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December 24, 2003

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DEC 24 2003

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

Robert C. Barber, Esquire  
AT&T Communications of PA  
3033 Chain Bridge Road  
Oakton, VA 22185

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 Mr. Barber:

Pursuant to the December 17, 2003 Order of ALJs Schnierle and Colwell, enclosed are Verizon Pennsylvania Inc.'s and Verizon North Inc.'s ("Verizon") supplemental responses to AT&T Set I, Nos. 1, 13, 15-17 and 19-21.

Verizon has gathered the information available from its internal sources that would contribute to providing the residential/business split for UNE loops on a wire center basis that was the subject of AT&T's Motion to Compel. Based on that effort, Verizon is able to report a residential/business split for the Hershey wire center, which is the only wire center in the relief area that is in Verizon North's territory. The Verizon North offices use the back office systems of the former GTE company, which is why Verizon was able to retrieve from its systems the residential/business split for this territory only. That information is provided.

As Verizon represented in its response to AT&T's motion to compel and the accompanying sworn declaration, Verizon does not have available in its systems internal information regarding the residential/business split for loops provisioned from Verizon PA offices. Verizon has attempted to gather the most complete information possible regarding those offices within the seven day time limit. That information was provided by the CLECs that purchase these unbundled loops, to the extent that they track the type of end user customer to

which they are providing these loops. Verizon has compiled the information the CLECs provided and has reported it in its supplemental responses to the pertinent interrogatories. Verizon still has outstanding requests for information from a couple of CLECs, and to the extent that information becomes available, Verizon will update its spreadsheet. At least two CLECs, RCN and XO, also report that they do not track a residential/business split for their unbundled loops on a wire center basis.

Very truly yours,



Suzan D. Paiva

SDP/slb

Enclosure

cc: Via UPS Overnight Delivery:  
Secretary James McNulty (cover and certificate only)  
Honorable Michael Schaeferle (cover and certificate only)  
Honorable Susan Colwell (cover and certificate only)

cc: Via E-Mail and UPS Overnight Delivery  
Attached Service List

CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc.'s Responses to AT&T Communications of Pennsylvania, LLC's interrogatories, 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 24<sup>th</sup> day of December, 2003.

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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December 29, 2003  
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VIA E-MAIL AND UPS OVERNIGHT DELIVERY

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Robert C. Barber, Esquire  
AT&T Communications of PA  
3033 Chain Bridge Road  
Oakton, VA 22185

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

Dear Mr. Barber:

Enclosed please find Verizon Pennsylvania Inc.'s Responses to AT&T Communications of Pennsylvania, LLC.'s Second Set of Interrogatories and Requests for Production of Documents to Verizon Pennsylvania Inc., in the above captioned matter. Please note that the attached documents include proprietary information.

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

Very truly yours,

  
Suzan D. Paiva

SDP/slb

Enclosure

cc: Via UPS Overnight Delivery  
Secretary James McNulty (cover and certificate only) ✓  
Honorable Michael Schnierle (cover and certificate only)  
Honorable Susan Colwell (cover and certificate only)

cc: Via E-Mail and UPS Overnight Delivery  
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CERTIFICATE OF SERVICE

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon Pennsylvania Inc.'s Responses to AT&T Communications of Pennsylvania, LLC.'s Second Set of Interrogatories and Requests for Production of Documents to Verizon Pennsylvania Inc., upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 29<sup>th</sup> day of December, 2003.

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December 29, 2003

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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 Ms. Jones:

Enclosed please find Verizon Pennsylvania Inc.'s Responses to the Office of Small Business Advocate's Interrogatories, Set I, in the above captioned matter. Please note that the attached documents include proprietary information.

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

Very truly yours,

Suzan D. Paiva

SDP/meb

Enclosure

cc: Via UPS Overnight Delivery  
Secretary James McNulty (cover and certificate only) ✓  
Honorable Michael Schnierle (cover and certificate only)  
Honorable Susan Colwell (cover and certificate only)

cc: Via E-Mail and UPS Overnight Delivery  
Attached Service List

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Dated at Philadelphia, Pennsylvania, this 29<sup>th</sup> day of December, 2003.

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December 30, 2003

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DEC 31 2003

**VIA UPS OVERNIGHT DELIVERY**

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

DOCUMENT

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Dear Secretary McNulty:

I enclose for filing the original and three copies of Verizon Pennsylvania Inc. and Verizon North Inc.'s Objections to Joint Parties' First Set of Interrogatories Addressed to Verizon Pennsylvania Inc. and Verizon North Inc., in the above captioned matter.

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

Very truly yours,

  
Suzan D. Paiva

SDP/meb

Enclosure

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

91

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

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

Docket No. I-00030099

OBJECTIONS TO JOINT PARTIES  
INTERROGATORIES ADDRESSED TO VERIZON  
PENNSYLVANIA INC. AND VERIZON NORTH INC. SET I

DOCKETED  
FEB 04 2004

Pursuant to 52 Pa. Code §§ 5.342 and 5.349, Verizon Pennsylvania Inc. and Verizon North Inc. ("Verizon") hereby object to Broadview Networks, Inc., BullsEye Telecom, InfoHighway Communications Corporation, McGraw Communications, Inc., and Metropolitan Telecommunications, Inc. (the "Joint Parties") First Set of Interrogatories and Request for Production of Documents, as follows. For ease of reference, Verizon has set forth a list of Specific Objections, and then has referred to each Specific Objection by number where applicable in response to the particular questions. Verizon has then indicated for each interrogatory whether or not it will be providing a response at the appropriate time under the procedural schedule of this proceeding.

GENERAL OBJECTIONS

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

2. Verizon objects to the Joint Parties' Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon

DOCUMENT

Pennsylvania Inc.'s or Verizon North Inc.'s territory, except for out of franchise operations.

3. Verizon objects to the Joint Parties' Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek confidential and proprietary materials relating to Verizon's customers or business practices whose probative value in this proceeding is substantially outweighed by the risk of prejudice or other potential harm to Verizon.

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

### **SPECIFIC OBJECTIONS**

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

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

3. Verizon objects to the discovery request to the extent that it seeks confidential and/or proprietary information. Any confidential or proprietary information provided by Verizon in response to the discovery request is done so subject to the terms of the Protective Order that was entered in this proceeding.

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

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

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

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

8. Verizon objects because the discovery request seeks information regarding Verizon's retail operations. This information is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added).

9. Verizon objects to the discovery request to the extent that it seeks operational and/or proprietary information regarding other telecommunications carriers. Such third party confidential or proprietary information provided by Verizon in response to the discovery request is done so subject to the terms of the Protective Order that was entered in this proceeding and pursuant to the presiding officer's order requiring such production.

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

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

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

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

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

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

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.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving those objections, Verizon will provide a response to this interrogatory.

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.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving those objections, Verizon will provide a response to this interrogatory.

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;

OBJECTION:

Verizon will provide a response to this interrogatory.

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.

OBJECTION:

Verizon will provide a response to this interrogatory.

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.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving those objections, Verizon will provide a response to this interrogatory.

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.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving those objections, Verizon will provide a response to this interrogatory.

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.

OBJECTION:

See Specific Objections 6 and 7. Subject to and without waiving those objections, Verizon will provide a response to this interrogatory to the extent information is available.

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.

OBJECTION:

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

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.

OBJECTION:

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

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.

OBJECTION:

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

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.

OBJECTION:

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

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.

OBJECTION:

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

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.

OBJECTION:

See Specific Objections 6 and 7. Based on those objections, Verizon will not be providing a response to subparts (b), (c) and (d) of this interrogatory. The information responsive to subpart (a) was provided in response to the Commission's Appendix A discovery.

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.

OBJECTION:

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

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.

OBJECTION:

Verizon will provide a response to this interrogatory.

JOINT PARTIES DOCUMENT REQUEST-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.

OBJECTION:

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

JOINT PARTIES DOCUMENT REQUEST-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

OBJECTION:

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



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Counsel for Verizon Pennsylvania Inc. and  
Verizon North Inc.

December 30, 2003

**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 Objections to Joint Parties' First Set of Interrogatories Addressed to Verizon Pennsylvania Inc. and Verizon North 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 30<sup>th</sup> day of December, 2003.

RECEIVED

DEC 31 2003

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

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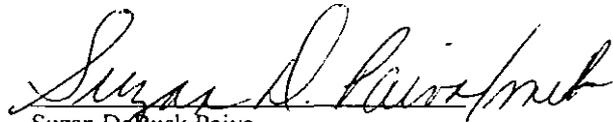
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December 30, 2003

**VIA UPS OVERNIGHT DELIVERY**

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

DOCUMENT RECEIVED  
DEC 31 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Dear Secretary McNulty:

I enclose for filing the original and three copies of Verizon Pennsylvania Inc. and Verizon North Inc.'s Objections to the Pennsylvania Carrier's Coalition's Second Set of Interrogatories Addressed to Verizon Pennsylvania Inc. and Verizon North Inc., in the above captioned matter.

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

Very truly yours,

Suzan D. Paiva

SDP/meb

Enclosure

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

90

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

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

Docket No. I-00030099

DOCKETED  
FEB 04 2004

**OBJECTIONS TO PENNSYLVANIA CARRIER'S COALITION'S  
INTERROGATORIES ADDRESSED TO VERIZON  
PENNSYLVANIA INC. AND VERIZON NORTH INC. SET II**

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

**GENERAL OBJECTIONS**

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

2. Verizon objects to the PCC's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Pennsylvania Inc.'s or Verizon North Inc.'s territory, except for out of franchise operations.

DOCUMENT

3. Verizon objects to the PCC's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek confidential and proprietary materials relating to Verizon's customers or business practices whose probative value in this proceeding is substantially outweighed by the risk of prejudice or other potential harm to Verizon.

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

#### **SPECIFIC OBJECTIONS**

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

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

3. Verizon objects to the discovery request to the extent that it seeks confidential and/or proprietary information. Any confidential or proprietary information provided by Verizon in response to the discovery request is done so subject to the terms of the Protective Order that was entered in this proceeding.

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

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

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

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

8. Verizon objects because the discovery request seeks information regarding Verizon's retail operations. This information is outside the scope of the FCC's mandatory "policy framework" that must be applied in this proceeding, which is based on "carefully targeted impairment determinations." *Triennial Review Order* ¶ 187. These determinations are premised on "granular evidence that new entrants are providing retail services in the relevant market *using non-incumbent LEC facilities*," not Verizon's retail operations. *Id.* ¶ 93 (emphasis added).

9. Verizon objects to the discovery request to the extent that it seeks operational and/or proprietary information regarding other telecommunications carriers. Such third party confidential or proprietary information provided by Verizon in response to the

discovery request is done so subject to the terms of the Protective Order that was entered in this proceeding and pursuant to the presiding officer's order requiring such production.

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

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

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

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

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

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

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 1 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

For each Verizon Wire Center and by CLEC, provide the number of DS0 loops provided by Verizon to CLECs that are served by DS0 transport provided by Verizon, but which are not served by Verizon's local circuit switching.

RESPONSE:

See Specific Objection 6. Subject to and without waiving the foregoing general and specific objections, Verizon will provide a response to this interrogatory to the extent such information is available in the format requested.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 2 OF  
PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET  
I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

For each Verizon Wire Center and by CLEC, provide the number of DS0 loops  
provided by Verizon to CLECs that are served through an EEL arrangement  
provided by Verizon.

RESPONSE:

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

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 3 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

For each CLEC self provisioning switches, provide the following data by LATA:

- a. inbound interconnection local trunks in service
- b. outbound interconnection trunks in service
- c. 2 way interconnection trunks in service

RESPONSE:

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

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 4 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

For each Verizon wire center, and by CLEC, identify the total number of DSIs served by EELs provided by Verizon.

RESPONSE:

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

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 5 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

Has Verizon modified its policy under which it rejects orders for loop migration to a CLEC when no facilities are available as a result of the TRO?

RESPONSE:

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

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 6 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

Has Verizon modified its internal processes for converting Special Access circuits to EELS since February 2003?

- a. Please provide all documents, training materials, procedures, processes, and memoranda that were used by or disseminated to Verizon personnel processing CLEC requests for Special Access/EEL conversions since January 1, 2003.
- b. How many DS1 EELS have been provisioned by CLECs to third party transport providers?

RESPONSE:

See Specific Objection 6. Based on the foregoing general and specific objections, Verizon will not be providing a response to this interrogatory.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 7 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

For every Verizon Wire Center for every month since January 2000, by CLEC, how many requested circuit identifiers for Special Access to EEL conversion have been:

- a. Sent to Verizon by CLEC's
- b. Denied by Verizon due to co-mingling issues
- c. Denied by Verizon due to reasons other than co-mingling issues
- d. Provided by Verizon

RESPONSE:

See Specific Objection 6 and 7. Based on the foregoing general and specific objections, Verizon will not be providing a response to this interrogatory.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 8 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

For every month since January 2000, by Wire Center and by CLEC, how many requests for stand alone DS1 or EEL requests were:

- a. Ordered by CLEC's
- b. Delivered to CLEC's as a stand-alone loop or EEL
- c. Denied due to No Facilities available.

RESPONSE:

See Specific Objection 6. Based on the foregoing general and specific objections, Verizon will not be providing a response to this interrogatory.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 9 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

REQUEST:

Pertaining to the answer to Interrogatory no. 8, for each CLEC Order for which the CLEC request was denied, provide the Verizon Code which indicates the reason that the wholesale service request was denied.

RESPONSE:

See Specific Objection 6. Based on the foregoing general and specific objections, Verizon will not be providing a response to this interrogatory.

RESPONSE OF VERIZON PENNSYLVANIA INC. TO SET II, INTERROGATORY NO. 10 OF PENNSYLVANIA CARRIER'S COALITION DATED DECEMBER 19, 2003 SUBMITTED IN DOCKET I-00030099 BEFORE THE PA PUC (UNE)

ANSWERED BY:  
POSITION:

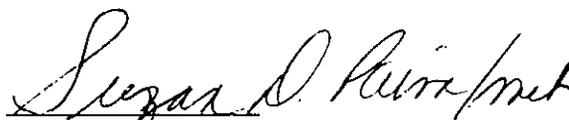
REQUEST:

Referring to the statement, "Moreover, CLECs do not enter the mass market at the wire center level, nor do they make their decisions to deploy switches to serve a particular market on a wire center-by-wire center basis, or even at the rate center level"

- c. Provide any documents, studies, analysis, which support the statement.
- d. Identify by CLEC, the number of mass market lines that were "self-provisioned" in areas outside of the specific wire centers where the CLEC has collocated in the central office.

RESPONSE:

Verizon will provide a response to this interrogatory.



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Counsel for Verizon Pennsylvania Inc. and  
Verizon North Inc.

December 30, 2003

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 Objections to the Pennsylvania Carrier's Coalition's Second Set of Interrogatories Addressed to Verizon Pennsylvania Inc. and Verizon North 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 30<sup>th</sup> day of December, 2003.

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Melanie Lloyd  
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DEC 31 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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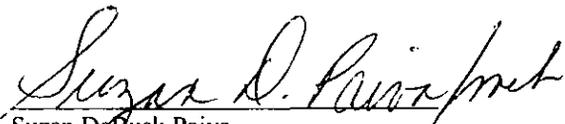
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Law and Public Policy  
1133 19th Street, NW  
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December 30, 2003

*Via Overnight Delivery*

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

DEC 30 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

**DOCUMENT**

Dear Mr. McNulty:

Please find enclosed four (4) copies of each Confidentiality Agreement signed on behalf of MCI WorldCom Network Services, Inc. in the above-referenced case.

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

Very truly yours,

  
Michelle Painter

cc: Certificates of Service  
Honorable Michael C. Schnierle  
Honorable Susan Colwell

Enclosures

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

RECEIVED

DEC 30 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Docket No. I-0003 ~~1734~~ <sup>0099</sup>

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

CONFIDENTIALITY AGREEMENT

DOCKETED  
FEB 04 2004

TO WHOM IT MAY CONCERN:

DOCUMENT

The undersigned is the employee of expert witness (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: 12/23/03

  
Signature  
Nathaniel Johnson  
Print Name  
employee of expert witness  
Status relative to Retaining Party  
Micra  
Employer  
1155 Connecticut Ave NW  
Address Suite 900  
Washington DC, 20036

RECEIVED

APPENDIX A-2

DEC 30 2003

PENNSYLVANIA  
PUBLIC UTILITY COMMISSION PA PUBLIC UTILITY COMMISSION  
Harrisburg PA 17105-3265 SECRETARY'S BUREAU

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

Docket No. I-0003<sup>0099</sup>~~1754~~

CONFIDENTIALITY AGREEMENT

DOCKETED  
FEB 04 2004

TO WHOM IT MAY CONCERN:

The undersigned is the RESEARCH ASSISTANT of  
MICRA (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: 12/24/03

Yael Slater  
Signature  
Yael Slater  
Print Name  
RA  
Status relative to Retaining Party  
MICRA  
Employer  
1155 CONNECTICUT AV.  
Address  
WASHINGTON DC 20036

DOCUMENT

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DEC 30 2003

**SERVICE LIST**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

I hereby certify that I have this day caused a true copy of MCI's Signed Protective Agreements to be served upon the parties of record in Docket Nos. I-00030099 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Washington, DC on December 30, 2003

**VIA FIRST CLASS MAIL OR OVERNIGHT DELIVERY**

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December 30, 2003

**VIA ELECTRONIC AND OVERNIGHT MAIL**

Barrett C. Sheridan, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Floor  
Harrisburg, PA 17101

DOCUMENT

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

Dear Barrett:

Please find enclosed AT&T Communications of Pennsylvania, LLC's Response to OCA's Second Set of Data Requests in the above-captioned matter. **Please note that this response includes information proprietary to AT&T.**

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

Very truly yours,

Robert C. Barber

Enclosures

cc: The Honorable Michael Schrierle (w/o enclosures) DEC 30 2003  
The Honorable Susan Colwell (w/o enclosures)  
Secretary McNulty (w/o enclosures)  
Service List (w/ enclosures)

RECEIVED

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Certificate of Service  
Docket No. I-00030099

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

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DEC 30 2003

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Washington, DC 20007

  
\_\_\_\_\_  
Robert C. Barber

Dated: December 30, 2003

\*By overnight mail



December 30, 2003

*Via E-mail and Overnight Delivery*

RECEIVED

Alan C. Kohler, Esq.  
Wolf Block  
212 Locust St, Suite 300  
Harrisburg, PA 17101

DOCUMENT

DEC 30 2003

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 Alan:

Please find enclosed the responses of MCI WorldCom Network Services, Inc. ("MCI") to the Interrogatories of Pennsylvania Carriers' Coalition's, Set I, in the above-referenced case.

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

Very truly yours,

  
Michelle Painter

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

Enclosures

**SERVICE LIST**

I hereby certify that I have this day caused a true copy of MCI's Responses to PCC Interrogatories, Set I to be served upon the parties of record in Docket Nos. I-00030099 in accordance with the requirements of 52 Pa. Code Sections 1.52 and 1.54 in the manner and upon the parties listed below.

Dated in Washington, DC on December 30, 2003

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December 30, 2003

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DOCUMENT

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

Dear Mr. McClelland:

Enclosed please find Verizon Pennsylvania Inc.'s Responses to the Pennsylvania Carrier's Coalition's Interrogatories, Set I, in the above captioned matter. Please note that the attached documents include proprietary information.

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

Very truly yours,

  
Suzan D. Paiva

SDP/meb

Enclosure

cc: Via UPS Overnight Delivery  
Secretary James McNulty (cover and certificate only)  
Honorable Michael Schnierle (cover and certificate only)  
Honorable Susan Colwell (cover and certificate only)

cc: Via E-Mail and UPS Overnight Delivery  
Attached Service List

**CERTIFICATE OF SERVICE**

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon's Responses to the Pennsylvania Carrier's Coalition's Interrogatories, Set I, 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 30<sup>th</sup> day of December, 2003.

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

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Melanie Lloyd  
Bob Loube

Sue Benedek, Esquire  
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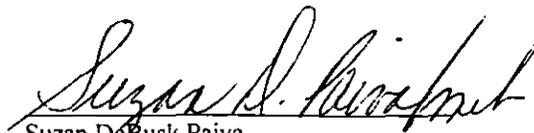
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December 30, 2003

**VIA ELECTRONIC AND OVERNIGHT MAIL**

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DOCUMENT

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

Dear Barrett:

Please find enclosed AT&T Communications of Pennsylvania, LLC's Responses to OCA's First Set of Data Requests in the above-captioned matter. **Please note that these responses include information proprietary to AT&T.**

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

Very truly yours,

Robert C. Barber

Enclosures

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

RECEIVED

DEC 30 2003

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Certificate of Service  
Docket No. I-00030099

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

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3000 K St., NW  
Washington, DC 20007

  
\_\_\_\_\_  
Robert C. Barber

Dated: December 30, 2003

\*By overnight mail

Suzan DeBusk Paiva  
Assistant General Counsel  
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DEC 31 2003

PA PUBLIC UTILITY COMMISSION  
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December 30, 2003

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

Philip McClelland, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
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Harrisburg, PA 17101-1923

DOCUMENT

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

Dear Mr. McClelland:

Enclosed please find Verizon Pennsylvania Inc.'s Responses to the Office of Consumer Advocate's Interrogatories, Set II, in the above captioned matter. Please note that the attached documents include proprietary information.

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

Very truly yours,



Suzan D. Paiva

SDP/meb

Enclosure

cc: Via UPS Overnight Delivery  
Secretary James McNulty (cover and certificate only)  
Honorable Michael Schnierle (cover and certificate only)  
Honorable Susan Colwell (cover and certificate only)

cc: Via E-Mail and UPS Overnight Delivery  
Attached Service List

**CERTIFICATE OF SERVICE**

I, Suzan DeBusk Paiva, hereby certify that I have this day served a copy of Verizon's Responses to the Office of Consumer Advocate's Interrogatories, Set II, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 30<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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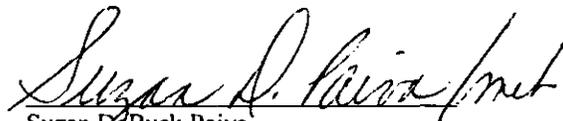
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**DOCKETED**  
FEB 05 2004

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

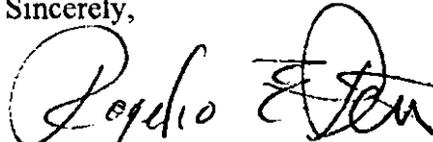
**DOCUMENT**

Dear Ms. Jones:

Level 3 Communications, LLC, ("Level 3") is not an active 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.

Level 3 authorizes the Pennsylvania Office of Small Business Advocate to disclose such "Highly Confidential Proprietary Information" to the OSBA's expert witness, Allen C. Buckalew, for use in this proceeding, subject to the terms and conditions of the PaPUC's October 2 Protective Order.

Sincerely,

  
Rogelio E. Peña

REP/jlmp

cc: James J. McNulty, Secretary  
Pa. Public Utility Commission