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December 18, 2003

**VIA ELECTRONIC AND FIRST CLASS MAIL**

Mr. Barrett C. Sheridan  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, PA 17101

**DOCUMENT**

RECEIVED  
03 DEC 22 AM 9:35  
PENNSYLVANIA  
SECRETARY'S BUREAU

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

Dear Mr. Sheridan:

Enclosed please find the responses of Broadview Networks, Inc. ("Broadview") to the first set of interrogatories filed by the Office of Consumer Advocate ("OCA") in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require additional assistance, please do not hesitate to contact Heather Hendrickson at (202) 887-1284.

Respectfully submitted,

*Heather Hendrickson*

Ross A. Buntrock  
Heather T. Hendrickson

Enclosures

cc: Rowland L. Curry, Bob Loube and Melanie Lloyd (via electronic and first class mail)  
Parties of Record (via electronic and first class mail)  
Mr. James M. McNulty, Secretary, Pennsylvania Public Utility Commission (cover letter and service list)

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

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

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

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ORIGINAL



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December 18, 2003

**VIA OVERNIGHT MAIL**

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

DOCUMENT

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2003 DEC 19 PM 2:43  
SECRETARY'S BUREAU

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

Dear Secretary McNulty:

Enclosed please find an original and three copies of Verizon Pennsylvania Inc.'s and Verizon North Inc.'s Application for a Subpoena.

We are also simultaneously making this application to Administrative Law Judges Schnierle and Colwell consistent with 52 Pa. Code Section 5.421.

Very truly yours,

*Suzan DeBusk Paiva*  
Suzan DeBusk Paiva

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

Suzan DeBusk Paiva  
Assistant General Counsel



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December 18, 2003

**BY OVERNIGHT DELIVERY**

The Honorable Michael Schnierle  
The Honorable Susan Colwell  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

SECRETARY'S BUREAU

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

Dear Judge Schnierle and Judge Colwell:

Enclosed are the original and three (3) copies of an Application for Subpoena submitted in the above-captioned matter by Verizon Pennsylvania Inc. and Verizon North Inc. ("Verizon") This Application is being filed with the Secretary's office today, pursuant to 52 Pa. Code §5.421.

As set forth in greater detail in the attached document, Verizon is making this very limited request for information from two CLECs who are not parties to this action, in order to comply with the discovery Order entered yesterday, December 17. While Verizon is simultaneously requesting these parties to provide us with this information voluntarily, Verizon believes that issuance of a subpoena may be required to ensure that the information is provided in a timely fashion. Verizon is also requesting expedited issuance of these subpoenas so that we can meet the December 24 deadline contained in your December 17 Order.

In accordance with the attached Certificate of Service, a copy of this document has been served upon the corporations named in the Application and the parties of record.

December 18, 2003

The Honorable Michael Schnierle  
The Honorable Susan Colwell  
Page 2

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions concerning the Application.

Very truly yours,

*Suzan DeBusk Paiva*

Suzan DeBusk Paiva

Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc. and Verizon North Inc.'s Application for Subpoena, 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 18<sup>th</sup> day of December, 2003.

VIA UPS OVERNIGHT DELIVERY

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*Suzan DeBusk Paiva*  
Suzan DeBusk Paiva  
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1717 Arch Street, 32NW  
Philadelphia, PA 19103  
(215) 963-6068

SECRETARY'S BUREAU

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S BUREAU

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Investigation Into The Obligation :  
Of Incumbent Local Exchange Carriers : I-00030099  
To Unbundle Network Elements. :

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**APPLICATION OF VERIZON PENNSYLVANIA INC.  
AND VERIZON NORTH INC.  
FOR ISSUANCE OF A SUBPOENA**

---

Verizon Pennsylvania Inc. and Verizon North ("Verizon"), pursuant to 52 Pa. Code § 5.421, hereby apply for the issuance of a subpoena for the production of documents or information by the non-party Competitive Local Exchange Carriers ("CLECs") listed in Appendix "1" hereto. In support hereof, Verizon represents as follows:

1. Verizon has petitioned the Commission in the above-captioned matter to undertake the "targeted, granular unbundling analysis" assigned to it by the Federal Communications Commission's ("FCC's") Triennial Review Order.<sup>1</sup>

DOCKETED  
JAN 14 2004

2. Verizon filed its Petition to Initiate Proceedings on October 31, 2003. In its Petition, Verizon requested that the Commission make impairment determinations for those network elements that the FCC has asked state commissions to review.<sup>2</sup>

DOCUMENT

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<sup>1</sup> *Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338; *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98; *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, FCC 03-36 (rel. August 21, 2003) ("TRO"), at para. 187.

<sup>2</sup> Petition to Initiate Proceedings at 1.

3. By an Order dated December 17, 2003 (the "Order") issued by Administrative Law Judges Michael J. Schnierle and Susan Colwell, Verizon was ordered to provide a breakdown of the number of unbundled loops that it provides to carriers in the wire centers that Verizon contends meet the FCC switching triggers, disaggregated by business and residence loops. Verizon was required to respond to this Order within 7 days, or by December 24.

4. Since Verizon does not maintain this information, it has requested that those carriers that purchase loops from Verizon provide it with this information regarding the loops they have purchased so that Verizon can comply with the Order.

5. Verizon has served discovery requests on all carriers that are parties to the above-captioned proceeding who have purchased unbundled voice grade loops from Verizon requesting that they provide this information to Verizon, and that they do so on an expedited basis.

6. The local exchange carriers for whom this subpoena is sought are CLECs holding certificates of public convenience from this Commission authorizing the provision of local exchange service in Pennsylvania, and who purchase voice grade unbundled loops from Verizon, but who are not parties in the above-captioned matter. Verizon believes that these non-party CLECs may not voluntarily provide the requested information absent issuance of the requested subpoenas.

7. Pursuant to 52 Pa. Code 5.423, the requested information will be treated in accordance with the Protective Order entered in this matter, which is attached to the proposed subpoena.

8. As indicated in the attached Certificate of Service, this Application was served on officers or representatives of the non-party CLECs by first class mail.

9. Verizon submits that the information which it is seeking from the non-party CLECs and for which subpoenas are being sought by this application is necessary in order for Verizon's compliance with the Order. While Verizon argued that this information was not relevant or material to the issues in this proceeding, the Order concluded "the Commission itself has already decided that a loop count breakdown between residential and small business customers is relevant by requesting such information in the *Procedural Order*." Order at 3. Therefore, the standards for issuance of a subpoena have been met.

10. The scope of the information sought is narrowly-tailored to the subject matter of the Order. The information requested is:

The total number of voice grade unbundled loops, including voice grade loops provisioned as part of an EEL, that [the non-party CLEC has] purchased or obtained from Verizon Pennsylvania Inc. or Verizon North Inc., by wire center, broken down into business and residential loops.

A proposed subpoena is attached as Appendix "2" hereto.

11. Verizon also requests that the subpoenas be issued as soon as possible so that the non-parties can respond before Verizon is required to comply with the discovery Order. Verizon respectfully requests that the information requested in the subpoena be returnable no later than close of business on December 23. This should not present difficulties for the two non-parties who are the subject of this application (Adelphia Business Solutions of Pa. and CEI Networks, Inc.), since they were already required to provide this information to the parties in response to the Commission's data requests Nos. 3 and 5.

WHEREFORE, Verizon requests that the Presiding Officers grant this application and issue the attached subpoena for the non-party CLECs identified in Appendix "1" of this application.

Respectfully submitted,

  
Julia A. Conover  
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Counsel for Verizon Pennsylvania Inc.  
and Verizon North Inc.

December 17, 2003

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APPENDIX 1

Adelphia Business Solutions  
of Pa., Inc. d/b/a Telcove  
c/o Jeffrey J. Heins  
712 North Main Street  
Coudersport, PA 16915

D&E Systems  
CEI Networks, Inc.  
c/o Jeanne Price  
P.O. Box 458  
130 East Main Street  
Ephrata, PA 17522

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APPENDIX 2

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SUBPOENA

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1. Pursuant to 52 Pa. Code §5.421, Verizon Pennsylvania Inc. and Verizon North Inc.

("Verizon") hereby requires that you produce answers and/or documents to the following

Interrogatory:

Please provide the total number of voice grade unbundled loops, including voice grade loops provisioned as part of an EEL, that you have purchased or obtained from Verizon Pennsylvania Inc. or Verizon North Inc., by wire center, broken down into business and residential loops.

2. Pursuant to 52 Pa. Code §5.421(b), Verizon also gives notice to the corporations named in Appendix "1" that an answer or objection to this subpoena shall be filed within ten (10) days of service of this application, as follows:

NOTICE: Pursuant to 52 Pa. Code §5.421, any answer or objection to this Application for Subpoena should be directed to the Secretary of the Pennsylvania Public Utility Commission and to the Presiding Officer within ten (10) days of service of this application. Their names and addresses are as follows:

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

The Honorable Michael Schnierle  
The Honorable Susan Colwell  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg PA 17105-3265**

Public Meeting held October 2, 2003

Commissioners Present:

Terrance J. Fitzpatrick, Chairman  
Robert K. Bloom, Vice Chairman  
Glen R. Thomas  
Kim Pizzingrilli  
Wendell F. Holland, Abstaining

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SECRETARY'S BUREAU

Investigation into the Obligations of  
Incumbent Local Exchange Carriers to  
Unbundle Local Circuit Switching for the  
Enterprise Market

Docket No. I-00030100

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

Docket No. I-00031754

Development of an Efficient Loop  
Migration Process

Docket No. M-00030099

**PROTECTIVE ORDER**

**BY THE COMMISSION:**

In accordance with the Commission's Procedural Order, adopted this same date in the above-captioned proceedings, and in recognition that documents, information and other materials submitted to the Commission and provided to the parties in the course of the investigations into the obligations of incumbent local exchange carriers to unbundle network elements and the development of an efficient loop migration process may represent or contain proprietary or highly confidential information, the Commission hereby enters this Protective Order. As part of this Protective Order, we also adopt the attached Confidentiality Agreement to ensure that such proprietary or confidential

information is afforded protection from unwarranted disclosure, while permitting parties appropriate access to such proprietary or confidential information. **THEREFORE:**

**IT IS ORDERED:**

1. That this Protective Order is entered with respect to all materials and information identified at Ordering Paragraph No. 2, below, that are filed with the Commission, produced in discovery, or otherwise presented during any proceedings. All persons now and hereafter granted access to the materials and information identified in Ordering Paragraph No. 5, below, shall use and disclose such information only in accordance with this Protective Order.

2. That the materials subject to this Protective Order include all correspondence, documents, data, information, studies, methodologies and other materials that a party (or an affiliate of a party) furnishes in the above-captioned proceedings pursuant to Commission rules, regulations, discovery procedures, or cross-examination or provides as a courtesy to a party to this proceeding, which materials are claimed to be of a proprietary or confidential nature and that are designated "PROPRIETARY INFORMATION."

3. The parties may designate extremely sensitive Proprietary Information as "HIGHLY CONFIDENTIAL" and secure additional protections as set forth in this Protective Order pertaining to such material. Such Highly Confidential Information shall be only such subset of Proprietary Information as constitutes or describes the producing party's marketing plans, competitive strategies, market share projections, marketing materials that have not yet been used, customer-identifying information, or customer prospects for services that are subject to competition.

4. That Proprietary Information and Highly Confidential Proprietary Information shall be made available to the Commission and any retained Commission experts, as well as the statutory advocates, for use in this proceeding. For purposes of filing, to the extent that Proprietary Information or Highly Confidential Proprietary Information is placed in the Commission's report folders, such information shall be marked and handled in accordance with routine Commission procedures inasmuch the report folders are not subject to public disclosure. To the extent the Proprietary Information or Highly Confidential Proprietary Information is placed in the Commission's testimony or document folders, such information shall be separately bound, conspicuously marked, and accompanied by a copy of this Protective Order. Public inspection of Proprietary Information and Highly Confidential Proprietary Information shall be permitted only in accordance with this Protective Order.

5. That Proprietary Information and Highly Confidential Proprietary Information shall be made available to counsel of record in this proceeding (including secretaries, legal assistants, or other such employees of counsel) pursuant to the following procedures:

a. Proprietary Information. To the extent required for participation in this proceeding, counsel for a party (retaining party) may have access to Proprietary Information made available by another party (producing party) to the retaining party's expert(s), subject to the following restrictions.

i. Such expert may not hold any of the following positions with any actual or potential competitor of the producing party: (a) an officer, board member, stockholder, partner, owner other than stock of the producing party, or an employee of any competitor of the producing party; or (b) an officer, board member, stockholder, partner, owner other than stock of any affiliate of a competitor of the producing party; provided, however, that any expert shall not be disqualified on account of being a stockholder, partner, or owner unless his/her interest in the competitor's business creates a significant potential for violations of the limitations of permissible use of the

Proprietary Information. For purposes of this Protective Order, stocks, partnership, or other ownership interest valued at less than \$100,000 and/or constituting less than a 2% interest in a business does not, in itself, establish a significant potential for violation.

ii. If a retaining party's independent expert, another member of the independent expert's firm, or the independent expert's firm generally also serves as an expert for, or as a consultant or advisor to a competitor or any affiliate of a competitor of the producing party, said independent expert must: (1) advise the producing party of the competitor's or affiliate's name(s); (2) make reasonable attempts to segregate those personnel assisting in the expert's participation in this proceeding from those personnel working on behalf of a competitor or any affiliate of a competitor of the producing party; and (3) if segregation of such personnel is impractical, the independent expert shall give to the producing party written assurances that the lack of segregation will in no way jeopardize the interests of the producing party. The producing party retains the right to challenge the adequacy of the written assurances that its interests will not be jeopardized.

b. Highly Confidential Proprietary Information. Highly Confidential Proprietary Information shall be produced only for inspection by the retaining party's counsel of record. If the inspecting lawyer desires copies of such material, or desires to disclose its contents to other persons, she or he shall submit a written request to the producing party's counsel. If requesting and producing parties are unable to reach agreement with respect to such a request, they may submit the issue orally to the presiding Administrative Law Judge (ALJ).

c. No other persons may have access to the Proprietary Information or Highly Confidential Proprietary Information except as authorized by order of the Commission or the presiding ALJ.

6. That persons obtaining access to Proprietary Information or Highly Confidential Proprietary Information under this Protective Order shall use the information only in the conduct of this proceeding and any administrative or judicial proceeding arising from this proceeding, and shall not use such information for any other

purpose, including business, governmental, commercial or other administrative or judicial proceedings. No person who may be entitled to receive, or who is afforded access to, any Proprietary Information or Highly Confidential Proprietary Information shall use or disclose such information for any other purpose, including business, governmental, commercial or other administrative or judicial proceedings.

7. That prior to making Proprietary Information or Highly Confidential Proprietary Information available to any person as provided in Ordering Paragraph No.5, above, counsel shall deliver a copy of this Protective Order to such person and shall receive a written acknowledgment from that person in the applicable form attached at Appendix A to this Protective Order and designated as the Confidentiality Agreement. Counsel shall promptly deliver to the producing party a copy of the executed Confidentiality Agreement. A copy of any executed Confidentiality Agreement must be filed with the Secretary's Bureau.

8. That a producing party shall designate the data or documents as constituting or containing Proprietary Information or Highly Confidential Proprietary Information by affixing an appropriate proprietary stamp or typewritten designation on such data or documents. Where only part of the data compilations or multi-page documents constitutes or contains Proprietary Information or Highly Confidential Proprietary Information, the producing party shall so designate only the specific data or pages which constitute or contain Proprietary Information or Highly Confidential Proprietary Information.

9. That any public reference to Proprietary Information or Highly Confidential Proprietary Information by counsel or persons afforded access thereto shall only be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information or Highly Confidential Proprietary Information to fully understand the reference and not more.

10. That the Proprietary Information or Highly Confidential Proprietary Information shall remain a part of the record, to the extent admitted into the record, for all purposes of administrative or judicial review. The part of the record in this proceeding containing Proprietary Information or Highly Confidential Proprietary Information, including but not limited to all exhibits, writings, testimony, cross-examination, argument, and responses to discovery, and including reference thereto as mentioned in ordering Ordering Paragraph No. 9. above, shall be sealed for all purposes, except as provided herein, including administrative and judicial review, unless such Proprietary Information or Highly Confidential Proprietary Information is released from the restrictions of this Protective Order, either through the agreement of the parties or pursuant to an order of an ALJ or the Commission.

11. That the parties affected by the terms of this Protective Order shall retain the right to: (1) question or challenge the alleged proprietary or confidential nature of Proprietary Information or Highly Confidential Proprietary Information; (2) question or challenge the admissibility of Proprietary Information or Highly Confidential Proprietary Information; (3) refuse or object to the production of Proprietary Information or Highly Confidential Proprietary Information on any proper ground, including but not limited to irrelevance, immateriality, or undue burden; (4) seek an order permitting disclosure of Proprietary Information or Highly Confidential Proprietary Information beyond that allowed in this Protective Order; (5) and to seek additional measures or protection of Proprietary Information or Highly Confidential Proprietary Information beyond those provided in this Protective Order. If a challenge is made to the designation of a document or information as Proprietary Information or Highly Confidential Proprietary Information, the party claiming that the information is Proprietary Information or Highly Confidential Proprietary Information bears the burden of demonstrating that the designation is necessary and appropriate. Unresolved challenges shall be decided on motion or petition by the presiding ALJ or the Commission as provided by 52 Pa. Code

§5.423(a). All such challenges will be resolved in conformity with existing rules, regulations, orders, statutes, precedent, etc., to the extent that such guidance is available.

12. That upon completion of this proceeding and any FCC, administrative, or judicial proceeding arising from this proceeding, all copies (except as have been filed with the Commission or used or created by the Commission or its experts using same) of all documents and other materials, including notes, which contain any Proprietary Information or Highly Confidential Proprietary Information, shall be immediately returned upon request to the providing party

13. The Secretary's Bureau is directed to serve this Order upon all jurisdictional telecommunication carriers, as well as the Pennsylvania Telephone Association, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Office of Trial Staff.

14. The Secretary's Bureau is directed to publish this Order in the Pennsylvania Bulletin.

BY THE COMMISSION

James J. McNulty  
Secretary

(SEAL)

ORDER ADOPTED: October 2, 2003

ORDER ENTERED: October 3, 2003

APPENDIX A-1  
PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg PA 17105-3265

Investigation into the Obligations of  
Incumbent Local Exchange Carriers to  
Unbundle Local Circuit Switching for the  
Enterprise Market

Docket No. I-00030100

**CONFIDENTIALITY AGREEMENT**

TO WHOM IT MAY CONCERN:

The undersigned is the \_\_\_\_\_ of  
\_\_\_\_\_ (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 \_\_\_\_\_ (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: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Status relative to Retaining Party

\_\_\_\_\_  
Employer

\_\_\_\_\_  
Address

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

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

Docket No. I-00031754

**CONFIDENTIALITY AGREEMENT**

TO WHOM IT MAY CONCERN:

The undersigned is the \_\_\_\_\_ of \_\_\_\_\_ (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 \_\_\_\_\_ (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: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Status relative to Retaining Party

\_\_\_\_\_  
Employer

\_\_\_\_\_  
Address

APPENDIX A-3  
PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg PA 17105-3265

Development of an Efficient Loop  
Migration Process

Docket No. M-00030099

**CONFIDENTIALITY AGREEMENT**

TO WHOM IT MAY CONCERN:

The undersigned is the \_\_\_\_\_ of \_\_\_\_\_ (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 \_\_\_\_\_ (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: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Status relative to Retaining Party

\_\_\_\_\_  
Employer

\_\_\_\_\_  
Address

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DOCUMENT  
FOLDER

December 18, 2003

## BY OVERNIGHT MAIL AND ELECTRONIC MAIL

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

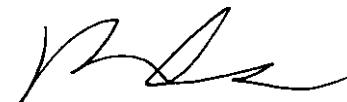
Re: Investigation into the Obligation of Incumbent Local  
Exchange Carriers to Unbundle Network Elements,  
Docket No. I-000 30099

Dear Ms. Sheridan:

Enclosed please find the PROPRIETARY responses of CTSI, LLC, to the Office of Consumer Advocate's First Set of Interrogatories in the above-captioned proceeding.

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

Sincerely,



Robin F. Cohn

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

RECEIVED  
DEC 18 2003  
PA. PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

I hereby certify that on this 18th day of December, 2003, I served a copy of the foregoing **PROPRIETARY Responses of CTSI, LLC to Office of Consumer Advocate's First Set of Interrogatories** in Docket Number I-00030099, by electronic mail and by U.S. first class mail, postage prepaid (except where otherwise noted), on the following individuals:

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DEC 18 2003

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(by overnight mail)  
JAMES McNULTY  
SECRETARY  
PENNSYLVANIA PUBLIC UTILITY  
COMMISSION  
P.O. BOX 3265  
HARRISBURG, PA 17105-3254  
UNITED STATES OF AMERICA

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

Robin F. Cohn

# SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

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December 18, 2003

DOCUMENT  
FOLDER

## BY OVERNIGHT MAIL AND ELECTRONIC MAIL

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

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

RECEIVED  
DEC 18 2003  
PA PIP AND UTILITY COMMISSION  
SECRETARY'S OFFICE

Dear Ms. Sheridan:

Enclosed please find the responses of Lightship Telecom, LLC, to the Office of Consumer Advocate's First Set of Interrogatories in the above-captioned proceeding.

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

Sincerely,



Robin F. Cohn

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

I hereby certify that on this 18th day of December, 2003, I served a copy of the foregoing **Responses of Lightship Telecom, LLC, to Office of Consumer Advocate's First Set of Interrogatories** in Docket Number I-00030099, by electronic mail and by U.S. first class mail, postage prepaid (except where otherwise noted), on the following individuals:

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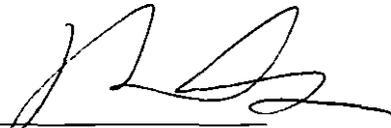
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COUDERSPORT PA 16915  
[Jeffrey.heins@telcove.com](mailto:Jeffrey.heins@telcove.com)

(by overnight mail)  
JAMES McNULTY  
SECRETARY  
PENNSYLVANIA PUBLIC UTILITY  
COMMISSION  
P.O. BOX 3265  
HARRISBURG, PA 17105-3254  
UNITED STATES OF AMERICA

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

Robin F. Cohn

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

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December 18, 2003

VIA ELECTRONIC AND FIRST CLASS MAIL

Mr. Barrett C. Sheridan  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, PA 17101

DOCUMENT

RECEIVED  
03 DEC 22 AM 9:34  
PENNSYLVANIA  
SECRETARY'S BUREAU

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

Dear Mr. Sheridan:

Enclosed please find the responses of XO Pennsylvania, Inc. ("XO") to the first set of interrogatories filed by the Office of Consumer Advocate ("OCA") in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Respectfully submitted,

*Erin W Emmott*

Steven A. Augustino  
Erin W. Emmott

Enclosures

cc: Rowland L. Curry, Bob Loube and Melanie Lloyd (via electronic and first class mail)  
Parties of Record (via electronic and first class mail)  
Mr. James M. McNulty, Secretary, Pennsylvania Public Utility Commission (cover letter and service list)

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

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SECRETARY'S BUREAU  
03 DEC 2009 AM 9:34

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

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I-00030099 Investigation into the Obligation of Incumbent Local  
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December 18, 2003

**VIA EMAIL AND OVERNIGHT MAIL**

**RECEIVED**

DEC 18 2003

Julia A. Conover  
Suzan D. Paiva  
William Petersen  
Verizon Pennsylvania Inc.  
1717 Arch Street, 32NW  
Philadelphia, Pennsylvania 19103

**DOCUMENT**

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**

Dear Counsel:

On behalf of Broadview Networks, Inc., BullsEye Telecom, InfoHighway Communications Corporation, McGraw Communications, Inc., and Metropolitan Telecommunications, Inc. (hereinafter the "Joint Parties"), enclosed please find an original and two (2) copies of the Joint Parties' First Set of Discovery Requests to Verizon Pennsylvania Inc. ("Verizon"). Please contact me if you have any questions regarding this transmittal.

Regards,



Ross A. Buntrock

Enc.

cc: James McNulty, Secretary  
Service list (by electronic and U.S. mail)

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

RECEIVED

DEC 18 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Docket No. I-00030099

DOCKETED  
FEB 04 2004

**JOINT PARTIES' FIRST SET OF DISCOVERY REQUESTS TO  
VERIZON-PENNSYLVANIA, INC.**

Pursuant to 52 Pa. Code §§ 5.341, 5.342 and 5.349, Broadview Networks, Inc., BullsEye Telecom, InfoHighway Communications Corporation, McGraw Communications, Inc., and Metropolitan Telecommunications, Inc. (hereinafter the "Joint Parties") hereby propound the following discovery requests to Verizon-Pennsylvania, Inc. ("Verizon") to be answered by those officers, employees or agents of Verizon (or its affiliates or parent companies) as may be cognizant of the requested information and who are authorized to answer on behalf of Verizon. Responses to these requests shall be served in accordance with the procedural schedule adopted by the Pennsylvania Public Utility Commission ("Commission").

**INSTRUCTIONS**

Please answer each question separately and in the order that it is asked. The number of the answers should correspond to the number of the Discovery Request being answered. Please copy each question immediately before the answer. Following each answer, please identify the person or persons responsible for the answer and indicate what person or

DOCUMENT

witness provided responsive information or documents, and where applicable, what witness will sponsor each answer in testimony.

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

In response to Discovery Requests requesting you to identify documents or other items, information or materials for disclosure, please identify the document(s) or other item(s), information or material(s) in sufficient detail so that they can be produced in response to a separate Discovery Request for production. Such identification shall contain the number (and subpart, if applicable) of the Discovery Request requesting the identification and the page count or description of the document or item. Additionally, to the extent known, the listing shall include the author, publisher, title, date, and any "Bates" or other sequential production numbering for the document or item. When responding to any request for production of documents, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to "identify for disclosure" in Joint Parties'

Discovery Requests. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the “identification for disclosure”.

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

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

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

This request is directed to all documents and information in your possession, custody or control. A document is deemed to be in your possession, custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably available to you (including those documents or communications in the custody or control of your company’s present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents contained in these Discovery

Requests, you shall produce the documents, including all appendices, exhibits, schedules, and attachments, that are most relevant to the request.

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

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

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

If you claim a privilege, or otherwise decline to produce or provide, any document or information responsive to one or more Discovery Requests, then in addition to, and not in lieu of, any procedure that you must follow under law to preserve your objection(s) and/or privilege(s), within the time allowed for responding to these Discovery Requests, the attorney asserting the privilege shall:

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

In the event that any requested information is considered by you to be confidential, the attorney asserting such confidential status shall inform Joint Parties of this designation as soon as he or she becomes aware of it, but in any event, prior to the time the responses to these Discovery Requests are due to discuss or attempt to negotiate a compromise.

However, the confidential documents should be produced pursuant to the protective order and/or non-disclosure agreement executed in this proceeding.

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

Genevieve Morelli  
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Heather Hendrickson  
Kelley Drye & Warren LLP  
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#### **DEFINITIONS**

1. The term “analog” refers to electrical signals representing sound or data which are transmitted in a linear, non-digital format.
2. The terms “and” and “or” as used herein shall be construed as both conjunctive and disjunctive.
3. The term “any” shall be construed to include “all,” and “all” shall be construed to include “any.”
4. The term “business end user” refers to an end user customer entity that purchases voice or data services, typically supported on multiple loops, to support a commercial enterprise. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.

5. The acronym "CLEC" refers to competitive local exchange carriers.
6. The acronym "CLLI" refers to common language location identifier, a multi-character code generally composed of numerals and letters that provides a unique identifier for circuit switches used by ILECs and CLECs.
7. The acronym "CO" refers to central office, the single physical ILEC building that houses one or more Class 5/end office ILEC switch(es), and in which end user customers' loops are cross connected to ILEC switching equipment or CLEC collocation arrangements.
8. The term "communication" includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.
- 9.. The term "cross connect/jumper" refers to a copper pair that connects at the vertical and horizontal sides of the ILEC MDF.
10. The term "customer location" refers to a building or set of connected, contiguous, or adjacent buildings in a common area, used by residential, commercial, and/or governmental customers that share a primary street address or group of street addresses. It includes multi-unit residential, commercial, and/or governmental premises.

11. The term "customer premises" refers to the physical point at which the end user customer assumes responsibility for telecommunications wiring (i.e., the network interface device ("NID")) for single unit dwellings, and the individual point of demarcation at the end user customer's unit for multi-unit buildings such as office buildings and apartment buildings).
12. The term "digital" refers to electrical or optical signals representing sound or data which are transmitted in a binary, discontinuous, non-linear format.
13. The term "DLC" refers to Digital Loop Carrier and includes UDLC, IDLC, and NGLDC.
14. The term "document," as used herein, shall include, without limitation, all written, reported, recorded, magnetic, graphic, photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the

foregoing upon which notations and writings have been made which do not appear on the originals.

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

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

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

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

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

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

(c) When used in reference to a communication: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the

communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.

19. The acronym "IDF" refers to an intermediate distribution frame, a physical frame located between an MDF and (1) an ILEC switch in a central office or wire center over which end user customer loops are transited for connection to the ILEC switch, or (2) a CLEC collocation arrangement.
20. The term "ILEC" refers to an incumbent local exchange carrier, and includes the ILEC's parent or any subsidiary or affiliate, and all current or former officers, directors, employees, agents, representatives, contractors or consultants of ILEC, as well as any persons or other entities who have acted or purported to act on its behalf.
21. The term "LATA" means "Local Access and Transport Area" as that term is defined in the *Modification of Final Judgment, United States v. Western Elec. Co.*, 552F. Supp. 131 (D.D.C. 1982), *aff'd sub nom., Maryland v. United States*, 460 U.S. 1001 (1983).
22. The term "MSA" refers to a Metropolitan Statistical Area as defined by the US Census Bureau and the Office of Management and Budget.
23. The term "qualifying service" refers to all telecommunications services, whether voice or data, and whether analog or digital, that have ever been offered or provided by an ILEC pursuant to tariff or an interconnection agreement.
24. The acronym "MDF" refers to main distribution frame, a physical frame located in a central office or wire center that connects loops coming from an end user customer

premises to (1) an ILEC switch located in the central office or wire center, and (2) facilities leading to a CLEC collocation arrangement.

25. The past tense includes the present tense and vice-versa.

26. "Relate, mention, reference, or pertain" shall be used to mean documents or communications containing, showing, relating, mentioning, referring or pertaining in any way, directly, or indirectly to, or in legal, logical or factual way connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by such request.

27. The singular form of a word shall be interpreted to include the plural, and the plural form of a word shall be interpreted to include the singular whenever appropriate.

28. The term "residential end user" refers to an end user customer, typically an individual or family, who purchases voice or data services at his, her or their place of residence, or household. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.

29. The term "wire center" is synonymous with the term "central office," and refers to the single physical building that houses one or more Class 5/end office ILEC switch(es) and in which end user customer's loops are cross connected to the Class 5/end office ILEC switch(es).

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

### **INTERROGATORIES**

#### **JOINT PARTIES-1:**

For each Verizon wire center in Pennsylvania, please provide on a monthly basis the number of loops, by type listed below, in electronic spreadsheet form (i.e., as an Excel Spreadsheet), provisioned to CLECs in each of the past 12 months:

- a. UNE analog loop (residential);
- b. UNE analog loop (business);
- c. UNE DS-1 loop;
- d. Analog special access;
- e. DS-1 special access;
- f. UNE-P (residential);
- g. UNE-P (business);
- h. ADSL loop (residential);
- i. ADSL loop (business);
- j. DS-3 loop;
- k. Other.

#### **JOINT PARTIES-2:**

For each Verizon wire center in Pennsylvania, please provide the total number of currently active loops, by type listed below, in electronic spreadsheet form (i.e., as an Excel Spreadsheet), provisioned to CLECs:

- a. UNE analog loop (residential);
- b. UNE analog loop (business);
- c. UNE DS-1 loop;
- d. Analog special access;
- e. DS-1 special access;
- f. UNE-P (residential);
- g. UNE-P (business);
- h. ADSL loop (residential);
- i. ADSL loop (business);
- j. DS-3 loop;
- k. Other.

#### **JOINT PARTIES-3:**

For each Verizon wire center in Pennsylvania, please provide the following information for the wire center in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The UNE pricing zone;
- b. The Special Access Zone Density Pricing zone;
- c. The MSA the wire center predominately serves;
- d. The LATA the wire center predominantly serves;

**JOINT PARTIES-4:**

Provide in electronic spreadsheet form (i.e., as an Excel Spreadsheet) Verizon's total switched access lines in service in Pennsylvania at the end of the most recent quarter for which such information is available, stated separately by wire center and state-wide.

**JOINT PARTIES-5:**

Provide the number of EEL local connections, in DS-1 equivalents, by Verizon wire center in Pennsylvania for each month since the fourth quarter of 1999.

**JOINT PARTIES-6:**

Provide the number of EELs in service in Pennsylvania at the end of the most recent quarter for which such information is available, stated separately for:

- a. EELs comprised of analog loops that are connected to analog transport;
- b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
- c. EELs comprised of DS-1 loops that are connected to DS-1 transport;
- d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

**JOINT PARTIES-7:**

Using the following table, identify separately for each Verizon wire center for the most recent quarter for which the data is available, the number of end-user customer locations by the number of analog switched local service lines with regard to end-user customers using 24 or fewer analog UNE loops, split between residential and business end-user customers.

Lines	Number of Customer Locations
	Residential
1	
2	
3	
4	
5	

6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

<b>Lines</b>	<b>Number of Customer Locations Business</b>
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
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17	
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21	
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23	
24	

**JOINT PARTIES-8:**

Separately for each carrier you maintain meets the self-provisioning trigger standard established in the *Triennial Review Order* in any geographic market within the Verizon operating territory in Pennsylvania, provide the total number of minutes (including both voice and data) exchanged within the past year, by switch, split between:

- a. Minutes that originated from Verizon retail customers and were delivered to the CLEC switch; and
- b. Minutes that originated from CLEC retail customers and were delivered to the Verizon switch.

**JOINT PARTIES-9:**

For the most recent time period that such information is available, provide the total number of Verizon loops in Pennsylvania, and by central office (by applicable CLLI code), that are served by:

- a. IDLC arrangements;
- b. NGDLC arrangements;
- c. UDLC arrangements;
- d. Of the IDLC loops, please state how many loops are transferable to spare copper or universal digital loop carrier (UDLC) without additional construction.

**JOINT PARTIES-10:**

For the most recent time period that such information is available, provide the total number of Verizon UNE loops, and by central office (by applicable CLLI code), that are served by IDLC and NGDLC arrangements in Pennsylvania that have been provided to a CLEC with unbundled local switching.

**JOINT PARTIES-11:**

For the most recent time period for which such information is available, provide the total number of Verizon UNE loops, and by central office (by applicable CLLI code), that are served by IDLC and NGDLC arrangements in Pennsylvania that have been provided to a CLEC without unbundled local switching.

**JOINT PARTIES-12:**

Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops that you intend to serve in Pennsylvania via:

- a. IDLC loop arrangements;
- b. NGDLC loop arrangements.

**JOINT PARTIES-13:**

For the most recent quarter for which such information is available, provide the:

- a. Total number of UNE-P lines in Pennsylvania, and by central office (by applicable CLLI code);
- b. Total billed revenues for unbundled local switching, shared transport and any charges for call detail records/access records billed UNE-P carriers in Pennsylvania;
- c. The number of shared transport (i.e., transport used in conjunction with unbundled local switching) minutes originating from each central office in Pennsylvania; and

- d. The number of shared transport minutes terminating to each central office in Pennsylvania.

**JOINT PARTIES-14:**

For each state in your region, provide the information requested in Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of September 2003.

**JOINT PARTIES-15:**

Separately for each geographic area in Pennsylvania in which Verizon claims the self-provisioning trigger standard established in the *Triennial Review Order* has been met, identify all wire centers in that geographic area.

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**JOINT PARTIES-1:**

Provide, for each state in your region, a copy of the completed Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of June 2003.

**JOINT PARTIES-2:**

Provide all written reports, studies and other documents forecasting the number of loops Verizon intends to serve in Pennsylvania via IDLC loop arrangements and/or NGDLC loop arrangements within the next five years

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560 (in PA only)

IRWINA. POPOWSKY  
Consumer Advocate

FAX (717) 783-7152  
consumer@paoca.org

SECRETARY'S BUREAU

2003 DEC 18 PM 3:59

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December 18, 2003

To All Counsel of Record

By e-mail and first class mail

DOCKETED  
FEB 06 2004

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

Dear Fellow Counsel:

The Office of Consumer Advocate requests that each telecommunications carrier participating in this proceeding authorize the OCA to share materials produced in discovery or creation of the record which have been labeled by the producing party as "Highly Confidential Proprietary Information ." Paragraph 5.b. of the Pennsylvania Public Utility Commission's October 2, 2003 Protective Order expressly permits parties to request in writing authorization from the producing party's counsel to disclose such materials to OCA's expert witnesses.

To expedite matters, the OCA has attached a draft letter agreement. OCA requests that counsel for each telecommunications carrier participating in this proceeding sign and return such an agreement by fax and mail.

By way of background, the OCA filed a Notice of Intervention on October 23, 2003 stating the OCA's intent to participate and protect the interest of residential consumers in Pennsylvania. The Pennsylvania Public Utility Commission refers to OCA as a "statutory advocate" because the OCA may intervene in PUC proceedings as a matter of right, pursuant to 71 P.S. §§ 309-1 *et seq.* The OCA also filed on October 23, 2003 "Appendix A" confidentiality agreements signed by the OCA's three outside expert witnesses, Rowland Curry, Melanie Lloyd, and Bob Loube. Mr. Curry, Ms. Lloyd and Mr. Loube are not employees of nor consultants to any local exchange carriers participating in this proceeding.

DOCUMENT

In the PUC's October 2, 2003 Protective Order, the Commission expressly stated "That Proprietary and Highly Confidential Proprietary Information shall be made available to the Commission and any retained Commission experts, *as well as the statutory advocates*, for use in this proceeding." (emphasis added). Permission for the OCA to share information claimed by the producing party to be "Highly Confidential Proprietary Information" is necessary so that the OCA may effectively use the information in this case. Additionally, grant of this permission will reduce the likelihood of challenges by the OCA to a party's designation of information as "Highly Confidential Proprietary Information."

Please call if you wish to discuss this request.

Sincerely yours,

A handwritten signature in black ink that reads "Barrett C. Sheridan". The signature is written in a cursive style with a large, looped initial 'B'.

Barrett C. Sheridan  
Assistant Consumer Advocate

**SAMPLE LETTER**

Barrett C. Sheridan  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101-1923

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

Dear Ms. Sheridan:

\_\_\_\_\_, a party to  
this proceeding, has or may produce information in this proceeding which is marked as “Highly Confidential Proprietary Information” and so subject to protection under the Pennsylvania Public Utility Commission’s October 2, 2003 Protective Order.

\_\_\_\_\_ authorizes  
the Pennsylvania Office of Consumer Advocate to disclose such “Highly Confidential Proprietary Information” to the OCA’s expert consultants, Rowland Curry, Melanie Lloyd, and Bob Loube, for use in this proceeding, subject to the terms and conditions of the PaPUC’s October 2 Protective Order.

Sincerely,

cc: Secretary McNulty, PaPUC

ORIGINAL



Zsuzsanna E. Benedek  
Senior Attorney

240 North Third Street, Suite 201  
Harrisburg, PA 17101  
Telephone (717) 236-1385  
Fax (717) 238-7844

December 19, 2003

**VIA HAND DELIVERY**

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

DOCUMENT

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2003 DEC 19 PM 3:27  
SECRETARY'S BUREAU

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

Dear Secretary McNulty:

Attached please find an original and three (3) copies of three additional Executed Confidentiality Agreements signed by Sprint Communications Company, L.P. (hereinafter "Sprint") in the above-referenced proceeding.

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

Sincerely,

Sue Benedek

ZEB/jh  
enclosures

cc: Certificate of Service (via first-class and electronic mail)

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APPENDIX A-2

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg PA 17105-3265

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

Docket No. I-00030099

CONFIDENTIALITY AGREEMENT

DOCKETED  
FEB 04 2004

TO WHOM IT MAY CONCERN:

The undersigned is the Manager - Network Costing of Sprint (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 (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: 12/10/2003

Richard Rousselot  
Signature

Richard Rousselot  
Print Name

Employee  
Status relative to Retaining Party

Sprint  
Employer

6450 Sprint Parkway Overland Park  
Address  
KS, 66251

DOCUMENT

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SECRETARY'S BUREAU

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

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

Docket No I-00030099

CONFIDENTIALITY AGREEMENT

DOCKETED  
FEB 04 2004

TO WHOM IT MAY CONCERN:

The undersigned is the Costing Analyst of Sprint (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 (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: 12-18-03

Debbie K Smith  
Signature  
Debbie K Smith  
Print Name  
employee  
Status relative to Retaining Party  
Sprint  
Employer  
6450 Sprint Parkway Overland Park  
Address  
KS 66251

DOCUMENT

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

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

Docket No. I-00030099

CONFIDENTIALITY AGREEMENT

DOCKETED  
FEB 04 2004

TO WHOM IT MAY CONCERN:

The undersigned is the Manager - Services Costing of Sprint (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 (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: 11/24/2003

Daniel R. Gordon

Signature

Daniel R. Gordon

Print Name

Employee

Status relative to Retaining Party

Sprint

Employer

6450 Sprint Parkway, Overland Park, KS 66251  
Address

DOCUMENT



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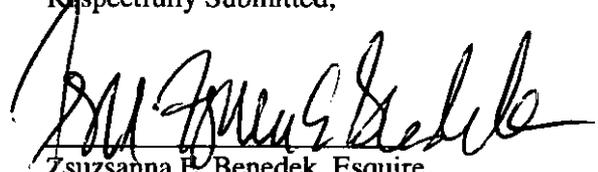
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DEC 19 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

ORIGINAL

December 19, 2003

**VIA OVERNIGHT MAIL**

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

DOCUMENT

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

Dear Secretary McNulty:

Enclosed please find an original and three copies of Verizon Pennsylvania Inc.'s and Verizon North Inc.'s letter responding to AT&T's letter of December 19, 2003 in the above-referenced matter.

Very truly yours,

*Suzan DeBusk Paiva*  
Suzan DeBusk Paiva

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

99

**CERTIFICATE OF SERVICE**

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc. and Verizon North Inc.'s Letter of December 19, 2003, 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 19<sup>th</sup> day of December, 2003.

**VIA E-MAIL AND UPS OVERNIGHT DELIVERY**

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Verizon Pennsylvania Inc.  
Verizon North Inc.  
1717 Arch Street, 32NW  
Philadelphia, PA 19103  
(215) 963-6068

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DEC 19 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

ORIGINAL

INVESTIGATION INTO THE  
OBLIGATION OF INCUMBENT LOCAL  
EXCHANGE CARRIERS TO UNBUNDLE  
NETWORK ELEMENTS

DOCKET NO. I-00030099

---

VERIZON PENNSYLVANIA INC.  
AND  
VERIZON NORTH INC.

STATEMENT NO. 1.1  
(SUPPLEMENTAL DIRECT TESTIMONY)

---

WITNESSES: Harold E. West, III  
Carlo Michael Peduto, II

DATED: December 19, 2003

DOCKETED  
FEB 05 2004

DOCUMENT

**[EXPURGATED - DOES NOT INCLUDE  
ANY PROPRIETARY EXHIBITS]**

**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

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**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

1    **I.       INTRODUCTION**

2    **Q.       PLEASE IDENTIFY THE MEMBERS OF THIS PANEL AND STATE ON**  
3    **WHOSE BEHALF THIS TESTIMONY IS SUBMITTED.**

4  
5    A.       The members of this panel are Carlo Michael Peduto, II and Harold E. West, III.

6            This testimony is submitted on behalf of Verizon Pennsylvania Inc. (“Verizon PA”)  
7            and Verizon North Inc. (“Verizon North”) (collectively “Verizon”).

8    **Q.       IS THIS THE SAME MR. PEDUTO THAT SUBMITTED DIRECT**  
9    **TESTIMONY STATEMENT 1.0 ON OCTOBER 31, 2003 ON BEHALF OF**  
10   **VERIZON?**

11  
12   A.       Yes.

13   **Q.       MR. WEST, PLEASE STATE YOUR FULL NAME AND BUSINESS**  
14   **ADDRESS.**

15  
16   A.       My name is Harold E. West, III. My office is located at 540 Broad Street, Newark,  
17            New Jersey.

18   **Q.       BY WHOM ARE YOU EMPLOYED, AND IN WHAT CAPACITY?**

19  
20   A.       I am employed by Verizon Services Corporation as Director – Regulatory Support.

21   **Q.       WHAT ARE THE RESPONSIBILITIES OF YOUR CURRENT**  
22   **POSITION?**

23  
24   A.       My responsibilities include the presentation of Verizon pricing and policy positions  
25            and market strategies associated with the competitive entry into telecommunications  
26            markets in state and federal regulatory arenas.

27   **Q.       PLEASE BRIEFLY OUTLINE YOUR EXPERIENCE IN THE**  
28   **TELECOMMUNICATIONS INDUSTRY AND EDUCATIONAL**  
29   **BACKGROUND.**

30

**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

1 A. I began working for Verizon NJ's predecessor, New Jersey Bell, in 1980 as a  
2 central office equipment engineer. I then held positions of increasing  
3 responsibility in Service Costs, Rates, Product Management and Sales. I have  
4 been in my current position since December 1994. In this position, I have  
5 presented testimony before public utility regulatory agencies in Delaware, New  
6 Jersey, Massachusetts, New York, Pennsylvania, Virginia, Washington and  
7 Washington, D.C., as well as the Federal Communications Commission ("FCC"),  
8 on the issues described above in my current responsibilities.

9 I graduated from Princeton University in 1980 with a Bachelor of Sciences degree  
10 in engineering. In 1991, I completed an Executive Masters program at the  
11 University of Pennsylvania and received a Master of Sciences degree in  
12 engineering.

13 **Q. MR. WEST, ARE YOU REPLACING MS. BERRY AS VERIZON'S**  
14 **WITNESS IN THIS PROCEEDING?**

15  
16 A. Yes. Since the time that Verizon submitted its direct testimony on October 31,  
17 2003, Ms. Berry has retired from Verizon's employ. I am therefore replacing her as  
18 the witness on Verizon Statement 1.0 and I adopt that testimony as my own.

19  
20 **II. PURPOSE OF TESTIMONY**

21 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT**  
22 **TESTIMONY.**

23  
24 A. This Supplemental Direct Testimony is being filed in accordance with the Second  
25 Prehearing Order, which requires that "any updates to Verizon's filing" should be

**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

1 filed on December 19, 2003. The purpose of our Supplemental Direct Testimony  
2 is to present additional evidence provided by the CLECs in response to the  
3 Commission's Preliminary Discovery Requests in Appendix A of the October 3,  
4 2003 Procedural Order, which further demonstrates that, under the standards set  
5 forth in the Federal Communications Commission's ("FCC") Triennial Review  
6 Order ("TRO"), Verizon is not required to provide unbundled access to mass  
7 market switching in any of the markets identified in our October 31, 2003 Direct  
8 Testimony. In this Supplemental Direct Testimony, we are also providing the  
9 Commission with Verizon's analyses of the evidence of self-provisioned and  
10 wholesale dedicated interoffice transport produced by certain CLECs in response  
11 to the Commission's discovery requests. Based on the supplemental information  
12 contained in these discovery responses, Verizon has been able to identify in total:  
13 1) 245 direct routes meeting the FCC's self-provisioning trigger for dark fiber, 2)  
14 498 direct routes meeting the FCC's self-provisioning trigger for DS3-level  
15 capacity, 3) 899 direct routes meeting the FCC's wholesale trigger for DS1 and  
16 DS3 capacities, and 4) 719 direct routes meeting the FCC's wholesale trigger for  
17 dark fiber . Finally, this Supplemental Direct Testimony identifies certain  
18 customer locations that meet the FCC's high capacity loop triggers, based on  
19 information the CLECs have provided in discovery.  
20

1   **III.   MASS MARKET SWITCHING**

2   **Q.   WHAT ADDITIONAL INFORMATION DID THE CLECS PROVIDE**  
3   **REGARDING MASS MARKET SWITCHING?**

4  
5   A.   In response to the Commission’s Discovery Requests, several CLECs identified the  
6       Verizon wire center locations where they provide voice grade DS0 service to mass  
7       market customers using their own switches, or the switches of an affiliate. In  
8       addition, those CLECs identified the total number of voice grade equivalent lines  
9       that they provide to customers in each wire center. Verizon compared this data with  
10      the results of the Line Count Study and residential E911 analysis described in our  
11      Direct Testimony, both at the MSA and Density Cell level, and at the wire center  
12      level.

13   **Q.   DID EVERY CLEC IDENTIFIED BY VERIZON IN THE LINE COUNT**  
14   **STUDY AND RESIDENTIAL E911 ANALYSIS FULLY AND**  
15   **ADEQUATELY RESPOND TO THE COMMISSION’S DISCOVERY**  
16   **REQUESTS?**

17  
18   A.   No, not all of them. For example, SBC Telecom was not a “footnote 14” CLEC and  
19       did not intervene, and has provided no response to the Discovery Requests. In  
20       addition, although Verizon counted affiliated carriers together for the purposes of the  
21       trigger (as required by the TRO), not all affiliated carriers provided a response. For  
22       example, CEI Networks provided the information requested by the Commission, but  
23       its affiliate D&E Systems has not.

24  
25       Other CLECs have provided deficient responses that make a side-by-side  
26       comparison with the results of Verizon’s Line Count Study difficult, if not

**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

1 impossible. For example, although Adelphia Business Solutions (now known as  
2 Telcove) identified its own switches, it did not provide information that would  
3 permit Verizon to determine the wire center location of Adelphia's customers, nor  
4 did it provide the number of voice-grade-equivalent lines it uses to serve  
5 customers in Pennsylvania. Therefore, Verizon has not been able to perform a  
6 detailed comparison of Adelphia's data to the Line Count Study results (although  
7 [CLEC PROPRIETARY DATA BEGINS]  
8  
9 [CLEC  
10 PROPRIETARY DATA ENDS] Verizon will continue its efforts to obtain  
11 complete, detailed information from all carriers in Pennsylvania so that this  
12 information is available to the Commission.

13 **Q. FOR THOSE CARRIERS WHO DID RESPOND TO THE**  
14 **COMMISSION'S PRELIMINARY DISCOVERY REQUESTS, WHAT**  
15 **DOES THE DATA SHOW?**  
16

17 A. As demonstrated in Exhibit 1, the CLEC responses to the Commission's Discovery  
18 Requests received to date are consistent with results of Verizon's Line Count Study  
19 and residential E911 analysis. Moreover, there are some CLECs that are providing  
20 service to mass market customers using their own switching that Verizon did not  
21 identify in its own internal data. Those CLECs are highlighted in Exhibit 1. In  
22 addition, the maps attached as Exhibit 2 shows the location of mass market  
23 customers currently being served by CLEC switches based on the data in Exhibit 1  
24 compared with the market areas where Verizon is seeking relief.

1

2 As this analysis shows, the CLEC's own data confirms that Verizon meets the  
3 FCC's mass market switching trigger in Density Cells 1, 2 and 3 within the  
4 Philadelphia-Camden-Wilmington, Allentown-Bethlehem-Easton, Reading,  
5 Lancaster, Scranton-Wilkes-Barre and Pittsburgh MSAs, and within the  
6 Harrisburg-Carlisle-Lebanon Combined Statistical Area (which consists of the  
7 Harrisburg-Carlisle and Lebanon MSAs).<sup>1</sup> Therefore, the Commission should  
8 make a finding of no impairment in each of these markets.

9 **IV. DEDICATED TRANSPORT**

10 **Q. PLEASE SUMMARIZE THE DEDICATED TRANSPORT ROUTES IN**  
11 **PENNSYLVANIA THAT VERIZON BELIEVES MEET ONE OR BOTH**  
12 **OF THE FCC'S TWO TRANSPORT TRIGGERS ONCE THE CLEC**  
13 **DISCOVERY RESPONSES HAVE BEEN APPROPRIATELY**  
14 **INCORPORATED?**

15  
16 A. Verizon has combined the CLECs' discovery responses, where appropriate, with the  
17 information used in its initial testimony, which was drawn largely from public and  
18 internal sources. In a number of cases, Verizon has also adjusted the information it  
19 used in its initial testimony to reflect the CLECs' responses. This combined and

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<sup>1</sup> In our Initial Direct Testimony, Verizon sought relief in Density Cells 1, 2, and 3 in the Harrisburg- Carlisle-Lebanon MSA. See Direct Testimony at 33 and Attachment 2. However, under the latest OMB definitions, Harrisburg-Carlisle-Lebanon is now a Combined Statistical Area consisting of two separate MSAs: Harrisburg-Carlisle and Lebanon. See Office of Management and Budget, Bulletin No. 03-04, June 6, 2003. <http://www.whitehouse.gov/omb/bulletins/b03-04.html>. Verizon is seeking relief in both MSAs within the combined MSA. This is a definitional change only – the geographic area in which Verizon is seeking relief set forth in the map attached as Attachment 3 to our initial Direct Testimony is the same. Verizon has updated the MSA definitions in Attachments 1 and 2 to account for this MSA split.

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1 adjusted evidence is presented, by LATA, in Exhibits 3-6. Within each Exhibit,  
2 Attachment A presents the direct routes meeting the FCC's self-provisioning trigger  
3 for dark fiber; Attachment B presents the direct routes meeting the self-provisioning  
4 trigger for DS-3 capacity; Attachment C presents the direct routes meeting the  
5 wholesale trigger for DS1s and DS3s; and Attachment D presents the direct routes  
6 meeting the wholesale trigger for dark fiber.<sup>2</sup> The proprietary version of these  
7 attachments identifies the CLECs with operational, fiber-based collocation  
8 arrangements in the Verizon wire centers. CLEC names are removed from the  
9 public versions of these attachments.

10 **Q. PLEASE DESCRIBE THE DIRECT ROUTES MEETING THE FCC'S**  
11 **SELF-PROVISIONING TRIGGER FOR DARK FIBER?**

12  
13 A. Once the CLECs' discovery responses are combined with Verizon's information,  
14 there are 245 direct routes (or pairs of Verizon wire centers) meeting the FCC's self-  
15 provisioning trigger for dark fiber. There is one direct route meeting the self-  
16 provisioning trigger in Harrisburg (LATA 226); 152 direct routes with at least one  
17 end in Pennsylvania in Philadelphia (LATA 228); and 92 direct routes in Pittsburgh  
18 (LATA 234). (See Attachment A in Exhibits 3-6.)

19 **Q. PLEASE DESCRIBE THE DIRECT ROUTES IN PENNSYLVANIA**  
20 **MEETING THE FCC'S SELF-PROVISIONING TRIGGER FOR DS3**  
21 **CAPACITY?**

---

<sup>2</sup> There are 3 direct transport routes meeting the dark fiber trigger (both wholesale and self-provisioning), and 3 direct transport routes meeting the DS1 and DS3 triggers (both wholesale and, for DS3, self-provisioning) that originate *and* terminate in Delaware (which is part of the Philadelphia LATA). Verizon is not asking the Commission for relief on those routes, and they have been removed from the Exhibit for LATA 228.

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1  
2 A. Based on the combined data, Verizon finds 498 direct routes meeting the FCC's  
3 self-provisioning trigger for DS3-level capacity. There are 3 direct routes in  
4 Harrisburg (LATA 226); 358 direct routes in Philadelphia (LATA 228); and 137  
5 direct routes in Pittsburgh (LATA 234). (*See* Attachment B in Exhibits 3-6.)

6 **Q. PLEASE DESCRIBE THE DIRECT ROUTES IN PENNSYLVANIA**  
7 **MEETING THE FCC'S WHOLESALE TRIGGER FOR DS1 AND DS3**  
8 **CAPACITIES?**

9  
10 A. The combined data show 899 direct routes (or pairs of Verizon wire centers)  
11 meeting the FCC's wholesale trigger for DS1 and DS3 capacities. To be clear,  
12 Verizon believes that the same 899 direct routes meet the FCC's triggers for both  
13 DS1s and DS3s. There are 15 direct routes in the Capital LATA (226); 551 direct  
14 routes with at least one end in Pennsylvania in the Philadelphia LATA (228); one  
15 direct route in the North East LATA (232); and 332 direct routes in the Pittsburgh  
16 LATA (234). (*See* Attachment C in Exhibits 3-6.)

17 **Q. PLEASE DESCRIBE THE DIRECT ROUTES IN PENNSYLVANIA**  
18 **MEETING THE FCC'S WHOLESALE TRIGGER FOR DARK FIBER?**

19  
20 A. Based on the combined data, Verizon concludes that there are 719 direct routes (or  
21 pairs of Verizon wire centers) in the Capital, Philadelphia, and Pittsburgh LATAs  
22 that meet the FCC's wholesale trigger for dark fiber. There are three direct routes in  
23 Harrisburg (LATA 226); 416 direct routes with at least one end in Pennsylvania in  
24 Philadelphia (LATA 228); and 300 direct routes in Pittsburgh (LATA 234). (*See*  
25 Attachment D in Exhibits 3-6.)

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1 **Q. DID CLECS RESPOND FULLY AND APPROPRIATELY TO THE**  
2 **COMMISSION'S DISCOVERY REQUESTS CONCERNING DEDICATED**  
3 **TRANSPORT?**

4  
5 **A.** No, not all of them. In its Discovery Requests, the Commission asked CLECs to  
6 identify the Verizon wire centers at which they have operational, fiber-based  
7 collocation arrangements, the technology used in their dedicated transport  
8 facilities (*e.g.*, OCn), and the capacities of transport facilities they have deployed  
9 (*e.g.*, DS1, DS3). The Commission also required the CLECs to state whether they  
10 provide dedicated transport facilities to other carriers or use the transport facilities  
11 of other carriers. Verizon has identified numerous problems and inadequacies  
12 with these responses. Not every competitive carrier identified by Verizon as  
13 having operational, fiber-based collocation arrangements at a Verizon wire center  
14 has responded to the Commission's discovery requests. For example, although  
15 Telcove (formerly known as Adelphia Business Solutions) responded to the  
16 Commission's switching questions, it failed altogether to respond to the  
17 Commission's transport questions. The absence of responses from such carriers  
18 may well result in an undercount of transport facilities.

19  
20 In addition, several CLECs claim to be unable to respond to discovery requests  
21 that are essential to the application of the FCC's triggers. [CLEC

22 **PROPRIETARY INFORMATION BEGINS**

23

24

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[CLEC PROPRIETARY INFORMATION ENDS]

Still other carriers did not respond fully and adequately to the Commission’s discovery requests. For example, in its Transport Questions 2 and 3, the Commission instructed the CLECs to provide “the transport facilities that currently serve” each of their collocation arrangements, as well as “the

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1 quantity/capacity of the facility deployed.” [CLEC PROPRIETARY

2 INFORMATION BEGINS]

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[CLEC

9

PROPRIETARY INFORMATION ENDS]

10

11

As another example of inadequate responses, MCI failed altogether to respond to

12

the Commission’s Transport Question 6, which instructs carriers to identify the

13

dedicated transport facilities that they provide to other carriers (*i.e.*, the transport

14

facilities provided at wholesale). Rather than identify the facilities it *offers to*

15

*other carriers* at wholesale, [CLEC PROPRIETARY INFORMATION BEGINS]

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[CLEC PROPRIETARY INFORMATION ENDS] Verizon will continue its



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1 Pennsylvania. Given the conservative approach taken by Verizon in its initial  
2 testimony, it is not surprising that the CLECs have identified in response to the  
3 Commission's discovery scores of collocation arrangements that Verizon did not  
4 identify in its initial testimony. As explained in its initial testimony, Verizon  
5 included a collocation arrangement in its dedicated transport triggers case only if  
6 it had first determined, through a rigorous process of visual inspection and cross  
7 checks, that the arrangement was operational, *i.e.*, the carrier's collocation facility  
8 is provisioned and powered, and that the competing carrier has provisioned it with  
9 fiber optic cable. Of the 507 Verizon wire centers in the five LATAs in  
10 Pennsylvania, Verizon inspected less than 20%, and sought relief under the FCC's  
11 triggers for pairs of wire centers in only three LATAs. Indeed, Verizon believes  
12 that if carriers such as [CLEC PROPRIETARY INFORMATION BEGINS]  
13 [CLEC PROPRIETARY INFORMATION ENDS] provided  
14 information on their dedicated transport facilities (most if not all of which  
15 Verizon believes are offered at wholesale), Verizon would be able to identify  
16 even more CLEC fiber-fed collocation arrangements in its wire centers. [CLEC  
17 PROPRIETARY INFORMATION BEGINS]  
18  
19  
20  
21 [CLEC PROPRIETARY INFORMATION ENDS] Verizon believes that this is  
22 weighty evidence that there is considerable non-Verizon dedicated transport

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1 facilities that are offered to other carriers at wholesale but at this time remain  
2 unreported.

3 Q. Do The responses to the commission's discovery confirm Verizon's assumptions  
4 about how CLECs deploy and operate their dedicated transport facilities?

5  
6 A. Yes. The CLECs' discovery responses confirm a key assumption is Verizon's initial  
7 triggers case: that CLECs build OCn-level transport facilities capable of  
8 channelization to DS1 or DS3 capacity services. In fact, the overwhelming majority  
9 of CLECs to respond to the Commission's discovery requests acknowledged that,  
10 where they deployed their own transport facilities, they deployed fiber optic cable  
11 and then (unless the fiber remains dark) attached OCn optronics (*e.g.*, OC48  
12 multiplexers) and other electronic multiplexing equipment, to subdivide -- *i.e.*,  
13 channelize -- the OCn system into the transport levels, such as DS1s and DS3s,  
14 required by their customers.

15  
16 Additionally, the CLECs' responses to the Commission's discovery requests have  
17 generally confirmed that CLECs deploy their dedicated transport facilities in such a  
18 way that traffic can flow to all parts of the their networks, including to and from  
19 CLEC collocation arrangements at Verizon wire centers. Specifically, [CLEC  
20 PROPRIETARY INFORMATION BEGINS]

21  
22

[CLEC

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1 PROPRIETARY INFORMATION ENDS] This evidence that CLECs deploy fiber  
2 rings further validates Verizon’s assumption in its initial testimony that if the same  
3 carrier has operational, fiber-based facilities in two or more Verizon wire centers in a  
4 LATA, the Commission should assume that traffic can be routed around the ring  
5 from one Verizon wire center to the others. Indeed, [CLEC PROPRIETARY  
6 INFORMATION BEGINS]

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[CLEC

PROPRIETARY INFORMATION ENDS] The FCC’s regulations make clear that  
dedicated transport routes, for purposes of the triggers, “may pass through one or  
more intermediate wire centers or switches,” and that a “direct” connection between  
wire centers is not required. 47 C.F.R. §51.319(e) (A “route” is “a transmission path  
between one of an incumbent LEC’s wire centers or switches and another of the

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1 incumbent LEC's wire centers or switches. A route between two points (*e.g.*, wire  
2 center or switch 'A' and wire center or switch 'Z' may pass through one or more  
3 intermediate wire centers or switches (*e.g.*, wire center or switch 'X'). Transmission  
4 paths between identical points (*e.g.*, wire center or switch 'A' and wire center or  
5 switch 'Z') are the same 'route,' irrespective of whether they pass through the same  
6 intermediate wire centers or switches."); *see also* TRO ¶ 402 n.1246 (declaring that  
7 a transport route may connect wire centers and switches that are not directly  
8 connected to each other). Thus, [CLEC PROPRIETARY INFORMATION  
9 BEGINS]

10  
11 [CLEC PROPRIETARY INFORMATION ENDS]

12  
13 Furthermore, the FCC also explained in its regulations that the test is not, as AT&T  
14 claims, whether a carrier is actually sending traffic over a route directly or indirectly  
15 connecting Verizon wire centers; it is whether a route is "*operationally ready to*  
16 *provide transport into or out of*" Verizon's wire centers. TRO ¶ 406 (emphasis  
17 added). [CLEC PROPRIETARY INFORMATION BEGINS]

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[CLEC PROPRIETARY INFORMATION ENDS]

For all of these reasons, the CLEC discovery responses – including AT&T’s -- strongly support Verizon’s position in its initial testimony that the Commission should find that CLECs’ networks directly or indirectly connect together the dedicated transport facilities that Verizon has identified or that have now been acknowledged by the CLECs.

**V. HIGH CAPACITY LOOPS**

**Q. WHAT SUPPLEMENTAL EVIDENCE DOES VERIZON HAVE FOR THE ANALYSIS OF HIGH CAPACITY LOOP FACILITIES?**

A. In its *Triennial Review Order* (“TRO”), the FCC established that a state commission must find that competing carriers are not impaired without access to Verizon’s unbundled dark fiber, DS1, and DS3 loop facilities (or hi-cap loops) at specific customer locations if Verizon meets one of two objective “triggers.” In our October 31, 2003 testimony, we indicated that Verizon was unable to identify customer locations meeting the hi-cap loop triggers because information on CLEC loop deployment was in the hands of the CLECs. Since that time, Verizon has reviewed responses to its hi-cap loop discovery questions, and can identify customer locations

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1 in Pennsylvania that satisfy the hi-cap loop triggers.

2 **Q. PLEASE DESCRIBE THE FCC'S OBJECTIVE TRIGGERS FOR**  
3 **IDENTIFYING THE CUSTOMER LOCATIONS FOR WHICH**  
4 **COMPETING CARRIERS ARE NOT IMPAIRED WITHOUT ACCESS**  
5 **TO VERIZON'S HI-CAP LOOP FACILITIES.**

6  
7 A. In its *Triennial Review Order*, the FCC found that requesting carriers are impaired  
8 on a nationwide basis without access to unbundled dark fiber, DS1, and DS3 hi-cap  
9 loop facilities serving the enterprise market. *Triennial Review Order* ¶¶ 311-14,  
10 320-27. The FCC recognized, however, that competing carriers often self-provision  
11 hi-cap facilities or obtain them on a wholesale basis from carriers other than the  
12 ILEC. *Id.* ¶¶ 328-39. Consequently, the FCC authorized the state commissions to  
13 determine the specific customer locations that meet one of two objective triggers —  
14 which show that CLECs are already providing non-ILEC hi-cap loop facilities,  
15 either to themselves (self-provisioning trigger) or to other carriers (wholesale  
16 trigger). If a state commission finds that either trigger is met for a specific loop  
17 capacity at a specific customer location, the state commission must make a finding  
18 of non-impairment, and the ILEC will no longer be required to unbundle that loop  
19 capacity to that customer location. *Triennial Review Order* ¶ 328; *see also* 47  
20 C.F.R. §51.319(a)(4)-(6). In other words, when a customer location meets one of  
21 the FCC's triggers, the state commission conducting the customer location-specific  
22 review *must* find that the FCC's national finding of impairment has been overcome  
23 for the relevant loop capacity at that location.

24

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1           The first of the FCC triggers looks at whether competing carriers have *self-deployed*  
2           or *self-provisioned* dark fiber or DS3 capacity loop facilities. Under the self-  
3           provisioning trigger for dark fiber, the Commission must find no impairment if *two*  
4           or *more* unaffiliated competing carriers have deployed to a particular customer  
5           location their own dark fiber facilities. *Triennial Review Order* ¶¶ 332-334; 47  
6           C.F.R. § 51.319(a)(6)(i). Dark Fiber obtained under a long-term indefeasible right  
7           of use is considered to be that carrier's own fiber for purpose of applying the self-  
8           provisioning trigger. *Triennial Review Order* ¶ 333 n. 981; 47 C.F.R. §  
9           51.319(a)(6)(i). Under the self provisioning trigger for DS3 loop facilities, the  
10          Department must find no impairment if *two or more* unaffiliated competing carriers  
11          have (i) deployed to a particular customer location their own dark fiber facilities and  
12          are serving customers via those facilities at that location, or (ii) deployed DS3  
13          facilities by attaching its own optronics to activate dark fiber facilities obtained  
14          under a long-term indefeasible right of use and is serving customer via those  
15          facilities at that location. *Triennial Review Order* ¶¶ 332-334; 47 C.F.R. §  
16          51.319(a)(5)(i)(A).

17  
18          The second FCC trigger looks at whether DS1 or DS3 loop facilities are available  
19          from other carriers on a *wholesale* basis. Under this test, competing carriers are not  
20          impaired without access to Verizon's DS1 or DS3 facilities if there are *two* or more  
21          competing providers (including intermodal providers of service comparable in  
22          quality to the ILEC) not affiliated with each other or the ILEC each (i) has deployed

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1 its own DS1 or DS3 facilities; (ii) offers a DS1 or DS3 loop over its own facilities on  
2 a widely available wholesale basis to other carriers desiring to serve customers at  
3 that location; and (ii) has access to the entire customer location (including each  
4 individual unit within that location). *Triennial Review Order* ¶ 337; 47 C.F.R. §  
5 51.319(a)(4)(ii), 47 C.F.R. § 51.319(a)(5)(i)(B). Dark fiber obtained on an  
6 unbundled, leased, or purchased basis from another carrier counts as the buying  
7 carrier's own DS1 or DS3 loop facility if that carrier attaches its own electronics and  
8 offers the activated fiber at wholesale. *Id.*

9 **Q. WHAT IS A CUSTOMER LOCATION?**

10  
11 A. The FCC distinguishes between “customer locations” and individual units within  
12 that location. *See Triennial Review Order* ¶ 337. This distinction indicates that a  
13 customer location is a building, not an individual unit or suite in a multi-unit  
14 building. Based on their discovery responses, the CLECs in Pennsylvania agree.  
15 Verizon specifically asked them to identify the “customer locations” to which they  
16 have deployed loop facilities, and in response, the CLECs provided the addresses of  
17 specific buildings.

18 **Q. THE FCC'S TWO TRIGGERS APPLY TO DIFFERENT “CAPACITIES”**  
19 **OF LOOPS. WHAT DETERMINES THE CAPACITY AT WHICH FIBER**  
20 **LOOP FACILITIES OPERATE?**

21  
22 A. The capacity of a fiber optic loop is almost exclusively based on the equipment that  
23 a carrier attaches to activate or “light” the fiber. *See Triennial Review Order* ¶311.  
24 As the FCC found in its *Triennial Review Order*, when carriers self-deploy fiber  
25 they predominantly do so at the OCn level. *Id.* ¶ 298. Indeed, the underlying

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1 capacity of a strand of dark fiber is comparable in total capacity to an OCn loop,  
2 which can operate at a wide range of capacities. *See id.* ¶ 311. Many CLECs that  
3 serve customers over their own DS1 loops have previously deployed an OCn level  
4 facility that they are using to serve other customers at lower loop capacity levels. *Id.*  
5 n. 859. Fiber optic cable is also “channelized”— that is, larger capacity facilities are  
6 subdivided into smaller capacity facilities — by attaching the appropriate electronics  
7 at both ends of the fiber cable to provide these various capacities. For example,  
8 lower capacity DS1 and DS3 facilities are channelized simultaneously within the  
9 larger capacity OC12 or OC48 facility. The electronic equipment used to activate  
10 these various levels of capacity is widely available.

11 **Q. WHAT DOES IT MEAN TO OPERATE A FIBER OPTIC LOOP**  
12 **FACILITY AT OCN, DS1, OR DS3 LEVELS OF CAPACITY?**

13  
14 A. As with transport, OCn loops refer to the technical distinction (*i.e.*, Optical Carrier  
15 or “OC”) and the capacity (*i.e.*, “n”) of fiber optic cable. For example, an optical  
16 carrier-level 3 — or OC3, capacity circuit contains the equivalent of up to three DS3  
17 circuits (an OC3 is approximately 155 Mbps, while three DS3s are 135 Mbps), but  
18 terminates on a different type of electronic interface.

19  
20 DS1 and DS3 loops likewise refer to the technical distinction (*i.e.*, Digital Signal or  
21 “DS”) and capacity. The elemental speed is a DS0, which is a voice grade line with  
22 a bandwidth of 64 Kbps. A DS1 capacity circuit contains the equivalent of 24 voice-  
23 grade or DS0 channels. A DS3 capacity circuit contains the equivalent of 28 DS1

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1 channels or 672 DS0 channels.

2 **Q. THE FCC'S LOOP TRIGGERS ARE SEPARATELY APPLIED TO DARK**  
3 **FIBER FACILITIES. WHAT IS DARK FIBER?**

4  
5 A. Dark fiber is the unused fiber within an existing fiber optic cable that has not yet  
6 been activated through optronics to render it capable of carrying communications  
7 services. *Triennial Review Order* ¶ 311. Dark fiber has virtually unlimited  
8 capacity, and it is the electronics that define the capacity. *Id.* n. 909.

9 **Q. DID ALL OF THE CLECS PROVIDE THE INFORMATION**  
10 **REQUESTED IN VERIZON'S HI-CAP LOOP DISCOVERY REQUESTS?**

11  
12 A. No. For example, some CLECs did not identify the capacity of the loops identified  
13 in response to Verizon Interrogatory 1. In these instances, Verizon assumed (and the  
14 Commission should find) that these carriers have provisioned dark fiber, DS1, and  
15 DS3 loops unless they present evidence to the contrary.

16 **Q. PLEASE DESCRIBE VERIZON'S EVIDENCE OF CUSTOMER**  
17 **LOCATIONS IN PENNSYLVANIA THAT MEET THE FCC'S HI-CAP**  
18 **LOOP TRIGGERS.**

19  
20 A. Verizon has evidence that 63 customer locations meet one or both of the FCC's  
21 triggers. There are 3 customer locations that meet the DS1 wholesale trigger. With  
22 respect to DS3 loops, 61 customer locations meet the self-provisioning trigger, and  
23 36 meet the wholesale trigger. Finally, there are 57 customer locations meeting the  
24 dark fiber self-provisioning trigger. Exhibit 7 identifies each customer location  
25 meeting the triggers. The proprietary version of this attachment identifies the  
26 CLECs with loop facilities at each customer location. CLEC names are removed  
27 from the public version of Exhibit 7.

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1   **Q.    CAN ANY FIBER LOOP FACILITY DEPLOYED BY A CLEC BE USED**  
2   **TO PROVIDE A DS1 OR DS3 LOOP?**

3  
4   **A.**    Yes. In identifying the customer locations meeting the FCC’s triggers, Verizon  
5           made the reasonable assumption that when competing carriers deploy fiber and  
6           attach OCn electronics (*e.g.*, OC48 multiplexers), they then subdivide — *i.e.*,  
7           channelize — the OCn system into the lower transport levels required by their  
8           customers, including DS3s and DS1s. For example, based on one CLEC’s  
9           representation that all customer locations identified in response to the Commission’s  
10          loop discovery questions contain at least one OCn loop, Verizon assumed that each  
11          loop facility identified as serving that CLEC’s retail customers can do so at the DS1  
12          or DS3 level. This is consistent with the FCC’s finding (discussed above) that many  
13          CLECs that serve customers over their own DS1 loops have previously deployed an  
14          OCn level facility that they are using to serve other customers at lower loop capacity  
15          levels. *Id.* n. 859.

16  
17          While fiber loop facilities are capable of operating at various levels of capacity, the  
18          capacity of the fiber is almost entirely a function of the electronics that a carrier  
19          attaches, not something inherent in the fiber itself. Once the fiber is deployed, it is  
20          operated at a DS1, DS3, OC48 or higher level — or at all of these levels  
21          simultaneously — simply by changing the electronics. The electronics used to  
22          channelize the OCn system to DS1 and DS3 transport levels are commonly  
23          available.

**Direct Testimony of Harold E. West, III  
and Carlo Michael Peduto, II  
on behalf of Verizon Pennsylvania Inc. and Verizon North Inc.  
Pa PUC Docket No. I-00030099  
December 19, 2003**

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Verizon’s assumption that competing carriers who deploy fiber optics generally build OCn level transport facilities, capable of channelization to DS1 or DS3, is consistent with standard industry practice. Few if any carriers deploy fiber loop facilities to accommodate *only* a DS1 or *only* a DS3. To the contrary, as the FCC found in its *Triennial Review Order*, carriers deploying fiber predominantly do so at the OCn level. *Triennial Review Order* ¶ 298. For example, one CLEC’s discovery responses indicate that it generally deploys loops at the OCn level. Verizon likewise generally deploys loops at OCn capacity. These OCn facilities are then subdivided or channelized to a DS1 or DS3 level because these are the levels at which service is typically requested by end user customers that use hi-cap facilities.

The assumptions underlying Verizon’s self-deployment trigger case are entirely consistent with the way fiber loop facilities commonly are constructed and operated. The Commission therefore should find that CLECs who have deployed fiber optic loop facilities have provisioned DS1 and DS3 circuits — unless a carrier shows, for a particular customer location, that it does not have any DS1 or DS3 circuits at that location.

- Q. DO THESE FIBER LOOP FACILITIES ALSO CONTAIN DARK FIBER?**
- A. Absent evidence to the contrary, it reasonably can be assumed that all self-provisioned loop facilities have dark fiber. Since dark fiber is simply fiber optic cable “that has not been activated through connections to optronics that light it, and

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1           thereby render it capable of carrying communications,” (*Triennial Review Order* ¶  
2           311), all fiber loop facilities, regardless of the capacities at which they now operate,  
3           once consisted entirely of dark fiber. Put differently, evidence of “lit” fiber is also  
4           evidence that a carrier has self-provisioned dark fiber.

5  
6           Additionally, as a matter of standard industry network engineering design and sound  
7           economics, the vast majority of self-provisioned fiber loop facilities will have spare  
8           dark fibers. As the FCC recognized, dark fiber exits in a carrier’s network as unused  
9           fiber available because that carrier has deployed fiber in the first instance for the  
10          express purpose of lighting certain strands of it to serve a particular customer  
11          location. *Triennial Review Order* ¶ 312. The FCC explained,

12                   When a fiber build decision is made, carriers take  
13                   advantage of the fact that they are already incurring  
14                   substantial fixed costs to obtain the rights-of-way, dig up  
15                   streets, and trench cable, to lay more fiber than they  
16                   immediately need. Once the significant fiber construction  
17                   cost is incurred, the record reflects that it is relatively easy  
18                   and inexpensive to install fiber strands in excess of current  
19                   demand at that time to maximize the use of conduit and  
20                   avoid the need to incur duplicate costs to retrench the same  
21                   location in the future if demand for additional fiber  
22                   facilities occurs.

23          *Id.*

24  
25          Thus, fiber facilities are always installed with extra fiber to meet projected demand  
26          growth. Furthermore, fiber cables are commonly manufactured and deployed in  
27          increments of 12 fiber strands (i.e., 12, 24, 48, etc., fibers per cable). Verizon

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1           therefore assumed (and the Commission should find) that CLECs who have  
2           deployed fiber optic loop facilities also have dark fiber deployed at that location—  
3           unless a carrier shows, for a particular customer location, that it does not have any  
4           dark fiber.

5   **Q.   HOW DID VERIZON IDENTIFY CARRIERS OFFERING LOOP**  
6   **FACILITIES ON A WHOLESALE BASIS, AND THE CAPACITIES AT**  
7   **WHICH THOSE FACILITIES ARE OFFERED?**

8  
9   **A.**   In response to Verizon Interrogatories 2 and 5, CLECs identified the suppliers of  
10          facilities they have obtained at wholesale from a non-ILEC. If a carrier is willing to  
11          offer loops at some customer locations, the Commission should assume that it is  
12          willing to do so at all customer locations—unless a carrier indicates that it is not.

13  
14          Verizon was also able to evidence of CLEC wholesale providers from public  
15          sources. As with its transport evidence, Verizon identified carriers that hold  
16          themselves out as wholesale providers on their websites. For example:

- 17                   • MCI offers wholesale telecommunications services.<sup>3</sup>
- 18                   • RCN’s Chief Strategy Officer indicates on its website that it is “seeking  
19                   opportunities to wholesale the excess capacity of RCN’s fiber-optic  
20                   Megaband Network, improving the company’s product offerings and  
21                   adding to its bundles.”<sup>4</sup>
- 22                   • XO offers “Wholesale Dial Up,” which allows CLECs “rapidly expand

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<sup>3</sup> [www.mci.com/telecom\\_wholesale/index.jsp](http://www.mci.com/telecom_wholesale/index.jsp) (included as Exhibit 8).

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1 [their] nationwide dial capacity and increase [their] coverage area,  
2 without building or managing [their] own *nationwide* dial network.”<sup>5</sup>

3 If a carrier publicly holds itself out as a wholesale provider— and does not limit its  
4 representation to particular locations or to exclude loops —Verizon identified the  
5 carrier as a wholesale provider.

6  
7 Finally, Verizon assumes that a carrier that has deployed fiber loop facilities and is  
8 willing to provide those facilities to other carriers is providing (or is willing to  
9 provide) various levels of capacity at wholesale, including dark fiber, DS1, and DS3.  
10 Therefore, unless there is specific evidence that a carrier refused to sell other carriers  
11 specific capacities and dark fiber on a particular transport route, the Department  
12 should find that a wholesale provider will sell DS1 and DS3 transport over its fiber  
13 facilities, as well as dark fiber.

14  
15 Based on the discovery responses and carrier websites, Verizon has identified four  
16 CLECs as offering loop facilities on a wholesale basis. If these carriers wish to

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4 [www.rcn.com/investor/leadership\\_operational.php](http://www.rcn.com/investor/leadership_operational.php). (included as Exhibit 9).

5 <http://answers.xo.com/xo/ui/vic.asp?num=0&ty=1&ref=http%3A//answers.xo.com/xo/ui/query.asp%3Fquery%3Dxo+wholesale+dial-up%253F&question=null&C0=All%20Topics&C1=All%20Topics&quid=1&answer=XO%E2%84%A2%20Wholesale%20Dial&ctxid=967%3A447.465%2C1165.1312%2C1722.1891%2C2297.2339%2C2340.2529%2C2674.2707%2C724.900%2C901.1051%23Goto447&url=http%3A//www.xo.com/products/smallgrowing/internet/dial/wholesale/index.html> (emphasis added) (Attached as Exhibit 10).

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1 attempt to show that a specific location is not available at wholesale, the burden is  
2 now properly put on them to make such a demonstration. Absent such  
3 particularized, location-specific evidence, however, they should rely on Verizon's  
4 evidence of a carrier's general willingness to offer its loop facilities on a wholesale  
5 basis and treat all such carriers' loop facilities as available for leasing at wholesale.

6 **Q. HOW DID VERIZON IDENTIFY WHETHER CLECS HAVE ACCESS TO**  
7 **AN ENTIRE CUSTOMER LOCATION?**

8  
9 A. In response to Verizon's Interrogatories, two CLECs identified specific customer  
10 locations where they do not have access to the entire building. It is reasonable to  
11 assume that absent such evidence, the remaining CLECs have access to the entire  
12 location. Specifically, it is reasonable to assume that a carrier with fiber optic  
13 facilities into a large commercial building has access to the entire building. Most, if  
14 not all, commercial properties designate a location, often called the "Minimum Point  
15 of Entry" (MPOE) into which all carriers serving the building bring facilities and  
16 to/from which all customer premise equipment (*i.e.*, CPE) vendors serving  
17 occupants of the building arrange intra-building cabling to interface with these  
18 facilities. Typically, fiber entrance facilities into commercial properties enter via  
19 this MPOE.

20 **Q. HOW DID VERIZON IDENTIFY WHETHER CLECS SERVE END-USER**  
21 **CUSTOMERS OVER DS3 FACILITIES THEY HAVE DEPLOYED?**

22  
23 A. Verizon Interrogatories Nos. 7-9 asked the CLECs to identify which facilities are  
24 connected to a switch. Verizon assumed that any DS3 that is connected to a switch  
25 is serving an end-user customer. In such cases where a carrier has connected high

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1 capacity (OCn, DS3, DS1) transport facilities, through multiplexing equipment, to a  
2 switch, it is reasonable to assume that voice-grade equivalent (*i.e.*, DS0) traffic is  
3 being carried within the channels of the high capacity transport. Operationally, in  
4 the circuit-switched network, there is no other valid reason to connect such transport  
5 to a switch.

6

7 Verizon also assumed that CLECs are not serving customers in Verizon central  
8 offices and excluded them from its trigger analysis.

9

10 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT**  
11 **TESTIMONY?**

12

13 A. Yes.

**PENNSYLVANIA COMBINED RESULTS OF LOOP AND FACILITIES-BASED STUDIES  
AND DISCOVERY RESPONSES  
PUBLIC VERSION**

MSA	DENSITY ZONE	CLEC NAME	VERIZON COUNTS	CLEC COUNTS (note 1)	
Allentown-Bethlehem-Easton, PA-NJ	3	CLEC #057	317	(note 2)	
		CLEC #033	266	529	
		CLEC #045	39		
		CLEC #024	6,173	1,342	
		CLEC #008	515	779	
		CLEC #007	42,371	24,989	
		CLEC #053	2,735	133	
	3 Total		52,416	27,772	
Allentown-Bethlehem-Easton, PA-NJ Total			52,416	27,772	
Harrisburg-Carlisle, PA	3	CLEC #057	593	(note 2)	
		CLEC #024	2,068	355	
		CLEC #008	8,286	13,929	
		CLEC #071	365		
		CLEC #053	1,246	94	
	3 Total		12,558	14,378	
Harrisburg-Carlisle, PA Total			12,558	14,378	
Lancaster, PA	3	CLEC #024	725	133	
		CLEC #008	3,746	6,561	
		CLEC #071	2,432		
		CLEC #053	1,045	59	
	3 Total		7,948	6,753	
Lancaster, PA Total			7,948	6,753	
Lebanon, PA	3	CLEC #024	903	135	
		CLEC #008	453	595	
		CLEC #071	411		
	3 Total		1,767	730	
Lebanon, PA Total			1,767	730	
PhiilCLEC #057-Camden-Wilmington, PA-NJ-DE-MD	1	CLEC #057	156	(note 2)	
		CLEC #033	4,799	5,736	
		CLEC #003	1,392	534	
		CLEC #025	527	408	
		CLEC #045	1,690	2,372	
		CLEC #016	1		
		CLEC #008	4		
		CLEC #074	11		
		CLEC #026	1,140	955	
		CLEC #053	2,445	364	
		1 Total		12,165	10,369
	2	CLEC #057	218	(note 2)	
		CLEC #033	8,068	9,093	
		CLEC #003	1,450	1,087	
		CLEC #025	1,717	1,451	
		CLEC #045	10,297	11,242	
		CLEC #024	1		
		CLEC #016	22		
		CLEC #007	1	721	
	CLEC #026		30		
	CLEC #053	48			
		2 Total		21,822	23,624
	3	CLEC #057	1,413	(note 2)	
CLEC #033		12,707	20,041		
CLEC #003		6,694	4,382		
CLEC #025		4,321	3,754		
CLEC #045		13,379	16,077		
CLEC #016		91			
CLEC #008		402	405		
CLEC #071		1,574	1,659		
CLEC #007		16,021	14,303		
CLEC #074		24			
CLEC #026		829	667		
CLEC #053	1,627	89			
	3 Total		59,082	61,377	
PhiilCLEC #057-Camden-Wilmington, PA-NJ-DE-MD Total			93,069	95,370	
Pittsburgh, PA	1	CLEC #033	1,832	2,591	
		CLEC #003	787	453	
		CLEC #024	5,072	690	
		CLEC #016	246	(note 3)	
		CLEC #???		846	
		CLEC #012	2,085	5,330	

**PENNSYLVANIA COMBINED RESULTS OF LOOP AND FACILITIES-BASED STUDIES  
AND DISCOVERY RESPONSES  
PUBLIC VERSION**

MSA	DENSITY ZONE	CLEC NAME	VERIZON COUNTS	CLEC COUNTS (note 1)
		CLEC #026	1,143	708
	1 Total		11,165	10,418
	2	CLEC #033	1,315	2,424
		CLEC #003	148	101
		CLEC #024	6,082	959
		CLEC #016	35,489	8
		CLEC #012	1,450	3,075
	2 Total		44,746	6,864
	3	CLEC #057	1	(note 2)
		CLEC #033	1,387	2,634
		CLEC #003	974	628
		CLEC #024	14,538	2,465
		CLEC #016	66,070	11,919
		CLEC #064	35	
		CLEC #012	2,873	8,270
	CLEC #026	1,021	813	
3 Total		86,899	26,729	
Pittsburgh, PA Total			142,810	44,011
Reading, PA	3	CLEC #008	4,235	6,220
		CLEC #071	4,100	4,407
		CLEC #007	1	
		CLEC #053	1,341	14
3 Total		9,677	10,641	
Reading, PA Total			9,677	10,641
Scranton--Wilkes-Barre, PA	3	CLEC #057	180	(note 2)
		CLEC #024	3,409	650
		CLEC #008	11,955	38,136
		CLEC #007	2	
		CLEC #053	813	68
3 Total		16,359	38,854	
Scranton--Wilkes-Barre, PA Total			16,359	38,854
Grand Total			336,604	238,509

(note 3)

(note 3)

**Note 1:** Where the CLEC identified line counts by wire center in response to Commission Preliminary Discovery Requests, Appendix A, Switching Question #5, Verizon counted the data responsive to subparts (a) and (b). Where the CLEC did not provide a response to Switching Question #5 at the wire center level, Verizon used the line counts in response to Switching Question #3. Differences in Verizon Counts and CLEC Counts may be due to a variety of factors, including but not limited to the different time frames in which the information was gathered (Verizon Line Count Study counts are from September 2003, and the facilities-based counts are as of June 2003).

**Note 2:** CLEC #074 and CLEC #064 have not provided responses to the Commission Preliminary Discovery Requests, Appendix A, Switching Questions, and CLEC #057 did not provide information sufficient to identify the wire center location of CLEC #057's customers, nor did it provide the number of voice-grade-equivalent lines it uses to serve customers in Pennsylvania.

**Note 3:** The CLEC totals by Density Zone are based on wire center level data, which are tabulated in Part 2 of Attachment 1. CLEC #016, however, provided responses to the Commission Preliminary Discovery Requests, Appendix A, Switching Questions by providing data at the rate center level, not by wire centers. Therefore, Verizon included specific line counts by wire center as "CLEC Counts" in Part 2 of Attachment A only where the rate center identified by CLEC #016 corresponded to a single Verizon wire center. As a result, the CLEC counts for CLEC #016 above do not include the following line counts in the following density zones:

MSA	DENSITY ZONE	CLEC NAME	VERIZON COUNTS
Pittsburgh, PA	1	CLEC #016	20
	2	CLEC #016	709
	3	CLEC #016	595

**PENNSYLVANIA COMBINED RESULTS OF LOOP AND FACILITIES-BASED STUDIES  
AND DISCOVERY RESPONSES  
PUBLIC VERSION**

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)			
Allentown-Bethlehem-Easton, PA-NJ	3	ALTWPAAL	ALLENTOWN PA	CLEC #057 CLEC #033 CLEC #024 CLEC #008 CLEC #007 CLEC #053	309 231 2,077 299 9,308 1,344	(note 2) 399 455 386 5,184 121			
		ALTWPAAL Total				13,568	6,545		
		ALWPAAMT	MOUNTAINVILLE PA	CLEC #024 CLEC #008 CLEC #007	353 1,791	86 16 1,811			
		ALWPAAMT Total				2,144	1,913		
		BHLHPABE	BETHLEHEM PA	CLEC #057 CLEC #024 CLEC #008 CLEC #007 CLEC #053	8 1,466 133 16,454 1,391	(note 2) 316 264 6,793 12			
		BHLHPABE Total				19,452	7,385		
		CTSQPACT	CATASAUQUA PA	CLEC #024 CLEC #007	414 3,085	88 2,171			
		CTSQPACT Total				3,499	2,259		
		ESTNPAEA	EASTON PA	CLEC #033 CLEC #045 CLEC #024 CLEC #007	35 39 969 10,254	130 216 7,194			
		ESTNPAEA Total				11,297	7,542		
		KHVLPAPU	KUHNSTOWN PA	CLEC #024 CLEC #008 CLEC #007	894 83 1,479	179 113 1,836			
		KHVLPAPU Total				2,456	2,128		
		<b>3 Total</b>				<b>52,416</b>	<b>27,772</b>		
		<b>Allentown-Bethlehem-Easton, PA-NJ Total</b>				<b>52,416</b>	<b>27,772</b>		
		Harrisburg-Carlisle, PA	3	CPHLPACH	CAMP HILL PA	CLEC #057 CLEC #024 CLEC #008 CLEC #071 CLEC #053	191 423 1,168 51 586	(note 2) 77 1,363 5	
				CPHLPACH Total				2,419	1,445
				ENOLPAEN	ENOLA PA	CLEC #008	456	497	
ENOLPAEN Total				456	497				
HRBGPAHA	HARRISBURG PA			CLEC #057 CLEC #024 CLEC #008 CLEC #071 CLEC #053	241 517 2,041 208 660	(note 2) 70 6,966 89			
HRBGPAHA Total				3,667	7,125				
HRSHPAXH	HERSHEY			CLEC #057 CLEC #008	1 570	(note 2) 656			
HRSHPAXH Total				571	656				
MBRGPAME	MECHANICSBURG PA			CLEC #057 CLEC #024 CLEC #008 CLEC #071	160 300 963 106	(note 2) 59 1,088			
MBRGPAME Total				1,529	1,147				
NCLDPANC	NEW CUMBERLAND PA			CLEC #008	463	513			
NCLDPANC Total				463	513				
PXTGPAPG	PAXTANG PA			CLEC #024 CLEC #008	208 793	30 867			
PXTGPAPG Total				1,001	897				
PXTNPAPA	PAXTONIA PA			CLEC #024 CLEC #008	349 1,832	58 1,871			
PXTNPAPA Total				2,181	1,929				
SLTNPAST	STEELTON PA			CLEC #024 CLEC #008	271 108	61 108			
SLTNPAST Total				271	169				
<b>3 Total</b>				<b>12,558</b>	<b>14,378</b>				
<b>Harrisburg-Carlisle, PA Total</b>				<b>12,558</b>	<b>14,378</b>				
Lancaster, PA	3	EPBGPAEP	EAST PETERSBURG PA	CLEC #008	872	970			
		EPBGPAEP Total				872	970		
		LNCSPALA	LANCASTER PA	CLEC #024 CLEC #008 CLEC #071 CLEC #053	565 2,874 2,207 1,045	99 5,558 59			
		LNCSPALA Total				6,691	5,716		
		WLSTPAWS	WILLOW STREET PA	CLEC #024 CLEC #008 CLEC #071	180 225	34 33			
		WLSTPAWS Total				385	67		
<b>3 Total</b>				<b>7,948</b>	<b>6,753</b>				
<b>Lancaster, PA Total</b>				<b>7,948</b>	<b>6,753</b>				
Lebanon, PA	3	LBNNPAES	LEBANON PA	CLEC #024 CLEC #008 CLEC #071	603 453 411	135 595			
		LBNNPAES Total				1,767	730		
		<b>3 Total</b>				<b>1,767</b>	<b>730</b>		
<b>Lebanon, PA Total</b>				<b>1,767</b>	<b>730</b>				

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)		
Phi CLEC #057-Camden-Wilmington, PA-NJ-DE-MD	1	PHLAPABA	BALDWIN PA	CLEC #033 CLEC #003	381 83	426 62		
		PHLAPABA Total			464	488		
		PHLAPALO	LOCUST PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #008 CLEC #026 CLEC #053	89 1,691 458 273 4 908 1,300	(note 2) 2,289 132 487 729 147		
		PHLAPALO Total			4,723	3,764		
		PHLAPAMK	MARKET PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #016 CLEC #074 CLEC #026 CLEC #053	27 1,651 385 527 478 1 11 232 767	(note 2) 1,710 103 408 877  (note 2) 202 217		
		PHLAPAMK Total			4,079	3,517		
		PHLAPAPE	PENNYPACKER PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #026 CLEC #053	40 1,078 355 348 378	(note 2) 1,311 174 358 24		
		PHLAPAPE Total			2,197	1,887		
		PHLAPAPO	POPLAR PA	CLEC #003 CLEC #045	111 591	63 670		
		PHLAPAPO Total			702	733		
		1 Total			12,165	10,369		
		2	2	PHLAPACH	CHESTNUT HILL PA	CLEC #033 CLEC #003 CLEC #045	394 6 351	703 6 410
				PHLAPACH Total			745	1,119
				PHLAPADB	DAVENPORT PA	CLEC #033	349	460
				PHLAPADB Total			349	460
				PHLAPADE	DEWEY PA	CLEC #057 CLEC #033 CLEC #045	18 1,061 901	(note 2) 1,048 1,034
				PHLAPADE Total			1,580	2,082
				PHLAPAEV	EVERGREEN PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #016	23 572 91 271 3	(note 2) 521 68 267
				PHLAPAEV Total			960	856
	PHLAPAEW			EASTWICK PA	CLEC #016	2	2	
	PHLAPAEW Total				2	2		
	PHLAPAGE			GERMANTOWN PA	CLEC #057 CLEC #033 CLEC #045 CLEC #026	24 565 617	(note 2) 776 611 30	
	PHLAPAGE Total				1,206	1,417		
	PHLAPAIV			IVYRIDGE PA	CLEC #007	1	721	
	PHLAPAIV Total				1	721		
	PHLAPAJE			JEFFERSON PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045	7 1,026 64 702 1,327	(note 2) 1,089 49 586 1,535	
	PHLAPAJE Total				3,128	3,259		
	PHLAPAKR			KNIGHTS ROAD PA	CLEC #057 CLEC #003 CLEC #045	9 35 326	(note 2) 18 380	
	PHLAPAKR Total				370	398		
	PHLAPAMY			MAYFAIR PA	CLEC #033 CLEC #003 CLEC #045	723 232 1,059	815 191 1,235	
	PHLAPAMY Total				2,014	2,241		
	PHLAPAOR			ORCHARD PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045	88 780 197 442 819	(note 2) 1,012 122 396 1,034	
	PHLAPAOR Total				2,336	2,564		
	PHLAPAPI			PILGRIM PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #053	8 614 179 758 48	(note 2) 647 142 795	
	PHLAPAPI Total				1,607	1,584		
	PHLAPARE			REGENT PA	CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #016	934 203 573 976 1	872 169 469 994	
	PHLAPARE Total				2,687	2,504		

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)
		PHLAPASA	SARATOGA PA	CLEC #003 CLEC #045 CLEC #016	110 469 3	97 435
		PHLAPASA Total			582	532
		PHLAPASH	SHERWOOD PA	CLEC #003 CLEC #045 CLEC #024 CLEC #016	232 101 818 1 6	255 68 850
		PHLAPASH Total			1,158	1,173
		PHLAPATR	TRINITY PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #016	15 325 105 705 6	(note 2) 354 52 696
		PHLAPATR Total			1,156	1,112
		PHLAPAWV	WAVERLY PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045	16 493 133 900	(note 2) 541 95 966
		PHLAPAWV Total			1,542	1,602
	2	Total			21,822	23,624
	3	AMBLPAAM	AMBLER PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #074 CLEC #026	117 768 469 500 496 2 42	(note 2) 1,441 181 401 694 (note 2) 45
		AMBLPAAM Total			2,394	2,762
		ARMRPAAR	ARDMORE PA	CLEC #033 CLEC #003 CLEC #045 CLEC #026	376 285 179 67	553 183 198 52
		ARMRPAAR Total			907	886
		BCYNPABC	CYNWYD PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #007 CLEC #026	15 670 400 161 12 81	(note 2) 862 252 268 33
		BCYNPABC Total			1,339	1,415
		BRSTPABR	BRISTOL PA	CLEC #003 CLEC #045 CLEC #007	213 309 2	175 377
		BRSTPABR Total			624	652
		BRYMPABM	BRYN MAWR PA	CLEC #003 CLEC #045 CLEC #016	319 133 9	165 168
		BRYMPABM Total			461	333
		CGVLPACL	COLLEGEVILLE PA	CLEC #053	4	4
		CGVLPACL Total			4	
		CHESPACA	CHESTER A PA	CLEC #003 CLEC #045 CLEC #007	230 324 337	124 301 328
		CHESPACA Total			891	753
		CHESPACB	CHESTER B PA	CLEC #007	167	
		CHESPACB Total			167	
		CHTTPACT	CHESTER HEIGHTS PA	CLEC #057 CLEC #003 CLEC #045 CLEC #007	25 38 190 1	(note 2) 1 216
		CHTTPACT Total			252	217
		CHVLPACH	CHURCHVILLE PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #074 CLEC #026	86 1,093 499 498 6 90	(note 2) 1,850 350 446 (note 2) 93
		CHVLPACH Total			2,272	2,739
		CNSHPACN	CONSHOHOCKEN PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045 CLEC #053	21 882 4 549 152	(note 2) 1,617 4 591 8
		CNSHPACN Total			1,404	2,220
		DWTWPADT	DOWNINGTOWN PA	CLEC #003 CLEC #016	93 20	90
		DWTWPADT Total			113	90
		DYTWPADB	DOYLESTOWN PA	CLEC #045	620	647
		DYTWPADB Total			620	647
		EDTNP AED	EDDINGTON PA	CLEC #057 CLEC #003	29 468	(note 2) 294
		EDTNP AED Total			497	294
		EXTNP AEX	EXTON PA	CLEC #057 CLEC #045 CLEC #016 CLEC #026	85 133 3	(note 2) 122
		EXTNP AEX Total			221	139

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)
		GLLDPAGN	GLENOLDEN PA	CLEC #033 CLEC #003 CLEC #045 CLEC #007	362 271 505 6,635	474 217 488 5,476
		GLLDPAGN Total			7,773	6,655
		HRLVPAHV	HARLEYSVILLE PA	CLEC #018	59	
		HRLVPAHV Total			59	
		HTBOPAHB	HATBORO PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #074 CLEC #028 CLEC #053	68 751 414 531 1,308 13 33 608	(note 2) 1,443 209 477 1,943 (note 2) 12 81
		HTBOPAHB Total			3,914	4,165
		JENKPAJK	JENKINTOWN PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045	174 1,126 407 479 608	(note 2) 1,335 307 386 669
		JENKPAJK Total			2,794	2,697
		KGPRPAKP	KING OF PRUSSIA PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #007 CLEC #026 CLEC #053	32 616 3 369 226 16 189 72	(note 2) 866 3 290 297 161 175
		KGPRPAKP Total			1,520	1,792
		KNSQPAKS	KENNETT SQUARE PA	CLEC #045	203	189
		KNSQPAKS Total			203	189
		KRLNPAKL	KIRKLYN PA	CLEC #033 CLEC #003 CLEC #007	471 339 2,784	631 261 2,114
		KRLNPAKL Total			3,594	3,006
		LANGPALA	LANGHORNE PA	CLEC #057 CLEC #033 CLEC #045	35 99 455	(note 2) 234 545
		LANGPALA Total			589	779
		LNOLPALD	LANSDALE PA	CLEC #057 CLEC #033 CLEC #003 CLEC #045	175 350 13 509	(note 2) 635 1 598
		LNOLPALD Total			1,047	1,234
		LNLPALN	LINE LEXINGTON PA	CLEC #045	301	350
		LNLPALN Total			301	350
		LNSDPALD	LANSDOWNE PA	CLEC #033 CLEC #045 CLEC #007	313 382 3,521	536 367 3,356
		LNSDPALD Total			4,216	4,259
		MEDIPAME	MEDIA PA	CLEC #033 CLEC #003	668 271	845 210
		MEDIPAME Total			939	1,055
		MRSLPAMV	MORRISVILLE PA	CLEC #045 CLEC #007	156 1	193
		MRSLPAMV Total			157	193
		NRTWPANR	NORRISTOWN PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #053	11 1,206 302 628 676 12	(note 2) 1,947 224 557 793
		NRTWPANR Total			2,835	3,521
		NWTWPANW	NEWTOWN PA	CLEC #045	362	443
		NWTWPANW Total			362	443
		PAOLPAPA	PAOLI PA	CLEC #057 CLEC #033 CLEC #003 CLEC #025 CLEC #045 CLEC #007 CLEC #028 CLEC #053	151 841 62 468 394 1 167 443	(note 2) 1,308 45 421 570 108
		PAOLPAPA Total			2,525	2,452
		PTTWPAPT	POTTSTOWN PA	CLEC #033 CLEC #003 CLEC #045 CLEC #008 CLEC #071	171 296 263 402 1,574	237 174 247 405 1,659
		PTTWPAPT Total			2,706	2,722
		PXVLPAPV	PHOENIXVILLE PA	CLEC #003 CLEC #045 CLEC #007 CLEC #028	221 161 161 6	144 176 752 6
		PXVLPAPV Total			382	1,078
		RDPKPARP	RIDLEY PARK PA	CLEC #057 CLEC #007	48 1,229	(note 2) 1,038

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)	
		RDPKPARP Total			1,277	1,038	
		RYFRPARF	ROYERSFORD PA	CLEC #045	136	137	
		RYFRPARF Total			136	137	
		SDTNPASD	SOUDERTON PA	CLEC #045	264	277	
		SDTNPASD Total			264	277	
		SPFDPASF	SPRINGFIELD PA	CLEC #033	413	536	
				CLEC #003	218	161	
				CLEC #045	246	235	
				CLEC #007	1,289	1,078	
		SPFDPASF Total			2,166	2,010	
		TRPRPATR	TROOPER PA	CLEC #057	48	(note 2)	
				CLEC #003	206	119	
				CLEC #045	362	485	
				CLEC #007	25		
		TRPRPATR Total			641	604	
		TULYPATU	TULLYTOWN PA	CLEC #057	96	(note 2)	
				CLEC #003	402	298	
				CLEC #045	585	712	
				CLEC #007	1		
		TULYPATU Total			1,084	1,010	
		WAYNPAWY	WAYNE PA	CLEC #057	47	(note 2)	
				CLEC #033	666	1,138	
				CLEC #003	35	19	
				CLEC #025	364	343	
				CLEC #045	75	145	
				CLEC #026	160	123	
				CLEC #053	136		
		WAYNPAWY Total			1,483	1,768	
		WCHSPAWC	WEST CHESTER PA	CLEC #057	82	(note 2)	
				CLEC #033	712	1,122	
				CLEC #003		9	
				CLEC #025	486	433	
				CLEC #045	1,099	1,376	
				CLEC #074	3	(note 2)	
				CLEC #026		3	
		WCHSPAWC Total			2,392	2,943	
		WGTNPAWR	WARRINGTON PA	CLEC #045	449	504	
		WGTNPAWR Total			449	504	
		WLGPRPAWG	WILLOW GROVE PA	CLEC #057	68	(note 2)	
				CLEC #033	353	431	
				CLEC #003	225	162	
				CLEC #045	399	545	
		WLGPRPAWG Total			1,045	1,138	
		YRDLPAYL	YAROLEY PA	CLEC #045	163	201	
		YRDLPAYL Total			163	201	
		3 Total			59,082	61,377	
PhiCLEC #057-Camden-Wilmington, PA-NJ-DE-MD Total					93,069	95,370	
Pittsburgh, PA		1	PITBPAAL	ALLENTOWN-PITT PA	CLEC #033	102	131
					CLEC #024	758	107
					CLEC #016	43	(note 3)
					CLEC #012	253	505
					CLEC #026	161	28
		PITBPAAL Total			1,317	771	
		PITBPADT	DOWNTOWN PA	CLEC #033	979	1,463	
				CLEC #003	469	213	
				CLEC #024	2,368	280	
				CLEC #016	10	(note 3)	
				CLEC #090		646	
				CLEC #012	1,005	2,796	
				CLEC #026	865	584	
		PITBPADT Total			5,696	5,982	
		PITBPANS	NORTH SIDE PA	CLEC #033	367	527	
				CLEC #024	595	85	
				CLEC #016	137	(note 3)	
				CLEC #012	353	736	
				CLEC #026		3	
		PITBPANS Total			1,452	1,351	
		PITBPAOK	OAKLAND PA	CLEC #033	384	470	
				CLEC #003	318	240	
				CLEC #024	898	137	
				CLEC #016	30	(note 3)	
				CLEC #012	416	852	
				CLEC #026	117	93	
		PITBPAOK Total			2,163	1,792	
		PITBPASQ	SQUIRREL HILL PA	CLEC #024	453	81	
				CLEC #016	25	(note 3)	
				CLEC #012	58	441	
		PITBPASQ Total			536	522	
		1 Total			11,165	10,418	
		2	BLLVPABE	BELLEVUE PA	CLEC #024	486	97
					CLEC #016	3,739	(note 3)
					CLEC #012	83	290
		BLLVPABE Total			4,308	387	
		BRDDPABR	BRADDOCK PA	CLEC #016	1,035	(note 3)	
		BRDDPABR Total			1,035		
		CRAFPACR	CRAFTON PA	CLEC #033	294	562	
				CLEC #003	112	80	
				CLEC #024	505	78	
				CLEC #016	3,752	(note 3)	

MSA	DENSITY ZONE	WIRE CENTER CCLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)
				CLEC #012	248	417
				CLEC #026	156	229
		CRAFPACR Total			5,067	1,366
		DRMTPADO	DORMONT PA	CLEC #033	249	605
				CLEC #003	36	19
				CLEC #024	1,370	240
				CLEC #016	3,819	(note 3)
				CLEC #012	314	715
		DRMTPADO Total			5,788	1,579
		HMSTPAHO	HOMESTEAD PA	CLEC #024	318	65
				CLEC #016	11	1
		HMSTPAHO Total			329	66
		MCRKPAMR	MCKEES ROCKS PA	CLEC #016	3,546	(note 3)
		MCRKPAMR Total			3,546	
		MLVAPAMI	MILLVALE PA	CLEC #016	1,475	(note 3)
		MLVAPAMI Total			1,475	
		PITBPACA	CARRICK PA	CLEC #033	234	262
				CLEC #024	596	112
				CLEC #016	6,206	(note 3)
				CLEC #012	80	346
		PITBPACA Total			7,116	720
		PITBPAEL	EAST LIBERTY PA	CLEC #033	119	181
				CLEC #003		2
				CLEC #024	677	65
				CLEC #016	112	7
				CLEC #012	268	493
		PITBPAEL Total			1,176	768
		SMSAPASH	SHARPSBURG PA	CLEC #033	232	529
				CLEC #024	913	142
				CLEC #016	2,444	(note 3)
				CLEC #012	236	563
				CLEC #026	106	68
		SMSAPASH Total			3,931	1,302
		WKBGPAWK	WILKINSBURG PA	CLEC #033	187	285
				CLEC #024	1,217	140
				CLEC #016	7,904	(note 3)
		WKBGPAWK Total			9,308	425
		WSVWPAWE	WEST VIEW PA	CLEC #016	1,445	(note 3)
				CLEC #012	221	251
		WSVWPAWE Total			1,666	251
	2 Total				44,746	8,864
	3	AMBRPAAM	AMBRIDGE PA	CLEC #016	1,884	1,421
		AMBRPAAM Total			1,884	1,421
		BADNPABA	BADEN PA	CLEC #016	1,777	925
		BADNPABA Total			1,777	925
		BGVLPABR	BRIDGEVILLE PA	CLEC #024	653	106
				CLEC #016	1,570	156
				CLEC #012	203	463
		BGVLPABR Total			2,426	735
		BTPKPABP	BETHEL PARK PA	CLEC #033	226	329
				CLEC #024	1,034	204
				CLEC #016	1,284	1,016
				CLEC #012	218	456
				CLEC #026		8
		BTPKPABP Total			2,762	2,013
		CARNPACA	CARNEGIE PA	CLEC #033	285	526
				CLEC #024	818	119
				CLEC #016	5,834	(note 3)
				CLEC #012	237	1,034
				CLEC #026	164	135
		CARNPACA Total			7,336	1,814
		CLRTPACL	CLAIRTON PA	CLEC #016	1,038	700
		CLRTPACL Total			1,038	700
		CRPLPACO	CORAOPOLIS PA	CLEC #033	164	493
				CLEC #003	64	4
				CLEC #024	905	155
				CLEC #016	38	11
				CLEC #012	112	939
		CRPLPACO Total			1,283	1,602
		DRVLPADO	DORSEYVILLE PA	CLEC #016	14	(note 3)
		DRVLPADO Total			14	
		ELZTPAET	ELIZABETH TOWNSHIP PA	CLEC #016	3,826	(note 3)
		ELZTPAET Total			3,826	
		GLNSPAGL	GLENSHAW PA	CLEC #024	638	123
				CLEC #018	4,540	722
				CLEC #012	266	472
		GLNSPAGL Total			5,444	1,317
		GNBGPAGR	GREENSBURG PA	CLEC #003	345	279
				CLEC #024	1,900	271
				CLEC #016	4,685	4,290
				CLEC #064	35	(note 2)
				CLEC #012	204	910
		GNBGPAGR Total			7,169	5,750
		IRWNPAIR	IRWIN PA	CLEC #024	1,109	214
				CLEC #016	5,473	5
		IRWNPAIR Total			6,582	219
		JNNTPAJE	JEANNETTE PA	CLEC #016	2,108	63
		JNNTPAJE Total			2,108	63
		MCMRPAMC	MCMURRAY PA	CLEC #024	635	130

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)
				CLEC #016	24	2
		MCMRPAMC Total			659	132
		MCPTPAMK	MCKEESPORT PA	CLEC #033	57	124
				CLEC #024	682	102
				CLEC #016	7,380	(note 3)
		MCPTPAMK Total			8,119	226
		MONSPAMO	MONESSEN PA	CLEC #016	1,557	11
		MONSPAMO Total			1,557	11
		MOVLPAMO	MONROEVILLE PA	CLEC #033	218	403
				CLEC #003	267	198
				CLEC #024	952	165
				CLEC #016	693	(note 3)
				CLEC #012	191	454
				CLEC #026	91	86
		MOVLPAMO Total			2,412	1,306
		NWKNPANK	NEW KENSINGTON PA	CLEC #033	143	204
				CLEC #024	567	108
				CLEC #012	100	129
		NWKNPANK Total			810	441
		OKMTPAOA	OAKMONT PA	CLEC #024	452	80
				CLEC #018	235	205
				CLEC #012	144	376
				CLEC #026	209	164
		OKMTPAOA Total			1,040	825
		PEHLPAPH	PENN HILLS PA	CLEC #057	1	
				CLEC #024	445	87
				CLEC #016	5,804	1,234
				CLEC #012	59	287
				CLEC #026	29	12
		PEHLPAPH Total			6,338	1,620
		PLHSPAPH	PLEASANT HILLS PA	CLEC #024	429	95
				CLEC #016	4,414	631
				CLEC #012	71	115
		PLHSPAPH Total			4,914	841
		PYVLPAPE	PERRYSVILLE PA	CLEC #033	155	280
				CLEC #003	56	24
				CLEC #024	1,472	209
				CLEC #016	6,206	510
				CLEC #012	673	1,776
				CLEC #026	201	175
		PYVLPAPE Total			8,763	2,954
		RBTPPART	ROBINSON TWP PA	CLEC #003	242	123
				CLEC #024	677	110
				CLEC #016	527	(note 3)
				CLEC #012	265	544
				CLEC #026	285	197
		RBTPPART Total			1,996	974
		SWKYPASE	SEWICKLEY PA	CLEC #016	1,600	7
				CLEC #012	130	315
		SWKYPASE Total			1,730	322
		TRCKPATC	TURTLE CREEK PA	CLEC #033	139	295
				CLEC #024	802	140
				CLEC #016	959	(note 3)
				CLEC #026	42	36
		TRCKPATC Total			1,942	471
		WMFLPAWM	WEST MIFFLIN PA	CLEC #024	370	47
				CLEC #016	2,600	(note 3)
		WMFLPAWM Total			2,970	47
		3 Total			86,899	26,729
Pittsburgh, PA Total					142,910	44,011
Reading, PA	3	LRDLPALB	LAURELDALE PA	CLEC #008	910	794
				CLEC #071	350	356
		LRDLPALB Total			1,260	1,150
		RDNGPARE	READING PA	CLEC #008	1,886	3,730
				CLEC #071	2,147	2,414
				CLEC #007	1	
				CLEC #053	1,341	14
		RDNGPARE Total			5,375	6,158
		SHLNPASH	SHILLINGTON PA	CLEC #008	925	1,024
				CLEC #071	467	475
		SHLNPASH Total			1,392	1,499
		SLWBPAOL	ST LAWRENCE PA	CLEC #071	601	619
		SLWBPAOL Total			601	619
		SNSPPASS	SINKING SPRINGS PA	CLEC #008	514	672
				CLEC #071	535	543
		SNSPPASS Total			1,049	1,215
		3 Total			9,677	10,641
Reading, PA Total					9,677	10,641
Scranton-Wilkes-Barre, PA	3	HZTNPAPHZ	HAZELTON PA	CLEC #024	518	106
				CLEC #008	1,464	2,722
		HZTNPAPHZ Total			1,982	2,828
		KGTPAES	KINGSTON PA	CLEC #024	370	71
				CLEC #008	1,156	8,825
				CLEC #007	1	
		KGTPAES Total			1,527	8,896
		OLYPPAOL	OLYPHANT PA	CLEC #024	294	84
				CLEC #008	451	511
		OLYPPAOL Total			745	595
		PTTNPAPI	PITTSTON PA	CLEC #024	226	53

MSA	DENSITY ZONE	WIRE CENTER CLLI	WIRE CENTER NAME	CLEC NAME	VERIZON COUNT	CLEC COUNT (note 1)
				CLEC #008	2,230	2,343
				CLEC #007	1	
		PTTNPAPI Total			2,457	2,396
		SCTNPASC	SCRANTON PA	CLEC #057	180	(note 2)
				CLEC #024	1,150	192
				CLEC #008	2,928	8,791
				CLEC #053	813	68
		SCTNPASC Total			5,071	9,051
		TAYLPATA	TAYLOR PA	CLEC #024	82	18
				CLEC #008		51
		TAYLPATA Total			82	69
		WLBPAWB	WILKES BARRE PA	CLEC #024	769	126
				CLEC #008	3,229	13,796
		WLBPAWB Total			3,998	13,922
		WYNGPAWY	WYOMING PA	CLEC #008	497	1,097
		WYNGPAWY Total			497	1,097
		3 Total			16,359	38,854
Scranton-Wilkes-Barre, PA Total					16,359	38,854
Grand Total					336,604	238,509

**Note 1:** Where the CLEC identified line counts by wire center in response to Commission Preliminary Discovery Requests, Appendix A, Switching Question #5, Verizon counted the data responsive to subparts (a) and (b). Where the CLEC did not provide a response to Switching Question #5 at the wire center level, Verizon used the line counts in response to Switching Question #3. Differences in Verizon Counts and CLEC Counts may be due to a variety of factors, including but not limited to the different time frames in which the information was gathered (Verizon Line Count Study counts are from September 2003, and the facilities-based counts are as of June 2003).

**Note 2:** CLEC #074 and CLEC #064 have not provided responses to the Commission Preliminary Discovery Requests, Appendix A, Switching Questions, and CLEC #057 did not provide information sufficient to identify the wire center location of CLEC #057's customers, nor did it provide the number of voice-grade-equivalent lines it uses to serve customers in Pennsylvania.

**Note 3:** The CLEC totals by Density Zone are based on wire center level data, which are tabulated in Part 2 of Attachment 1. CLEC #016, however, provided responses to the Commission Preliminary Discovery Requests, Appendix A, Switching Questions by providing data at the rate center level, not by wire centers. Therefore, Verizon included specific line counts by wire center as "CLEC Counts" in Part 2 of Attachment A only where the rate center identified by CLEC #016 corresponded to a single Verizon wire center. As a result, the CLEC counts for CLEC #016 above do not include the following line counts in the following density zones:

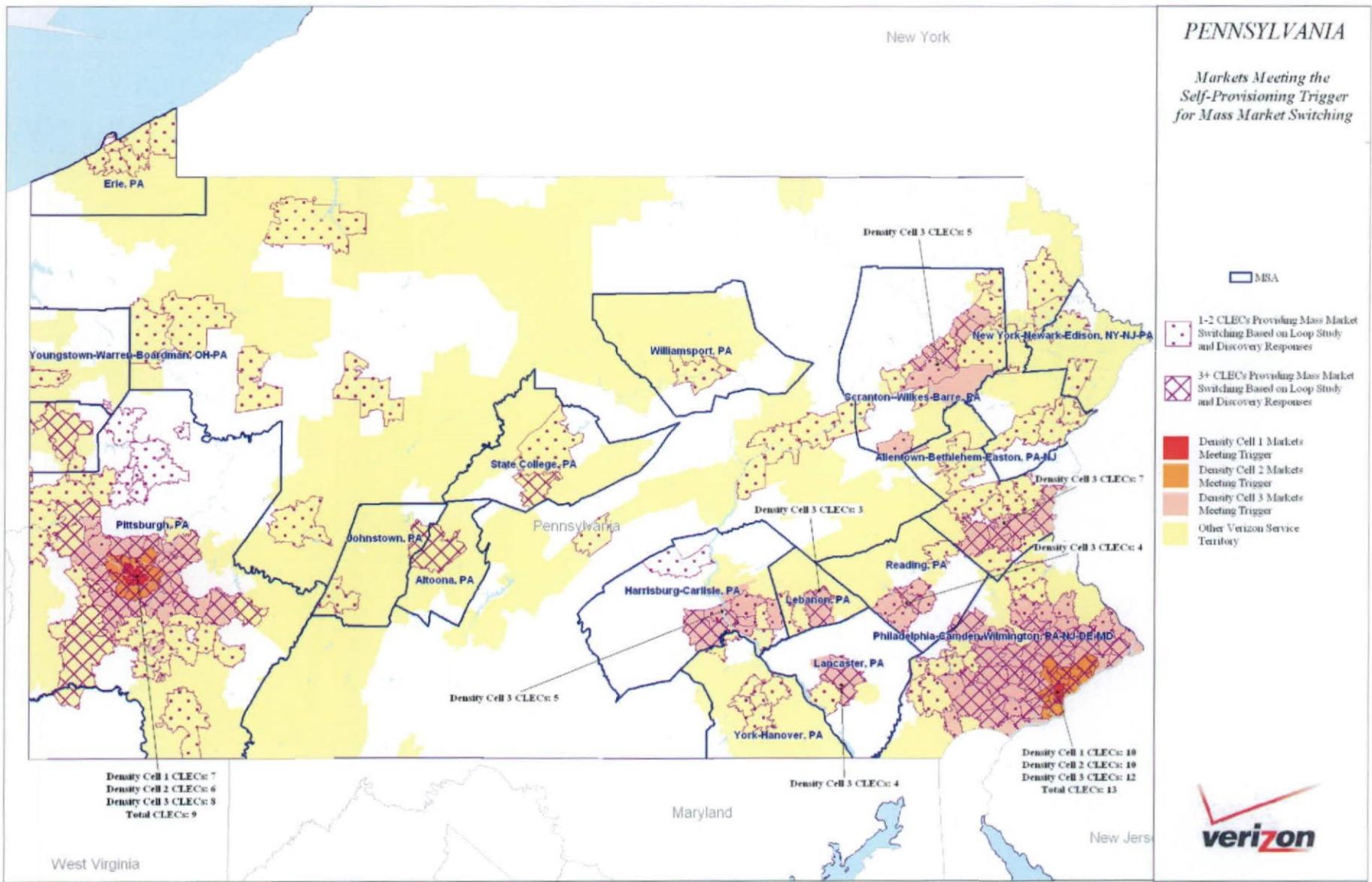


EXHIBIT 2-A

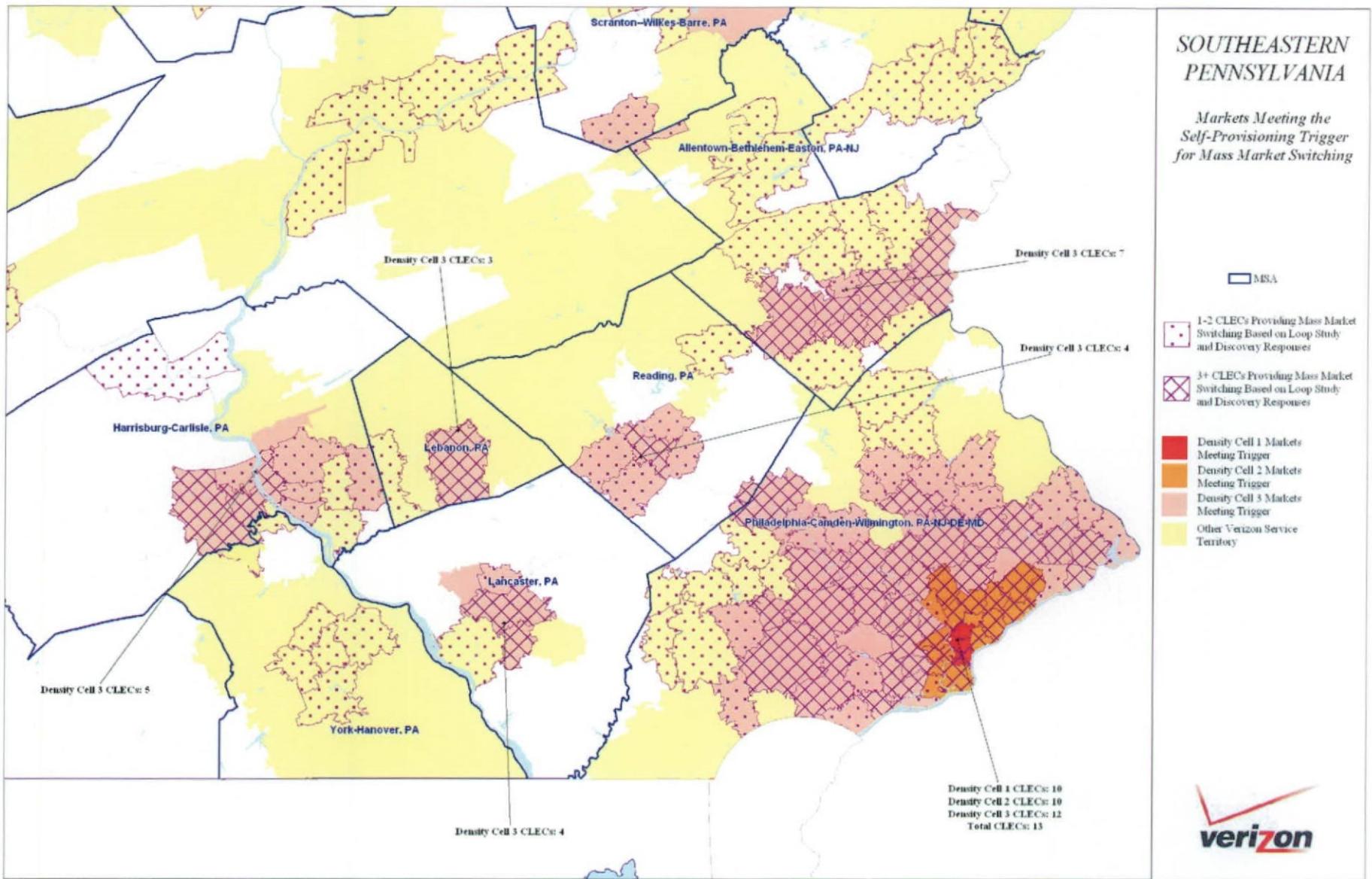


Exhibit 2-B

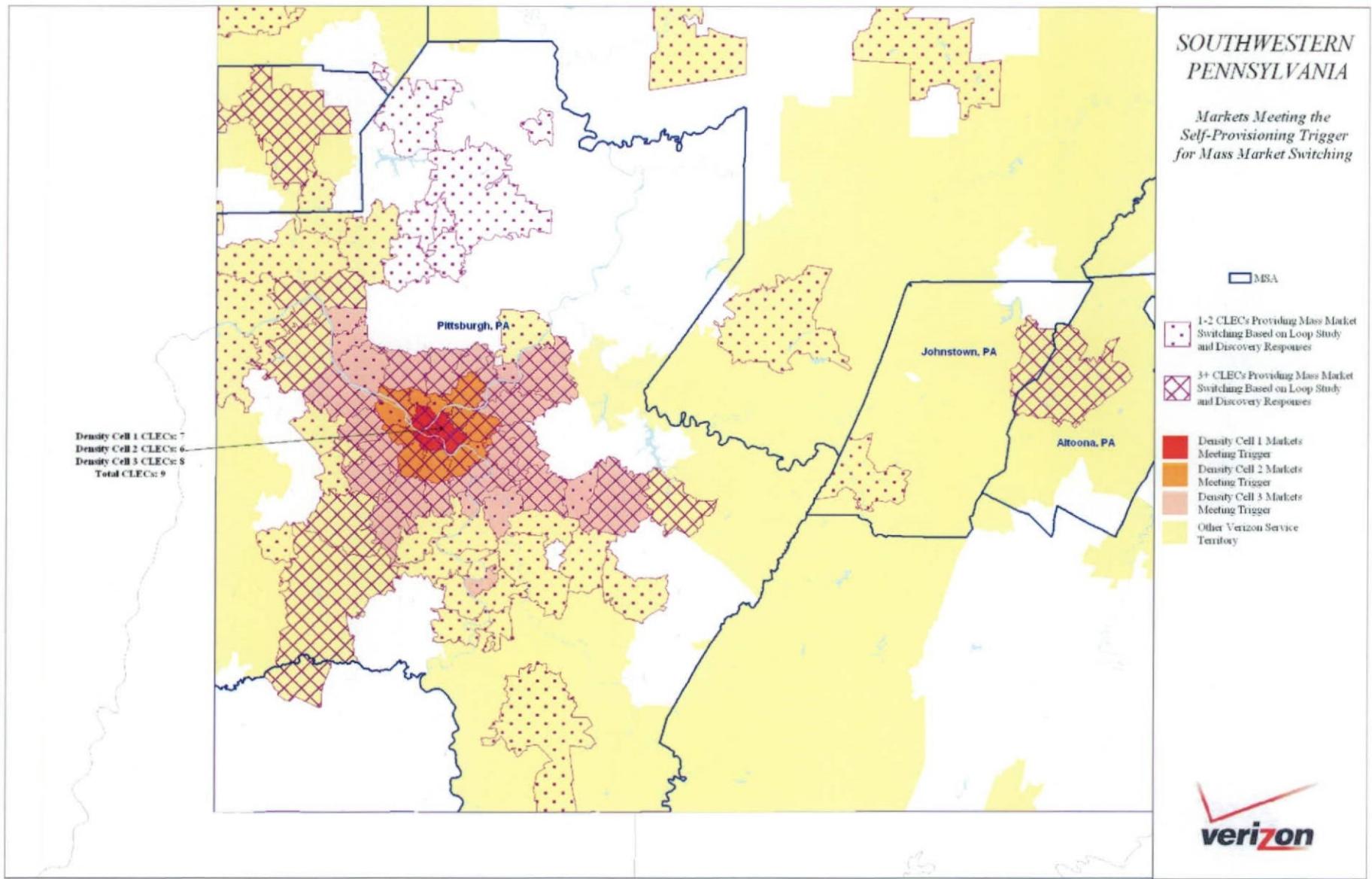


Exhibit 2-C

DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DARK FIBER

LATA 234															
Count of CLECNm				CLECNum											
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	060	066					
CARNPACA	CARNEGIE	CRAFPACR	CRAFTON		1	1	1							1	
		CRPLPACO	CORAOPOLIS		1	1	1								1
		DRMTPADO	DORMONT		1	1	1								1
		MOVLPAMO	MONROEVILLE		1		1	1							
		OKMTPAOA	OAKMONT		1	1			1						1
		PEHLPAPH	PENN HILLS		1	1			1						1
		PITBPAAL	ALLENTOWN PITTSBURG		1		1	1							
		PITBPADT	DOWNTOWN		1		1	1							
		PITBPAEL	EAST LIBERTY		1	1	1								1
		PITBPANS	NORTH SIDE		1	1	1								1
		PITBPAOK	OAKLAND		1	1	1								1
		PYVLPAPE	PERRYSVILLE		1	1	1								1
		RBTPPART	ROBINSON TOWNSHIP		1	1			1						1
		SHSAPASH	SHARPSBURG		1		1	1							1
		TRCKPATC	TURTLE CREEK				1	1	1						1
CRAFPACR	CRAFTON	CRPLPACO	CORAOPOLIS		1	1	1							1	
		DRMTPADO	DORMONT		1	1	1							1	
		MOVLPAMO	MONROEVILLE	1	1		1								
		PITBPAAL	ALLENTOWN PITTSBURG		1	1	1	1						1	
		PITBPADT	DOWNTOWN		1	1		1							
		PITBPAEL	EAST LIBERTY		1	1	1							1	
		PITBPANS	NORTH SIDE		1	1		1							
		PITBPAOK	OAKLAND		1	1		1							
		PYVLPAPE	PERRYSVILLE		1	1	1								1
		RBTPPART	ROBINSON TOWNSHIP		1	1	1								1
SHSAPASH	SHARPSBURG		1	1		1									
CRPLPACO	CORAOPOLIS	DRMTPADO	DORMONT		1	1	1							1	
		MOVLPAMO	MONROEVILLE		1	1	1							1	
		PITBPAAL	ALLENTOWN PITTSBURG		1	1	1				1	1			
		PITBPADT	DOWNTOWN		1	1	1							1	
		PITBPAEL	EAST LIBERTY		1	1	1							1	
		PITBPANS	NORTH SIDE		1	1	1							1	
		PITBPAOK	OAKLAND		1	1	1							1	
		PYVLPAPE	PERRYSVILLE		1	1	1								1
		SHSAPASH	SHARPSBURG		1	1	1								1
DRMTPADO	DORMONT	MOVLPAMO	MONROEVILLE		1	1	1							1	
		PITBPAAL	ALLENTOWN PITTSBURG		1	1	1							1	
		PITBPADT	DOWNTOWN		1	1	1							1	
		PITBPAEL	EAST LIBERTY		1	1	1							1	
		PITBPANS	NORTH SIDE		1	1	1							1	
		PITBPAOK	OAKLAND		1	1	1							1	
		PYVLPAPE	PERRYSVILLE		1	1	1								1
		SHSAPASH	SHARPSBURG		1	1	1								1
MOVLPAMO	MONROEVILLE	OKMTPAOA	OAKMONT		1	1			1					1	
		PEHLPAPH	PENN HILLS		1	1			1					1	

DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DARK FIBER

LATA 234														
Count of CLECNm				CLECNum										
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	060	066				
MOVLPAMO	MONROEVILLE	PITBPAAL	ALLENTOWN PITTSBURG		1			1	1					
		PITBPADT	DOWNTOWN		1	1		1	1					
		PITBPAEL	EAST LIBERTY			1	1	1				1		
		PITBPANS	NORTH SIDE		1	1		1						
		PITBPAOK	OAKLAND		1	1		1						
		PYVLPAPE	PERRYSVILLE			1	1	1					1	
		RBTPPART	ROBINSON TOWNSHIP		1	1			1					
		SHSAPASH	SHARPSBURG		1	1		1	1					
		TRCKPATC	TURTLE CREEK				1	1	1				1	
OKMTPAOA	OAKMONT	PEHLPAPH	PENN HILLS			1	1		1			1		
		PITBPAAL	ALLENTOWN PITTSBURG		1	1		1			1			
		PITBPADT	DOWNTOWN			1	1		1			1		
		RBTPPART	ROBINSON TOWNSHIP		1	1			1			1		
		SHSAPASH	SHARPSBURG			1	1		1			1		
PEHLPAPH	PENN HILLS	PITBPAAL	ALLENTOWN PITTSBURG		1	1		1			1			
		PITBPADT	DOWNTOWN		1	1		1			1			
		RBTPPART	ROBINSON TOWNSHIP			1	1		1			1		
		SHSAPASH	SHARPSBURG			1	1		1			1		
PITBPAAL	ALLENTOWN PITTSBURG	PITBPADT	DOWNTOWN			1		1	1					
		PITBPAEL	EAST LIBERTY		1	1	1				1			
		PITBPANS	NORTH SIDE			1	1	1			1			
		PITBPAOK	OAKLAND			1	1	1			1			
		PYVLPAPE	PERRYSVILLE			1	1	1			1			
		RBTPPART	ROBINSON TOWNSHIP		1	1			1			1		
		SHSAPASH	SHARPSBURG			1		1	1					
		TRCKPATC	TURTLE CREEK				1	1	1			1		
		PITBPADT	DOWNTOWN	PITBPAEL	EAST LIBERTY			1	1	1				1
				PITBPANS	NORTH SIDE		1	1		1				
PITBPAOK	OAKLAND				1	1		1						
PYVLPAPE	PERRYSVILLE					1	1	1			1			
RBTPPART	ROBINSON TOWNSHIP				1	1			1					
SHSAPASH	SHARPSBURG				1	1		1	1					
TRCKPATC	TURTLE CREEK						1	1	1			1		
PITBPAEL	EAST LIBERTY			PITBPANS	NORTH SIDE			1	1	1				1
		PITBPAOK	OAKLAND			1	1	1			1			
		PYVLPAPE	PERRYSVILLE			1	1	1			1			
		SHSAPASH	SHARPSBURG			1	1	1			1			
PITBPANS	NORTH SIDE	PITBPAOK	OAKLAND		1	1		1						
		PYVLPAPE	PERRYSVILLE			1	1	1			1			
		RBTPPART	ROBINSON TOWNSHIP		1	1	1				1			
		SHSAPASH	SHARPSBURG		1	1		1						
PITBPAOK	OAKLAND	PYVLPAPE	PERRYSVILLE			1	1	1			1			
		RBTPPART	ROBINSON TOWNSHIP		1	1	1				1			
		SHSAPASH	SHARPSBURG		1	1		1						
PYVLPAPE	PERRYSVILLE	SHSAPASH	SHARPSBURG		1	1	1			1				



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LATA 234											
Count of CLECNm				CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	033	057	066
BTPKPABP	BETHEL PARK	CARNPACA	CARNEGIE			1	1		1		
		CRAFPACR	CRAFTON			1	1		1		
		CRPLPACO	CORAOPOLIS			1	1		1		
		DRMTPADO	DORMONT			1	1		1		
		MOVLPAMO	MONROEVILLE			1	1		1		
		PITBPAAL	ALLENTOWN PITTSBURG			1	1		1		
		PITBPACA	CARRICK			1	1		1		
		PITBPADT	DOWNTOWN			1	1		1		
		PITBPAEL	EAST LIBERTY			1	1		1		
		PITBPANS	NORTH SIDE			1	1		1		
		PITBPAOK	OAKLAND			1	1		1		
		PYVLPAPE	PERRYSVILLE			1	1		1		
		SHSAPASH	SHARPSBURG			1	1		1		
		CARNPACA	CARNEGIE	CRAFPACR	CRAFTON			1		1	1
CRPLPACO	CORAOPOLIS					1		1	1		
DRMTPADO	DORMONT					1		1	1		
MOVLPAMO	MONROEVILLE					1		1	1	1	
OKMTPAOA	OAKMONT					1	1		1		1
PEHLPAPH	PENN HILLS					1	1		1		1
PITBPAAL	ALLENTOWN PITTSBURG					1		1	1	1	
PITBPACA	CARRICK					1	1		1		1
PITBPADT	DOWNTOWN					1		1	1	1	
PITBPAEL	EAST LIBERTY					1		1	1		
PITBPANS	NORTH SIDE					1		1	1		
PITBPAOK	OAKLAND					1		1	1		
PYVLPAPE	PERRYSVILLE					1		1	1		
RBTPPART	ROBINSON TOWNSHIP					1	1		1		1
SHSAPASH	SHARPSBURG					1		1	1	1	
TRCKPATC	TURTLE CREEK							1	1	1	
WKBGPAWK	WILKINSBURG							1	1	1	1
CRAFPACR	CRAFTON			CRPLPACO	CORAOPOLIS			1		1	1
		DRMTPADO	DORMONT			1		1	1		
		MOVLPAMO	MONROEVILLE		1	1		1	1		

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LATA 234													
Count of CLECNm				CLECNum									
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	033	057	066		
CRAFPACR	CRAFTON	PITBPAAL	ALLENTOWN PITTSBURG		1		1		1				
		PITBPACA	CARRICK		1	1			1		1		
		PITBPADT	DOWNTOWN		1	1		1		1			
		PITBPAEL	EAST LIBERTY			1		1		1			
		PITBPANS	NORTH SIDE		1	1		1		1			
		PITBPAOK	OAKLAND		1	1		1		1			
		PYVLPAPE	PERRYSVILLE			1		1		1			
		RBTPPART	ROBINSON TOWNSHIP		1	1	1						1
		SHSAPASH	SHARPSBURG		1	1		1		1			
		TRCKPATC	TURTLE CREEK				1	1		1		1	
		WKBGPAWK	WILKINSBURG				1	1		1		1	
CRPLPACO	CORAOPOLIS	DRMTPADO	DORMONT			1		1		1			
		MOVLPAMO	MONROEVILLE			1		1		1			
		PITBPAAL	ALLENTOWN PITTSBURG			1		1		1			
		PITBPACA	CARRICK			1	1			1		1	
		PITBPADT	DOWNTOWN			1		1		1	1		
		PITBPAEL	EAST LIBERTY			1		1		1			
		PITBPANS	NORTH SIDE			1		1		1	1		
		PITBPAOK	OAKLAND			1		1		1	1		
		PYVLPAPE	PERRYSVILLE			1		1		1			
		SHSAPASH	SHARPSBURG			1		1		1			
		TRCKPATC	TURTLE CREEK				1	1		1		1	
WKBGPAWK	WILKINSBURG				1	1		1		1			
DRMTPADO	DORMONT	MOVLPAMO	MONROEVILLE			1		1		1			
		PITBPAAL	ALLENTOWN PITTSBURG			1		1		1			
		PITBPACA	CARRICK			1	1			1		1	
		PITBPADT	DOWNTOWN			1		1		1			
		PITBPAEL	EAST LIBERTY			1		1		1			
		PITBPANS	NORTH SIDE			1		1		1			
		PITBPAOK	OAKLAND			1		1		1			
		PYVLPAPE	PERRYSVILLE			1		1		1			
		SHSAPASH	SHARPSBURG			1		1		1			
TRCKPATC	TURTLE CREEK				1	1		1		1			

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LATA 234													
Count of CLECNm				CLECNum									
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	033	057	066		
DRMTPADO	DORMONT	WKBGPAWK	WILKINSBURG			1	1		1		1		
MOVLPAMO	MONROEVILLE	OKMTPAOA	OAKMONT		1	1		1			1		
		PEHLPAPH	PENN HILLS		1	1		1				1	
		PITBPAAL	ALLENTOWN PITTSBURG		1		1	1	1				
		PITBPACA	CARRICK		1	1				1		1	
		PITBPADT	DOWNTOWN		1	1		1	1	1			
		PITBPAEL	EAST LIBERTY			1		1		1			
		PITBPANS	NORTH SIDE		1	1		1		1			
		PITBPAOK	OAKLAND		1	1		1		1			
		PYVLPAPE	PERRYSVILLE			1		1		1			
		RBTTPPART	ROBINSON TOWNSHIP		1	1				1			
		SHSAPASH	SHARPSBURG		1	1		1	1	1			
		TRCKPATC	TURTLE CREEK					1	1	1			
		WKBGPAWK	WILKINSBURG				1	1			1		1
		OKMTPAOA	OAKMONT	PEHLPAPH	PENN HILLS		1	1		1			
PITBPAAL	ALLENTOWN PITTSBURG				1	1		1				1	
PITBPADT	DOWNTOWN				1	1		1				1	
RBTTPPART	ROBINSON TOWNSHIP				1	1		1				1	
SHSAPASH	SHARPSBURG				1	1		1				1	
PEHLPAPH	PENN HILLS	PITBPAAL	ALLENTOWN PITTSBURG		1	1		1				1	
		PITBPADT	DOWNTOWN		1	1		1				1	
		RBTTPPART	ROBINSON TOWNSHIP		1	1		1				1	
		SHSAPASH	SHARPSBURG		1	1		1				1	
PITBPAAL	ALLENTOWN PITTSBURG	PITBPACA	CARRICK		1	1				1		1	
		PITBPADT	DOWNTOWN		1		1	1	1				
		PITBPAEL	EAST LIBERTY		1		1		1				
		PITBPANS	NORTH SIDE		1		1		1				
		PITBPAOK	OAKLAND		1		1		1				
		PYVLPAPE	PERRYSVILLE		1		1		1				
		RBTTPPART	ROBINSON TOWNSHIP		1	1		1				1	
		SHSAPASH	SHARPSBURG		1		1	1	1				
		TRCKPATC	TURTLE CREEK				1	1	1				
		WKBGPAWK	WILKINSBURG				1	1		1		1	

DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3

LATA 234											
Count of CLECNm				CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	033	057 066	
PITBPACA	CARRICK	PITBPADT	DOWNTOWN		1	1			1	1	
		PITBPAEL	EAST LIBERTY		1	1			1	1	
		PITBPANS	NORTH SIDE		1	1			1	1	
		PITBPAOK	OAKLAND		1	1			1	1	
		PYVLPAPE	PERRYSVILLE		1	1			1	1	
		SHSAPASH	SHARPSBURG		1	1			1	1	
		PITBPADT	DOWNTOWN	PITBPAEL	EAST LIBERTY		1		1	1	
PITBPADT	DOWNTOWN	PITBPANS	NORTH SIDE	1	1		1		1	1	
		PITBPAOK	OAKLAND	1	1		1		1	1	
		PYVLPAPE	PERRYSVILLE		1		1		1		
		RBTPPART	ROBINSON TOWNSHIP	1	1			1			
		SHSAPASH	SHARPSBURG	1	1		1	1	1		
		TRCKPATC	TURTLE CREEK				1	1	1		
		WKBGPAWK	WILKINSBURG			1	1		1	1	
		PITBPAEL	EAST LIBERTY	PITBPANS	NORTH SIDE		1		1	1	
PITBPAEL	EAST LIBERTY	PITBPAOK	OAKLAND		1		1		1		
		PYVLPAPE	PERRYSVILLE		1		1		1		
		SHSAPASH	SHARPSBURG		1		1		1		
		TRCKPATC	TURTLE CREEK			1	1		1	1	
		WKBGPAWK	WILKINSBURG			1	1		1	1	
		PITBPANS	NORTH SIDE	PITBPAOK	OAKLAND	1	1		1		1
PITBPANS	NORTH SIDE	PYVLPAPE	PERRYSVILLE		1		1		1		
		RBTPPART	ROBINSON TOWNSHIP	1	1	1				1	
		SHSAPASH	SHARPSBURG	1	1		1		1		
		TRCKPATC	TURTLE CREEK			1	1		1	1	
		WKBGPAWK	WILKINSBURG			1	1		1	1	
		PITBPAOK	OAKLAND	PYVLPAPE	PERRYSVILLE		1		1	1	
		PITBPAOK	OAKLAND	RBTPPART	ROBINSON TOWNSHIP	1	1	1			
SHSAPASH	SHARPSBURG			1	1		1		1		
TRCKPATC	TURTLE CREEK					1	1		1	1	
WKBGPAWK	WILKINSBURG					1	1		1	1	
PYVLPAPE	PERRYSVILLE			SHSAPASH	SHARPSBURG		1		1	1	
PYVLPAPE	PERRYSVILLE	TRCKPATC	TURTLE CREEK			1	1		1	1	

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<b>LATA 234</b>													
Count of CLECNm				CLECNum									
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	012	021	024	026	033	057	066		
PYVLPAP	PERRYSVILLE	WKBGPAWK	WILKINSBURG			1	1		1		1		
RBTPPART	ROBINSON TOWNSHIP	SHSAPASH	SHARPSBURG		1	1			1				
SHSAPASH	SHARPSBURG	TRCKPATC	TURTLE CREEK				1	1	1				
		WKBGPAWK	WILKINSBURG			1	1		1		1		
TRCKPATC	TURTLE CREEK	WKBGPAWK	WILKINSBURG			1	1		1		1		

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

LATA 234											
Count of CLECNm					CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066	
BLLVPABE	BELLEVUE	CARNPACA	CARNEGIE		1					1	
		CRAFPACR	CRAFTON		1					1	
		CRPLPACO	CORAOPOLIS		1						1
		DRMTPADO	DORMONT		1						1
		GLNSPAGL	GLENSHAW		1						1
		HMSTPAHO	HOMESTEAD		1						1
		MCPTPAMK	MCKEESPORT		1						1
		MCRKPAMR	MCKEES ROCKS		1						1
		MOVLPAMO	MONROEVILLE		1						1
		OKMTPAOA	OAKMONT		1						1
		PEHLPAPH	PENN HILLS		1						1
		PITBPAAL	ALLENTOWN PITTSBURG		1						1
		PITBPACA	CARRICK		1						1
		PITBPADT	DOWNTOWN		1						1
		PITBPAEL	EAST LIBERTY		1						1
		PITBPANS	NORTH SIDE		1						1
		PITBPAOK	OAKLAND		1						1
		PITBPASQ	SQUIRREL HILL		1						1
		PYVLPAPE	PERRYSVILLE		1						1
		RBTPPART	ROBINSON TOWNSHIP		1						1
SHSAPASH	SHARPSBURG		1						1		
SWKYPASE	SEWICKLEY		1						1		
TRCKPATC	TURTLE CREEK		1						1		
WKBGPAWK	WILKINSBURG		1						1		
BTPKPABP	BETHEL PARK	CARNPACA	CARNEGIE		1		1				
		CRAFPACR	CRAFTON		1		1				
		CRPLPACO	CORAOPOLIS		1		1				
		DRMTPADO	DORMONT		1		1				
		MCPTPAMK	MCKEESPORT		1		1				
		MOVLPAMO	MONROEVILLE		1		1				
		PITBPAAL	ALLENTOWN PITTSBURG		1		1				
		PITBPACA	CARRICK		1		1				
PITBPADT	DOWNTOWN		1		1						

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
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LATA 234												
Count of CLECNm					CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066		
BTPKPABP	BETHEL PARK	PITBPAEL	EAST LIBERTY		1		1					
		PITBPANS	NORTH SIDE		1		1					
		PITBPAOK	OAKLAND		1		1					
		PYVLPAPE	PERRYSVILLE		1		1					
		SHSAPASH	SHARPSBURG		1		1					
		TRCKPATC	TURTLE CREEK		1		1					
		WKBGPAWK	WILKINSBURG		1		1					
CARNPACA	CARNEGIE	CRAFPACR	CRAFTON		1		1			1		
		CRPLPACO	CORAOPOLIS		1		1			1		
		DRMTPADO	DORMONT		1		1			1		
		GLNSPAGL	GLENSHAW		1					1		
		HMSTPAHO	HOMESTEAD		1					1		
		MCPTPAMK	MCKEESPORT		1		1			1		
		MCRKPAMR	MCKEES ROCKS		1					1		
		MOVLPAMO	MONROEVILLE		1	1	1			1		
		NWKNPANK	NEW KENSINGTON				1			1		
		OKMTPAOA	OAKMONT		1	1				1		
		PEHLPAPH	PENN HILLS		1	1				1		
		PITBPAAL	ALLENTOWN PITTSBURG		1	1	1			1		
		PITBPACA	CARRICK		1		1			1		
		PITBPADT	DOWNTOWN		1	1	1			1		
		PITBPAEL	EAST LIBERTY		1		1			1		
		PITBPANS	NORTH SIDE		1		1			1		
		PITBPAOK	OAKLAND		1		1			1		
		PITBPASQ	SQUIRREL HILL		1					1		
		PYVLPAPE	PERRYSVILLE		1		1			1		
		RBTPPART	ROBINSON TOWNSHIP		1	1				1		
		SHSAPASH	SHARPSBURG		1	1	1			1		
		SWKYPASE	SEWICKLEY		1					1		
		TRCKPATC	TURTLE CREEK		1	1	1			1		
		WKBGPAWK	WILKINSBURG		1		1			1		
		CRAFPACR	CRAFTON	CRPLPACO	CORAOPOLIS		1		1			1
				DRMTPADO	DORMONT		1		1			1

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
Public Version  
Attachment C

LATA 234											
Count of CLECNm				CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066	
CRAFPACR	CRAFTON	GLNSPAGL	GLENSHAW		1					1	
		HMSTPAHO	HOMESTEAD		1					1	
		MCPTPAMK	MCKEESPORT		1		1				1
		MCRKPAMR	MCKEES ROCKS		1						1
		MOVLPAMO	MONROEVILLE	1	1		1				1
		NWKNPANK	NEW KENSINGTON				1				1
		OKMTPAOA	OAKMONT		1						1
		PEHLPAPH	PENN HILLS		1						1
		PITBPAAL	ALLENTOWN PITTSBURG		1		1				1
		PITBPACA	CARRICK		1		1				1
		PITBPADT	DOWNTOWN		1	1		1			1
		PITBPAEL	EAST LIBERTY		1		1				1
		PITBPANS	NORTH SIDE		1	1		1			1
		PITBPAOK	OAKLAND		1	1		1			1
		PITBPASQ	SQUIRREL HILL		1						1
		PYVLPAPE	PERRYSVILLE		1		1				1
		RBTPPART	ROBINSON TOWNSHIP		1	1					1
		SHSAPASH	SHARPSBURG		1	1		1			1
		SWKYPASE	SEWICKLEY		1						1
		TRCKPATC	TURTLE CREEK		1		1				1
WKBGPAWK	WILKINSBURG		1		1				1		
CRPLPACO	CORAOPOLIS	DRMTPADO	DORMONT		1		1			1	
		GLNSPAGL	GLENSHAW		1					1	
		HMSTPAHO	HOMESTEAD		1					1	
		MCPTPAMK	MCKEESPORT		1		1			1	
		MCRKPAMR	MCKEES ROCKS		1					1	
		MOVLPAMO	MONROEVILLE		1		1			1	
		NWKNPANK	NEW KENSINGTON				1			1	
		OKMTPAOA	OAKMONT		1					1	
		PEHLPAPH	PENN HILLS		1					1	
		PITBPAAL	ALLENTOWN PITTSBURG		1		1			1	
		PITBPACA	CARRICK		1		1			1	
		PITBPADT	DOWNTOWN		1		1	1		1	

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
Public Version  
Attachment C

LATA 234												
Count of CLECNm					CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066		
CRPLPACO	CORAOPOLIS	PITBPAEL	EAST LIBERTY		1		1			1		
		PITBPANS	NORTH SIDE		1		1	1		1		
		PITBPAOK	OAKLAND		1		1	1		1		
		PITBPASQ	SQUIRREL HILL		1					1		
		PYVLPAPE	PERRYSVILLE		1		1			1		
		RBTPPART	ROBINSON TOWNSHIP		1					1		
		SHSAPASH	SHARPSBURG		1		1			1		
		SWKYPASE	SEWICKLEY		1					1		
		TRCKPATC	TURTLE CREEK		1		1			1		
		WKBGPAWK	WILKINSBURG		1		1			1		
		DRMTPADO	DORMONT	GLNSPAGL	GLENSHAW		1					1
				HMSTPAHO	HOMESTEAD		1					1
				MCPTPAMK	MCKEESPORT		1		1			1
MCRKPAMR	MCKEES ROCKS				1					1		
MOVLPAMO	MONROEVILLE				1		1			1		
NWKNPANK	NEW KENSINGTON						1			1		
OKMTPAOA	OAKMONT				1					1		
PEHLPAPH	PENN HILLS				1					1		
PITBPAAL	ALLENTOWN PITTSBURG				1		1			1		
PITBPACA	CARRICK				1		1			1		
PITBPADT	DOWNTOWN				1		1			1		
PITBPAEL	EAST LIBERTY				1		1			1		
PITBPANS	NORTH SIDE				1		1			1		
PITBPAOK	OAKLAND				1		1			1		
PITBPASQ	SQUIRREL HILL				1					1		
PYVLPAPE	PERRYSVILLE				1		1			1		
RBTPPART	ROBINSON TOWNSHIP				1					1		
SHSAPASH	SHARPSBURG				1		1			1		
SWKYPASE	SEWICKLEY				1					1		
TRCKPATC	TURTLE CREEK				1		1			1		
WKBGPAWK	WILKINSBURG				1		1			1		
GLNSPAGL	GLENSHAW	HMSTPAHO	HOMESTEAD		1					1		
		MCPTPAMK	MCKEESPORT		1					1		

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
Public Version  
Attachment C

LATA 234										
Count of CLECNm				CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066
GLNSPAGL	GLENSHAW	MCRKPAMR	MCKEES ROCKS		1					1
		MOVLPAMO	MONROEVILLE		1					1
		OKMTPAOA	OAKMONT		1					1
		PEHLPAPH	PENN HILLS		1					1
		PITBPAAL	ALLENTOWN PITTSBURG		1					1
		PITBPACA	CARRICK		1					1
		PITBPADT	DOWNTOWN		1					1
		PITBPAEL	EAST LIBERTY		1					1
		PITBPANS	NORTH SIDE		1					1
		PITBPAOK	OAKLAND		1					1
		PITBPASQ	SQUIRREL HILL		1					1
		PYVLPAPE	PERRYSVILLE		1					1
		RBTPPART	ROBINSON TOWNSHIP		1					1
		SHSAPASH	SHARPSBURG		1					1
		SWKYPASE	SEWICKLEY		1					1
		TRCKPATC	TURTLE CREEK		1					1
		WKBGPAWK	WILKINSBURG		1					1
		HMSTPAHO	HOMESTEAD	MCPTPAMK	MCKEESPORT		1			
MCRKPAMR	MCKEES ROCKS				1					1
MOVLPAMO	MONROEVILLE				1					1
OKMTPAOA	OAKMONT				1					1
PEHLPAPH	PENN HILLS				1					1
PITBPAAL	ALLENTOWN PITTSBURG				1					1
PITBPACA	CARRICK				1					1
PITBPADT	DOWNTOWN				1					1
PITBPAEL	EAST LIBERTY				1					1
PITBPANS	NORTH SIDE				1					1
PITBPAOK	OAKLAND				1					1
PITBPASQ	SQUIRREL HILL				1					1
PYVLPAPE	PERRYSVILLE				1					1
RBTPPART	ROBINSON TOWNSHIP				1					1
SHSAPASH	SHARPSBURG				1					1
SWKYPASE	SEWICKLEY		1					1		

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
Public Version  
Attachment C

LATA 234												
Count of CLECNm				CLECNum								
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066		
HMSTPAHO	HOMESTEAD	TRCKPATC	TURTLE CREEK		1					1		
		WKBGPAWK	WILKINSBURG		1					1		
MCPTPAMK	MCKEESPORT	MCRKPAMR	MCKEES ROCKS		1					1		
		MOVLPAMO	MONROEVILLE		1		1			1		
		NWKNPANK	NEW KENSINGTON				1				1	
		OKMTPAOA	OAKMONT		1						1	
		PEHLPAPH	PENN HILLS		1						1	
		PITBPAAL	ALLENTOWN PITTSBURG		1		1				1	
		PITBPACA	CARRICK		1		1				1	
		PITBPADT	DOWNTOWN		1		1				1	
		PITBPAEL	EAST LIBERTY		1		1				1	
		PITBPANS	NORTH SIDE		1		1				1	
		PITBPAOK	OAKLAND		1		1				1	
		PITBPASQ	SQUIRREL HILL		1						1	
		PYVLPAPE	PERRYSVILLE		1		1				1	
		RBTPPART	ROBINSON TOWNSHIP		1						1	
		SHSAPASH	SHARPSBURG		1		1				1	
		SWKYPASE	SEWICKLEY		1						1	
		MCRKPAMR	MCKEES ROCKS	TRCKPATC	TURTLE CREEK		1		1			1
				WKBGPAWK	WILKINSBURG		1		1			1
MOVLPAMO	MONROEVILLE				1					1		
OKMTPAOA	OAKMONT				1					1		
PEHLPAPH	PENN HILLS				1					1		
PITBPAAL	ALLENTOWN PITTSBURG				1					1		
PITBPACA	CARRICK				1					1		
PITBPADT	DOWNTOWN				1					1		
PITBPAEL	EAST LIBERTY				1					1		
PITBPANS	NORTH SIDE				1					1		
PITBPAOK	OAKLAND		1					1				
PITBPASQ	SQUIRREL HILL		1					1				
PYVLPAPE	PERRYSVILLE		1					1				
RBTPPART	ROBINSON TOWNSHIP		1					1				
SHSAPASH	SHARPSBURG		1					1				

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

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LATA 234											
Count of CLECNm				CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066	
MCRKPAMR	MCKEES ROCKS	SWKYPASE	SEWICKLEY		1					1	
		TRCKPATC	TURTLE CREEK		1					1	
		WKBGPAWK	WILKINSBURG		1					1	
MOVLPAMO	MONROEVILLE	NWKNPANK	NEW KENSINGTON				1			1	
		OKMTPAOA	OAKMONT		1	1				1	
		PEHLPAPH	PENN HILLS		1	1				1	
		PITBPAAL	ALLENTOWN PITTSBURG		1	1	1			1	
		PITBPACA	CARRICK		1		1			1	
		PITBPADT	DOWNTOWN	1	1	1	1			1	
		PITBPAEL	EAST LIBERTY		1		1			1	
		PITBPANS	NORTH SIDE	1	1		1			1	
		PITBPAOK	OAKLAND	1	1		1			1	
		PITBPASQ	SQUIRREL HILL		1					1	
		PYVLPAPE	PERRYSVILLE		1		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1	1	1			1	
		SHSAPASH	SHARPSBURG		1	1	1	1		1	
		SWKYPASE	SEWICKLEY		1					1	
		TRCKPATC	TURTLE CREEK		1	1	1			1	
		WKBGPAWK	WILKINSBURG		1		1			1	
NWKNPANK	NEW KENSINGTON	PITBPAAL	ALLENTOWN PITTSBURG				1			1	
		PITBPACA	CARRICK				1			1	
		PITBPADT	DOWNTOWN				1			1	
		PITBPAEL	EAST LIBERTY				1			1	
		PITBPANS	NORTH SIDE				1			1	
		PITBPAOK	OAKLAND				1			1	
		PYVLPAPE	PERRYSVILLE				1			1	
		SHSAPASH	SHARPSBURG				1			1	
		TRCKPATC	TURTLE CREEK				1			1	
WKBGPAWK	WILKINSBURG				1			1			
OKMTPAOA	OAKMONT	PEHLPAPH	PENN HILLS		1	1				1	
		PITBPAAL	ALLENTOWN PITTSBURG		1	1				1	
		PITBPACA	CARRICK		1					1	
		PITBPADT	DOWNTOWN		1	1				1	

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
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Attachment C

LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060 066
OKMTPAOA	OAKMONT	PITBPAEL	EAST LIBERTY		1				1
		PITBPANS	NORTH SIDE		1				1
		PITBPAOK	OAKLAND		1				1
		PITBPASQ	SQUIRREL HILL		1				1
		PYVLPAPE	PERRYSVILLE		1				1
		RBTPPART	ROBINSON TOWNSHIP		1	1			1
		SHSAPASH	SHARPSBURG		1	1			1
		SWKYPASE	SEWICKLEY		1				1
		TRCKPATC	TURTLE CREEK		1	1			1
		WKBGPAWK	WILKINSBURG		1				1
PEHLPAPH	PENN HILLS	PITBPAAL	ALLENTOWN PITTSBURG		1	1			1
		PITBPACA	CARRICK		1				1
		PITBPADT	DOWNTOWN		1	1			1
		PITBPAEL	EAST LIBERTY		1				1
		PITBPANS	NORTH SIDE		1				1
		PITBPAOK	OAKLAND		1				1
		PITBPASQ	SQUIRREL HILL		1				1
		PYVLPAPE	PERRYSVILLE		1				1
		RBTPPART	ROBINSON TOWNSHIP		1	1			1
		SHSAPASH	SHARPSBURG		1	1			1
		SWKYPASE	SEWICKLEY		1				1
		TRCKPATC	TURTLE CREEK		1	1			1
		WKBGPAWK	WILKINSBURG		1				1
PITBPAAL	ALLENTOWN PITTSBURG	PITBPACA	CARRICK		1		1		1
		PITBPADT	DOWNTOWN		1	1	1		1
		PITBPAEL	EAST LIBERTY		1		1		1
		PITBPANS	NORTH SIDE		1		1		1
		PITBPAOK	OAKLAND		1		1		1
		PITBPASQ	SQUIRREL HILL		1				1
		PYVLPAPE	PERRYSVILLE		1		1		1
		RBTPPART	ROBINSON TOWNSHIP		1	1			1
		SHSAPASH	SHARPSBURG		1	1	1		1
		SWKYPASE	SEWICKLEY		1				1

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

LATA 234												
Count of CLECNm				CLECNum								
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066		
PITBPAAL	ALLENTOWN PITTSBURG	TRCKPATC	TURTLE CREEK		1	1	1			1		
		WKBGPAWK	WILKINSBURG		1		1			1		
PITBPACA	CARRICK	PITBPADT	DOWNTOWN		1		1			1		
		PITBPAEL	EAST LIBERTY		1		1			1		
		PITBPANS	NORTH SIDE		1		1			1		
		PITBPAOK	OAKLAND		1		1			1		
		PITBPASQ	SQUIRREL HILL		1					1		
		PYVLPAPE	PERRYSVILLE		1		1			1		
		RBTPPART	ROBINSON TOWNSHIP		1					1		
		SHSAPASH	SHARPSBURG		1		1			1		
		SWKYPASE	SEWICKLEY		1					1		
		TRCKPATC	TURTLE CREEK		1		1			1		
		WKBGPAWK	WILKINSBURG		1		1			1		
		PITBPADT	DOWNTOWN	PITBPAEL	EAST LIBERTY		1		1			1
				PITBPANS	NORTH SIDE	1	1		1	1		1
				PITBPAOK	OAKLAND	1	1		1	1		1
PITBPASQ	SQUIRREL HILL				1					1		
PYVLPAPE	PERRYSVILLE				1		1			1		
RBTPPART	ROBINSON TOWNSHIP			1	1	1				1		
SHSAPASH	SHARPSBURG			1	1	1	1			1		
SWKYPASE	SEWICKLEY				1					1		
TRCKPATC	TURTLE CREEK				1	1	1			1		
WKBGPAWK	WILKINSBURG				1		1			1		
PITBPAEL	EAST LIBERTY	PITBPANS	NORTH SIDE		1		1			1		
		PITBPAOK	OAKLAND		1		1			1		
		PITBPASQ	SQUIRREL HILL		1					1		
		PYVLPAPE	PERRYSVILLE		1		1			1		
		RBTPPART	ROBINSON TOWNSHIP		1					1		
		SHSAPASH	SHARPSBURG		1		1			1		
		SWKYPASE	SEWICKLEY		1					1		
		TRCKPATC	TURTLE CREEK		1		1			1		
		WKBGPAWK	WILKINSBURG		1		1			1		
PITBPANS	NORTH SIDE	PITBPAOK	OAKLAND	1	1		1	1	1			

DIRECT ROUTES MEETING FCC'S WHOLESALE TRIGGER FOR DS1 DS3

Exhibit 3  
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Attachment C

LATA 234											
Count of CLECNm				CLECNum							
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	033	057	060	066	
PITBPANS	NORTH SIDE	PITBPASQ	SQUIRREL HILL		1					1	
		PYVLPAPE	PERRYSVILLE		1		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1	1					1
		SHSAPASH	SHARPSBURG		1	1		1			1
		SWKYPASE	SEWICKLEY			1					1
		TRCKPATC	TURTLE CREEK			1		1			1
		WKBGPAWK	WILKINSBURG			1		1			1
PITBPAOK	OAKLAND	PITBPASQ	SQUIRREL HILL		1					1	
		PYVLPAPE	PERRYSVILLE		1		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1	1					1
		SHSAPASH	SHARPSBURG		1	1		1			1
		SWKYPASE	SEWICKLEY			1					1
		TRCKPATC	TURTLE CREEK			1		1			1
		WKBGPAWK	WILKINSBURG			1		1			1
PITBPASQ	SQUIRREL HILL	PYVLPAPE	PERRYSVILLE		1					1	
		RBTPPART	ROBINSON TOWNSHIP		1					1	
		SHSAPASH	SHARPSBURG		1					1	
		SWKYPASE	SEWICKLEY		1					1	
		TRCKPATC	TURTLE CREEK		1					1	
		WKBGPAWK	WILKINSBURG		1					1	
PYVLPAPE	PERRYSVILLE	RBTPPART	ROBINSON TOWNSHIP		1					1	
		SHSAPASH	SHARPSBURG		1		1			1	
		SWKYPASE	SEWICKLEY		1					1	
		TRCKPATC	TURTLE CREEK		1		1			1	
		WKBGPAWK	WILKINSBURG		1		1			1	
RBTPPART	ROBINSON TOWNSHIP	SHSAPASH	SHARPSBURG		1	1	1			1	
		SWKYPASE	SEWICKLEY		1					1	
		TRCKPATC	TURTLE CREEK		1	1				1	
		WKBGPAWK	WILKINSBURG		1					1	
SHSAPASH	SHARPSBURG	SWKYPASE	SEWICKLEY		1					1	
		TRCKPATC	TURTLE CREEK		1	1	1			1	
		WKBGPAWK	WILKINSBURG		1		1			1	
SWKYPASE	SEWICKLEY		1						1		



DIRECT ROUTES MEETING FCC's WHOLESAL TRIGGER FOR DARK FIBER

LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
BLLVPABE	BELLEVUE	CARNPACA	CARNEGIE		1			1	
		CRAFPACR	CRAFTON		1			1	
		CRPLPACO	CORAOPOLIS		1			1	
		DRMTPADO	DORMONT		1			1	
		GLNSPAGL	GLENSHAW		1			1	
		HMSTPAHO	HOMESTEAD		1			1	
		MCPTPAMK	MCKEESPORT		1			1	
		MCRKPAMR	MCKEES ROCKS		1			1	
		MOVLPAMO	MONROEVILLE		1			1	
		OKMTPAOA	OAKMONT		1			1	
		PEHLPAPH	PENN HILLS		1			1	
		PITBPAAL	ALLENTOWN PITTSBURG		1			1	
		PITBPACA	CARRICK		1			1	
		PITBPADT	DOWNTOWN		1			1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
SHSAPASH	SHARPSBURG		1			1			
SWKYPASE	SEWICKLEY		1			1			
TRCKPATC	TURTLE CREEK		1			1			
WKBGPAWK	WILKINSBURG		1			1			
CARNPACA	CARNEGIE	CRAFPACR	CRAFTON		1			1	
		CRPLPACO	CORAOPOLIS		1			1	
		DRMTPADO	DORMONT		1			1	
		GLNSPAGL	GLENSHAW		1			1	
		HMSTPAHO	HOMESTEAD		1			1	
		MCPTPAMK	MCKEESPORT		1			1	
		MCRKPAMR	MCKEES ROCKS		1			1	
		MOVLPAMO	MONROEVILLE		1	1		1	
		OKMTPAOA	OAKMONT		1	1		1	

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

Exhibit 3  
Public Version  
Attachment D

LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
CARNPACA	CARNEGIE	PEHLPAPH	PENN HILLS		1	1		1	
		PITBPAAL	ALLENTOWN PITTSBURG		1	1		1	
		PITBPACA	CARRICK		1			1	
		PITBPADT	DOWNTOWN		1	1		1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1	1		1	
		SHSAPASH	SHARPSBURG		1	1		1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1	1		1	
		WKBGPAWK	WILKINSBURG		1			1	
		CRAFPACR	CRAFTON	CRPLPACO	CORAOPOLIS		1		
DRMTPADO	DORMONT				1			1	
GLNSPAGL	GLENSHAW				1			1	
HMSTPAHO	HOMESTEAD				1			1	
MCPTPAMK	MCKEESPORT				1			1	
MCRKPAMR	MCKEES ROCKS				1			1	
MOVLPAMO	MONROEVILLE			1	1			1	
OKMTPAOA	OAKMONT				1			1	
PEHLPAPH	PENN HILLS				1			1	
PITBPAAL	ALLENTOWN PITTSBURG				1			1	
PITBPACA	CARRICK				1			1	
PITBPADT	DOWNTOWN			1	1			1	
PITBPAEL	EAST LIBERTY				1			1	
PITBPANS	NORTH SIDE			1	1			1	
PITBPAOK	OAKLAND			1	1			1	
PITBPASQ	SQUIRREL HILL				1			1	
PYVLPAPE	PERRYSVILLE				1			1	
RBTPPART	ROBINSON TOWNSHIP			1	1			1	
SHSAPASH	SHARPSBURG			1	1			1	

DIRECT ROUTES MEETING FCC's WHOLESAL TRIGGER FOR DARK FIBER

Exhibit 3  
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Attachment D

LATA 234									
Count of CLECNm				CLECNum					
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
CRAFPACR	CRAFTON	SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
		WKBGPAWK	WILKINSBURG		1			1	
CRPLPACO	CORAOPOLIS	DRMTPADO	DORMONT		1			1	
		GLNSPAGL	GLENSHAW		1			1	
		HMSTPAHO	HOMESTEAD		1			1	
		MCPTPAMK	MCKEESPORT		1			1	
		MCRKPAMR	MCKEES ROCKS		1			1	
		MOVLPAMO	MONROEVILLE		1			1	
		OKMTPAOA	OAKMONT		1			1	
		PEHLPAPH	PENN HILLS		1			1	
		PITBPAAL	ALLENTOWN PITTSBURG		1		1	1	
		PITBPACA	CARRICK		1			1	
		PITBPADT	DOWNTOWN		1			1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
		SHSAPASH	SHARPSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
WKBGPAWK	WILKINSBURG		1			1			
DRMTPADO	DORMONT	GLNSPAGL	GLENSHAW		1			1	
		HMSTPAHO	HOMESTEAD		1			1	
		MCPTPAMK	MCKEESPORT		1			1	
		MCRKPAMR	MCKEES ROCKS		1			1	
		MOVLPAMO	MONROEVILLE		1			1	
		OKMTPAOA	OAKMONT		1			1	
		PEHLPAPH	PENN HILLS		1			1	
		PITBPAAL	ALLENTOWN PITTSBURG		1			1	
PITBPACA	CARRICK		1			1			

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

Exhibit 3  
Public Version  
Attachment D

LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
DRMTPADO	DORMONT	PITBPADT	DOWNTOWN		1			1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
		SHSAPASH	SHARPSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
		WKBGPAWK	WILKINSBURG		1			1	
		GLNSPAGL	GLENSHAW	HMSTPAHO	HOMESTEAD		1		
MCPTPAMK	MCKEESPORT				1			1	
MCRKPAMR	MCKEES ROCKS				1			1	
MOVLPAMO	MONROEVILLE				1			1	
OKMTPAOA	OAKMONT				1			1	
PEHLPAPH	PENN HILLS				1			1	
PITBPAAL	ALLENTOWN PITTSBURG				1			1	
PITBPACA	CARRICK				1			1	
PITBPADT	DOWNTOWN				1			1	
PITBPAEL	EAST LIBERTY				1			1	
PITBPANS	NORTH SIDE				1			1	
PITBPAOK	OAKLAND				1			1	
PITBPASQ	SQUIRREL HILL				1			1	
PYVLPAPE	PERRYSVILLE				1			1	
RBTPPART	ROBINSON TOWNSHIP				1			1	
SHSAPASH	SHARPSBURG				1			1	
SWKYPASE	SEWICKLEY				1			1	
TRCKPATC	TURTLE CREEK				1			1	
WKBGPAWK	WILKINSBURG				1			1	
HMSTPAHO	HOMESTEAD			MCPTPAMK	MCKEESPORT		1		
		MCRKPAMR	MCKEES ROCKS		1			1	
		MOVLPAMO	MONROEVILLE		1			1	

DIRECT ROUTES MEETING FCC's WHOLESale TRIGGER FOR DARK FIBER

Exhibit 3  
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LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
HMSTPAHO	HOMESTEAD	OKMTPAOA	OAKMONT		1			1	
		PEHLPAPH	PENN HILLS		1			1	
		PITBPAAL	ALLENTOWN PITTSBURG		1			1	
		PITBPACA	CARRICK		1			1	
		PITBPADT	DOWNTOWN		1			1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
		SHSAPASH	SHARPSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
		WKBGPAWK	WILKINSBURG		1			1	
		MCPTPAMK	MCKEESPORT	MCRKPAMR	MCKEES ROCKS		1		
MOVLPAMO	MONROEVILLE				1			1	
OKMTPAOA	OAKMONT				1			1	
PEHLPAPH	PENN HILLS				1			1	
PITBPAAL	ALLENTOWN PITTSBURG				1			1	
PITBPACA	CARRICK				1			1	
PITBPADT	DOWNTOWN				1			1	
PITBPAEL	EAST LIBERTY				1			1	
PITBPANS	NORTH SIDE				1			1	
PITBPAOK	OAKLAND				1			1	
PITBPASQ	SQUIRREL HILL				1			1	
PYVLPAPE	PERRYSVILLE				1			1	
RBTPPART	ROBINSON TOWNSHIP				1			1	
SHSAPASH	SHARPSBURG				1			1	
SWKYPASE	SEWICKLEY				1			1	
TRCKPATC	TURTLE CREEK				1			1	
WKBGPAWK	WILKINSBURG		1			1			
MCRKPAMR	MCKEES ROCKS	MOVLPAMO	MONROEVILLE		1			1	

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
MCRKPAMR	MCKEES ROCKS	OKMTPAOA	OAKMONT		1			1	
		PEHLPAPH	PENN HILLS		1			1	
		PITBPAAL	ALLENTOWN PITTSBURG		1			1	
		PITBPACA	CARRICK		1			1	
		PITBPADT	DOWNTOWN		1			1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
		SHSAPASH	SHARPSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
		WKBGPAWK	WILKINSBURG		1			1	
		MOVLPAMO	MONROEVILLE	OKMTPAOA	OAKMONT		1	1	
PEHLPAPH	PENN HILLS				1	1		1	
PITBPAAL	ALLENTOWN PITTSBURG				1	1		1	
PITBPACA	CARRICK				1			1	
PITBPADT	DOWNTOWN			1	1	1		1	
PITBPAEL	EAST LIBERTY				1			1	
PITBPANS	NORTH SIDE			1	1			1	
PITBPAOK	OAKLAND			1	1			1	
PITBPASQ	SQUIRREL HILL				1			1	
PYVLPAPE	PERRYSVILLE				1			1	
RBTPPART	ROBINSON TOWNSHIP			1	1	1		1	
SHSAPASH	SHARPSBURG			1	1	1		1	
SWKYPASE	SEWICKLEY				1			1	
TRCKPATC	TURTLE CREEK				1	1		1	
WKBGPAWK	WILKINSBURG				1			1	
OKMTPAOA	OAKMONT			PEHLPAPH	PENN HILLS		1	1	
		PITBPAAL	ALLENTOWN PITTSBURG		1	1		1	
		PITBPACA	CARRICK		1			1	

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

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LATA 234									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
OKMTPAOA	OAKMONT	PITBPADT	DOWNTOWN		1	1		1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTTPART	ROBINSON TOWNSHIP		1	1		1	
		SHSAPASH	SHARPSBURG		1	1		1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1	1		1	
		WKBGPAWK	WILKINSBURG		1			1	
		PEHLPAPH	PENN HILLS	PITBPAAL	ALLENTOWN PITTSBURG		1	1	
PITBPACA	CARRICK				1			1	
PITBPADT	DOWNTOWN				1	1		1	
PITBPAEL	EAST LIBERTY				1			1	
PITBPANS	NORTH SIDE				1			1	
PITBPAOK	OAKLAND				1			1	
PITBPASQ	SQUIRREL HILL				1			1	
PYVLPAPE	PERRYSVILLE				1			1	
RBTTPART	ROBINSON TOWNSHIP				1	1		1	
SHSAPASH	SHARPSBURG				1	1		1	
SWKYPASE	SEWICKLEY				1			1	
TRCKPATC	TURTLE CREEK				1	1		1	
WKBGPAWK	WILKINSBURG		1			1			
PITBPAAL	ALLENTOWN PITTSBURG	PITBPACA	CARRICK		1			1	
		PITBPADT	DOWNTOWN		1	1		1	
		PITBPAEL	EAST LIBERTY		1			1	
		PITBPANS	NORTH SIDE		1			1	
		PITBPAOK	OAKLAND		1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTTPART	ROBINSON TOWNSHIP		1	1		1	
SHSAPASH	SHARPSBURG		1	1		1			

DIRECT ROUTES MEETINF FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 234											
Count of CLECNm					CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066			
PITBPAAL	ALLENTOWN PITTSBURG	SWKYPASE	SEWICKLEY		1			1			
		TRCKPATC	TURTLE CREEK		1	1		1			
		WKBGPAWK	WILKINSBURG		1			1			
PITBPACA	CARRICK	PITBPADT	DOWNTOWN		1			1			
		PITBPAEL	EAST LIBERTY		1			1			
		PITBPANS	NORTH SIDE		1			1			
		PITBPAOK	OAKLAND		1			1			
		PITBPASQ	SQUIRREL HILL		1			1			
		PYVLPAPE	PERRYSVILLE		1			1			
		RBTTPPART	ROBINSON TOWNSHIP		1			1			
		SHSAPASH	SHARPSBURG		1			1			
		SWKYPASE	SEWICKLEY		1			1			
		TRCKPATC	TURTLE CREEK		1			1			
		WKBGPAWK	WILKINSBURG		1			1			
		PITBPADT	DOWNTOWN	PITBPAEL	EAST LIBERTY		1			1	
				PITBPANS	NORTH SIDE		1	1		1	
PITBPAOK	OAKLAND				1	1		1			
PITBPASQ	SQUIRREL HILL				1			1			
PYVLPAPE	PERRYSVILLE				1			1			
RBTTPPART	ROBINSON TOWNSHIP				1	1	1	1			
SHSAPASH	SHARPSBURG				1	1	1	1			
SWKYPASE	SEWICKLEY				1			1			
TRCKPATC	TURTLE CREEK				1	1		1			
WKBGPAWK	WILKINSBURG				1			1			
PITBPAEL	EAST LIBERTY	PITBPANS	NORTH SIDE		1			1			
		PITBPAOK	OAKLAND		1			1			
		PITBPASQ	SQUIRREL HILL		1			1			
		PYVLPAPE	PERRYSVILLE		1			1			
		RBTTPPART	ROBINSON TOWNSHIP		1			1			
		SHSAPASH	SHARPSBURG		1			1			
		SWKYPASE	SEWICKLEY		1			1			
		TRCKPATC	TURTLE CREEK		1			1			
WKBGPAWK	WILKINSBURG		1			1					

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

Exhibit 3  
Public Version  
Attachment D

<b>LATA 234</b>									
Count of CLECNm					CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	021	026	060	066	
PITBPANS	NORTH SIDE	PITBPAOK	OAKLAND	1	1			1	
		PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP	1	1			1	
		SHSAPASH	SHARPSBURG	1	1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
		WKBGPAWK	WILKINSBURG		1			1	
PITBPAOK	OAKLAND	PITBPASQ	SQUIRREL HILL		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP	1	1			1	
		SHSAPASH	SHARPSBURG	1	1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
PITBPASQ	SQUIRREL HILL	WKBGPAWK	WILKINSBURG		1			1	
		PYVLPAPE	PERRYSVILLE		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
		SHSAPASH	SHARPSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
PYVLPAPE	PERRYSVILLE	WKBGPAWK	WILKINSBURG		1			1	
		RBTPPART	ROBINSON TOWNSHIP		1			1	
		SHSAPASH	SHARPSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1			1	
RBTPPART	ROBINSON TOWNSHIP	WKBGPAWK	WILKINSBURG		1			1	
		SHSAPASH	SHARPSBURG	1	1	1		1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1	1		1	
SHSAPASH	SHARPSBURG	WKBGPAWK	WILKINSBURG		1			1	
		SWKYPASE	SEWICKLEY		1			1	
		TRCKPATC	TURTLE CREEK		1	1		1	
		WKBGPAWK	WILKINSBURG		1			1	





**DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3**

Public Version  
 Exhibit 4  
 Attachment B

<b>LATA 226</b>									
Count of CLECNm				CLECNum					
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	008	053	057	071	079	
CPHLPACH	CAMP HILL	HRBGPAHA	HARRISBURG	1	1	1			
		LNCSPALA	LANCASTER	1	1	1			
HRBGPAHA	HARRISBURG	LNCSPALA	LANCASTER	1	1	1	1	1	

DIRECT ROUTES MEETING FCC's WHOLESALE PROVIDER TRIGGER FOR DS1 DS3

LATA 226						
Count of CLECNm				CLECNum		
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	008	053	057
CPHLPACH	CAMP HILL	HRBGPAHA	HARRISBURG	1	1	1
		HRSHPAXH	HERSHEY	1		1
		LNCSPALA	LANCASTER	1	1	1
		MBRGPAME	MECHANICSBURG	1		1
		YORKPAXM	YORK MAIN	1		1
HRBGPAHA	HARRISBURG	HRSHPAXH	HERSHEY	1		1
		LNCSPALA	LANCASTER	1	1	1
		MBRGPAME	MECHANICSBURG	1		1
		YORKPAXM	YORK MAIN	1		1
HRSHPAXH	HERSHEY	LNCSPALA	LANCASTER	1		1
		MBRGPAME	MECHANICSBURG	1		1
		YORKPAXM	YORK MAIN	1		1
LNCSPALA	LANCASTER	MBRGPAME	MECHANICSBURG	1		1
		YORKPAXM	YORK MAIN	1		1
MBRGPAME	MECHANICSBURG	YORKPAXM	YORK MAIN	1		1

**DIRECT ROUTES MEETING FCC's WHOLESALE PROVIDER TRIGGER FOR DARK FIBER**

Public Version  
 Exhibit 4  
 Attachment D

<b>LATA 226</b>						
Count of CLECNm					CLECNum	
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	008	053	
CPHLPACH	CAMP HILL	HRBGPAHA	HARRISBURG	1	1	
		LNCSPALA	LANCASTER	1	1	
HRBGPAHA	HARRISBURG	LNCSPALA	LANCASTER	1	1	

**DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DS1 DS3**

Public Version  
 Exhibit 5  
 Attachment C

<b>LATA 232</b>						
Count of CLECNm				CLECNum		
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTE 2	WIRE CENTER 2 Name	008	057	
SCTNPASC	SCRANTON	WLBRPAWB	WILKES BARRE		1	1





DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DARK FIBER

LATA 228																									
Count of CLECNm				CLECNum																					
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	012	014	024	026	038	044	045	050	053	060	071	074	075	077	079	088			
KGPRPAK	KING OF PRUSSIA	PAOLPAPA	PAOLI	1				1		1			1		1										
		PHLAPADE	DEWEY					1			1			1											
		PHLAPAEV	EVERGREEN					1						1			1								
		PHLAPALO	LOCUST	1				1			1			1		1									
		PHLAPAMK	MARKET	1				1			1			1		1									
		PHLAPAPE	PENNYPACKER	1				1			1			1		1									
		PHLAPAPI	PILGRIM					1						1		1									
		PHLAPATR	TRINITY					1						1		1		1							
		TRPRPATR	TROOPER	1				1			1			1		1									
		WAYNPAWY	WAYNE	1								1			1		1								
		WCHSPAWC	WEST CHESTER	1				1						1		1									
		WLMGDEWL	WILMINGTON	1									1		1										
		NRTWPANR	NORRISTOWN	PAOLPAPA	PAOLI	1				1		1			1	1									
PHLAPADE	DEWEY							1			1			1											
PHLAPAEV	EVERGREEN							1						1	1										
PHLAPALO	LOCUST			1				1			1			1	1										
PHLAPAMK	MARKET			1				1			1			1	1										
PHLAPAPE	PENNYPACKER			1				1			1			1											
PHLAPATR	TRINITY							1						1				1							
TRPRPATR	TROOPER			1				1			1			1		1									
WAYNPAWY	WAYNE			1								1			1		1								
WCHSPAWC	WEST CHESTER			1				1						1		1									
WLMGDEWL	WILMINGTON			1									1		1										
PAOLPAPA	PAOLI			PHLAPADE	DEWEY					1		1			1										
				PHLAPAEV	EVERGREEN					1						1	1								
		PHLAPALO	LOCUST	1				1			1			1	1	1						1			
		PHLAPAMK	MARKET	1				1			1			1	1	1						1	1		
		PHLAPAPE	PENNYPACKER	1				1			1			1		1									
		PHLAPAPI	PILGRIM					1						1		1									
		PHLAPATR	TRINITY					1						1				1							
		TRPRPATR	TROOPER	1				1			1			1		1									
		WAYNPAWY	WAYNE	1								1			1		1								
		WCHSPAWC	WEST CHESTER	1				1						1		1									
		WLMGDEWL	WILMINGTON	1									1		1										
		PHLAPADE	DEWEY	PHLAPALO	LOCUST					1		1			1										
				PHLAPAMK	MARKET					1		1			1										
PHLAPAPE	PENNYPACKER							1		1			1												
TRPRPATR	TROOPER							1		1			1												
PHLAPAEV	EVERGREEN	PHLAPALO	LOCUST					1					1	1											
		PHLAPAMK	MARKET					1					1	1											
		PHLAPAPE	PENNYPACKER					1					1				1								
		PHLAPATR	TRINITY					1					1				1								







DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3

LATA 228																											
Count of CLECNm				CLECNum																							
WIRE CENTER	WIRE CENTER 1	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	012	014	024	026	033	038	044	045	050	053	057	060	071	074	075	077	079	088			
BHLHPABE	BETHLEHEM	CNSHPACN	CONSHOHOCKEN							1						1	1										
		HTBOPAHB	HATBORO								1						1	1									
		KGPRPAKP	KING OF PRUSSIA								1						1	1									
		PAOLPAPA	PAOLI								1						1	1									
		PHLAPALO	LOCUST								1						1	1									
		PHLAPAMK	MARKET								1						1	1							1		
		PHLAPAPE	PENNYPACKER								1						1	1									
		WAYNPAWY	WAYNE								1						1	1									
BRYMPABM	BRYN MAWR	CNSHPACN	CONSHOHOCKEN	1						1									1								
		KGPRPAKP	KING OF PRUSSIA	1							1									1							
		NRTWPANR	NORRISTOWN	1							1									1							
		PAOLPAPA	PAOLI	1							1									1							
		PHLAPALO	LOCUST	1							1									1							
		PHLAPAMK	MARKET	1							1									1							
		PHLAPAPE	PENNYPACKER	1							1									1							
WAYNPAWY	WAYNE	1							1									1									
CNSHPACN	CONSHOHOCKE	HTBOPAHB	HATBORO	1				1		1	1			1		1	1										
		JENKPAJK	JENKINTOWN					1				1			1				1								
		KGPRPAKP	KING OF PRUSSIA	1				1			1	1			1			1	1								
		NRTWPANR	NORRISTOWN	1				1			1	1			1	1		1	1								
		PAOLPAPA	PAOLI	1				1			1	1			1	1	1	1									
		PHLAPACH	CHESTNUT HILL					1				1			1												
		PHLAPADE	DEWEY					1			1	1			1					1							
		PHLAPAEV	EVERGREEN					1				1			1	1				1							
		PHLAPAGE	GERMANTOWN					1				1			1					1							
		PHLAPAJE	JEFFERSON					1				1			1					1							
		PHLAPALO	LOCUST	1				1			1	1			1	1	1	1									
		PHLAPAMK	MARKET	1				1			1	1			1	1	1	1									
		PHLAPAMY	MAYFAIR					1				1			1												
		PHLAPAPE	PENNYPACKER	1				1			1	1			1			1	1								
		PHLAPAPI	PILGRIM					1				1			1					1	1						
		PHLAPARE	REGENT					1				1			1												
		PHLAPATR	TRINITY					1				1			1						1						
		PHLAPAWV	WAVERLY					1				1			1						1						
		TRPRPATR	TROOPER	1				1				1			1						1						
		WAYNPAWY	WAYNE	1								1	1			1			1	1							
		WCHSPAWC	WEST CHESTER	1				1				1			1						1	1					
		WLGRPAWG	WILLOW GROVE					1							1						1						
		WLMGDEWL	WILMINGTON	1								1				1											
HTBOPAHB	HATBORO	JENKPAJK	JENKINTOWN					1			1			1					1								
		KGPRPAKP	KING OF PRUSSIA	1				1			1	1			1				1	1							
		NRTWPANR	NORRISTOWN	1				1			1	1			1				1	1							



DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3

LATA 228																											
Count of CLECNm			CLECNum																								
WIRE CENTER	WIRE CENTER 1	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	012	014	024	026	033	038	044	045	050	053	057	060	071	074	075	077	079	088			
KGPRPAKP	KING OF PRUSS	PHLAPADE	DEWEY					1		1	1			1			1										
		PHLAPAEV	EVERGREEN					1			1				1			1									
		PHLAPAGE	GERMANTOWN					1			1				1			1									
		PHLAPAJE	JEFFERSON					1			1				1			1									
		PHLAPALO	LOCUST	1				1		1	1				1			1									
		PHLAPAMK	MARKET	1				1		1	1				1			1									
		PHLAPAMY	MAYFAIR					1			1				1			1									
		PHLAPAPE	PENNYPACKER	1				1		1	1				1			1		1	1						
		PHLAPAPI	PILGRIM					1			1				1			1			1	1					
		PHLAPARE	REGENT					1			1				1			1									
		PHLAPATR	TRINITY					1			1				1			1									
		PHLAPAWV	WAVERLY					1			1				1			1									
		TRPRPATR	TROOPER	1				1			1				1			1									
		WAYNPAWY	WAYNE	1							1	1			1			1			1	1					
		WCHSPAWC	WEST CHESTER	1				1			1	1			1			1									
		WLGRPAWG	WILLOW GROVE					1			1				1			1									
		WLMGDEWL	WILMINGTON	1							1				1			1									
NRTWPANR	NORRISTOWN	PAOLPAPA	PAOLI	1				1		1	1			1	1		1										
		PHLAPACH	CHESTNUT HILL					1			1			1			1										
		PHLAPADE	DEWEY					1			1			1			1										
		PHLAPAEV	EVERGREEN					1			1			1		1		1									
		PHLAPAGE	GERMANTOWN					1			1			1			1										
		PHLAPAJE	JEFFERSON					1			1			1			1										
		PHLAPALO	LOCUST	1				1			1	1			1	1		1									
		PHLAPAMK	MARKET	1				1			1	1			1			1	1								
		PHLAPAMY	MAYFAIR					1			1				1			1									
		PHLAPAPE	PENNYPACKER	1				1			1	1			1			1									
		PHLAPAPI	PILGRIM					1			1				1			1									
		PHLAPARE	REGENT					1			1				1			1									
		PHLAPATR	TRINITY					1			1				1			1									
		PHLAPAWV	WAVERLY					1			1				1			1									
		TRPRPATR	TROOPER	1				1			1				1			1									
		WAYNPAWY	WAYNE	1							1	1			1			1									
		WCHSPAWC	WEST CHESTER	1				1			1				1			1									
WLGRPAWG	WILLOW GROVE					1			1				1			1											
WLMGDEWL	WILMINGTON	1							1				1			1											
PAOLPAPA	PAOLI	PHLAPACH	CHESTNUT HILL					1			1			1			1										
		PHLAPADE	DEWEY					1			1	1			1			1									
		PHLAPAEV	EVERGREEN					1			1			1		1		1									
		PHLAPAGE	GERMANTOWN					1			1			1			1										
		PHLAPAJE	JEFFERSON					1			1			1			1										
PHLAPALO	LOCUST	1				1			1	1			1	1		1							1				



DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3

LATA 228																											
Count of CLECNm				CLECNum																							
WIRE CENTER	WIRE CENTER 1	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	012	014	024	026	033	038	044	045	050	053	057	060	071	074	075	077	079	088			
PHLAPAEV	EVERGREEN	PHLAPAJE	JEFFERSON					1			1			1			1										
		PHLAPALO	LOCUST					1			1				1	1		1									
		PHLAPAMK	MARKET					1			1					1	1		1								
		PHLAPAMY	MAYFAIR					1			1					1											
		PHLAPAPE	PENNYPACKER					1			1					1											
		PHLAPAPI	PILGRIM					1			1					1											
		PHLAPARE	REGENT					1			1					1											
		PHLAPATR	TRINITY					1			1					1											
		PHLAPAWV	WAVERLY					1			1					1											
		TRPRPATR	TROOPER					1								1											
		WAYNPAWY	WAYNE										1			1											
		WCHSPAWC	WEST CHESTER							1			1			1											
		WLGRPAWG	WILLOW GROVE							1			1			1											
PHLAPAGE	GERMANTOWN	PHLAPAJE	JEFFERSON					1			1			1			1										
		PHLAPALO	LOCUST					1			1				1			1									
		PHLAPAMK	MARKET					1			1				1			1									
		PHLAPAMY	MAYFAIR					1			1					1											
		PHLAPAPE	PENNYPACKER					1			1					1											
		PHLAPAPI	PILGRIM					1			1					1											
		PHLAPARE	REGENT					1			1					1											
		PHLAPATR	TRINITY					1			1					1											
		PHLAPAWV	WAVERLY					1			1					1											
		TRPRPATR	TROOPER					1								1											
		WAYNPAWY	WAYNE										1			1											
		WCHSPAWC	WEST CHESTER							1			1			1											
		WLGRPAWG	WILLOW GROVE							1			1			1											
PHLAPAJE	JEFFERSON	PHLAPALO	LOCUST					1			1			1			1										
		PHLAPAMK	MARKET					1			1				1			1									
		PHLAPAMY	MAYFAIR					1			1				1			1									
		PHLAPAPE	PENNYPACKER					1			1				1			1									
		PHLAPAPI	PILGRIM					1			1				1			1									
		PHLAPARE	REGENT					1			1				1			1									
		PHLAPATR	TRINITY					1			1				1			1									
		PHLAPAWV	WAVERLY					1			1				1			1									
		TRPRPATR	TROOPER					1							1			1									
		WAYNPAWY	WAYNE									1			1			1									
		WCHSPAWC	WEST CHESTER							1			1			1			1								
		WLGRPAWG	WILLOW GROVE							1			1			1			1								
		PHLAPALO	LOCUST	PHLAPAMK	MARKET		1			1		1	1		1	1	1	1	1					1	1		
PHLAPAMY	MAYFAIR							1			1				1												
PHLAPAPE	PENNYPACKER				1			1		1	1				1			1									
PHLAPAPI	PILGRIM							1			1				1			1									

DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3

LATA 228																											
Count of CLECNm				CLECNum																							
WIRE CENTER	WIRE CENTER 1	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	012	014	024	026	033	038	044	045	050	053	057	060	071	074	075	077	079	088			
PHLAPALO	LOCUST	PHLAPARE	REGENT					1			1			1													
		PHLAPATR	TRINITY					1			1			1				1									
		PHLAPAWV	WAVERLY					1			1			1				1									
		TRPRPATR	TROOPER		1			1			1			1				1									
		WAYNPAWY	WAYNE		1						1	1			1			1	1								
		WCHSPAWC	WEST CHESTER		1				1		1				1			1									
		WLGRPAWG	WILLOW GROVE						1			1			1			1									
		WLMGDEWL	WILMINGTON		1							1						1									
		PHLAPAMK	MARKET	PHLAPAMY	MAYFAIR					1			1			1											
				PHLAPAPE	PENNYPACKER		1			1		1	1			1			1	1	1						
PHLAPAPI	PILGRIM							1			1			1			1	1	1								
PHLAPARE	REGENT							1			1			1													
PHLAPATR	TRINITY							1			1			1				1									
PHLAPAWV	WAVERLY							1			1			1				1									
TRPRPATR	TROOPER				1			1			1			1				1									
WAYNPAWY	WAYNE				1						1	1			1			1	1	1							
WCHSPAWC	WEST CHESTER				1				1		1				1			1		1							
WLGRPAWG	WILLOW GROVE								1			1			1			1		1							
PHLAPAMY	MAYFAIR	PHLAPAPE	PENNYPACKER					1			1			1													
PHLAPAPI		PILGRIM					1			1			1														
PHLAPARE		REGENT					1			1			1														
PHLAPATR		TRINITY					1			1			1														
PHLAPAWV		WAVERLY					1			1			1														
WCHSPAWC		WEST CHESTER					1			1			1														
WLGRPAWG		WILLOW GROVE					1			1			1														
WLMGDEWL		WILMINGTON		1							1							1									
PHLAPAPE	PENNYPACKER	PHLAPAPI	PILGRIM					1			1			1			1	1	1								
		PHLAPARE	REGENT					1			1			1													
		PHLAPATR	TRINITY					1			1			1													
		PHLAPAWV	WAVERLY					1			1			1													
		TRPRPATR	TROOPER		1			1			1			1				1		1							
		WAYNPAWY	WAYNE		1						1	1			1			1	1	1							
		WCHSPAWC	WEST CHESTER		1				1		1			1				1		1							
		WLGRPAWG	WILLOW GROVE					1			1			1				1		1							
PHLAPAPI	PILGRIM	PHLAPARE	REGENT					1			1			1													
PHLAPATR		TRINITY					1			1			1						1								
PHLAPAWV		WAVERLY					1			1			1						1								
TRPRPATR		TROOPER					1						1						1								
WAYNPAWY		WAYNE									1			1				1	1								
WCHSPAWC		WEST CHESTER					1			1			1					1		1							
WLGRPAWG		WILLOW GROVE					1			1			1					1		1							

DIRECT ROUTES MEETING FCC's SELF-DEPLOYMENT TRIGGER FOR DS3

Public Version  
Exhibit 6  
Attachment B

LATA 228																											
Count of CLECNm				CLECNum																							
WIRE CENTER	WIRE CENTER 1	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	012	014	024	026	033	038	044	045	050	053	057	060	071	074	075	077	079	088			
PHLAPARE	REGENT	PHLAPATR	TRINITY					1			1			1													
		PHLAPAWV	WAVERLY					1			1			1													
		WCHSPAWC	WEST CHESTER					1			1			1													
		WLGRPAWG	WILLOW GROVE					1			1			1													
PHLAPATR	TRINITY	PHLAPAWV	WAVERLY					1			1			1				1									
		TRPRPATR	TROOPER					1						1				1									
		WAYNPAWY	WAYNE								1			1				1									
		WCHSPAWC	WEST CHESTER					1			1			1				1									
PHLAPAWV	WAVERLY	TRPRPATR	TROOPER					1						1				1									
		WAYNPAWY	WAYNE								1			1				1									
		WCHSPAWC	WEST CHESTER					1			1			1				1									
		WLGRPAWG	WILLOW GROVE					1			1			1				1									
PTTWPAPT	POTTSTOWN	RDNGPARE	READING																1					1			
TRPRPATR	TROOPER	WAYNPAWY	WAYNE		1						1			1				1									
		WCHSPAWC	WEST CHESTER		1			1						1				1									
		WLGRPAWG	WILLOW GROVE					1						1				1									
		WLMGDEWL	WILMINGTON		1						1			1													
WAYNPAWY	WAYNE	WCHSPAWC	WEST CHESTER		1						1			1				1									
		WLGRPAWG	WILLOW GROVE								1			1				1									
		WLMGDEWL	WILMINGTON		1						1			1				1									
WCHSPAWC	WEST CHESTER	WLGRPAWG	WILLOW GROVE					1			1		1				1										

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DS1 DS3

LATA 228																				
Count of CLECNm		CLECNum																		
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066	(blank)	
ALTWPAAL	ALLENTOWN	AMBLPAAM	AMBLER						1	1						1	1			
		ARMRPAAR	ARDMORE						1	1										
		BCYNPABC	BALA CYNWYD						1	1								1		
		BHLHPABE	BETHLEHEM		1	1			1	1							1	1		
		CHVLPACH	CHURCHVILLE								1							1		
		CNSHPACN	CONSHOHOCKEN							1	1						1	1		
		ESTNPAEA	EASTON			1						1								
		FTWSPAFW	FORT WASHINGTON TANDEM				1											1		
		HTBOPAHB	HATBORO								1	1						1	1	
		JENKPAJK	JENKINTOWN									1							1	
		KGPRPAKP	KING OF PRUSSIA								1	1						1	1	
		KHVLPAKU	KUHNSVILLE				1													1
		LNDLPALD	LANSDALE									1							1	
		NRTWPANR	NORRISTOWN								1	1							1	
		PAOLPAPA	PAOLI								1	1						1	1	
		PHLAPADE	DEWEY								1	1							1	
		PHLAPAEV	EVERGREEN									1							1	
		PHLAPAGE	GERMANTOWN									1							1	
		PHLAPAJE	JEFFERSON									1							1	
		PHLAPALO	LOCUST								1	1						1	1	
		PHLAPAMK	MARKET								1	1						1	1	
		PHLAPAOR	ORCHARD									1							1	
		PHLAPAPE	PENNYPACKER									1	1					1	1	
		PHLAPAPI	PILGRIM									1						1	1	
		PHLAPATR	TRINITY									1							1	
		PHLAPAWV	WAVERLY									1							1	
		PTTWPAPT	POTTSTOWN									1							1	
		RDNGPARE	READING					1											1	
		TRPRPATR	TROOPER									1								1
		WAYNPAWY	WAYNE									1	1					1	1	
		WCHSPAWC	WEST CHESTER									1							1	
		WLGSRPAWG	WILLOW GROVE									1							1	
AMBLPAAM	AMBLER	ARMRPAAR	ARDMORE	1					1	1				1						
		BCYNPABC	BALA CYNWYD	1			1		1	1				1				1		
		BHLHPABE	BETHLEHEM							1							1	1		
		BRYMPABM	BRYN MAWR	1					1											
		CHVLPACH	CHURCHVILLE								1								1	
		CNSHPACN	CONSHOHOCKEN	1			1		1	1				1		1	1			
		HTBOPAHB	HATBORO	1			1		1	1				1		1	1			
		JENKPAJK	JENKINTOWN				1			1				1				1		
		KGPRPAKP	KING OF PRUSSIA	1			1		1	1				1		1	1			
		LNDLPALD	LANSDALE								1								1	
		NRTWPANR	NORRISTOWN	1			1		1	1				1		1	1			
		NWRKDENB	NEWARK	1												1				
		PAOLPAPA	PAOLI	1						1	1				1		1	1		
		PHLAPACH	CHESTNUT HILL				1			1					1					
		PHLAPADE	DEWEY				1			1	1				1				1	
		PHLAPAEV	EVERGREEN				1			1					1				1	
		PHLAPAGE	GERMANTOWN	1			1			1					1				1	
		PHLAPAJE	JEFFERSON				1			1					1				1	
		PHLAPALO	LOCUST	1			1			1	1				1		1	1		
		PHLAPAMK	MARKET	1			1			1	1				1		1	1		
		PHLAPAMY	MAYFAIR				1			1		1			1					





DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DS1 DS3

LATA 228																				
Count of CLECNm		CLECNum																		
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066 (blank)		
CHVLPACH	CHURCHVILLE	LNDLPALD	LANSDALE							1						1				
		NRTWPANR	NORRISTOWN							1							1			
		PAOLPAPA	PAOLI								1						1			
		PHLAPADE	DEWEY								1						1			
		PHLAPAEV	EVERGREEN								1						1			
		PHLAPAGE	GERMANTOWN								1						1			
		PHLAPAJE	JEFFERSON								1						1			
		PHLAPALO	LOCUST								1						1			
		PHLAPAMK	MARKET								1						1			
		PHLAPAOR	ORCHARD								1						1			
		PHLAPAPE	PENNYPACKER								1						1			
		PHLAPAPI	PILGRIM								1						1			
		PHLAPATR	TRINITY								1						1			
		PHLAPAWV	WAVERLY								1						1			
		PTTWPAPT	POTTSTOWN								1						1			
		WAYNPAWY	WAYNE								1						1			
		WCHSPAWC	WEST CHESTER								1						1			
		WLGSRPAWG	WILLOW GROVE								1						1			
		CNSHPACN	CONSHOHOCKEN	HTBOPAHB	HATBORO		1		1		1	1			1		1	1		
				JENKPAJK	JENKINTOWN				1		1	1			1			1		
KGPRPAKP	KING OF PRUSSIA				1		1		1	1			1		1	1	1			
LNDLPALD	LANSDALE									1							1			
NRTWPANR	NORRISTOWN				1		1		1	1			1	1		1	1			
NWRKDENB	NEWARK				1						1									
PAOLPAPA	PAOLI				1		1		1	1			1	1	1	1	1			
PHLAPACH	CHESTNUT HILL						1		1	1			1							
PHLAPADE	DEWEY						1		1	1			1			1				
PHLAPAEV	EVERGREEN						1		1	1			1	1		1	1			
PHLAPAGE	GERMANTOWN						1		1	1			1			1				
PHLAPAJE	JEFFERSON						1		1	1			1			1				
PHLAPALO	LOCUST				1		1		1	1			1	1	1	1	1			
PHLAPAMK	MARKET				1		1		1	1			1	1	1	1	1			
PHLAPAMY	MAYFAIR						1		1	1			1							
PHLAPAOR	ORCHARD									1							1			
PHLAPAPE	PENNYPACKER				1		1		1	1			1		1	1	1			
PHLAPAPI	PILGRIM						1		1	1			1		1	1				
PHLAPAPO	POPLAR						1						1							
PHLAPARE	REGENT						1		1	1			1							
PHLAPATR	TRINITY						1		1	1			1			1	1			
PHLAPAWV	WAVERLY						1		1	1			1			1				
PTTWPAPT	POTTSTOWN										1						1			
TLVLDET	TALLEYVILLE				1								1							
TRPRPATR	TROOPER				1		1		1	1			1			1				
WAYNPAWY	WAYNE				1				1	1			1		1	1	1			
WCHSPAWC	WEST CHESTER				1		1		1	1			1			1				
WLGSRPAWG	WILLOW GROVE						1		1	1			1			1				
WLMGDEWL	WILMINGTON				1				1	1			1			1				
FTWSPAFW	FORT WASHINGTON TANDEM			RDNGPARE	READING			1									1			
HTBOPAHB	HATBORO	JENKPAJK	JENKINTOWN				1		1			1			1					
		KGPRPAKP	KING OF PRUSSIA		1		1		1	1		1		1	1					
		LNDLPALD	LANSDALE							1						1				
		NRTWPANR	NORRISTOWN		1		1		1	1			1		1					
		NWRKDENB	NEWARK		1								1							

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DS1 DS3

Public Version  
Exhibit 8  
Attachment C

LATA 228				CLECNum																	
Count of CLECNm	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066	(blank)		
HTBOPAHB	HATBORO	PAOLPAPA	PAOLI	1																	
		PHLAPACH	CHESTNUT HILL				1		1				1								
		PHLAPADE	DEWEY				1		1	1			1				1				
		PHLAPAEV	EVERGREEN				1		1				1				1				
		PHLAPAGE	GERMANTOWN				1			1			1								
		PHLAPAJE	JEFFERSON								1			1							
		PHLAPALO	LOCUST	1			1		1	1				1		1	1				
		PHLAPAMK	MARKET		1			1		1	1			1			1	1			
		PHLAPAMY	MAYFAIR					1			1			1							
		PHLAPAOR	ORCHARD									1									
		PHLAPAPE	PENNYPACKER		1			1		1	1			1			1	1			
		PHLAPAPI	PILGRIM									1			1		1	1			
		PHLAPAPO	POPLAR					1							1						
		PHLAPARE	REGENT					1			1				1						
		PHLAPATR	TRINITY					1			1				1						
		PHLAPAWV	WAVERLY					1			1				1						
		PTTWPAPT	POTTSTOWN									1									
		TLVLOETV	TALLEYVILLE			1									1						
		TRRPRATR	TROOPER		1			1		1					1						
		WAYNPAWY	WAYNE			1				1	1				1			1	1		
		WCHSPAWC	WEST CHESTER			1				1	1				1						
		WLGPRPAWG	WILLOW GROVE					1		1	1				1						
		WLMGDEWL	WILMINGTON		1					1					1						
		JENKPAJK	JENKINTOWN	KGPRPAKP	KING OF PRUSSIA					1		1			1						
				LNDLPALD	LANSDALE							1				1					
				NRTWPANR	NORRISTOWN					1			1			1					
				PAOLPAPA	PAOLI					1			1			1					
				PHLAPACH	CHESTNUT HILL					1		1				1					
PHLAPADE	DEWEY							1			1			1							
PHLAPAEV	EVERGREEN							1			1			1							
PHLAPAGE	GERMANTOWN							1			1			1							
PHLAPAJE	JEFFERSON							1			1			1							
PHLAPALO	LOCUST							1			1			1							
PHLAPAMK	MARKET							1			1			1							
PHLAPAMY	MAYFAIR							1			1			1							
PHLAPAOR	ORCHARD											1									
PHLAPAPE	PENNYPACKER							1		1				1			1	1			
PHLAPAPI	PILGRIM							1			1			1							
PHLAPAPO	POPLAR							1						1							
PHLAPARE	REGENT							1			1			1							
PHLAPATR	TRINITY							1			1			1							
PHLAPAWV	WAVERLY							1			1			1							
PTTWPAPT	POTTSTOWN										1										
TRRPRATR	TROOPER							1						1							
WAYNPAWY	WAYNE											1			1						
WCHSPAWC	WEST CHESTER							1			1			1							
WLGPRPAWG	WILLOW GROVE							1			1			1							
KGPRPAKP	KING OF PRUSSIA			LNDLPALD	LANSDALE							1									
				NRTWPANR	NORRISTOWN		1			1	1				1			1	1		
				NWRKDENB	NEWARK		1									1					
				PAOLPAPA	PAOLI		1			1	1		1			1		1	1		
		PHLAPACH	CHESTNUT HILL					1		1				1							
		PHLAPADE	DEWEY					1		1	1			1							

LATA 228																					
Count of CLECNm																CLECNum					
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066	(blank)		
KGPRPAKP	KING OF PRUSSIA	PHLAPAEV	EVERGREEN				1			1			1			1	1				
		PHLAPAGE	GERMANTOWN				1			1			1			1					
		PHLAPAJE	JEFFERSON				1			1			1			1					
		PHLAPALO	LOCUST		1		1		1	1			1			1	1	1			
		PHLAPAMK	MARKET		1		1		1	1			1			1	1	1			
		PHLAPAMY	MAYFAIR				1			1			1								
		PHLAPAOR	ORCHARD							1							1				
		PHLAPAPE	PENNYPACKER		1		1		1	1				1		1	1	1			
		PHLAPAPI	PILGRIM				1			1				1		1	1				
		PHLAPAPO	POPLAR				1														
		PHLAPARE	REGENT				1			1				1							
		PHLAPATR	TRINITY				1			1				1			1	1			
		PHLAPAWV	WAVERLY				1							1				1			
		PTTWPAPT	POTTSTOWN								1							1			
		TLVLDETV	TALLEYVILLE		1										1						
		TRRPRPATR	TROOPER		1		1		1					1				1			
		WAYNPAWY	WAYNE		1				1	1				1		1	1	1			
		WCHSPAWC	WEST CHESTER		1			1			1			1			1				
		WLGRPAWG	WILLOW GROVE				1		1		1			1				1			
		WLMGDEWL	WILMINGTON		1					1				1							
KHVLPAKU	KUHNSVILLE	PTTWPAPT	POTTSTOWN			1										1					
LNDLPALD	LANSDALE	NRTWPANR	NORRISTOWN							1						1					
		PAOLPAPA	PAOLI							1						1					
		PHLAPADE	DEWEY							1						1					
		PHLAPAEV	EVERGREEN							1						1					
		PHLAPAGE	GERMANTOWN							1						1					
		PHLAPAJE	JEFFERSON							1						1					
		PHLAPALO	LOCUST							1						1					
		PHLAPAMK	MARKET							1						1					
		PHLAPAOR	ORCHARD							1						1					
		PHLAPAPE	PENNYPACKER							1						1					
		PHLAPAPI	PILGRIM							1						1					
		PHLAPATR	TRINITY							1						1					
		PHLAPAWV	WAVERLY							1						1					
		PTTWPAPT	POTTSTOWN							1						1					
		WAYNPAWY	WAYNE							1						1					
		WCHSPAWC	WEST CHESTER							1						1					
		WLGRPAWG	WILLOW GROVE							1						1					
NRTWPANR	NORRISTOWN	NWRKDENB	NEWARK		1								1								
		PAOLPAPA	PAOLI		1		1	1	1			1	1			1	1				
		PHLAPACH	CHESTNUT HILL				1		1			1									
		PHLAPADE	DEWEY				1	1	1			1				1					
		PHLAPAEV	EVERGREEN				1	1	1			1	1			1	1				
		PHLAPAGE	GERMANTOWN				1		1			1				1					
		PHLAPAJE	JEFFERSON				1		1			1				1					
		PHLAPALO	LOCUST		1		1	1	1			1	1			1	1				
		PHLAPAMK	MARKET		1		1	1	1			1	1			1	1				
		PHLAPAMY	MAYFAIR				1		1			1									
		PHLAPAOR	ORCHARD						1							1					
		PHLAPAPE	PENNYPACKER		1		1	1	1			1				1	1				
		PHLAPAPI	PILGRIM				1		1			1				1					
		PHLAPAPO	POPLAR				1					1									
		PHLAPARE	REGENT				1		1			1									

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DS1 DS3

LATA 228																					
Count of CLECNm				CLECNum																	
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066	(blank)		
NRTWPANR	NORRISTOWN	PHLAPATR	TRINITY					1		1			1			1	1				
		PHLAPAWV	WAVERLY				1			1			1								
		PTTWPAPT	POTTSTOWN								1						1				
		TLVLDETV	TALLEYVILLE		1									1							
		TRPRPATR	TROOPER		1		1		1					1			1				
		WAYNPAWY	WAYNE		1				1	1				1			1	1			
		WCHSPAWC	WEST CHESTER		1			1			1			1			1				
		WLGRPAWG	WILLOW GROVE				1			1				1				1			
		WLMGDEWL	WILMINGTON		1					1					1						
		NWRKDENB	NEWARK	PAOLPAPA	PAOLI										1						
PHLAPALO	LOCUST													1							
PHLAPAMK	MARKET													1							
PHLAPAPE	PENNYPACKER													1							
TLVLDETV	TALLEYVILLE													1							
TRPRPATR	TROOPER													1							
WAYNPAWY	WAYNE													1							
WCHSPAWC	WEST CHESTER													1							
WLMGDEWL	WILMINGTON													1							
PAOLPAPA	PAOLI			PHLAPACH	CHESTNUT HILL				1			1			1						
		PHLAPADE	DEWEY				1		1	1			1				1				
		PHLAPAEV	EVERGREEN				1		1	1			1	1		1	1	1			
		PHLAPAGE	GERMANTOWN				1			1			1				1				
		PHLAPAJE	JEFFERSON				1		1				1				1				
		PHLAPALO	LOCUST		1		1		1	1			1	1	1	1	1	1			
		PHLAPAMK	MARKET		1		1		1	1			1	1	1	1	1	1			
		PHLAPAMY	MAYFAIR				1		1				1								
		PHLAPAOR	ORCHARD								1							1			
		PHLAPAPE	PENNYPACKER		1		1		1	1			1		1	1	1	1			
		PHLAPAPI	PILGRIM				1		1				1		1	1	1				
		PHLAPAPO	POPLAR				1						1								
		PHLAPARE	REGENT				1		1				1								
		PHLAPATR	TRINITY				1		1				1					1	1		
		PHLAPAWV	WAVERLY				1		1				1					1			
		PTTWPAPT	POTTSTOWN								1							1			
		TLVLDETV	TALLEYVILLE		1									1							
		TRPRPATR	TROOPER		1		1		1					1				1			
		WAYNPAWY	WAYNE		1				1	1				1			1	1	1		
		WCHSPAWC	WEST CHESTER		1			1			1			1				1			
		WLGRPAWG	WILLOW GROVE				1			1				1					1		
		WLMGDEWL	WILMINGTON		1					1					1						
		PHLAPACH	CHESTNUT HILL	PHLAPADE	DEWEY				1			1			1						
				PHLAPAEV	EVERGREEN				1		1				1						
				PHLAPAGE	GERMANTOWN				1		1				1						
PHLAPAJE	JEFFERSON						1		1				1								
PHLAPALO	LOCUST						1		1				1								
PHLAPAMK	MARKET						1		1				1								
PHLAPAMY	MAYFAIR						1		1				1								
PHLAPAPE	PENNYPACKER						1		1				1								
PHLAPAPI	PILGRIM						1		1				1								
PHLAPAPO	POPLAR						1						1								
PHLAPARE	REGENT						1		1				1								
PHLAPATR	TRINITY						1		1				1								
PHLAPAWV	WAVERLY						1		1				1								

LATA 228																						
Count of CLECNm																						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	CLECNm	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066	(blank)		
PHLAPACH	CHESTNUT HILL	TRPRPATR	TROOPER					1						1								
		WAYNPAWY	WAYNE							1					1							
		WCHSPAWC	WEST CHESTER					1							1							
		WLGRPAWG	WILLOW GROVE					1			1				1							
PHLAPADE	DEWEY	PHLAPAEV	EVERGREEN					1		1				1								
		PHLAPAGE	GERMANTOWN					1		1				1								
		PHLAPAJE	JEFFERSON					1		1				1								
		PHLAPALO	LOCUST					1		1				1								
		PHLAPAMK	MARKET					1		1				1								
		PHLAPAMY	MAYFAIR					1		1				1								
		PHLAPAOR	ORCHARD								1											
		PHLAPAPE	PENNYPACKER					1		1					1							
		PHLAPAPI	PILGRIM					1		1					1							
		PHLAPAPO	POPLAR					1							1							
		PHLAPARE	REGENT					1		1					1							
		PHLAPATR	TRINITY							1					1							
		PHLAPAWV	WAVERLY							1					1							
		PTTWPAPT	POTTSTOWN								1											
		TRPRPATR	TROOPER							1		1				1						
		WAYNPAWY	WAYNE								1	1				1						
WCHSPAWC	WEST CHESTER							1		1				1								
WLGRPAWG	WILLOW GROVE							1		1				1								
WLMGDEWL	WILMINGTON									1				1								
PHLAPAEV	EVERGREEN	PHLAPAGE	GERMANTOWN					1		1				1								
		PHLAPAJE	JEFFERSON					1		1				1								
		PHLAPALO	LOCUST					1		1				1	1							
		PHLAPAMK	MARKET					1		1				1	1							
		PHLAPAMY	MAYFAIR					1		1				1								
		PHLAPAOR	ORCHARD								1											
		PHLAPAPE	PENNYPACKER					1		1					1							
		PHLAPAPI	PILGRIM					1		1					1							
		PHLAPAPO	POPLAR					1							1							
		PHLAPARE	REGENT					1		1					1							
		PHLAPATR	TRINITY							1					1							
		PHLAPAWV	WAVERLY							1					1							
		PTTWPAPT	POTTSTOWN								1											
		TRPRPATR	TROOPER							1						1						
		WAYNPAWY	WAYNE									1				1						
		WCHSPAWC	WEST CHESTER							1		1				1						
WLGRPAWG	WILLOW GROVE							1		1				1								
PHLAPAGE	GERMANTOWN	PHLAPAJE	JEFFERSON					1		1				1								
		PHLAPALO	LOCUST					1		1				1								
		PHLAPAMK	MARKET					1		1				1								
		PHLAPAMY	MAYFAIR					1		1				1								
		PHLAPAOR	ORCHARD								1											
		PHLAPAPE	PENNYPACKER					1		1					1							
		PHLAPAPI	PILGRIM					1		1					1							
		PHLAPAPO	POPLAR					1							1							
		PHLAPARE	REGENT					1		1					1							
		PHLAPATR	TRINITY							1					1							
		PHLAPAWV	WAVERLY							1					1							
		PTTWPAPT	POTTSTOWN								1											
TRPRPATR	TROOPER							1						1								

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DS1 DS3

LATA 228																					
Count of CLECNm	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	CLECNm	003	007	008	014	021	026	033	038	044	045	050	053	057	060	066	(blank)	
PHLAPAGE	GERMANTOWN	WAYNPAWY	WAYNE								1			1			1				
		WCHSPAWC	WEST CHESTER					1			1				1			1			
		WLGRPAWG	WILLOW GROVE					1			1				1			1			
PHLAPAJE	JEFFERSON	PHLAPALO	LOCUST						1		1			1			1				
		PHLAPAMK	MARKET					1			1			1			1				
		PHLAPAMY	MAYFAIR					1			1			1			1				
		PHLAPAOR	ORCHARD								1							1			
		PHLAPAPE	PENNYPACKER					1			1			1			1				
		PHLAPAPI	PILGRIM					1			1			1			1				
		PHLAPAPO	POPLAR					1						1							
		PHLAPARE	REGENT					1			1			1							
		PHLAPATR	TRINITY					1			1			1				1			
		PHLAPAWV	WAVERLY					1			1			1				1			
		PTTWPAPT	POTTSTOWN									1							1		
		TRPRPATR	TROOPER						1						1				1		
		WAYNPAWY	WAYNE									1			1			1			
		WCHSPAWC	WEST CHESTER						1			1			1			1			
		WLGRPAWG	WILLOW GROVE						1			1			1			1			
		PHLAPALO	LOCUST	PHLAPAMK	MARKET		1			1		1	1		1	1	1	1	1	1	
				PHLAPAMY	MAYFAIR					1			1			1					
PHLAPAOR	ORCHARD										1							1			
PHLAPAPE	PENNYPACKER				1			1	1		1			1	1	1	1	1	1		
PHLAPAPI	PILGRIM							1			1			1	1	1					
PHLAPAPO	POPLAR							1						1							
PHLAPARE	REGENT							1			1			1							
PHLAPATR	TRINITY							1			1			1				1	1		
PHLAPAWV	WAVERLY							1			1			1				1			
PTTWPAPT	POTTSTOWN										1								1		
TLVLDTV	TALLEYVILLE							1							1						
TRPRPATR	TROOPER							1		1	1			1				1			
WAYNPAWY	WAYNE							1			1	1			1			1	1	1	
WCHSPAWC	WEST CHESTER							1			1				1			1			
WLGRPAWG	WILLOW GROVE							1			1				1			1			
WLMGDEWL	WILMINGTON							1			1				1						
PHLAPAMK	MARKET			PHLAPAMY	MAYFAIR					1			1			1					
		PHLAPAOR	ORCHARD								1							1			
		PHLAPAPE	PENNYPACKER		1			1	1		1			1	1	1	1	1			
		PHLAPAPI	PILGRIM					1			1			1	1	1					
		PHLAPAPO	POPLAR					1						1							
		PHLAPARE	REGENT					1			1			1							
		PHLAPATR	TRINITY					1			1			1				1	1		
		PHLAPAWV	WAVERLY					1			1			1				1			
		PTTWPAPT	POTTSTOWN								1								1		
		TLVLDTV	TALLEYVILLE					1							1						
		TRPRPATR	TROOPER					1		1	1			1				1			
		WAYNPAWY	WAYNE					1			1	1			1			1	1	1	
		WCHSPAWC	WEST CHESTER					1			1				1			1			
		WLGRPAWG	WILLOW GROVE					1			1				1			1			
		WLMGDEWL	WILMINGTON					1			1				1						
		PHLAPAMY	MAYFAIR	PHLAPAPE	PENNYPACKER					1			1			1					
				PHLAPAPI	PILGRIM					1			1			1					
PHLAPAPO	POPLAR							1						1							
PHLAPARE	REGENT							1			1			1							



LATA 228																					
Count of CLECNm				CLECNum																	
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	028	033	038	044	045	050	053	057	060	066	(blank)		
PHLAPAWV	WAVERLY	PTTWPAPT	POTTSTOWN							1						1					
		TRPRPATR	TROOPER				1						1				1				
		WAYNPAWY	WAYNE								1			1				1			
		WCHSPAWC	WEST CHESTER					1			1			1							
		WLGRPAWG	WILLOW GROVE					1			1			1							
PTTWPAPT	POTTSTOWN	WAYNPAWY	WAYNE																		
		WCHSPAWC	WEST CHESTER								1										
		WLGRPAWG	WILLOW GROVE								1										
TLVLDETV	TALLEYVILLE	TRPRPATR	TROOPER		1									1							
		WAYNPAWY	WAYNE		1										1						
		WCHSPAWC	WEST CHESTER		1										1						
		WLMGDEWL	WILMINGTON		1										1						
TRPRPATR	TROOPER	WAYNPAWY	WAYNE		1					1				1							
		WCHSPAWC	WEST CHESTER		1			1						1							
		WLGRPAWG	WILLOW GROVE					1						1							
		WLMGDEWL	WILMINGTON		1					1					1						
WAYNPAWY	WAYNE	WCHSPAWC	WEST CHESTER		1						1			1							
		WLGRPAWG	WILLOW GROVE								1			1							
		WLMGDEWL	WILMINGTON		1					1				1							
WCHSPAWC	WEST CHESTER	WLGRPAWG	WILLOW GROVE					1		1				1							
		WLMGDEWL	WILMINGTON		1									1							

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228																	
Count of CLECNm																CLECNm	
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066	
ALTWPAAL	ALLENTOWN	AMBLPAAM	AMBLER						1					1			
		BHLHPABE	BETHLEHEM		1	1		1	1						1		
		CNSHPACN	CONSHOHOCKEN							1						1	
		FTWSPAFW	FORT WASHINGTON TANDEM			1										1	
		HTBOPAHB	HATBORO							1						1	
		KGPRPAKP	KING OF PRUSSIA							1						1	
		PAOLPAPA	PAOLI							1						1	
		PHLAPALO	LOCUST							1						1	
		PHLAPAMK	MARKET							1						1	
		PHLAPAPE	PENNYPACKER								1					1	
		RDNGPARE	READING				1									1	
		WAYNPAWY	WAYNE								1					1	
		AMBLPAAM	AMBLER	ARMRPAAR	ARDMORE	1					1			1			
BCYNPABC	BALA CYNWYD			1			1		1			1					
BHLHPABE	BETHLEHEM									1					1		
BRYMPABM	BRYN MAWR			1						1							
CNSHPACN	CONSHOHOCKEN			1			1			1			1		1		
HTBOPAHB	HATBORO			1			1			1			1		1		
JENKPAJK	JENKINTOWN						1						1				
KGPRPAKP	KING OF PRUSSIA			1			1			1			1		1		
NRTWPANR	NORRISTOWN			1			1			1			1				
NWRKDENB	NEWARK			1									1				
PAOLPAPA	PAOLI			1			1			1			1		1		
PHLAPACH	CHESTNUT HILL						1						1				
PHLAPADE	DEWEY						1			1			1				
PHLAPAEV	EVERGREEN						1						1				
PHLAPAGE	GERMANTOWN						1						1				
PHLAPAJE	JEFFERSON						1						1				
PHLAPALO	LOCUST			1			1				1		1		1		
PHLAPAMK	MARKET			1			1				1		1		1		
PHLAPAMY	MAYFAIR						1						1				
PHLAPAPE	PENNYPACKER			1			1				1		1		1		
PHLAPAPI	PILGRIM						1						1		1		
PHLAPAPO	POPLAR						1						1				
PHLAPARE	REGENT						1						1				
PHLAPATR	TRINITY						1						1				
PHLAPAWV	WAVERLY						1						1				
TLVLDETV	TALLEYVILLE			1									1				
TRPRPATR	TROOPER			1			1				1		1				
WAYNPAWY	WAYNE			1							1		1		1		
WCHSPAWC	WEST CHESTER			1			1						1				
WLGRPAGW	WILLOW GROVE						1						1				
WLMGDEWL	WILMINGTON			1							1		1				
ARMRPAAR	ARDMORE			BCYNPABC	BALA CYNWYD	1					1		1			1	1
				BRYMPABM	BRYN MAWR	1					1		1				1

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228																	
Count of CLECNm		CLECNm															
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066	
ARMRPAAR	ARDMORE	CNSHPACN	CONSHOCKEN	1					1			1			1		
		HTBOPAHB	HATBORO	1					1			1					
		KGPRPAKP	KING OF PRUSSIA	1					1			1				1	
		NRTWPANR	NORRISTOWN	1					1			1				1	
		NWRKDENB	NEWARK	1								1					
		PAOLPAPA	PAOLI	1					1			1				1	
		PHLAPADE	DEWEY						1			1					
		PHLAPAEV	EVERGREEN										1				1
		PHLAPALO	LOCUST	1					1	1		1					1
		PHLAPAMK	MARKET	1					1			1					1
		PHLAPAPE	PENNYPACKER	1					1			1					1
		PHLAPATR	TRINITY										1				1
		TLVLDETV	TALLEYVILLE	1									1				
		TRPRPATR	TROOPER	1						1		1					
		WAYNPAWY	WAYNE	1						1		1					1
		WCHSPAWC	WEST CHESTER	1									1				
		WLMGDEWL	WILMINGTON	1							1		1				
BCYNPABC	BALA CYNWYD	BRYMPABM	BRYN MAWR	1					1							1	
		CNSHPACN	CONSHOCKEN	1			1		1		1					1	
		HTBOPAHB	HATBORO	1			1		1		1						
		JENKPAJK	JENKINTOWN				1					1					
		KGPRPAKP	KING OF PRUSSIA	1			1		1		1					1	
		NRTWPANR	NORRISTOWN	1			1		1		1					1	
		NWRKDENB	NEWARK	1								1					
		PAOLPAPA	PAOLI	1			1		1		1					1	
		PHLAPACH	CHESTNUT HILL				1					1					
		PHLAPADE	DEWEY				1			1		1					
		PHLAPAEV	EVERGREEN				1					1				1	
		PHLAPAGE	GERMANTOWN				1					1					
		PHLAPAJE	JEFFERSON				1					1					
		PHLAPALO	LOCUST	1			1		1			1				1	
		PHLAPAMK	MARKET	1			1		1			1				1	
		PHLAPAMY	MAYFAIR				1					1					
		PHLAPAPE	PENNYPACKER	1			1		1			1				1	
		PHLAPAPI	PILGRIM				1					1					
		PHLAPAPO	POPLAR				1					1					
		PHLAPARE	REGENT				1					1					
		PHLAPATR	TRINITY				1					1				1	
		PHLAPAWV	WAVERLY				1					1					
		TLVLDETV	TALLEYVILLE	1									1				
		TRPRPATR	TROOPER	1			1		1			1					
		WAYNPAWY	WAYNE	1						1		1				1	
		WCHSPAWC	WEST CHESTER	1			1					1					
		WLGRPAWG	WILLOW GROVE				1					1					
		WLMGDEWL	WILMINGTON	1							1		1				

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228				CLECNum														
Count of CLECNm	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066		
BHLHPABE	BETHLEHEM	CNSHPACN	CONSHOCKEN						1					1				
		FTWSPAFW	FORT WASHINGTON TANDEM			1									1			
		HTBOPAHB	HATBORO						1						1			
		KGPRPAKP	KING OF PRUSSIA						1						1			
		PAOLPAPA	PAOLI						1						1			
		PHLAPALO	LOCUST						1						1			
		PHLAPAMK	MARKET						1						1			
		PHLAPAPE	PENNYPACKER						1						1			
		RDNGPARE	READING				1								1			
		WAYNPAWY	WAYNE								1					1		
		BRYMPABM	BRYN MAWR	CNSHPACN	CONSHOCKEN	1					1							1
				HTBOPAHB	HATBORO	1					1							
KGPRPAKP	KING OF PRUSSIA			1					1								1	
NRTWPANR	NORRISTOWN			1					1								1	
PAOLPAPA	PAOLI			1					1								1	
PHLAPALO	LOCUST			1					1								1	
PHLAPAMK	MARKET			1					1								1	
PHLAPAPE	PENNYPACKER			1					1								1	
TRPRPATR	TROOPER			1					1									
WAYNPAWY	WAYNE			1					1									1
CNSHPACN	CONSHOCKEN	WLMGDEWL	WILMINGTON	1					1									
		HTBOPAHB	HATBORO	1			1		1			1			1			
		JENKPAJK	JENKINTOWN				1						1					
		KGPRPAKP	KING OF PRUSSIA	1			1		1			1			1	1		
		NRTWPANR	NORRISTOWN	1			1		1			1	1		1	1		
		NWRKDENB	NEWARK	1								1						
		PAOLPAPA	PAOLI	1			1		1			1	1		1	1		
		PHLAPACH	CHESTNUT HILL				1					1						
		PHLAPADE	DEWEY				1		1			1						
		PHLAPAEV	EVERGREEN				1					1	1		1			
		PHLAPAGE	GERMANTOWN				1					1						
		PHLAPAJE	JEFFERSON				1					1						
		PHLAPALO	LOCUST	1			1		1			1	1		1	1		
		PHLAPAMK	MARKET	1			1		1			1	1		1	1		
		PHLAPAMY	MAYFAIR				1					1						
		PHLAPAPE	PENNYPACKER	1			1		1			1			1	1		
		PHLAPAPI	PILGRIM				1					1			1			
		PHLAPAPO	POPLAR				1					1						
		PHLAPARE	REGENT				1					1						
		PHLAPATR	TRINITY				1					1					1	
		PHLAPAWV	WAVERLY				1					1						
		TLVLDENV	TALLEYVILLE	1								1						
		TRPRPATR	TROOPER	1			1			1		1						
		WAYNPAWY	WAYNE	1						1		1				1	1	
		WCHSPAWC	WEST CHESTER	1			1					1						



DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228																	
Count of CLECNm				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066	
JENKPAJK	JENKINTOWN	TRPRPATR	TROOPER				1					1					
		WCHSPAWC	WEST CHESTER				1					1					
		WLGRPAWG	WILLOW GROVE				1					1					
KGPRPAKP	KING OF PRUSSIA	NRTWPANR	NORRISTOWN	1			1		1			1			1		
		NWRKDENB	NEWARK	1								1					
		PAOLPAPA	PAOLI	1			1		1			1			1	1	
		PHLAPACH	CHESTNUT HILL				1					1					
		PHLAPADE	DEWEY				1		1			1					
		PHLAPAEV	EVERGREEN				1					1				1	
		PHLAPAGE	GERMANTOWN				1					1					
		PHLAPAJE	JEFFERSON				1					1					
		PHLAPALO	LOCUST	1			1		1			1		1	1	1	
		PHLAPAMK	MARKET	1			1		1			1		1	1	1	
		PHLAPAMY	MAYFAIR				1					1					
		PHLAPAPE	PENNYPACKER	1			1		1			1		1	1	1	
		PHLAPAPI	PILGRIM				1					1		1			
		PHLAPAPO	POPLAR				1					1					
		PHLAPARE	REGENT				1					1					
		PHLAPATR	TRINITY				1					1				1	
		PHLAPAWV	WAVERLY				1					1					
				TLVLDETV	TALLEYVILLE	1								1			
				TRPRPATR	TROOPER	1			1		1			1			
				WAYNPAWY	WAYNE	1					1			1		1	1
				WCHSPAWC	WEST CHESTER	1			1					1			
				WLGRPAWG	WILLOW GROVE				1					1			
				WLMGDEWL	WILMINGTON	1					1			1			
		NRTWPANR	NORRISTOWN	NWRKDENB	NEWARK	1								1			
PAOLPAPA	PAOLI			1			1		1			1	1	1			
PHLAPACH	CHESTNUT HILL						1					1					
PHLAPADE	DEWEY						1		1			1					
PHLAPAEV	EVERGREEN						1					1	1		1		
PHLAPAGE	GERMANTOWN						1					1					
PHLAPAJE	JEFFERSON						1					1					
PHLAPALO	LOCUST			1			1		1			1	1	1	1		
PHLAPAMK	MARKET			1			1		1			1	1	1	1		
PHLAPAMY	MAYFAIR						1					1					
PHLAPAPE	PENNYPACKER			1			1		1			1			1		
PHLAPAPI	PILGRIM						1					1					
PHLAPAPO	POPLAR						1					1					
PHLAPARE	REGENT						1					1					
PHLAPATR	TRINITY						1					1			1		
PHLAPAWV	WAVERLY						1					1					
				TLVLDETV	TALLEYVILLE	1								1			
				TRPRPATR	TROOPER	1			1		1			1			
				WAYNPAWY	WAYNE	1					1			1		1	

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228																	
Count of CLECNm				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066	
NRTWPANR	NORRISTOWN	WCHSPAWC	WEST CHESTER	1			1					1					
		WLGRPAWG	WILLOW GROVE				1					1					
		WLMGDEWL	WILMINGTON	1					1				1				
NWRKDENB	NEWARK	PAOLPAPA	PAOLI	1								1					
		PHLAPALO	LOCUST	1								1					
		PHLAPAMK	MARKET	1									1				
		PHLAPAPE	PENNYPACKER	1									1				
		TLVLDETV	TALLEYVILLE	1									1				
		TRPRPATR	TROOPER	1									1				
		WAYNPAWY	WAYNE	1									1				
		WCHSPAWC	WEST CHESTER	1									1				
		WLMGDEWL	WILMINGTON	1									1				
PAOLPAPA	PAOLI	PHLAPACH	CHESTNUT HILL				1					1					
		PHLAPADE	DEWEY				1		1			1					
		PHLAPAEV	EVERGREEN				1						1	1		1	
		PHLAPAGE	GERMANTOWN				1						1				
		PHLAPAJE	JEFFERSON				1						1				
		PHLAPALO	LOCUST	1			1		1				1	1	1	1	
		PHLAPAMK	MARKET	1			1		1				1	1	1	1	
		PHLAPAMY	MAYFAIR				1						1				
		PHLAPAPE	PENNYPACKER	1			1		1				1		1	1	
		PHLAPAPI	PILGRIM				1						1		1		
		PHLAPAPO	POPLAR				1						1				
		PHLAPARE	REGENT				1						1				
		PHLAPATR	TRINITY				1						1			1	
		PHLAPAWV	WAVERLY				1						1				
		TLVLDETV	TALLEYVILLE	1									1				
		TRPRPATR	TROOPER	1			1			1			1				
		WAYNPAWY	WAYNE	1						1			1		1	1	
		WCHSPAWC	WEST CHESTER	1			1						1				
		WLGRPAWG	WILLOW GROVE				1						1				
WLMGDEWL	WILMINGTON	1						1			1						
PHLAPACH	CHESTNUT HILL	PHLAPADE	DEWEY				1					1					
		PHLAPAEV	EVERGREEN				1					1					
		PHLAPAGE	GERMANTOWN				1					1					
		PHLAPAJE	JEFFERSON				1					1					
		PHLAPALO	LOCUST				1					1					
		PHLAPAMK	MARKET				1					1					
		PHLAPAMY	MAYFAIR				1					1					
		PHLAPAPE	PENNYPACKER	1			1					1					
		PHLAPAPI	PILGRIM				1					1					
		PHLAPAPO	POPLAR				1					1					
		PHLAPARE	REGENT				1					1					
		PHLAPATR	TRINITY				1					1					
		PHLAPAWV	WAVERLY				1					1					

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228																
Count of CLECNm				CLECNum												
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066
PHLAPACH	CHESTNUT HILL	TRPRPATR	TROOPER				1					1				
		WCHSPAWC	WEST CHESTER					1				1				
		WLGRPAWG	WILLOW GROVE					1				1				
PHLAPADE	DEWEY	PHLAPAEV	EVERGREEN					1				1				
		PHLAPAGE	GERMANTOWN					1				1				
		PHLAPAJE	JEFFERSON					1				1				
		PHLAPALO	LOCUST					1	1			1				
		PHLAPAMK	MARKET					1	1			1				
		PHLAPAMY	MAYFAIR					1				1				
		PHLAPAPE	PENNYPACKER					1	1			1				
		PHLAPAPI	PILGRIM					1				1				
		PHLAPAPO	POPLAR					1				1				
		PHLAPARE	REGENT					1				1				
		PHLAPATR	TRINITY					1				1				
		PHLAPAWV	WAVERLY					1				1				
		TRPRPATR	TROOPER					1		1		1				
		WAYNPAWY	WAYNE								1		1			
		WCHSPAWC	WEST CHESTER						1				1			
		WLGRPAWG	WILLOW GROVE						1				1			
		WLMGDEWL	WILMINGTON								1		1			
PHLAPAEV	EVERGREEN	PHLAPAGE	GERMANTOWN					1				1				
		PHLAPAJE	JEFFERSON					1				1				
		PHLAPALO	LOCUST					1				1	1		1	
		PHLAPAMK	MARKET					1				1	1		1	
		PHLAPAMY	MAYFAIR					1				1				
		PHLAPAPE	PENNYPACKER					1				1			1	
		PHLAPAPI	PILGRIM					1				1				
		PHLAPAPO	POPLAR					1				1				
		PHLAPARE	REGENT					1				1				
		PHLAPATR	TRINITY					1				1			1	
		PHLAPAWV	WAVERLY					1				1				
		TRPRPATR	TROOPER					1				1				
		WAYNPAWY	WAYNE										1			1
		WCHSPAWC	WEST CHESTER						1				1			
WLGRPAWG	WILLOW GROVE						1				1					
PHLAPAGE	GERMANTOWN	PHLAPAJE	JEFFERSON					1				1				
		PHLAPALO	LOCUST					1				1				
		PHLAPAMK	MARKET					1				1				
		PHLAPAMY	MAYFAIR					1				1				
		PHLAPAPE	PENNYPACKER					1				1				
		PHLAPAPI	PILGRIM					1				1				
		PHLAPAPO	POPLAR					1				1				
		PHLAPARE	REGENT					1				1				
		PHLAPATR	TRINITY					1				1				
PHLAPAWV	WAVERLY					1				1						

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

LATA 228																
Count of CLECNm				CLECNum												
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066
PHLAPAGE	GERMANTOWN	TRPRPATR	TROOPER				1					1				
		WCHSPAWC	WEST CHESTER				1					1				
		WLGRPAWG	WILLOW GROVE				1					1				
PHLAPAJE	JEFFERSON	PHLAPALO	LOCUST				1					1				
		PHLAPAMK	MARKET				1					1				
		PHLAPAMY	MAYFAIR				1					1				
		PHLAPAPE	PENNYPACKER				1					1				
		PHLAPAPI	PILGRIM				1					1				
		PHLAPAPO	POPLAR				1					1				
		PHLAPARE	REGENT				1					1				
		PHLAPATR	TRINITY				1					1				
		PHLAPAWV	WAVERLY				1					1				
		TRPRPATR	TROOPER				1					1				
		WCHSPAWC	WEST CHESTER				1					1				
		WLGRPAWG	WILLOW GROVE				1					1				
		PHLAPALO	LOCUST	PHLAPAMK	MARKET	1			1		1		1	1	1	1
PHLAPAMY	MAYFAIR						1				1					
PHLAPAPE	PENNYPACKER			1			1		1		1		1	1	1	
PHLAPAPI	PILGRIM						1				1		1		1	
PHLAPAPO	POPLAR						1				1					
PHLAPARE	REGENT						1				1					
PHLAPATR	TRINITY						1				1				1	
PHLAPAWV	WAVERLY						1				1					
TLVLDETV	TALLEYVILLE			1								1				
TRPRPATR	TROOPER			1			1		1			1				
WAYNPAWY	WAYNE			1					1			1		1	1	
WCHSPAWC	WEST CHESTER			1			1					1				
WLGRPAWG	WILLOW GROVE						1					1				
WLMGDEWL	WILMINGTON	1					1			1						
PHLAPAMK	MARKET	PHLAPAMY	MAYFAIR				1					1				
		PHLAPAPE	PENNYPACKER	1			1		1		1		1	1		
		PHLAPAPI	PILGRIM				1				1		1			
		PHLAPAPO	POPLAR				1				1					
		PHLAPARE	REGENT				1				1					
		PHLAPATR	TRINITY				1				1				1	
		PHLAPAWV	WAVERLY				1				1					
		TLVLDETV	TALLEYVILLE	1								1				
		TRPRPATR	TROOPER	1			1		1			1				
		WAYNPAWY	WAYNE	1					1			1		1	1	
		WCHSPAWC	WEST CHESTER	1			1					1				
		WLGRPAWG	WILLOW GROVE				1					1				
		WLMGDEWL	WILMINGTON	1					1			1				
PHLAPAMY	MAYFAIR	PHLAPAPE	PENNYPACKER				1					1				
		PHLAPAPI	PILGRIM				1				1					
		PHLAPAPO	POPLAR				1				1					

DIRECT ROUTES MEETING FCC's WHOLESALE TRIGGER FOR DARK FIBER

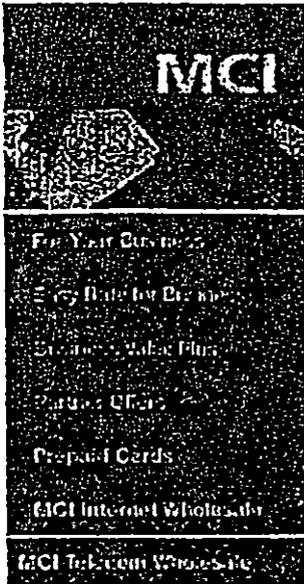
LATA 228																	
Count of CLECNm				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	007	008	014	021	026	038	044	045	050	053	060	066	
PHLAPAMY	MAYFAIR	PHLAPARE	REGENT				1					1					
		PHLAPATR	TRINITY					1				1					
		PHLAPAWV	WAVERLY					1				1					
		TRPRPATR	TROOPER					1				1					
		WCHSPAWC	WEST CHESTER					1				1					
		WLGRPAWG	WILLOW GROVE					1				1					
		PHLAPAPI	PILGRIM	PHLAPAPI	PILGRIM				1				1		1		
		PHLAPAPO	POPLAR	PHLAPAPO	POPLAR				1				1				
PHLAPAPE	PENNYPACKER	PHLAPARE	REGENT					1				1					
		PHLAPATR	TRINITY					1				1			1		
		PHLAPAWV	WAVERLY					1				1					
		TLVLDETV	TALLEYVILLE		1							1					
		TRPRPATR	TROOPER		1		1		1			1					
		WAYNPAWY	WAYNE		1				1			1		1	1		
		WCHSPAWC	WEST CHESTER		1		1					1					
		WLGRPAWG	WILLOW GROVE				1					1					
		WLMGDEWL	WILMINGTON		1					1		1					
		PHLAPAPI	PILGRIM	PHLAPAPO	POPLAR				1					1			
PHLAPARE	REGENT						1				1						
PHLAPATR	TRINITY							1				1					
PHLAPAWV	WAVERLY						1				1						
TRPRPATR	TROOPER						1				1						
WAYNPAWY	WAYNE											1		1			
WCHSPAWC	WEST CHESTER						1				1						
WLGRPAWG	WILLOW GROVE						1				1						
PHLAPAPO	POPLAR	PHLAPARE	REGENT				1					1					
		PHLAPATR	TRINITY				1				1						
		PHLAPAWV	WAVERLY				1				1						
		TRPRPATR	TROOPER				1				1						
		WCHSPAWC	WEST CHESTER				1				1						
PHLAPARE	REGENT	WLGRPAWG	WILLOW GROVE				1				1						
		PHLAPATR	TRINITY				1				1						
		PHLAPAWV	WAVERLY				1				1						
		TRPRPATR	TROOPER				1				1						
PHLAPATR	TRINITY	WCHSPAWC	WEST CHESTER				1				1						
		WLGRPAWG	WILLOW GROVE				1				1						
		PHLAPAWV	WAVERLY				1				1						
		TRPRPATR	TROOPER				1				1						
PHLAPAWV	WAVERLY	WAYNPAWY	WAYNE									1			1		
		WCHSPAWC	WEST CHESTER				1				1						
		WLGRPAWG	WILLOW GROVE				1				1						
		TRPRPATR	TROOPER				1				1						
TLVLDETV	TALLEYVILLE	WCHSPAWC	WEST CHESTER				1				1						
		WLGRPAWG	WILLOW GROVE				1				1						
		TRPRPATR	TROOPER		1						1						



Street Address	BLD CLLI	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-3 Wholesale Trigger	DS-1 Wholesale Trigger
3 Bala Plz, Bala Cywyd, PA	BCYNPA02	003	X	X	X	
		026	X	X	X	
251 Saint Asaphs Rd, Bala Cywyd, PA	BCYNPAAE	003	X	X	X	
		026	X	X	X	
1 Belmont Ave, Bala Cywyd, PA	BCYNPAAI	003	X	X		
		026	X	X		
231 Saint Asaphs Rd, Bala Cywyd, PA	BCYNPAAN	003	X	X	X	
		026	X	X	X	
1 Bala Ave, Bala Cywyd, PA	BCYNPABO	003	X	X		
		026	X	X		
1205 Westlakes Dr, Berwyn, PA	BWYNPAAO	003	X	X	X	
		026	X	X	X	
747 Dresher Rd, Horsham, PA	HRHMPAAP	003	X	X	X	
		026	X	X	X	
1100 1st Ave, King of Prussia, PA	KGPRPA33	003	X	X		
		026	X	X		
150 S Wamer Rd, King of Prussia, PA	KGPRPAAB	003	X	X		
		026	X	X		
1150 1st Ave, King of Prussia, PA	KGPRPAFA	003	X	X	X	
		026	X	X	X	
230 Mail Blvd, King of Prussia, PA	KGPRPAWH	003	X	X		
		026	X	X		
101 Lindenwood Dr, Malvern, PA	MLVRPAAL	003	X	X	X	
		026	X	X	X	
100 Vanguard Blvd, Malvern, PA	MLVRPABH	003	X	X		
		026	X	X		
1000 Forge Ave, Norristown, PA	NRTWPAFQ	026	X	X		
		053	X	X		
2400 Market St, Philadelphia, PA	PHLAPA03	026	X	X		
		053	X	X		
2005 Market St., Philadelphia, PA	PHLAPAAQ	003	X	X	X	
		026	X	X	X	
1900 Market St., Philadelphia, PA	PHLAPAAAT	003	X	X	X	
		026	X	X	X	
30 S 17th St., Philadelphia, PA	PHLAPABM	003	X	X	X	
		026	X	X	X	
60 Walnut St., Philadelphia, PA	PHLAPABP	003	X	X	X	
		026	X	X	X	
1500 Market St., Philadelphia, PA	PHLAPACS	003	X	X	X	
		026	X	X	X	
		053		X		
1835 Market St., Philadelphia, PA	PHLAPAEC	003	X	X	X	
		026	X	X	X	
1735 Market St., Philadelphia, PA	PHLAPAHK	003	X	X	X	
		026	X	X	X	
1515 Market St., Philadelphia, PA	PHLAPAHN	003	X	X	X	
		026	X	X	X	
1700 Market St., Philadelphia, PA	PHLAPAIN	003	X	X	X	
		026	X	X	X	
2001 Market St., Philadelphia, PA	PHLAPAJY	003		X	X	
		026		X	X	
701 Market St., Philadelphia, PA	PHLAPAKK	003	X	X		
		026	X	X		
1650 Market St., Philadelphia, PA	PHLAPALP	003	X	X	X	
		026	X	X	X	
2401 Locust St., Philadelphia, PA	PHLAPALU	053	X	X	X	X
		026	X	X	X	X
399 Market St., Philadelphia, PA	PHLAPAMR	003	X	X		
		026	X	X		
2301 Market St., Philadelphia, PA	PHLAPAPB	003	X			
		053	X			
1601 Market St., Philadelphia, PA	PHLAPASI	003	X	X	X	
		026	X	X	X	
500 S 27th St., Philadelphia, PA	PHLAPASL	053	X			X
		026	X			X

Pennsylvania Customer Locations Meeting FCC's Loop Triggers

Street Address	BLD CLLI	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-3 Wholesale Trigger	DS-1 Wholesale Trigger
1600 Market St., Philadelphia, PA	PHLAPASM	003	X	X	X	
		026	X	X	X	
1617 John F. Kennedy Blvd., Philadelphia, PA	PHLAPASU	003	X	X	X	
		026	X	X	X	
1801 Market St., Philadelphia, PA	PHLAPATP	003	X	X		
		026	X	X		
1635 Market St., Philadelphia, PA	PHLBPAFD	003	X	X		
		053	X	X		
		026	X	X		
2300 Chestnut St., PA	PHLBPAFU	003	X	X		
		053	X	X		
		026	X	X		
401N. Broad St., Philadelphia, PA	PHLHPACP	053	X			
		026	X	X		X
		007	X	X		X
625 Liberty Ave., Pittsburgh, PA	PITBPACG	003	X	X	X	
		026	X	X	X	
717 Liberty Ave., Pittsburgh, PA	PITBPACL	003	X	X	X	
		026	X	X	X	
1400 Penn Ave., Pittsburgh, PA	PITBPAFH	003	X	X		
		026	X	X		
60 Blvd. Of Allies, Pittsburgh, PA	PITBPAGF	003		X	X	
		026		X	X	
120 5th Ave., Pittsburgh PA	PITBPAIK	003	X	X	X	
		026	X	X	X	
1627 Penn Ave., Pittsburgh, PA	PITBPAIS	003	X	X		
		026	X	X		
436 7th Ave., Pittsburgh, PA	PITBPAKP	003	X	X	X	
		026	X	X	X	
3126 Liberty Ave., Pittsburgh, PA	PITBPALA	003	X	X	X	
		026	X	X	X	
1001 Liberty Ave., Pittsburgh, PA	PITBPALC	003	X	X		
		026	X	X		
1 Station Sq., Pittsburgh, PA	PITBPALM	003	X	X		
		026	X	X		
500 Grant St., Pittsburgh, PA	PITBPAMC	003	X	X	X	
		026	X	X	X	
535 Smithfield ST., Pittsburgh, PA	PITBPAOL	003	X	X	X	
		026	X	X	X	
210 6th AVE, Pittsburgh, PA	PITBPAOP	003	X	X	X	
		026	X	X	X	
8 PPG PL, PITTSBURGH, PA	PITBPARO	003		X	X	
		026		X	X	
600 Grant St., Pittsburgh, PA	PITBPAUS	003	X	X	X	
		026	X	X	X	
11 Stanwix At., Pittsburg, PA	PITBPAWH	003	X	X	X	
		026	X	X	X	
500 Ross St., Pittsburgh, PA	PITDPA86	003	X	X		
		026	X	X		
525 William Penn Way, Pittsburgh, PA	PITEPA14	003	X	X		
		026	X	X		
249 5th Ave., Pittsburgh, PA	PITEPAJN	003		X		
		026		X		
455 Devon Park Dr., Wayne PA	WAYNPA04	003	X	X		
		026	X	X		
190 S Warner Rd., Wayne, PA	WAYNPA18	003		X	X	
		026		X	X	
690 Lee Rd., Wayne, PA	WAYNPA38	003	X	X	X	
		026	X	X	X	
640 Lee Rd., Wayne, PA	WAYNPAAP	003	X	X		
		026	X	X		
170 S Warner Rd, Wayne, PA	WAYNPABC	003	X	X		
		026	X	X		
595 E Swedesford Road, Wayne, PA	WAYNPADA	003	X	X		
		026	X	X		



Local	Long Distance	International Plans	Calling Cards	Partner Offers	For Your Business
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## MCI Telecommunications Wholesale Services

The leader in comprehensive voice products, value-added solutions, and management tools for long distance resellers, carriers, and ISPs.

MCI Telecom Wholesale Services is the leading provider of comprehensive wholesale service solutions. Our wholesale voice products, value-added services and management tools are designed to satisfy the needs of today's telecommunications carriers, resellers, CLECs, Internet Service Providers, and Application Solution Providers. Our wholesale service solutions include:

### Voice Products

- Classic Service
- Transcend™
- Access Based Billing
- Advanced Toll Free Billing
- Basic Toll Free Service
- Prism™

### Management Tools

- Portfolio™
- EDE Interface
- EDE Manager
- Daily CDRs

### Value-Added Services

- Calling Card
- Enhanced Call Routing
- International Toll Free Service
- Signalling System 7
- Universal International Freephone Number

How will your business benefit?

### Agent Program

Interested in becoming an agent? For further information see [www.ttinational.com](http://www.ttinational.com).

### Resellers



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# About MCI



## Our Network

MCI's extensive global network is a key advantage for business customers of all sizes.

▶ **Our Company**

▶ **Our Network**

▶ Global Presence

▶ IP Dial-up PoP Numbers

▶ IP Latency Statistics

▶ DSL (On-Net) Latency Statistics

▶ Investor Relations

▶ Career Center

▶ Public Policy

▶ MCI Worldwide

MCI® owns, operates, monitors and maintains one of the largest communications networks in the world. Facilities are throughout North America, Latin America, Europe, Africa, and the Asia-Pacific region, in 100 countries and over 2,800 cities.

Our 98,000-mile fiber optic network is designed to support the largest array of data communications products in the world.

MCI owns the world's farthest reaching global network (based on company-owned PoPs), and spans 4,500 Points of Presence (POPs) throughout the world, with 3.2 million global dial modems and high-speed connections to more than 91,000 lit buildings. The global IP network can circle the globe more than four times.

MCI offers the fastest speeds available over IP today. We were the first to route and switch OC-192 IP traffic. MCI also has the most scalable IP network available, offering speeds from dial to OC-48.

MCI's IP data solutions are directly built into a wholly-owned global network, for direct, safe, secure and reliable service.

Skilled technicians in Network Operations Centers around the world monitor the network for optimal performance 24 hours a day, 365 days a year.

EXHIBIT 8  
PAGE 3 OF 3



## The same strengths with a new approach

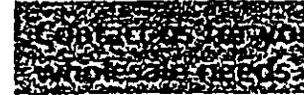
### UUNET Wholesale Network Services

Welcome to UUNET – providing the Wholesale communication services you need to maximize your business potential.

We'll help you to find the right solution to enhance your productivity and profitability.

Our new name is MCI and our brand for domestic and international Wholesale Services is UUNET – a name known in the industry for unsurpassed innovation and value. But we have changed more than our name. We are marking an exciting new era in communication by delivering more powerful products and services for your business and for your customers' businesses.

UUNET will continue its market leadership by delivering the highest quality services and driving the convergence of voice and data on one of the world's largest IP backbone network. We will serve you with the utmost integrity while providing simplicity, innovation, and value for your business. We want to see you succeed.



For information on US products and services, wholesale-solutions@ call 800.494.5629

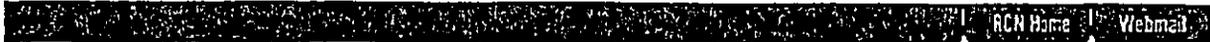
For information on international wholesale products and click here



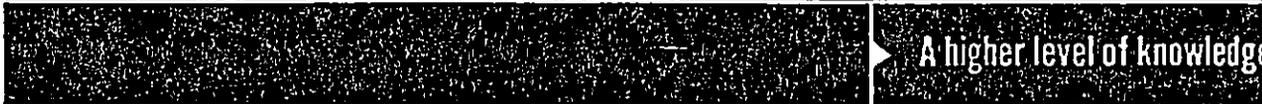
International Wholesale  
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[Ethernet Transport](#) | [Managed Dedicated Server](#) | [SONET Transport](#)  
[Dark Fiber](#) | [Voice](#)

**RCN Dark Fiber**

If your company is looking for a cost-effective solution to expand your network or to create additional route diversity for high-bandwidth applications, RCN is the place to start. RCN offers its dark fiber and conduit in seven major metropolitan areas under 5, 10, and 20 year Indefeasible Rights of Use (IRU).

RCN has constructed networks in metropolitan areas that can be extended directly to businesses and buildings requiring fiber connectivity. The metro networks connect the RCN data centers to key traffic aggregation points such as central offices and carrier hotels.

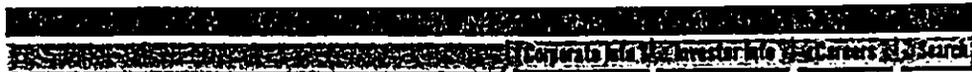
With customer leased fiber networks, your company controls the fiber and can choose the service provider for services such as telephony, CATV, and Internet. In addition, the RCN Network supports the latest advanced networking technologies, including: SONET, ATM, and Ethernet devices at either end of the fiber connection.

Leasing fiber provides you with tangible benefits:

- Reducing local loop telecom costs
- Provides the flexibility, security, and reliability you need to manage your own private optical network
- Ability to deploy redundant paths to multiple carriers
- Carrier hotels feature meet-me-rooms where fiber cables can be cross-connected to any service provider within the building

The RCN Megaband Network is a state-of-the-art broadband fiber-optic platform, which expands over 9,000 route miles. This network is built with the latest advanced networking technologies for superior performance. The fully redundant Metropolitan Area Networks employ self-healing SONET ring backbone architecture and localized nodes, ensuring that bandwidth and connectivity are never compromised.

RCN is committed to supporting the success of our customers with affordability, high quality service, and reliability.





Type in your question here:

- PRODUCTS & PROGRAMS
- CUSTOMER CARE
- ABOUT XO
- AGENT PROGRAM
- NEWS

## XO™ Wholesale Dial



- Home
- Small and Growing Business Product Portfolio
- Internet Access
  - Dial Access
    - Corporate Dial
    - Enterprise Dial
    - Wholesale Dial
  - Concentric™ Dial-Up Internet

### Overview

XO™ Wholesale Dial lets you rapidly expand your nationwide dial capacity and increase your current coverage area, without building or managing your own nationwide dial network. By leveraging our private, nationwide OC-192 IP backbone, Wholesale Dial provides high-performance, business-critical reliability through dial access. XO access numbers provide coverage for over 75% of the United States, and our network is continuously expanding. Wholesale Dial gives you *maximum flexibility in offering highly reliable Internet access while maintaining control of your own subscriber accounts.* By outsourcing remote access to XO™, you can:

- Significantly reduce costs because you don't need to establish or operate your own Points of Presence (POPs)
- Free up resources to focus on value-added services like enhanced online content, web hosting and e-commerce applications
- Enhance or expand your business since you gain immediate access to a large geographic area covered by the XO™ Network

With Wholesale Dial XO offers you a reliable and efficient way to streamline operations while maintaining excellent end-user performance and customer service statistics.

### Features

- RADIUS proxy server authentication
- Nationwide local and 800 dial access
- Full support for V.90 56 Kbps modem access throughout the XO™ network
- Point-to-Point Protocol (PPP) support
- Secure Web-based reporting including detailed usage by user
- Flexible billing options
- 24 x 7 network monitoring and support
- Independent network monitoring

### Pricing and Availability

XO Wholesale Dial is available nationwide. XO offers Wholesale Dial with both usage-based and user-based pricing, allowing you to select the method that best fits your business, and it makes it simple for you to bill your end-users. Call XO Carrier Services toll-free today at 1.800.474.1763 or contact us online.

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**See Also**

- [Learn More About the XO™ OC-192 Network](#)
- [Carriers - See XO™ Wholesale Dial](#)
- [Access Number Lookup tool](#)

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P

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December 19, 2003

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

DOCUMENT  
FOLDER

RECEIVED  
2003 DEC 24 AM 12: 04  
SECRETARY'S BUREAU

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

Dear Suzan:

Enclosed please find the Pennsylvania Carriers' Coalition's Interrogatories Set II directed to Verizon Pennsylvania, Inc. and Verizon North, Inc. in the above-referenced proceeding.

Thank you for your attention to this matter.

Sincerely,



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

ACK/smw

cc: Secretary James J. McNulty (cover letter and certificate only)  
Parties of Record

DSH:39192.2/FUL022-216383

**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).

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Assistant General Counsel

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



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[Suzan.D.Paiva@Verizon.com](mailto:Suzan.D.Paiva@Verizon.com)

December 19, 2003

**VIA ELECTRONIC MAIL AND OVERNIGHT MAIL**

Administrative Law Judge Michael C. Schnierle  
Administrative Law Judge Susan D. Colwell  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

DOCUMENT

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

Dear Judge Schnierle and Judge Colwell:

I am writing in response to the letter that Robert C. Barber of AT&T filed and served earlier today in the above-captioned proceeding. In his letter, Mr. Barber claims that it "does not appear" that Verizon is "engaged in any independent review of its internal data for purposes of complying with the December 17 Order and responding to AT&T's First Set of Interrogatories." This contention is false.

In light of the Order issued by you on December 17<sup>th</sup>, Verizon is in the process of gathering whatever information it has in its possession that would contribute to providing complete answers to the data requests that were the subject of AT&T's Motion to Compel. But as Verizon represented in its Response to AT&T's Motion to Compel, Verizon does not believe that it has available to it the information that it needs to provide these complete answers, especially within seven days. For this reason, Verizon has also sought to obtain this information from those carriers that do have it – the CLECs who have purchased these unbundled loops and know the type of end user customer to which they are providing these loops. In fact, as you are no doubt aware, the Commission itself asked CLECs to provide this very information.

December 19, 2003

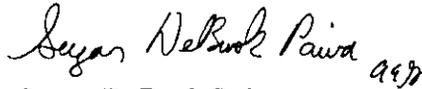
Administrative Law Judge Michael C. Schnierle  
Administrative Law Judge Susan D. Colwell

Page 2

In order to avoid needlessly imposing on the Administrative Law Judge or Judges assigned to a proceeding, as a general rule parties have an obligation to "meet and confer" on discovery disputes before they contact the Commission. The Second Prehearing Order in this proceeding expressly requires parties to contact an opposing party with oral objections before asserting written objections, much less filing a motion to compel. This Prehearing Order also expects parties "to demonstrate good faith in the conduct of discovery . . . ."

In the future, Verizon hopes that before Mr. Barber assumes what it is that Verizon is or is not "engaged in," he will have the courtesy to contact Verizon before he files and serves documents that prove to be inaccurate. Doing so will no doubt reduce the Commission's burdens, but will also avoid the confusion that accompanies false suppositions.

Respectfully,

A handwritten signature in cursive script that reads "Suzan DeBusk Paiva" followed by a small mark that appears to be "a.e.p." or similar initials.

Suzan DeBusk Paiva

cc: Certificate of Service

Suzan DeBusk Paiva  
Assistant General Counsel

RECEIVED

DEC 19 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Verizon Pennsylvania Inc.  
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[Suzan.D.Paiva@Verizon.com](mailto:Suzan.D.Paiva@Verizon.com)

December 19, 2003

**VIA ELECTRONIC MAIL AND OVERNIGHT MAIL**

Administrative Law Judge Michael C. Schnierle  
Administrative Law Judge Susan D. Colwell  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

DOCUMENT

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

Dear Judge Schnierle and Judge Colwell:

I am writing in response to the letter that Robert C. Barber of AT&T filed and served earlier today in the above-captioned proceeding. In his letter, Mr. Barber claims that it "does not appear" that Verizon is "engaged in any independent review of its internal data for purposes of complying with the December 17 Order and responding to AT&T's First Set of Interrogatories." This contention is false.

In light of the Order issued by you on December 17<sup>th</sup>, Verizon is in the process of gathering whatever information it has in its possession that would contribute to providing complete answers to the data requests that were the subject of AT&T's Motion to Compel. But as Verizon represented in its Response to AT&T's Motion to Compel, Verizon does not believe that it has available to it the information that it needs to provide these complete answers, especially within seven days. For this reason, Verizon has also sought to obtain this information from those carriers that do have it – the CLECs who have purchased these unbundled loops and know the type of end user customer to which they are providing these loops. In fact, as you are no doubt aware, the Commission itself asked CLECs to provide this very information.

December 19, 2003

Administrative Law Judge Michael C. Schnierle  
Administrative Law Judge Susan D. Colwell

Page 2

In order to avoid needlessly imposing on the Administrative Law Judge or Judges assigned to a proceeding, as a general rule parties have an obligation to "meet and confer" on discovery disputes before they contact the Commission. The Second Prehearing Order in this proceeding expressly requires parties to contact an opposing party with oral objections before asserting written objections, much less filing a motion to compel. This Prehearing Order also expects parties "to demonstrate good faith in the conduct of discovery . . . ."

In the future, Verizon hopes that before Mr. Barber assumes what it is that Verizon is or is not "engaged in," he will have the courtesy to contact Verizon before he files and serves documents that prove to be inaccurate. Doing so will no doubt reduce the Commission's burdens, but will also avoid the confusion that accompanies false suppositions.

Respectfully,



Suzan DeBusk Paiva

cc: Certificate of Service

**DOCKETED**  
FEB 04 2004

**DOCUMENT**

RECEIVED



DEC 19 2003

Robert C. Barber  
Senior Attorney

PA PUBLIC UTILITY COMMISSION  
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December 19, 2003

**BY OVERNIGHT MAIL**

Administrative Law Judge Michael C. Schnierle  
Administrative Law Judge Susan D. Colwell  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

DOCKETED  
FEB 04 2004

DOCUMENT

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

Dear Judge Schnierle and Judge Colwell:

I am writing to bring to your attention actions Verizon Pennsylvania Inc. has taken in reaction to your order of December 17, 2003, granting AT&T's Motion to Overrule Objections and to Compel Responses to Its First Set of Interrogatories and requests for Production of Documents.

That Order directed Verizon to furnish complete answers to certain interrogatories, including a breakdown of unbundled loops between residential and business lines. It was apparent from the Order that these answers were to reflect information compiled from Verizon's own records, information that, as the Order stated, Verizon had admitted was "routinely collect[ed] . . . when a competitor orders an unbundled loop. . . ." (Order at 3). In fact, the Order directly rejected Verizon's belated contention that this information was unavailable to it for purposes of responding to AT&T's discovery, or to the Commission's previous requests for the same information. (Order at 5-6).

Subsequent to the issuance of this directive, Verizon, on December 17, served its Second Set of Interrogatories to Competitive Local Exchange Carriers, a copy of which is attached. That discovery was propounded to eleven CLECs, including AT&T, whom Verizon has identified as "trigger" CLECs in this proceeding. It consists of one question requesting that these CLECs identify "the total number of voice grade

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December 17, 2003

**VIA E-MAIL AND UPS OVERNIGHT DELIVERY**

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

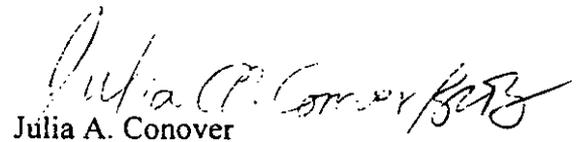
To All Parties In Docket No. I-00030099:

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

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

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

Very truly yours,

  
Julia A. Conover

JAC/slb  
Enc.

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

**CERTIFICATE OF SERVICE**

I, Julia A. Conover, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc. and Verizon North Inc.'s Second Set of Interrogatories to Competitive Local Exchange Carriers, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 17<sup>th</sup> day of December, 2003.

**VIA E-MAIL AND UPS OVERNIGHT DELIVERY**

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Regina L. Matz, Esquire  
Thomas, Thomas, Armstrong  
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Melanie Lloyd  
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Julia A. Conover  
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Verizon North Inc.  
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Philadelphia, PA 19103  
(215) 963-6001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIZON PENNSYLVANIA INC.'S  
AND VERIZON NORTH INC.'S SECOND SET OF INTERROGATORIES  
TO THOSE COMPETITIVE LOCAL EXCHANGE CARRIERS THAT  
ORDER UNBUNDLED LOOPS FROM VERIZON**

Pursuant to 52 Pa. Code § 5.341 Verizon Pennsylvania Inc. and Verizon North Inc. (collectively "Verizon") hereby propound the following Interrogatory to:

(1) Allegiance Telecom of Pennsylvania, Inc., (2) AT&T Communications of Pennsylvania, LLC, (3) Broadview, (4) Cavalier Telephone Mid-Atlantic, LLC, (5) Choice One Communications of Pennsylvania, Inc., (6) CTSI, (7) MCI WorldCom Network Service, Inc., (8) Penn Telecom, (9) RCN Telecom Services, Inc./RCN Telecom of Philadelphia, Inc., (10) XO Pennsylvania, Inc., and (11) Full Service Network (the "Responding Parties"). The Interrogatory contained herein is to be answered by those officers, employees or agents who may be cognizant of or who may possess the information, data and/or documents requested and who are authorized to answer on the Responding Party's behalf.

## INSTRUCTIONS

1. The answer provided should restate the question asked and also identify the person(s) supplying the information, pursuant to the requirements of 52 Pa. Code § 5.342(a).
2. Provide all information that is within the knowledge, possession, control, or custody of the Responding Party or that may be reasonably ascertained by the Responding Party.
3. Pursuant to 52 Pa. Code § 5.332, you are under a continuing duty to change, supplement and correct your answer to this Interrogatory to conform to available information, including information that becomes available to you after your answers hereto are provided.
4. Please provide your response to this Interrogatory in hard copy and electronic copy formats.

## DEFINITIONS

1. "Respondent", "Responding Party", "you", or "your" shall refer to the CLEC party receiving this Request and its respective parent corporation(s), subsidiaries, affiliates (including CLEC affiliates), agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of, any of the above-mentioned persons or entities.

**INTERROGATORY**

VZ-II-1 Please provide the total number of voice grade unbundled loops, including voice grade loops provisioned as part of an EEL, that you have purchased or obtained from Verizon Pennsylvania Inc. or Verizon North Inc., by wire center, broken down into business and residential loops.



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e-mail: [Julia.a.conover@verizon.com](mailto:Julia.a.conover@verizon.com)  
[William.b.petersen@verizon.com](mailto:William.b.petersen@verizon.com)  
[Suzan.d.paiva@verizon.com](mailto:Suzan.d.paiva@verizon.com)

Counsel for Verizon Pennsylvania Inc.  
and Verizon North Inc.

December 17, 2003

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ORDER GRANTING AT&T COMMUNICATIONS OF PENNSYLVANIA, LLC'S  
MOTION TO COMPEL THE VERIZON COMPANIES TO ANSWER CERTAIN  
INTERROGATORIES**

**BACKGROUND**

This proceeding is an outgrowth of the Federal Communication Commission's *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, Report and Order (rel. Aug. 21, 2003)(FCC 03-36), as corrected by errata, FCC 03-227 issued on September 17, 2003. (hereinafter "*Triennial Review Order*" or "*TRO*"). In reaction to that order, on October 2, 2003, the Commission adopted an order that established the procedural framework for this proceeding ("*Procedural Order*"). The purpose of this order is to dispose of a discovery dispute that has arisen between AT&T Communications of Pennsylvania, LLC and Verizon Pennsylvania, Inc..

On November 21, 2003, AT&T served its First Set of Interrogatories and Requests for Production of Documents on Verizon. On December 5, 2003, Verizon filed objections to most, if not all, of AT&T's discovery requests. On December 9, 2003, AT&T filed a Motion to Overrule Objections and to Compel Responses to Its First Set of Interrogatories and Requests for Production of Documents. On December 11, 2003, Sprint Communications - Company, L.P. and the Pennsylvania Carriers Coalition, filed letters supporting AT&T's motion. On December 15, 2003, Verizon filed a Response to AT&T's motion. Also, on December 12, 2003, AT&T filed a letter concerning its motion. Because that letter concisely summarizes the remaining dispute between the parties, we will quote it at some length here:

I am writing to confirm for the Presiding Officers and the Commission that Verizon has not provided the data that that were

the subject 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., which was filed with the Commission on December 9, 2003. Accordingly, AT&T still desires to pursue its Motion to obtain complete responses to its discovery requests.

AT&T's Motion was filed before Verizon submitted its formal responses to AT&T's First Set of Interrogatories, based on counsel for Verizon's representation that it would not provide certain information that had been requested in AT&T's First Set of Interrogatories, Nos. I-1, I-13, I-15, I-16, I-17, I-19, I-20 and I-21. The data that Verizon indicated that it would not provide involved the number of unbundled loops, explicitly disaggregated between residential and business lines, that Verizon provides to those competitive local exchange carriers it claims meet the "trigger" requirements for self-provided switching under the FCC's Triennial Review Order. This data was requested for each wire center in each Metropolitan Statistical Area in which Verizon is seeking a finding of "non-impairment" under the TRO's self-provisioning switching trigger.

Verizon served its written responses to AT&T's First Set of Interrogatories electronically on the evening of December 10. Hard copies were received by overnight mail on December 11. We have confirmed that those responses did **not** include the breakdown of unbundled loop data that had been requested in AT&T's First Set of Interrogatories, Nos. I-1, I-13, I-15, I-16, I-17, I-19, I-20 and I-21. Accordingly, Verizon should be compelled to provide that information for the reasons explained in AT&T's Motion.

#### DISCUSSION

The dispute here is over AT&T's request that Verizon provide the number of unbundled loops, explicitly disaggregated between residential and business lines, that Verizon provides to those competitive local exchange carriers it claims meet the "trigger" requirements for self-provided switching under the FCC's Triennial Review Order. This data was requested

for each wire center in each Metropolitan Statistical Area in which Verizon it is seeking a finding of "non-impairment" under the TRO's self-provisioning switching trigger.

Verizon argues that this information is not relevant because the Commission need not, and may not, distinguish between residential and small business customers in determining whether certain "triggers" have been met:

The FCC's mandatory triggers are based on "mass market" customers, which consist of both residential customers and small business customers. *See, e.g., TRO* ¶ 430, 459 note 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."). In order to determine whether customers qualify as mass market customers, this Commission need not and should not determine whether they are residential or business customers, but rather whether the customers are "analog voice customers that purchase only a limited number of POTS lines and can only be economically served via DS0 loops." *TRO* ¶ 497.

(Verizon Response to Motion to Compel at 6). Verizon also claims not to have the requested information readily available. Verizon admits that it routinely collects such information when a competitor orders an unbundled loop, but Verizon claims that it uses such information only for directory listing purposes. Verizon claims that it does not tabulate this information in any fashion that would permit it to respond to AT&T's request without a "special study." (Verizon Response to Motion to Compel at 4-5).

AT&T argues that the FCC in the *TRO* order recognized that there are differences between the residential and small business markets, citing Note 432. (AT&T Motion to Compel at 5). AT&T also argues that the Commission itself in the *Procedural Order* directed Verizon to provide the information that AT&T now seeks. AT&T also avers that Verizon failed to provide this information in response to the Commission's request. In its Response, Verizon does not deny that it failed to fully respond to the Commission's request; in fact, Verizon has not even addressed this issue.

In Appendix A to the *Procedural Order* the Commission set forth series of questions that a petitioning ILEC (like Verizon here) should answer when it filed its petition. Among those questions were the following (for ease of reference, we have included the Verizon response with each question):

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

REQUEST:

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

RESPONSE:

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

.....

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

REQUEST:

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

RESPONSE:

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

It is apparent from this that Verizon, when it filed its petition did not claim to be unable to comply with these Commission's requests: Verizon simply ignored the Commission's data requests on this point. Nowhere in its *Procedural Order* does the Commission authorize the presiding officers to amend or modify the Commission's discovery requests.

In our view, the Commission itself has already decided that a loop count breakdown between residential and small business customers is relevant by requesting such information in the *Procedural Order*. Because Commission orders are effective unless modified or reversed on appeal, 66 Pa. C.S. §316, and because the *Procedural Order* is in full force, Verizon may not be heard to complain that such information is irrelevant. Verizon cannot amend Commission orders by simply ignoring them.

Moreover, Verizon filed its petition with its responses to the Commission's data requests on or about October 31, 2003, almost one month after the Commission entered its *Procedural Order*. On the other hand, Verizon waited until it responded to AT&T's Motion to Compel (over two months after the Commission entered its *Procedural Order*) to complain that the information sought by the Commission and AT&T would require a special study. Had Verizon instead embarked upon the study before filing its petition, there is at least a possibility that the data would have been available by now. At this late stage of this proceeding, we

conclude that Verizon should not be heard to raise an issue that it could have, and should have raised long ago.

For the foregoing reasons, we conclude that AT&T's Motion to Compel should be granted.

ORDER

THEREFORE, IT IS ORDERED:

1. That the Motion to Overrule Objections and to Compel Responses to Its First Set of Interrogatories and Requests for Production of Documents to Verizon Pennsylvania Inc. filed by AT&T Communications of Pennsylvania, LLC on December 9, 2003, is granted consistent with the discussion set forth in this order.

2. That within seven days of the date of this order, Verizon shall furnish complete answers to AT&T's First Set of Interrogatories, Nos. I-1, I-13, I-15, I-16, I-17, I-19, I-20 and I-21, including a breakdown of unbundled loops between residential and business lines.

Date: December 17, 2003

---

MICHAEL C. SCHNIERLE  
Administrative Law Judge

---

SUSAN D. COLWELL  
Administrative Law Judge

Administrative Law Judge Michael C. Schnierle  
Administrative Law Judge Susan D. Colwell  
December 19, 2003  
Page 2 of 2

unbundled loops . . . that you have purchased or obtained from Verizon Pennsylvania Inc. or Verizon North Inc., by wire center, broken down into business and residential loops."

In its cover letter to this discovery, Verizon states that the purpose of this interrogatory is to obtain the information necessary to respond to the Order granting AT&T's motion to compel. According to the letter, "[s]ince Verizon does not maintain this information, we are requesting that those carriers that purchase loops from Verizon provide us with this information regarding the loops they purchase so that we can comply with the ALJ's Order."

Verizon thus does not appear to be engaged in any independent review of its internal data for the purpose of complying with the December 17 Order and responding to AT&T's First Set of Interrogatories. Instead, relying on the same claim that the Order rejected, Verizon is deflecting its responsibilities under the Order to the other parties in the case, with the apparent intent of simply rehashing any information they may receive into a response to AT&T's discovery.

This is not what the December 17 Order contemplated. We are thus bringing this matter to your attention, and requesting your guidance in obtaining full compliance with that Order.

Very truly yours,



Robert C. Barber

Enclosures

cc: (w/ encl)  
The Honorable James McNulty, Secretary  
Service List (w/ encl)

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Docket No. I-00030099

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December 22, 2003

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DEC 22 2003

**VIA UPS OVERNIGHT DELIVERY**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

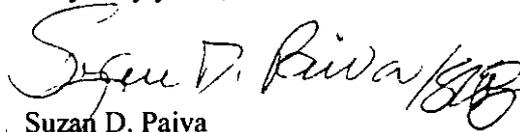
Re: *Investigation into the Obligation of Incumbent Local Exchange Carriers to  
Unbundle Network Elements, Docket No. I-00030099*

Dear Secretary McNulty:

I enclose for filing the original and three copies of the Opposition of Verizon  
Pennsylvania Inc. and Verizon North Inc. to the Petition To Intervene of ACN, Inc. in the above  
named matter.

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

Very truly yours,

  
Suzan D. Paiva

SDP/slb

Enclosure

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

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

DOCKETED  
FEB 04 2004

**OPPOSITION OF VERIZON PENNSYLVANIA INC. AND  
VERIZON NORTH INC. TO THE PETITION TO INTERVENE OF  
ACN, INC. COMMUNICATIONS COMPANY**

Pursuant to 52 Pa. Code § 5.74, Verizon Pennsylvania Inc. and Verizon North Inc. (“Verizon”) oppose the late-filed Petition to Intervene of ACN, Inc. (“ACN”).

ACN’s Petition, filed a month after the intervention deadline established in this Commission’s Procedural Order, is untimely under 52 Pa. Code § 5.74(a). As the Presiding Officers already found in denying the untimely Petition to Intervene of Covad Communications Company on December 17, 2003, this regulation allows late intervention *only* upon a showing that the petitioner had “good cause” for missing the Commission-established deadline. ACN, like Covad, has not even attempted to make such a showing – nor can it. No such justification exists. And having failed so much as to offer one, ACN’s Petition must be summarily denied.

Even if the Commission reaches the merits of ACN’s Petition – which it should not, given ACN’s failure to offer a “good cause” for its untimeliness – ACN’s Petition should be denied. ACN’s interests already more than adequately represented by the 24 other competitive local exchange carriers (“CLECs”) that have already intervened in this proceeding.

DOCUMENT

1. By Order entered October 3, 2003, this Commission opened this docket and detailed the process and procedure that will be used to implement the FCC's *Triennial Review Order*<sup>1</sup> (the "Procedural Order").

2. The *TRO* provides state commissions with nine months from the effective date of the order to consider specific issues on a more granular basis and to determine whether ILECs must continue to provide competing carriers with unbundled access to high-capacity loops, mass market switching and dedicated transport.

3. Pursuant to the Procedural Order, Verizon filed a Petition to Initiate a nine month proceeding on October 31, 2003. Verizon declined to bring a more complex "potential deployment" case as described in the *TRO*, but rather elected to bring only a case under the FCC's "bright-line" triggers. (See *TRO* ¶ 498). These triggers are objective standards that, if met, "require" the Commission to find "no impairment" and therefore no obligation to unbundle the network element at issue (in this case switching and dedicated transport). (*Id.*)

4. The Commission's Procedural Order also provided that "[a]ny interested party must file a Petition to Intervene . . . by November 14, 2003. (Procedural Order, p. 20 and Ordering Paragraph 3(c)).

5. The Procedural Order was published in the *Pennsylvania Bulletin* on October 18, 2003. (See 33 Pa. B. 5267). Under Commission regulations, publication in the *Pennsylvania Bulletin* constitutes notice to all interested parties. See 52 Pa. Code §

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<sup>1</sup> *Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338; *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98; *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, FCC 03-36 (rel. August 21, 2003) ("TRO").

5.201(“Where notice and hearing are required under the act, publication in the *Pennsylvania Bulletin* of a notice of application or other initial pleading is sufficient to provide notice of the proceeding.”) The contents of the *Pennsylvania Bulletin* are available for free on-line at [www.pabulletin.com](http://www.pabulletin.com).

6. The Procedural Order also directed the Secretary’s Bureau to “to serve this Order upon all jurisdictional telecommunications carriers.” (Procedural Order, Ordering Paragraph 11).

7. Twenty-four CLECs petitioned to intervene on or before November 14, 2003, and all were granted intervener status orally at the November 25, 2003 Prehearing Conference, as confirmed in writing by the Second Prehearing Order dated December 9, 2003.

8. ACN did not file a timely Petition to Intervene on or before November 14, 2003.

9. ACN filed the instant Petition to Intervene on December 16, 2003 – a month after the Commission’s deadline.

10. The Commission’s regulations provide that petitions to intervene must be filed “no later than the date fixed for the filing of petitions to intervene in an order or notice with respect to the proceedings or, *except for good cause shown*, the date fixed for filing protests as published in the *Pennsylvania Bulletin*.” 52 Pa. Code § 5.74(a) (emphasis added).

11. The Commission has made clear that the “good cause” that must be shown to allow late intervention is “good cause” for missing the Commission’s deadline – not simply an argument under the substantive standards for intervention. Specifically,

“[l]ate intervention will normally only be granted” when, among other things, “the petitioner has a reasonable excuse for missing the protest due date.” *See Joint Application of Pennsylvania-American Water Company and Thames Water Aqua Holdings*, No. A-212285F0096, 2002 Pa. PUC Lexis 15 (Opinion and Order entered May 9, 2002) (upholding denial of an untimely petition to intervene where the petitioner gave no reasonable excuse and was a sophisticated frequent participant in Commission proceedings).

12. ACN’s Petition to Intervene does not even attempt to show “good cause” for missing the Commission’s intervention deadline. Indeed, ACN does not even state why it missed the deadline. Therefore, ACN’s petition is faulty on its face and must be denied.

13. ACN relies solely on the contention that it meets the “substantive standard for intervention stated in Section 5.72 of the Commission’s regulations” – an argument the Commission cannot even consider since ACN has failed to show “good cause” for missing the Commission’s intervention deadline. (ACN Petition ¶ 6).

14. Even if the Commission were to consider ACN’s petition as a substantive matter, ACN does not meet the substantive standards set forth in 52 Pa. Code § 5.72.

15. ACN has not made the required showing that its interest is “not adequately represented by existing participants.” (52 Pa. Code § 5.72). Indeed, the Commission has already granted intervener status to 24 CLEC parties, as detailed in ACN’s petition. Given the limited issues before the Commission in this case – which relate only to whether the FCC’s objective triggers are satisfied for certain Pennsylvania

markets and routes – these parties certainly will adequately represent the interests of the CLEC community. Indeed, ACN virtually admits that its interests will be adequately represented, as it says it seeks to join an existing “coalition” of CLECs that have already intervened in the case and are represented by the same counsel. (ACN Petition ¶ 5).

16. Finally, ACN’s attempt to barter purportedly “relevant” information regarding its network and operations in exchange for allowing its late intervention is not only a woefully inadequate basis, but it is improper and should not be tolerated. (ACN Petition ¶ 7). If ACN does indeed have relevant information, it should provide that information voluntarily to the Commission regardless of whether it is allowed to intervene, so that the Commission may make a fully informed decision. In any event, ACN would be subject to the Commission’s subpoena power even if it is not a party to this proceeding.

WHEREFORE, the Commission should deny ACN’s untimely Petition to Intervene.



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Counsel for Verizon Pennsylvania Inc. and  
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December 22, 2003

CERTIFICATE OF SERVICE

ORIGINAL

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of the Opposition of Verizon Pennsylvania Inc. and Verizon North Inc. to the Petition to Intervene of ACN, 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 22<sup>nd</sup> day of December, 2003.

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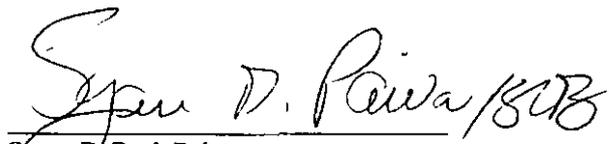
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December 22, 2003

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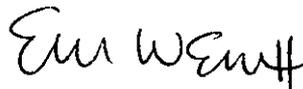
**Re: Docket No. I-00030099, Response of Choice One Communications of Pennsylvania, Inc. to Verizon's Second Set of Interrogatories**

Dear Ms. Conover:

Enclosed please find the responses of Choice One Communications of Pennsylvania, Inc. ("Choice One") to Verizon Pennsylvania and Verizon North's second set of interrogatories to those competitive local exchange carrier that order unbundled loops from Verizon in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require any additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Sincerely,



Steven A. Augustino  
Erin Weber Emmott

Enclosures

cc: Parties of Record (via electronic and first class mail)  
James N. McNulty, Secretary PA PUC (cover letter and service list only)

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

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

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**Re: Docket No. I-00030099, Response of Broadview Networks, Inc. to Verizon's Second Set of Interrogatories**

Dear Ms. Conover:

Enclosed please find the responses of Broadview Networks, Inc. ("Broadview") to Verizon Pennsylvania and Verizon North's second set of interrogatories to those competitive local exchange carrier that order unbundled loops from Verizon in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require any additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Sincerely,

Steven A. Augustino  
Erin Weber Emmott

Enclosures

cc: Parties of Record (via electronic and first class mail)  
James N. McNulty, Secretary PA PUC (cover letter and service list only)

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

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

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December 22, 2003

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03 DEC 29 AM 9:23

11/20/03

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

Dear Ms. Sheridan:

Enclosed please find the responses of XO Pennsylvania, Inc. ("XO") to the second set of interrogatories filed by the Office of Consumer Advocate ("OCA") in the above referenced case.

Should you have any questions or require additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Respectfully submitted,

*Erin W Emmott*

Steven A. Augustino  
Erin W. Emmott

Enclosures

cc: Rowland L. Curry, Bob Loube and Melanie Lloyd (via electronic and first class mail)  
Parties of Record (via electronic and first class mail)  
James M. McNulty, Secretary, PA PUC (cover letter and service list)



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

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December 22, 2003

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**Re: Docket No. I-00030099, Response of XO Pennsylvania, Inc. to PCC's First Set of Interrogatories**

Dear Alan:

Enclosed please find the responses of XO Pennsylvania, Inc. ("XO") to the first set of interrogatories filed by the Pennsylvania Carrier's Coalition ("PCC") in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Sincerely,

Steven A. Augustino  
Erin Weber Emmott

Enclosures

cc: Parties of Record (via electronic and first class mail)  
James M. McNulty, Secretary, PA PUC (cover letter and service list)

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

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**Re: Docket No. I-00030099, Response of Broadview Networks, Inc. to  
PCC's First Set of Interrogatories**

Dear Alan:

Enclosed please find the responses of Broadview Networks, Inc. ("Broadview") to the first set of interrogatories filed by the Pennsylvania Carrier's Coalition ("PCC") in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Sincerely,



Steven A. Augustino  
Erin Weber Emmott

Enclosures

cc: Parties of Record (via electronic and first class mail)  
James M. McNulty, Secretary, PA PUC (cover letter and service list)

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

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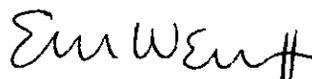
**Re: Docket No. I-00030099, Response of XO Pennsylvania, Inc. to Verizon's Second Set of Interrogatories**

Dear Ms. Conover:

Enclosed please find the responses of XO Pennsylvania, Inc. ("XO") to Verizon Pennsylvania and Verizon North's second set of interrogatories to those competitive local exchange carrier that order unbundled loops from Verizon in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require any additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Sincerely,



Steven A. Augustino  
Erin Weber Emmott

Enclosures

cc: Parties of Record (via electronic and first class mail)  
James N. McNulty, Secretary PA PUC (cover letter and service list only)

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

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

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I-00030099 Investigation into the Obligation of Incumbent Local  
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COMMONWEALTH OF PENNSYLVANIA

**DATE:** December 22, 2003  
**SUBJECT:** I-00030099  
**TO:** Office of Administrative Law Judge  
**FROM:** James J. McNulty, Secretary *JJ*

**DOCKETED**  
JAN 14 2004

**DOCUMENT**

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

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Attached is a copy of Verizon Pennsylvania Inc.  
and Verizon north Inc. Petition for Issuance of  
Subpoena filed in connection with the above docketed  
proceeding.

This matter is assigned to your Office for  
appropriate action.

Attachment

cc: OTS

was

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December 22, 2003

VIA ELECTRONIC AND FIRST CLASS MAIL

Mr. Alan Kohler, Esq.  
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DOCUMENT

SECRETARY'S BUREAU  
03 DEC 31 AM 8:38

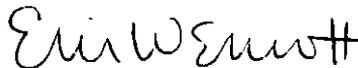
**Re: Docket No. I-00030099, Response of Choice One Communications of Pennsylvania, Inc. to PCC's First Set of Interrogatories**

Dear Alan:

Enclosed please find the responses of Choice One Communications of Pennsylvania, Inc. ("Choice One") to the first set of interrogatories filed by the Pennsylvania Carrier's Coalition ("PCC") in the above referenced case. Please note that the responses contain proprietary information.

Should you have any questions or require additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Sincerely,



Steven A. Augustino  
Erin Weber Emmott

Enclosures

cc: Parties of Record (via electronic and first class mail)  
James M. McNulty, Secretary, PA PUC (cover letter and service list)

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

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

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I-00030099 Investigation into the Obligation of Incumbent Local  
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December 23, 2003

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

Dear Ms. Sheridan:

Enclosed please find the responses of Choice One Communications of Pennsylvania, Inc. ("Choice One") to the second set of interrogatories filed by the Office of Consumer Advocate ("OCA") in the above referenced case. Please note that these responses are labeled "Confidential" and should be afforded the necessary protection as required under the terms of the protective order.

Should you have any questions or require additional assistance, please do not hesitate to contact Erin Emmott at (202) 955-9766.

Respectfully submitted,

*Erin W Emmott*

Steven A. Augustino  
Erin W. Emmott

Enclosures

cc: Rowland L. Curry, Bob Loube and Melanie Lloyd (via electronic and first class mail)  
Parties of Record (via electronic and first class mail)  
James M. McNulty, Secretary, PA PUC (cover letter and service list)

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

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December 23, 2003

## BY OVERNIGHT MAIL AND ELECTRONIC MAIL

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1717 Arch Street, 32 NW  
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DOCUMENT  
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Re: Investigation into the Obligation of Incumbent Local  
Exchange Carriers to Unbundle Network Elements,  
Docket No. I-000 30099

Dear Ms. Paiva:

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

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

Sincerely,



Robin F. Cohn

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DEC 23 2003  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

I hereby certify that on this 23<sup>rd</sup> day of December, 2003, I served a copy of the foregoing **PROPRIETARY Response of CTSI, LLC to Verizon's Second Set of Interrogatories**, in Docket Number I-00030099, by electronic mail and by U.S. first class mail, postage prepaid (except where otherwise noted), on the following individuals:

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---

Robin F. Cohn

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December 23, 2003

## BY OVERNIGHT MAIL AND ELECTRONIC MAIL

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

DOCUMENT  
FOLDER

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

Dear Ms. Paiva:

Enclosed please find the PROPRIETARY response of CTSI, LLC, to Question 4 of Verizon- Pennsylvania, Inc.'s First Set of Interrogatories, in the above-captioned proceeding.

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

Sincerely,

  
Robin F. Cohn

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DEC 23 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

I hereby certify that on this 23<sup>rd</sup> day of December, 2003, I served a copy of the foregoing **PROPRIETARY Response of CTSI, LLC to Verizon's First Set of Interrogatories, Question 4**, in Docket Number I-00030099, by electronic mail and by U.S. first class mail, postage prepaid (except where otherwise noted), on the following individuals:

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DEC 23 2003

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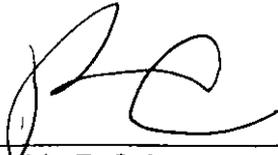
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P.O. BOX 3265  
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UNITED STATES OF AMERICA

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

Robin F. Cohn



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

PLEASE DOCKET

IN REPLY PLEASE  
REFER TO OUR FILE

December 23, 2003

Robert C. Barber, Esquire  
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Room 3D  
3033 Chain Bridge Road  
Oakton VA 22185

Suzan DeBusk Paiva, Esquire  
Verizon  
1717 Arch Street, 32NW  
Philadelphia PA 19103

DOCKETED  
FEB 04 2004

RE: AT&T's December 19, 2003 letter and Verizon's December 19, 2003 response  
PUC Docket No. I-00030099

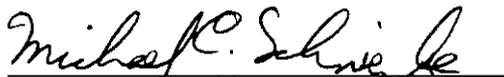
DOCUMENT

Dear Mr. Barber and Ms. Paiva:

In response to your concerns raised in the above-captioned letters, the parties are advised to discuss their discovery concerns and to work very hard to resolve them without our intervention. It is not practical to expect us to oversee the details of the discovery process in a case which has as many parties as this one. The cooperation of all parties is essential to building a successful record on which the Commission will base its decision, and that cooperation begins with discovery.

Please be advised that a letter "bringing a matter to our attention and requesting our guidance in obtaining full compliance" with an order is not an appropriate medium for our response within the context of an adversarial proceeding. We will respond to the appropriate pleadings filed in accordance with the rules of practice and procedure found at 52 Pa. Code Chapters 1, 3 & 5. We encourage you to file discovery motions only when absolutely necessary.

Keeping in mind that cooperation with each other is not only important, but expected, we trust that you will be able to resolve your differences amicably.

  
Michael C. Schnierle  
Administrative Law Judge

  
Susan D. Colwell  
Administrative Law Judge

Cc: all parties of record by e-mail