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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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BY HAND

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

WorldCom, Cox, and AT&T ads. Verizon
CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed for filing on behalf of Verizon, please find four copies of Verizon's Objections to AT&T's First Set of Data Requests.

Please do not hesitate to call me with any questions.

Sincerely,

Kimberly A. Newman

Kimberly A. Newman
Counsel for Verizon

Enclosures

No. of Copies rec'd 0+2
List A B C D E

cc: Dorothy T. Attwood, Chief, Common Carrier Bureau (8 copies) (by hand)
David Levy, counsel for AT&T (by hand)
Mark A. Keffer, counsel for AT&T (by hand)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Expedited Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration	)	CC Docket No. 00-218
In the Matter of Petition of Cox Virginia Telecom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc. and for Arbitration	)	CC Docket No. 00-249
In the Matter of Petition of AT&T Communications of Virginia Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes With Verizon Virginia Inc.	)	CC Docket No. 00-251

VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T'S FIRST SET OF DATA REQUESTS

In accordance with the *Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox and WorldCom*, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon Virginia

Inc. ("Verizon") objects as follows to the First Set of Data Requests served on Verizon by AT&T Communications of Virginia ("AT&T") on the evening of May 31, 2001.[1]

GENERAL OBJECTIONS

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek confidential business information covered by the agreed-to Protective Order jointly submitted by the Parties.[2] Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 *et seq.*

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad and unduly burdensome.

5. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein,

[1] The above-cited Public Notice states that "parties shall negotiate diligently and in good faith concerning any discovery dispute prior to the filing of any objection." *Public Notice* at 6. AT&T served these requests after the close of business on Thursday evening, May 31. The deadline for filing these objections is Monday, June 4, and the deadline for responding to these requests is June 15. Counsel for Verizon contacted counsel for AT&T on June 4 and explained the nature of these objections. Verizon will continue to negotiate in good faith with AT&T between now and June 15 before refusing to answer on the basis of any of the objections stated herein.

seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

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

7. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. *See* Memorandum Opinion and Order, *In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996*, CC Docket No. 00-251 (January 26, 2001).

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to AT&T's Data Requests as follows:

[2] On April 2, 2001, the Parties jointly submitted, in a by-hand filing, an agreed-to Protective Order. To Verizon's knowledge, that Order remains pending before the Commission for adoption and release.

1. Please provide a copy of all data requests which Verizon submits to other parties to this proceeding and provide a copy of all data responses which Verizon provides to other parties.

OBJECTION: None.

2. Please state, by quarter (from 3Q99 to the present), the number of loops used for retail DSL customers *[sic]* services provided by Verizon (or any Verizon affiliate) in Virginia. Please state your answers separately for former Bell Atlantic and former GTE entities.

OBJECTION: See General Objections.

2.a. Please provide the percentage of xDSL (including 2 wire ADSL and 4 wire HDSL) loops for which CLECs requested manual loop qualification during the past 6 months and any support used to develop this response.

OBJECTION: See General Objections.

2.b. Please indicate the number of xDSL loops provisioned in the last 6 months that had cooperative testing between Verizon-Virginia, Inc. and CLECs other than a Verizon division or affiliate. Please provide the absolute number of, and percentage of xDSL loops (including 2 wire ADSL and 4 wire HDSL) that CLECs requested cooperative testing which had a trouble report filed within 30 days of provisioning.

OBJECTION: See General Objections.

3. Please state, by quarter (from 3Q99 to the present) and by State within the Verizon footprint [footnote omitted], except for Virginia, the number of loops used for retail DSL customers services provided by Verizon (or any Verizon affiliate). Please state your answers separately for former Bell Atlantic and former GTE entities.

OBJECTION: See General Objections.

3.a. Please provide the percentage of xDSL (including 2 wire ADSL and 4 wire HDSL) loops for which CLECs requested manual loop qualification during the past 6 months and any support used to develop this response.

OBJECTION: See General Objections.

3.b. Please indicate the number of xDSL loops provisioned in the last 6 months that had cooperative testing between Verizon-Virginia, Inc. and CLECs other than a Verizon division or affiliate. Please provide the absolute number of, and percentage of xDSL loops (including 2 wire ADSL and 4 wire HDSL) that CLECs requested cooperative testing which had a trouble report filed within 30 days of provisioning.

OBJECTION: See General Objections.

4. Please state, by quarter (from 3Q99 to the present), the number of loops over which Verizon supported line sharing, regardless of the provider of DSL capabilities, in the high frequency spectrum of the loop within Virginia. Please state your answers separately for former Bell Atlantic and former GTE entities.

OBJECTION: See General Objections.

5. Please state, by quarter (from 3Q99 to the present) and by State within the Verizon footprint, except for Virginia, the number of loops over which Verizon supported line sharing, regardless of the provider of DSL capabilities, in the high frequency spectrum of the loop. Please state your answers separately for former Bell Atlantic and former GTE entities.

OBJECTION: See General Objections.

6. Please state, by quarter (from 3Q99 to the present), the number of DSL capable loops Verizon provisioned for DSL service providers (regardless of whether or not the provider is or was affiliated with Verizon) for which Verizon did not provide local service using the low frequency spectrum of the same loop within Virginia. Also specify how Verizon determined that the loop provided was DSL capable (e.g., based on the NCNCI code supplied by the CLEC on its order for the loop).

OBJECTION: See General Objections.

7. Please state, by quarter (from 3Q99 to the present) and by State within the Verizon footprint, except for Virginia, the number of DSL capable loops Verizon provisioned for DSL service providers (regardless of whether or not the provider is or was affiliated with Verizon) for which Verizon did not provide local service using the low frequency spectrum of the same loop. Also specify how Verizon determined that the loop provided was DSL capable (e.g., based on the NCNCI code supplied by the CLEC on its order for the loop).

OBJECTION: See General Objections.

8. Please state, by quarter (from 3Q99 to the present), the number and percentage of Verizon central offices in Virginia in which Verizon (or any Verizon affiliate) has deployed advanced services equipment, including but not limited to DSLAMs and splitters.

OBJECTION: See General Objections.

9. Please state, by quarter (from 3Q99 to the present) and by State within the Verizon footprint, except for Virginia, the number and percentage of Verizon central offices in which Verizon (or any Verizon affiliate) has deployed advanced services equipment, including but not limited to DSLAMs and splitters.

OBJECTION: See General Objections.

10. Please state, by quarter (from 3Q99 to the present), the number and percentage of collocations established in Virginia by competitive carriers that Verizon has been informed or has reason to believe contain equipment, including but not limited to DSLAMs and splitters, that a carrier could employ to provide advanced service capabilities, including any form of DSL service. State the basis by which this determination was made, e.g., the NCNCI code associated with one or more loops connecting to the collocation, the disclosure of a PSD for equipment with the collocation. If some other means was used to make such determination, please describe.

OBJECTION: See General Objections. Verizon further objects this Request on the grounds that AT&T's use of the phrase "has reason to believe" renders the Request vague and/or calls for Verizon to speculate in its response.

11. Please state, by quarter (from 3Q99 to the present) and by State within the Verizon footprint, except for Virginia, the number and percentage of collocations established by competitive carriers that Verizon has been informed or has reason to believe contain equipment, including but not limited to DSLAMs and splitters, that a carrier could employ to provide advanced service capabilities, including any form of DSL service. State the basis by which this determination was made, e.g., the NCNCI code associated with one or more loops connecting to the collocation, the disclosure of a PSD for equipment with the collocation. If some other means was used to make such determination, please describe.

OBJECTION: See Verizon's Objection to Request No. 10.

12. Please provide a histogram for Virginia showing the average loop length for each area. The abscissa of the histogram should be the electrical length of the loops connecting a Central Office to customer premises broken in 1000 foot increments of electrical length, starting with 0 and incremented by 1000 feet (electrical length) until the longest loop length is surpassed. The ordinate should be the cumulative proportion of 2 wire loops that are equal to or less than the electrical length indicated on the x axis.

OBJECTION: See General Objections. Verizon further objects to this Request on the grounds that it does not ask Verizon to produce a document but, rather, to prepare one. Thus, it is not a permissible discovery request.

13. Please provide a histogram for the Verizon footprint showing the average loop length for each area. The abscissa of the histogram should be the electrical length of the loops connecting a Central Office to customer premises broken in 1000 foot increments of electrical length, starting with 0 and incremented by 1000 feet (electrical length) until the longest loop length is surpassed. The ordinate should be the cumulative proportion of 2 wire loops that are equal to or less than the electrical length indicated on the x axis.

OBJECTION: See Verizon's Objection to Request No. 12.

14. Please state whether Verizon's OSS, as presently configured and as planned to be configured through the end of 2001, allow *[sic]* (or will allow) a competitive LEC to order a UNE-P serving arrangement that employs the same customer loop that, at the time of the order, is employed by an unaffiliated carrier to provide service in the high frequency spectrum of the loop in a in a *[sic]* line sharing without first requiring that the service in the high frequency spectrum be disconnected. If your answer is "no" for any period, please explain why Verizon does not permit such arrangements to be ordered and provide, by quarter (from 3Q99 to the present), the number of orders for service in Virginia that were rejected for this reason.

OBJECTION: See General Objections.

15. Please state whether Verizon's OSS, as presently configured and as planned to be configured through the end of 2001, allow *[sic]* (or will allow) a competitive LEC to order a UNE-P serving arrangement that employs the same customer loop that, at the time of the order, is employed by an unaffiliated carrier to provide service in the high frequency spectrum of the loop in a in a *[sic]* line sharing without first requiring that the service in the high frequency spectrum be disconnected. If your answer is "no" for any period, please explain why Verizon does not permit such arrangements to be ordered and provide, by quarter (from 3Q99 to the

present) and by State within the Verizon footprint, except for Virginia, the number of orders that were rejected for this reason.

OBJECTION: See General Objections.

16. If Verizon re-integrates its data affiliate(s) into its incumbent local exchange entity, will the operations of its former affiliate be subject to the interconnection agreements being arbitrated here? If not, how will the data affiliate(s) be made subject to these agreements?

OBJECTION: See General Objections. Verizon further objects to this Request on the grounds that it calls for speculation.

17. Please state whether Verizon asserts that the DSLAMs it or its affiliates have employed integrated splitters. If so, state whether the sole basis for this contention is that such arrangements use connectorized cables to connect splitters located in one part of a frame to DSLAM functionality located in a separate part of the frame. If there are additional bases for this contention, describe the nature of the integration that exists and provide technical literature from the supplier that describes the equipment employed.

OBJECTION: See General Objections.

18. Under what contract(s), tariff(s) or other arrangement(s) may a competitive LEC purchase Verizon advanced services for resale?

OBJECTION: See General Objections.

19. Separately state, for each of the following service delivery configurations that may be used for voice service, how a competitive LEC may add a resold Verizon advanced service to the high frequency spectrum of the same loop employed to provide the voice service: (a) UNE-P; (b) UNE Loop; (c) resale of Verizon local service?

OBJECTION: See General Objections.

19.a For any service configuration for which Verizon states that a CLEC may add a resold Verizon advanced service to the high frequency spectrum of the loop, describe the procedures that the CLEC must follow to place such orders and when and how the procedures were first made available.

OBJECTION: See Verizon's Objection to Request No. 19.

19.b For any service configuration for which Verizon states that the CLEC may not add a resold Verizon advanced service to the high frequency spectrum of the loop, please state if Verizon contends that adding the capability is technically infeasible and, if so, explain why. If Verizon makes no assertion of technical infeasibility, please explain why Verizon does not make such configuration available.

OBJECTION: See Verizon's Objection to Request No. 19.

20. Has Verizon considered deploying or actually deployed a next generation digital loop carrier (NGDLC) architecture [footnote omitted] in Virginia? If any planning has occurred, provide any documents that draw conclusions or make recommendations regarding whether or not Verizon should move forward with such deployment and the implications of making the deploying including, but not limited to, the opportunity to reduce operating cost, future capital investment and/or increased revenue potential. To the extent that it is not apparent in the foregoing documentation, identify the equipment supplier(s) and equipment model(s) that were considered in the evaluation, particularly with respect to any electronics that might have been considered for deployment in remote terminals. If Verizon has deployed NGDLC loops anywhere in Virginia, please identify the number of customer distribution facility pairs connected to this architecture, the number of remote terminals ("RTs") containing equipment with the enabling electronics and the number of different central offices to which these RTs are connected.

OBJECTION: See General Objections. Verizon further objects to this Request on the grounds that the phrase "Has Verizon considered" renders this Request vague and unanswerable. Moreover, Verizon objects to this Request on the grounds that AT&T's suggested definition of "NGDLC" (see AT&T's First Set of Data Requests at 11-12, footnotes 2 and 3) is overly broad and vague.

20.a. Please provide all network planning documents, whether in "draft" or in final form, which relate in any way to the provision of DSL services to customers being served by loops constructed of fiber optic cable and/or digital loop carrier.

OBJECTION: See Verizon's Objection to Request No. 20.

21. Has Verizon considered deploying or actually deployed a next generation digital loop carrier (NGDLC) architecture [footnote omitted] anywhere in Verizon footprint, except for Virginia? If any planning has occurred, provide any documents that draw conclusions or make recommendations regarding whether or not Verizon should move forward with such deployment and the implications of making the deploying including, but not limited to, the opportunity to reduce operating cost, future capital investment and/or increased revenue potential. To the extent that it is not apparent in the foregoing documentation, identify the equipment supplier(s) and equipment model(s) that were considered in the evaluation, particularly with respect to any electronics that might have been considered for deployment in remote terminals. If Verizon has deployed NGDLC loops anywhere within the Verizon footprint, except for Virginia, please identify the number of customer distribution facility pairs connected to this architecture, the number of remote terminals ("RTs") containing equipment with the enabling electronics and the number of different central offices to which these RTs are connected.

OBJECTION: See Verizon's Objection to Request No. 20.

21.a. Please provide all network planning documents, whether in "draft" or in final form, which relate in any way to the provision of DSL services to customers being served by loops constructed of fiber optic cable and/or digital loop carrier.

OBJECTION: See Verizon's Objection to Request No. 20.

22. To the extent that Verizon has considered or actually deployed NGDLC loops: (a) what is the electrical length of the 2 wire loops that would otherwise service the customer premises (if deployed); (b) what is the assumed electrical length of the 2 wire loops that are targeted to have an alternative NGDLC loop architecture available; (c)what is the length of the copper distribution for customers using the NGDLC loop architecture (if deployed); and (d) what is the length of the copper distribution that Verizon assumed within its planning process?

OBJECTION: See Verizon's Objection to Request No. 20.

23. If not provided in the response to the preceding, please provide a complete description of the equipment that will be deployed (including manufacturer-provided specification sheet), the facilities that will be employed and the manner in which the facilities and equipment will be interconnected to provide a communications path between the customer's premises and the central office. This description should include but not be limited to the following:

OBJECTION: See Verizon's Objection to Request No. 20.

(a) Between the RT and the central office, does Verizon plan to commingle communications using the low frequency spectrum of a customer's "loop" on the same feeder facilities as those carrying communications using the high frequency spectrum of a customer's loop? If not, will the customer's communications be connected to one and only one central office to gain access to Verizon's circuit switched network and to one and only one central office to gain access to Verizon's high speed data network? If so, the two facilities from the RT terminate on the same central office? If not, why not?

OBJECTION: See Verizon's Objection to Request No. 20.

(b) If such commingling is not currently planned, does Verizon believe that it is technically feasible or infeasible for a single feeder facility to commingle the high and low frequency traffic and does Verizon's chosen/planned equipment supplier take the same position?

OBJECTION: See Verizon's Objection to Request No. 20.

(c) What bandwidth capacity has Verizon considered for deployment or actually deployed for the fiber feeder facility that connects the RT to the central office? Does Verizon believe that it is technically feasible to expand the bandwidth capacity of such feeder facilities? If so, what capacities does Verizon believe can be achieved through upgrade/modification to deployed electronics?

OBJECTION: See Verizon's Objection to Request No. 20.

(d) Does Verizon believe that it is feasible to engineer the capacity of feeder facilities so that multiple carriers can have nondiscriminatory access to the capacity in those facilities? If so, on what does Verizon base this assertion?

OBJECTION: See Verizon's Objection to Request No. 20.

(e) Other than by connecting at the central office, the RT or at the customer premises, is there any other technically feasible point that Verizon contends a competitor could gain access to the communications of its own retail customers without also gaining access to communications destined to the network(s) of other service providers? If so, identify all such point and describe how the carrier would make such a connection.

OBJECTION: See Verizon's Objection to Request No. 20.

(f) Under Verizon's current planning assumptions for the NGDLC loop architecture, how would a Verizon retail customer served over that architecture be physically connected to an Internet Service Provider?

OBJECTION: See Verizon's Objection to Request No. 20.

24. Please provide all terms and conditions for CLECs to lease unbundled dark fiber feeder subloop between the remote terminal and the central office.

OBJECTION: See General Objections.

25. Please provide copies of all briefings or disclosures Verizon provided to the financial community regarding the financial implications of deploying NGDLC architecture in the Verizon footprint.

OBJECTION: See General Objections.

26. Has Verizon performed or otherwise obtained any analyses that assess the loop lengths for which NGDLC deployment is cost effective? If so, please provide copies.

OBJECTION: See General Objections.

27. Does Verizon have plans to use NGDLC architecture in connection with the deployment of fiber distribution facilities to or close to the retail customer premises (e.g., "fiber to the curb", "fiber to the home" or "fiber to the neighborhood")? If so, please state such plans for the Verizon footprint.

OBJECTION: See General Objections.

28. Has Verizon investigated whether it is technically feasible to modify the NGDLC architecture (e.g., through replacement of plug-in electronics and or modification of the channel bank assembly) to enable it to accommodate fiber distribution? If so, what conclusions were reached? Does Verizon's current vendor of choice for any NGDLC products claim that such modification can be made to the infrastructure Verizon has considered?

OBJECTION: See General Objections.

29. Please provide all documents describing the procedures a CLEC must use to order line splitting on a manual basis, state when such procedures were established and, if not yet established when such procedures will be offered to CLECs in Virginia. In addition, please describe the process used to create any existing procedures, the process that will be used to modify such procedures and, if not yet introduced within Virginia, the process that will be employed to permit prompt availability of manual procedures. In all cases, please describe how such procedures were or will be communicated to CLECs.

OBJECTION: See General Objections.

29.a. Please provide the percentage of the following DSL services provided to CLECs other than a Verizon-Virginia, Inc., division or affiliate that flow-through Verizon's provisioning systems without any manual intervention.

OBJECTION: See General Objections.

30. Please state the process that Verizon intends to rely upon to negotiate and develop electronic OSS capabilities that support its line splitting obligations as set forth in the FCC's Line Sharing Reconsideration Order (FCC 01-26, released January 19, 2001). If Verizon intends to rely upon activities conducted in the New York collaborative, state:

OBJECTION: See General Objections. Verizon further objects to this Request to the extent it calls for speculation and/or argument on a point of law.

(a) Whether Verizon will agree to abide by all of the results of the collaborative, including all rulings of the New York Public Service Commission in connection therewith. If not, state any exceptions and the reasons for such exceptions;

OBJECTION: See Verizon's Objection to Request No. 30.

(b) Whether Verizon will implement in Virginia all of the OSS systems and processes developed for New York and when such modifications will be implemented in Virginia. If Verizon does not agree to implement in Virginia all of the New York OSS on the same timeline as such OSS are implemented in New York, state the reasons why and how long Verizon expects it will take to implement such modifications in Virginia;

OBJECTION: See Verizon's Objection to Request No. 30.

(c) Whether a CLEC, complying the operational interfaces established in NY supporting line splitting, will need to negotiate new parameters for use in Virginia or in any other way modify the operation of its OSS to be compatible with the interface accommodations in Virginia. If modification are required, please explain why they are necessary; and

OBJECTION: See Verizon's Objection to Request No. 30

(d) Whether all the software modifications/licenses necessary to deploy the OSS capabilities supporting line sharing in Virginia been secured on a parallel path and scheduled for implementation on the same time line as followed/planned for NY. If not, please explain why not.

OBJECTION: See Verizon's Objection to Request No. 30

31. Please state whether Verizon will require AT&T to pre-qualify all loops AT&T intends to use to provide DSL-based services. If all loops need not be pre-qualified, please identify all circumstances under which Verizon will impose such a requirement and the reasons for any such requirement. Specifically, if a loop was previously qualified and used by any carrier to support a DSL service in the HFS and the customer's loop is reterminated to different collocation space within the same central office, please state whether will Verizon require that the loop be pre-qualified.

OBJECTION: See Verizon's Objection to Request No. 30

32. Please state whether Verizon will allow AT&T (or a cooperating carrier) engaging in line splitting to provide splitter functionality in virtual, shared cageless and traditional collocation arrangements. If not, explain why.

OBJECTION: See Verizon's Objection to Request No. 30

33. Please state whether Verizon will provide splitter functionality to AT&T on a line-at-a time basis. [Footnote omitted]. If not, explain why Verizon refuses to do so. Any claims that the arrangement is technically infeasible should be fully documented.

OBJECTION: See Verizon's Objection to Request No. 30

34. Please state whether Verizon will permit two CLECs, with separate collocation space in the same Verizon Central Office building, to deploy facilities to connect the two collocations. In answering this question, please state whether and under what conditions the CLEC may self-provide the cross-connection. Also state whether Verizon will provide the connection between the two CLEC collocations. If so, state whether the connections will be provided under sections 251 and 252 of the

Act, under Federal common carrier obligations or other legal obligations. Please describe any conditions or limitations on a CLEC's right to request such cross-connections, the reasons for such limitations, Verizon's charges for making such cross-connections, and the basis used to develop such charges. If Verizon will not make such cross-connections, explain Verizon's reasons for its refusal.

OBJECTION: See Verizon's Objection to Request No. 30

35. Please state Verizon's definition of what constitutes a packet switch; whether Verizon has deployed any equipment that conforms to this definition of packet switching within any Central Office or remote terminal space owned or controlled by Verizon; and whether there is any Central Office or remote terminal space currently reserved for Verizon (or an affiliate) so that it may deploy such equipment. In addition, please state whether Verizon will permit AT&T to collocate packet switches in its collocations on Verizon's premises. If not, state Verizon's basis for refusing to permit such collocation.

OBJECTION: See Verizon's Objection to Request No. 30

36. Please state any differences in the support Verizon will provide for loop-switch port-shared transport combinations relating to line splitting compared to the support Verizon provides to retail customers for their voice services in a line sharing arrangement, and provide the reasons for such differences.

OBJECTION: See General Objections.

37. Please state whether Verizon will require any form of collocation as a prerequisite to obtaining access to the low or high frequency spectrum of a loop.

OBJECTION: See General Objections.

38. Please state whether Verizon asserts that it is technically infeasible to connect a dedicated transport UNE to the COT (or equivalent) employed in a NGDLC loop architecture to gain access to the TDM time slots. If so, explain all the technical impediments to doing so. In addition, please state whether Verizon asserts that it is technically infeasible to connect a dedicated transport UNE to the OCD (or equivalent) employed in the NGDLC loop architecture to gain access to the packets directed to the connecting carrier. If so, please explain all the technical impediments to doing so.

OBJECTION: See General Objections.

39. Detail the off-hours and weekend technical support Verizon currently provides for these different classes of customers:

(a) residential end users
(b) small business customers
(c) large business customers

OBJECTION: See General Objections.

40. Describe the process by which Verizon ceases billing to a customer when a customer has ported his telephone number over to a CLEC.

OBJECTION: See General Objections.

41. Will Verizon's OSS accept an order to port a telephone number on a Saturday or Sunday? If not, why not. If the reason is systems-related, explain what alterations would be needed to permit such an order to flow through Verizon's systems, the estimated costs for such alterations and the estimated time of implementing such system modifications.

OBJECTION: See General Objections.

42. Detail the times during which Verizon's Service Order Administration ("SOA") connectivity to NPAC is available for processing all required number portability activities.

OBJECTION: See General Objections.

43. Does Verizon-VA offer installations to any customers outside of business hours (Monday through Friday, 8:00 am – 5:00 pm). If so, under what rate, terms, and conditions? Are such off-hours installations limited to specific classes of customers? If so, please detail such limitations.

OBJECTION: See General Objections.

44. What is the "Premium Installation Appointment Charge" listed in Verizon's VA tariff [SCC Va. No. 203, Section 3 Original Page 2].

OBJECTION: See General Objections.

44.a Which classes of customers are entitled to a "Premium Installation Appointment"?

OBJECTION: See General Objections.

44.b What is the basis for the charge?

OBJECTION: See General Objections.

44.c Provide all data showing how many customers request premium installation.

OBJECTION: See General Objections.

44.d How many customers receive premium installation?

OBJECTION: See General Objections.

44.e How many customers who receive premium installation cancel that installation at the door?

OBJECTION: See General Objections.

44.f If the service is tariffed, but not currently offered, explain why it is tariffed?

OBJECTION: See General Objections.

45. Why does the Verizon-DC tariff, PSC DC Tariff No 203 Section 3 Original Page 5, B.2.f.(2), specifically offer a premium installation appointment charge for installation between the hours of 5:00 pm to 9:00 pm Monday through Friday and 8:00 am to 5:00 pm Saturday? Why does the Verizon-VA tariff not contain the specific timeframes in connection with the premium installation appointment charge?

OBJECTION: See General Objections.

46. Provide copies of any comments Verizon might have filed with the NANC's Local Number Portability Administration Working Group that pertain to issues raised in the Third Report on Wireline/Wireless Integration issued on November 29, 2000.

OBJECTION: See General Objections.

47. Does Verizon confirm with NPAC that a port has been activated and completed prior to disconnecting the telephone number from its switch? If not, why not?

OBJECTION: See General Objections.

48. What are the current intervals for LNP Provisioning for larger customers? What constitutes a "project"?

OBJECTION: See General Objections.

49. Detail the process and provide copies of all available documentation by which Verizon establishes and confirms a provisioning date for larger customers for which Verizon will provide the service directly.

OBJECTION: See General Objections.

50. Detail the process and provide copies of all available documentation by which Verizon allows a CLEC to reschedule a port of a simple pots line after the initial port due date was put on hold.

OBJECTION: See General Objections.

50.a Identify the shortest timeframe within which the CLEC can reschedule the port and identify the steps that need to be taken by the CLEC and by Verizon to meet that rescheduled date.

OBJECTION: See General Objections.

51. Detail the process and provide copies of all available documentation by which Verizon works with a CLEC to restore an end user's service in the event that a port is unsuccessful and leaves the end user without dial tone.

OBJECTION: See General Objections.

52. How many customers and what classes of customers request each type of referral announcement?

(a) Call Direct
(b) Call Direct Plus
(c) Call Messenger
(d) Call Messenger Plus

OBJECTION: See General Objections.

53. How many customers and what classes of customers request a referral announcement similar to the one which Verizon now offers to AT&T, *i.e.* a referral announcement that simply states that the telephone number has changed a recorded announcement of the new telephone number?

OBJECTION: See General Objections.

54. Does Verizon offer these Call Mover services (Call Direct, Call Direct Plus, Call Messenger, and Call Messenger Plus) to customers who are terminating a line with Verizon and transferring to a line offered by an independent telephone company?

OBJECTION: See General Objections.

54.a If the answer is no, please explain the following language from the reseller letter from February 1999 (found at this link: http://128.11.40.241/east/wholesale/resources/master.htm):

"Old telephone number and referral number must be within the same LATA and cannot be a toll free, International or Independent Telephone Company number, except in the case of Call Messenger."

OBJECTION: See General Objections.

54.b Why is this permitted for Call Messenger, but not the other Call Mover services (Call Direct, Call Direct Plus, and Call Messenger Plus)?

OBJECTION: See General Objections.

54.c Why does Verizon permit a reseller to offer Call Messenger service when a customer transfers service to an independent telephone company, but not to a CLEC?

OBJECTION: See General Objections.

Respectfully submitted,

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Dated: June 4, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's First Set of Data Requests were delivered this 4th day of June, 2001, by hand to:

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