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 53 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 alternative competitive provider listed in your response to MCI-52,
indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of
Verizon or of any other listed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide
relevant, non-privileged information, if any, responsive to 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. 55 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 list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §1.319(e)(2)(i)(B). For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 56 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 alternative competitive provider listed in your response to MCI-55,
indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of
Verizon or of any other listed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide
relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 57 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-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. 58 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 list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §1.319(e)(3)(i)(A). For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 59 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 alternative competitive provider listed in your response to MCI-58,
indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of
Verizon or of any other listed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide
relevant, non-privileged information, if any, responsive to this request.

OBJECTION 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:
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. 61 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 list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §1.319(e)(3)(i)(B). For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General objections, Verizon will provide relevant, non-privileged information, if any, responsive to this request.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 62 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 alternative competitive provider listed in your response to MCI-61,
indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of
Verizon or of any other listed alternative competitive provider.

OBJECTION:

Subject to and without waiving its General Objections, Verizon will provide
relevant, non-privileged information, if any, responsive to 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 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 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 WORLDCOM 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. 68 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 documents that address or assess the risk of stranded
transport capacity on all or any portion of Verizon's existing network in
Pennsylvania.

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. 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
WORLDCOM 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

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc.'s Objections to MCI WorldCom Network Services, Inc.'s First Set of Interrogatories and Request 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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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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ORIGINAL

December 5, 2003

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DEC 05 2003

VIA UPS OVERNIGHT DELIVERY

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

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-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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

13

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED
JAN 07 2004

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

Docket No. I-00030099

DOCUMENT

**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.

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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Counsel for Verizon Pennsylvania Inc. and
Verizon North Inc.

December 5, 2003

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.

RECEIVED

DEC 05 2003

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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DEC 05 2003

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ORIGINAL RECEIVED
December 8, 2003

DEC 09 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 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.'s
Objections to the Office of Consumer Advocate's First Set of Interrogatories Addressed 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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

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

Docket No. I-00030099

**OBJECTIONS TO THE OFFICE OF CONSUMER ADVOCATE'S
FIRST SET OF INTERROGATORIES
ADDRESSED TO VERIZON PENNSYLVANIA, INC.**

Pursuant to 52 Pa. Code §§ 5.342 and 5.349, Verizon Pennsylvania Inc.

("Verizon") hereby objects to the Office of Consumer Advocate's ("OCA") First Set of Interrogatories, 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.

DOCKETED
JAN 08 2004

GENERAL OBJECTIONS

1. Verizon objects to OCA'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 OCA'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.

DOCUMENT

3. Verizon objects to OCA'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 OCA'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 OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each of the MSAs listed below, provide the following line counts as of December 31, 2001, June 30, 2002, December 31, 2002, and June 30, 2003.

- (a) The number of residential lines
- (b) The number of mass market business lines
- (c) The number of enterprise business lines

For the purposes of answering this question lines should be counted in voice grade equivalents separated into DSO and other categories. Line counts should be provided for the Allentown-Bethlehem-Easton, Harrisburg-Lebanon-Carlisle, Lancaster, Philadelphia-NJ, Pittsburgh, Reading, and Scranton-Wilkes-Barre-Hazleton MSAs.

OBJECTION:

Subject to its General Objections, Verizon will provide information responsive to this request to the extent that Verizon has such information. Verizon will not perform a special study.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 2 OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For each ILEC wire center located in the MSAs listed in question no. 1, provide the following line counts as of December 31, 2001, June 30, 2002, December 31, 2002, and June 30, 2003.

- (a) The number of residential lines
- (b) The number of mass market business lines
- (c) The number of enterprise business lines

For the purposes of answering this question lines should be counted in voice grade equivalents.

OBJECTION:

Subject to its General Objections, Verizon will provide information responsive to this request to the extent that Verizon has such information. Verizon will not perform a special study.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 3 OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:

POSITION:

REQUEST:

Provide the current subscriber line charges for primary residential, single-business, non-primary residential, and multi-line business customers for every Verizon study area in Pennsylvania. Indicate whether the subscriber line charge is the same for each customer class within the study area. If there is geographic disaggregation, provide the disaggregated rates.

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. 4 OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:

POSITION:

REQUEST:

Provide a list of recurring rate elements and rates that a CLEC purchases when that CLEC purchases UNE-P.

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. 5 OF
OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:

POSITION:

REQUEST:

Using the list of recurring rate elements and rates provided in the answer to question 3 above, provide a table that shows the revenue received from a CLEC for a 5 minute call. Provide all calculations used to obtain the revenue. If the revenue varies depending on whether the call is an intra-office or inter-office call, show calculations separating for intra- and inter-office calls.

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. 6 OF
OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC
purchases when that CLEC purchases UNE-P.

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. 7 OF
OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all recurring rate elements and rates that a CLEC
purchases when that CLEC purchases UNE-Loop and has the loop connected
to a collocation cage, or cageless site.

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. 8 OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC purchases when that CLEC purchases UNE-Loop and has the loop connected to a collocation cage, or cageless site.

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. 9 OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all recurring rate elements and rates that a CLEC purchases when that CLEC leases a collocation cage, or cageless site.

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. 10
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC
purchases when that CLEC leases a collocation cage, or cageless site.

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. 11
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:

POSITION:

REQUEST:

Provide the total collocation recurring revenues and the number of
collocating CLECs by wire center and UNE zone for the year 2002.

OBJECTION:

See Specific Objections 6 and 7. Based on these objections, Verizon
will not be providing a response to the request for collocation
recurring revenues. Verizon will provide a response to the remainder
of the question, but has orally sought clarification from OCA as to
what is being requested.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 12
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide the total collocation non-recurring revenues and the number of
collocating CLECs by wire center and UNE zone for the year 2002.

OBJECTION:

See Specific Objections 6 and 7. Based on these objections, Verizon
will not be providing a response to the request for collocation non-
recurring revenues. Verizon will provide a response to the remainder
of the question, but has orally sought clarification from OCA as to
what is being requested.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 13
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For a CLEC that purchases UNE-Loop and special access transport from
the ILEC wire center to the CLEC wire center, provide a list of all
recurring rate elements and rates that the CLEC purchases.

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 OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Using the list of recurring rate elements and rates provided in the
answer to question 12 above, provide a table that shows the revenue
received from a CLEC for a 5 minute call.

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. 15
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC
purchases when that CLEC purchases UNE-Loop and special access
transport from the ILEC wire center to the CLEC wire center.

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. 16
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For a CLEC that purchases UNE-Loop and EEL transport from the ILEC wire
center to another wire center, provide a list of all recurring rate
elements and rates that the CLEC purchases.

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. 17
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Using the list of recurring rate elements and rates provided in the
answer to question 18 above, provide a table that shows the revenue
received from a CLEC for a 5 minute call.

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. 18
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC
purchases when that CLEC purchases UNE-Loop and EEL transport from the
ILEC wire center to another ILEC wire center.

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. 19
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For a CLEC that purchases UNE-Loop and DS-1 transport from the ILEC
wire center to another ILEC wire center, provide a list of all
recurring rate elements and rates that the CLEC purchases.

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. 20
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Using the list of recurring rate elements and rates provided in the
answer to question 18 above, provide a table that shows the revenue
received from a CLEC for a 5 minute call.

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. 21
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC
purchases when that CLEC purchases UNE-Loop and DS-1 transport from the
ILEC wire center to another ILEC wire center.

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. 22
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

For a CLEC that purchases UNE-Loop and DS-3 transport from the ILEC
wire center to another ILEC wire center, provide a list of all
recurring rate elements and rates that the CLEC purchases.

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. 23
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Using the list of recurring rate elements and rates provided in the
answer to question 21 above, provide a table that shows the revenue
received from a CLEC for a 5 minute call.

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. 24
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide a list of all non-recurring rate elements and rates that a CLEC
purchases when that CLEC purchases UNE-Loop and DS-3 transport from the
ILEC wire center to another ILEC wire center.

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. 25
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide total UNE-P recurring revenue, minutes used and loops monthly
for each month in 2002 by wire center and UNE zone.

OBJECTION:

See Specific Objections 6 and 7. Based on these objections, Verizon
will not be providing a response to the portion of this interrogatory
asking for UNE-P recurring revenue and minutes used. Verizon will
provide information responsive to the request for the number of UNE-P
arrangements to the extent it has such information.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 26
OF OFFICE OF CONSUMER ADVOCATE DATED NOVEMBER 26, 2003 SUBMITTED IN
DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide total UNE-P non-recurring revenue, and loops monthly for each
month in 2002 by wire center and UNE zone.

OBJECTION:

See Specific Objections 6 and 7. Based on these objections, Verizon
will not be providing a response to the portion of this interrogatory
asking for UNE-P non-recurring revenue. Verizon will provide
information responsive to the request for the number of UNE-P
arrangements to the extent it has such information.

OBJECTION OF VERIZON PENNSYLVANIA INC. TO SET I, INTERROGATORY NO. 27
OF SPRINT COMMUNICATIONS COMPANY, L.P. DATED NOVEMBER 26, 2003
SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:
POSITION:

REQUEST:

Provide digital line carrier cost information according to the following parameters. For carriers with a line capacity of 24, 96, 1,344 and 2,016 provide fixed cost and cost per channel card. State how many voice grade lines can be attached to the channel card. Remove outdoor installation costs such as concrete pads and environmental vault costs from the fixed costs.

OBJECTION:

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



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Suzan DeBusk Paiva

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William.b.petersen@verizon.com

Suzan.d.paiva@verizon.com

Counsel for Verizon Pennsylvania Inc. and
Verizon North Inc.

December 8, 2003

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc.'s Objections to the Office of Consumer Advocate's First Set of Interrogatories Addressed 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 8th day of December, 2003.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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Regina L. Matz, Esquire
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DOCUMENT

December 8, 2003

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via E-mail and Overnight Delivery

Julia Conover, Esq.
Verizon Pennsylvania, Inc.
1717 Arch Street, 32nd Fl
Philadelphia, Pennsylvania 19103

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

Dear Julie:

Please find enclosed the General Objections and the responses of MCI WorldCom Network Services, Inc. ("MCI") to the Interrogatories of Verizon Pennsylvania, Inc., Set I, in the above-referenced case.

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

Very truly yours,


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 General Objections and Responses to Verizon Pennsylvania, Inc.'s 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 8, 2003

VIA E-MAIL AND FIRST CLASS MAIL

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JAN 08 2004

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DEBRA M. KRIETE

FILE NO.

December 9, 2003

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

Mr. James McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Commonwealth and North Streets
Third Floor
Harrisburg, PA 17120

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FOLDER

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SECRETARY'S BUREAU

Dear Mr. McNulty:

Enclosed for filing in the above-captioned proceeding, on behalf of **Allegiance Telecom of Pennsylvania, Inc.**, is the original and three copies (3) of the Motion for Admission Pro Hac Vice of Charles Gerkin, Jr., Esq.

A copy of this Motion has been served on the parties to this proceeding indicated on the attached Certificate of Service, and on the presiding Administrative Law Judges. Please contact me if you have any questions.

Very truly yours,

RHOADS & SINON LLP

By: *Debra M. Kriete*
Debra M. Kriete

cc: Certificate of Service
ALJ Michael Schnierle
ALJ Susan Colwell
Charles V. Gerkin, Jr., Esq.

H

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation into the Obligation of :
Incumbent Local Exchange Carriers : Docket No. I-00030100
To Unbundle Network Elements :

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MOTION FOR ADMISSION PRO HAC VICE

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I, Debra M. Kriete, hereby move for the admission *pro hac vice* of Charles V. Gerkin, Jr., to permit him to appear and practice before the Commission in the above-captioned proceeding. Pursuant to Pa.B.A.R. No. 301 and 52 Pa. Code §1.22, and in support of this motion, I state the following:

1. I am an attorney at Rhoads & Sinon LLP, and I am a member in good standing of the bar in the Commonwealth of Pennsylvania.
2. Mr. Gerkin is regulatory counsel to Allegiance Telecom, Inc. His business address is 9201 North Central Expressway, Dallas Texas, 75321. He was admitted to the bar of State of Georgia in 1982. He is a member in good standing of the Georgia bar (Georgia Bar No. 291625), and is admitted to practice before the United States District Court for the Northern District of Georgia.
3. Allegiance Telecom, Inc. is the parent company of Allegiance Telecom of Pennsylvania, Inc., a competitive local exchange company certificated to provide service in Pennsylvania.

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4. Mr. Gerkin's responsibilities include the participation and representation of Allegiance Telecom of Pennsylvania, Inc. before this Commission in the above-captioned proceeding. He is familiar and knowledgeable about Allegiance's facilities and operations and Pennsylvania.

WHEREFORE, I respectfully request that the Commission admit Mr. Gerkin to appear and practice before it in the above-captioned proceeding.

Respectfully submitted,

Debra M. Kriete
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Dated: December 9, 2003

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I-00030099 Investigation into the Obligation of Incumbent Local Exchange Carriers to Unbundle Network Elements.

I hereby certify that on this 9th day of December, 2003, a true and correct copy of the foregoing document, Motion for Admission Pro Hac Vice, was served upon the following persons in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant):

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December 9, 2003

BY OVERNIGHT MAIL

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Mr. James J. McNulty, Secretary
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Commonwealth Keystone Building
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Investigation Into Obligations Of Incumbent
Local Exchange Carriers To Unbundle Network Elements
Docket No. I-00030099

Dear Mr. McNulty:

Please find enclosed for filing in the above-captioned proceeding the original and three (3) 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..

Please do not hesitate to contact me with any questions regarding the enclosures.

Very truly yours,

Robert C. Barber

Enclosures

cc: (w/ encl)
The Honorable Michael Schnierle
The Honorable Susan Colwell
Service List (w/ encl)

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PENNSYLVANIA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Docket No. I-00030099

DOCKETED
JAN 08 2004

**AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC.'S
MOTION TO OVERRULE OBJECTIONS AND
TO COMPEL RESPONSES TO ITS
FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO VERIZON PENNSYLVANIA INC.**

DOCUMENT

Pursuant to 52 Pa. Code §5.343(e), AT&T Communications of Pennsylvania, LLC. ("AT&T") moves for an order dismissing Verizon Pennsylvania, Inc.'s ("Verizon" or "VZ-PA") objections and compelling VZ-PA to provide complete responses to AT&T's First Set of Interrogatories, Nos. I-1, I-4, I-7, I-13, I-15, I-16, I-17, I-19, I-20, I-21, I-24 and I-26. AT&T also requests, pursuant to 52 Pa. Code §5.343(e)(2), that the Presiding Officers set this motion for hearing as soon as possible, but no later than December 12, 2003, and direct Verizon to respond to the motion at that time.

This Motion seeks data that is at the very heart of this case -- whether three CLECs are, in fact, serving both residential and business customers broadly throughout each geographic area that Verizon has identified as a 'market' for purpose of analyzing the mass-market 'trigger' for UNE switching. By refusing to provide information that is clearly within its possession, Verizon is attempting not only to prevent CLECs like AT&T from presenting a rebuttal to Verizon's claims, but -- more seriously -- is attempting to mislead this Commission into

drawing a factually incorrect conclusion about the nature of the limited competition that does occur today in Pennsylvania's local exchange markets. The Commission should sternly and swiftly rebuke this attempt to deprive the record of facts that are central to the Commission's discharge of the tasks delegated to it by the FCC in its Triennial Review Order.

In further support of this motion, AT&T states as follows:

1. On November 21, 2003, AT&T served its First Set of Interrogatories and Requests for Production of Documents on Verizon Pennsylvania, Inc. The purpose of those data requests was to obtain data related to VZ-PA's claims in its Petition to Initiate Proceedings that it had demonstrated that the standards for "non-impairment" established in the FCC's Triennial Review Order ("TRO") had been met in seven different Metropolitan Statistical Areas ("MSAs") in Pennsylvania, and that, therefore, it was no longer required to provide AT&T and other CLECs to access to local switching as an unbundled element in those areas. In particular, AT&T propounded several requests – most notably, AT&T I-1¹ – which requested Verizon to identify, for each such MSA, the number of lines that Verizon itself served, separated between residential and business service, and the number of unbundled loops each company that Verizon had identified as

¹ AT&T Set I, Nos. I-4, I-7, I-13, I-15, I-16, I-17, I-19, I-20, I-21, I-24 and I-26 also sought line count and other data relevant to VZ-PA's claims, and specifically residential information. As AT&T stated in AT&T I-1, to the extent that data requested in response to certain other interrogatories, including AT&T Set I., Nos. I-4, I-7, I-13, I-15, I-16, I-17, I-19, I-20, I-21, I-24 and I-26, already had been addressed in AT&T Set I-1, VZ-PA could simply indicate where in the response to AT&T I-1 the data had been identified. However, insofar as Verizon has indicated that it will not provide the residential/business line break-out requested in AT&T I-1, it presumably will also refuse to provide that information in the subsequent requests, and therefore this motion includes those requests as well.

a “trigger” CLEC obtained from Verizon, again broken down by residential and business services. A copy of the AT&T’s First Set of Data Requests is attached as Exhibit 1.

2. Shortly after the prehearing conference (at which AT&T compromised on scheduling issues in return for Verizon’s assurances that it would respond fully to AT&T’s discovery), counsel for Verizon contacted counsel for AT&T regarding the “residential/business” line breakdown requested in AT&T’s interrogatories. At that time, counsel for VZ-PA suggested that Verizon might not be in possession of such data, and thus would not be able to provide it in response to AT&T’s requests. Counsel for AT&T responded that the data clearly is known to VZ-PA, insofar as CLECs ordering unbundled loops from Verizon are required to identify whether the loops are going to be used to provide “residential” or “business” services. Moreover, counsel for AT&T noted that Verizon’s monthly bills to CLECs also identify whether an unbundled loop is being used to provide a specific service. Counsel for VZ-PA indicated that he would consider that information.

3. On December 5, counsel for VZ-PA again contacted counsel for AT&T to indicate that Verizon would not be providing the breakdown of residential and business lines requested in AT&T’s interrogatories. Counsel for AT&T in turn informed VZ-PA’s counsel that AT&T would file a motion to compel the production of this information.

4. Subsequently, VZ-PA served its written objections to AT&T’s First Set of Interrogatories and Requests for Production of Documents. In that

document VZ-PA for the first time listed its “specific” objections to AT&T I-1, including, *inter alia*, claims that the interrogatory sought information “that is or are outside Verizon’s possession, custody or control,” and “that is beyond the scope of the impairment analysis at issue in the Commission’s review of Verizon’s case.” A copy of VZ-PA’s written Objections is attached as Exhibit 2.

5. VZ-PA stated that, subject to these objections, it would “provide relevant, non-privileged information, if any, responsive to this request” when it provides its formal responses to AT&T requests –which, according to VZ-PA’s calculations, apparently will not be until December 10. However, given VZ-PA’s counsel’s representations, those responses will not disaggregate the residential/business line count information, and thus will be incomplete. Accordingly, and especially in light of the extreme time pressures inherent in this case, AT&T is submitting this motion at this time in order to obtain an expeditious resolution of this dispute.

6. Verizon’s refusal to provide the disaggregated line count data sought in AT&T’s interrogatories in an ill-conceived attempt to hide key facts from the Commission and the parties. Specifically, Verizon is refusing to identify where, and in what quantities, CLECs are serving residential customers via the CLECs’ own switching facilities.

7. The scope of discovery in this case is necessarily broad. Under 52 Pa. Code §5.321(c), AT&T is entitled to obtain discovery “regarding any matter, not privileged, which is relevant to the subject matter involved in the

pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party or participant. . . .”

8. The information sought in AT&T’s data requests concerning the breakdown of residential and business unbundled loops is directly relevant to the Commission’s resolution of this proceeding for a number of reasons. As an initial matter, this data is essential to analyzing whether the CLECs that Verizon has identified in fact satisfy the TRO’s trigger test.

9. For example, under the TRO’s trigger test, Verizon would no longer be obligated to offer unbundled local switching – and thus the unbundled network element platform “UNE-P” -- in markets where at least three CLECs are serving “mass market” customers using the CLECs’ own switching facilities.² The TRO defines the “mass market” as consisting of both residential **and** small business customers that are served using DS0 level loops.³ It acknowledges that there are “differences” between the two,⁴ which can mean, as appears to be the case in Pennsylvania, that CLECs may have been able to serve limited higher-revenue small business customers using the CLECs’ own switching facilities, but have not

² TRO ¶¶ 498-503.

³ TRO ¶ 127 (“Mass market customers consist of residential customers **and** very small business customers.”) (emphasis supplied); TRO n. 1402 (“Mass market customers are residential **and** very small business customers – customers that do not, unlike larger businesses, require high bandwidth connectivity at DS1 capacity and above. . . .”) (emphasis supplied).

⁴ TRO n. 432.

yet been able, at least not in any appreciable way, to serve residential customers.⁵

10. Thus, disaggregated data showing whether the “trigger” CLECs identified by Verizon are serving only business customers through self-provided switching, rather than both business *and* residential customers, are critical to determining whether the triggers have in fact been met. Indeed, in Pennsylvania, as in most other states, the overwhelming majority of mass market customers are residential.⁶ AT&T and the other CLECs are entitled to explore whether three or more “trigger” CLECs are in fact serving residential customers through self-provisioned switching throughout Density Zones 1 through 3 in each of the MSAs that Verizon has identified, or whether, as appears to be the case, facilities-based CLECs are limiting service to some portion of the business segment of the mass market.

11. The fundamental relevance of these data is demonstrated by the fact that NARUC’s Triennial Review Implementation Process (“TRIP”) Task Force, which was created to act as a coordinating body to assist the States in their efforts to implement the FCC’s Triennial Review Order, has suggested that

⁵ TRO ¶ 438 (acknowledging that “only a small percentage of the residential voice market” is being served over CLEC switches, and that even those data may be “significantly inflated.”).

⁶ The mass market is heavily weighted towards residential customers. Verizon’s responses to the Commission’s initial data requests reveal that Verizon’s retail operation serves more than twice as many residential lines as business lines. Verizon Response to Appendix A, Part B, 1-3, 5-7, Business and Residential Lines by Type, Data as of June 2003. Removing the enterprise customers from the data would show that, within the mass market category, Verizon’s own retail residential lines outnumber business lines by more than 3 to 1. Moreover, the same Verizon report shows that, for CLECs using UNE-P, residence lines outnumber business by nearly 2.5 to 1.

States collect data in this manner.⁷ More to the point, the Commission itself, in its own initial interrogatories to Verizon, directed Verizon to provide a count of the lines CLECs were serving through their own facilities, broken out between residential and business services.⁸ However, Verizon did not provide that breakout in its responses. Instead, Verizon provided only aggregated data culled from the E-911 database.⁹ Given that the Commission explicitly indicated its desire for this detailed information, Verizon cannot be heard to complain that it is not relevant to the Commission's resolution of this case.

12. Indeed, these data are essential to the Commission's ultimate resolution of this proceeding. This Commission would not want to eliminate UNE-P, the primary entry vehicle that Pennsylvania CLECs have used to generate competition, especially to serve residential customers,¹⁰ unless it is assured that those customers already have other options readily available. Put

⁷ See recommended "Discovery to CLECs and ILEC Regarding Switching" found at NARUC.org/programs/trip/discovery_9month.pdf.

⁸ Procedural Order, Docket No. I-00030099, Appendix A, Part B., Nos. 4 and 8. The Commission also directed CLECs to provide line count data, broken out by residential and business lines. Appendix A, Part A, CLEC Switching Interrogatory No. 5. Of course, that directive was issued before Verizon filed its case identifying the MSAs in which it claimed CLECs were "not impaired" without unbundled local switching, and identifying those CLECs who, at least according to Verizon, tripped the TRO trigger in those MSAs. Now that Verizon has made its submission, AT&T is seeking to obtain the same type of data that the Commission itself considered relevant. The only difference is that AT&T is seeking to obtain the unbundled loop data directly from the source of those loops – Verizon.

⁹ Copies of Verizon's non-proprietary responses to Appendix A, Part B. Nos. 4 and 8 are attached as Exhibit 3.

¹⁰ See note 6, *infra*. Although Verizon claims exact figures are proprietary, it is accurate to say that CLECs are using UNE-P to serve hundreds of thousands of residential consumers.

more bluntly, the Commission needs to be sure that a decision to “pull the trigger” does not also inadvertently “pull the plug” on residential competition. Such a decision would be tragic for Pennsylvania consumers. And making the decision without first understanding all of the underlying data would be irresponsible. Thus, CLECs are entitled to explore through discovery whether “the mass market” – i.e., both residential **and** small business customers – is being served by at least three CLECs using their own switches. If that is not the case, the CLECs are also entitled to argue that the trigger is not met.

13. The residential line count data requested in AT&T’s interrogatories is also important to the Commission’s resolution of the issue of the “cross over” point between mass market and enterprise level customers.¹¹ Verizon has offered absolutely no evidence on this point, contending instead that the “mass market” exists wherever the “trigger” CLECs have purchased DS0 loops. While AT&T does not believe that this conclusory assertion withstands even cursory scrutiny under the TRO, AT&T is nevertheless entitled to obtain data demonstrating its flaws. The disaggregated line count information requested in AT&T I-1 and other requests will permit the Commission and AT&T to fully address this issue.

14. The reason that Verizon wants to hide data concerning “residential” lines, and especially residential unbundled loops, is obvious – exposing the data will most assuredly cause Verizon’s trigger case to fail. Verizon’s fear of exposing its case to a careful factual analysis, however, is not a legitimate basis

¹¹ See TRO ¶497.

for refusing to respond to discovery. Because the interrogatories are designed to elicit data that are relevant to issues that are critical to a full and fair resolution of this case, Verizon should be compelled to provide complete responses to them.

15. There is also no merit to VZ-PA's claim that the residential line count data AT&T is requesting is not within its possession. Indeed, the requirements that VZ-PA imposes upon CLEC seeking to order unbundled loops from VZ-PA puts the lie to any such claim. In such cases, VZ-PA has required the CLECs to explicitly identify whether the loop was going to be used to provide "residential" or "business" services. While VZ-PA's rationale for demanding this information has never been obvious, the fact remains that Verizon has that information.

16. This is borne out by Verizon's wholesale billing. The paper bills that Verizon sends to CLECs like AT&T for unbundled loops specifically indicate the purpose to which those loops are being put. Thus, AT&T, which has *no* residential customers served by unbundled loops in Pennsylvania, receives bills identifying each unbundled loop as "Unbundled Loop Service – Business."¹² This again demonstrates that Verizon not only possesses data differentiating unbundled loops used by CLECs to provide business services from those used to provide residential services, but that it is readily retrievable from Verizon's systems. The Commission thus should not countenance any assertion by

¹² Copies of excerpts from several such bills from Verizon in Pennsylvania are attached as Exhibit 4.

Verizon that the data sought by AT&T cannot be produced in a timely fashion for consideration by the Commission in this proceeding.

17. Moreover, any contention that the development of this information would require some unreasonable special study,¹³ or would be unduly burdensome, is meritless. Verizon's responses to the Commission's initial data responses show that the information is readily retrievable from Verizon's systems. Indeed, Verizon's responses to the PUC's questions included a wire center-specific list of its own retail lines, as well as resold and UNE-P lines, broken out between residential and business services.

18. In sum, Verizon has advanced no legitimate basis for its refusal to provide complete responses to AT&T's data requests. To the contrary, that refusal appears to be part of the pattern of obstructionism that was first exhibited in Verizon's stonewalling with respect to the service on CLECs of the "proprietary" data filed with its Petition. The Commission should make it clear that, in view of the importance of the issues it must resolve in this case – not to mention the short time frames that have been set for the litigation of this complex matter – such tactics will not be tolerated. To that end, Verizon should be put on notice that, absent production of these critically important data, Verizon's "trigger" application for mass market switching will be summarily dismissed as a sanction pursuant to 52 Pa. Code §5.372.

19. In view of the critical importance of the information sought in AT&T Set I-1 to the CLECs' effort to respond to Verizon's claims in this litigation, and of

¹³ See 52 Pa. Code §5.361(a)(4) (limiting discovery that "would require the making of an unreasonable investigation" by a party) (emphasis added).

the already severely constrained time periods for analyzing that data for use in responsive testimony, it is imperative that this motion be addressed and resolved in an expeditious manner. To that end, the Presiding Officers should set this matter for oral hearing as soon as possible, but no latter than December 12, 2003, and direct VZ-PA to respond the motion at that time.

WHEREFORE, AT&T respectfully moves:

- A. That Verizon be compelled to provide full and complete responses to AT&T's First Set of Interrogatories, Nos. I-1, I-4, I-7, I-13, I-15, I-16, I-17, I-19, I-20, I-21, I-24 and I-26, and specifically, to identify where, and in what quantities, CLECs are serving residential customers via the CLECs' own switching facilities.
- B. That pursuant to 52 Pa. Code §5.343(e)(2) the Presiding Officers set fort his matter for hearing as soon as possible, but no later than December 12, 2003, and direct VZ-PA to respond to this motion at that time.

Respectfully submitted,

**AT&T Communications
of Pennsylvania, LLC**

By its Attorneys,



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Dated: December 9, 2003

EXHIBIT 1



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November 21, 2003

VIA ELECTRONIC AND OVERNIGHT MAIL

Suzan D. Paiva, Esq.
Bell Atlantic-Pennsylvania, Inc.
1717 Arch Street, 32N
Philadelphia, PA 19103

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

Dear Suzan:

Please find enclosed AT&T Communications of Pennsylvania, LLC.'s
First Set of Data Requests directed to Verizon Pennsylvania Inc. in the
above-captioned matter.

Please do not hesitate to contact me with any questions regarding
these requests.

Very truly yours,

A handwritten signature in black ink that reads "Robert C. Barber".

Robert C. Barber

Enclosures

cc: The Honorable Michael Schnierle (w/o enclosures)
The Honorable Susan Colwell (w/o enclosures)
Secretary McNulty (w/o enclosures)
Service List (w/ enclosures)

Certificate of Service
Docket No. I-00030099

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

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Dated: November 21, 2003

* By Overnight mail