

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

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JUN 27 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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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

**OBJECTIONS OF WORLDCOM TO
VERIZON VIRGINIA INC.'S SECOND SET
OF DISCOVERY TO WORLDCOM**

WorldCom, Inc. respectfully submits its objections to Verizon Virginia, Inc.'s Second Set of Discovery.¹ Set out below are Verizon's requests, followed by WorldCom's objections. As a general matter, Verizon has sought discovery of a broad range of WorldCom cost and network data. WorldCom objects to each and every such discovery request on the ground that the costs to be set in this proceeding must comply with this Commission's TELRIC methodology, not WorldCom's (or any particular company's) actual costs and network. What needs to be modeled is the cost of serving Verizon Virginia's demand and territory, consistent with TELRIC cost principles.

OBJECTIONS TO INDIVIDUAL REQUESTS

II-1. Please provide copies of WorldCom's vendor contracts for switches that WorldCom has purchased for its Virginia operations over the last five years, as well as a list of vendors that have sold switches to WorldCom over the last five years. For each of the contracts, identify the discount that WorldCom received.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

¹ On June 26, 2001, counsel for WorldCom telephoned Catherine Kane Ronis, counsel for Verizon, to discuss WorldCom's objections and attempt to settle this dispute amicably. At the time of filing, WorldCom had not received a return phone call, and has thus been unable to confer with Verizon regarding WorldCom's objections.

II-2. For each of the switches that WorldCom has purchased over the last five years for its Virginia operations, identify what types of upgrades and switch replacements WorldCom has performed, and how often these have occurred.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-3. For each of the switches that WorldCom has installed in Virginia over the last five years, provide the following: (a) the date the switch was installed, (b) the location where the switch was installed, (c) the name of the switch manufacturer and model number, (d) the price paid for the switch, and (e) the total costs of installing the switch, including all costs of engineering, furnishing, and installation.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-4. For each of the last five years, provide (a) WorldCom's total revenues (for all Virginia subsidiaries and affiliates) from wholesale services in Virginia and (b) the total amount that WorldCom has spent on wholesale marketing (including without limitation advertising, product management, and customer interfacing functions) in Virginia.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is vague and overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-5. Please provide the 1999 and 2000 depreciation lives and rates for WorldCom reported in its annual report, including for all Virginia subsidiaries and affiliates. Provide all underlying parameters that form the basis for setting that rate, including any studies or supporting documents. Please provide the regulated and financial depreciation lives and rates used by WorldCom for these categories of assets: (a) digital switching; (b) circuit equipment; (c) pole lines; (d) aerial cable metallic; (e) aerial cable non-metallic; (f) underground cable metallic; (g) underground cable non-metallic; (h) buried cable metallic; (i) buried cable non-metallic; and (j) conduit systems.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence. Subject to and without waiving this objection, WorldCom's annual reports are a matter of public record.

II-6. Identify the following values actually used by WorldCom in planning its own network: (a) the route to air ratio for inter-office facilities; (b) the actual number of minutes per month, per DSO level switched access trunk; (c) the investment per DSO level trunk port; (d) the investment per installed foot of fiber; (e) the tandem common equipment investment; (f) the switch installation multiplier; (g) the power investment per switch; (h) the cost of construction per square foot of a wire center building; (i) the land price per square foot of land that contains switch buildings; (j) the busy hour fraction of daily usage; (k) the annual to daily usage reduction factor; (l) the installed terminal multiplexer investment per OC3; (m) the interoffice facility wire center EF&I fully loaded labor rate per hour in Virginia; and (n) the installed cost of an OC-48 regenerator.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that the request is burdensome and that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence. Subject to and without waiving this objection, WorldCom does not keep data in the forms requested.

II-7. For each of the last five years, provide the total book value of all WorldCom equipment and facilities (including all Virginia subsidiaries and affiliates) that were removed from service by WorldCom in dollars and as a percentage of the book value of all WorldCom equipment and facilities remaining in service.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-8. For each of the last five years, provide WorldCom's total common overhead expenses and WorldCom's total revenues, including for all Virginia subsidiaries and affiliates.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-9. For each of the last five years, provide WorldCom's annual productivity savings (adjusted for inflation) for network-related expenses and non-network related expenses, including for all Virginia subsidiaries and affiliates.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is vague and overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-10. For each of the last three years, provide the percentage of all network repairs performed by WorldCom that had to be re-performed at least once within six months of the first repair date, including for all Virginia subsidiaries and affiliates.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is vague, overly broad, and burdensome. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

II-11. Identify the number and location of COSMIC frames deployed in WorldCom's network (including for all Virginia subsidiaries and affiliates) and what percentage of all distributing frames in AT&T network are COSMIC frames

RESPONSE OF WORLDCOM:

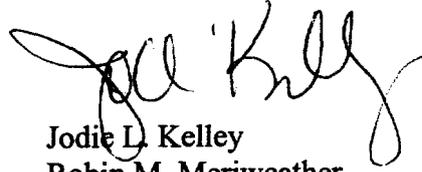
WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence. Subject to and without waiving this objection, WorldCom states that it has no information regarding AT&T's network.

II-12. Please produce all documents referred to or relied upon in answering the above interrogatories.

RESPONSE OF WORLDCOM:

WorldCom has not referred to or relied on any documents in making these responses.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jodie L. Kelley". The signature is fluid and cursive, with a large, sweeping flourish at the end.

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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing "Objections of WorldCom to Verizon Virginia Inc.'s Second Set of Discovery to WorldCom" were delivered this 27th day of June, 2001, by federal express and regular mail to:

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** By Federal Express*

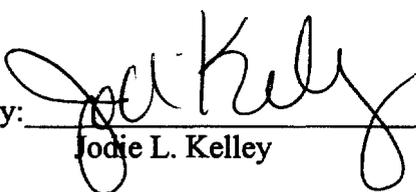
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By: 
Jodie L. Kelley