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July 2, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Esq.
Federal Communications Commission
Office of the Secretary
The Portals
445 12th St. S.W.
Room TWB 204
Washington, D.C. 20554

00-249

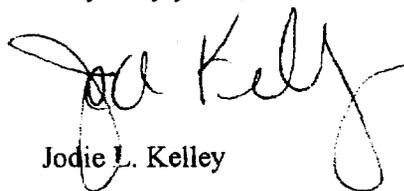
Re: CC Docket No. 00-218

Dear Ms. Salas:

Enclosed for filing please find an original and three copies of "Responses of WorldCom, Inc. to Verizon Virginia Inc.'s First Set of Data Requests." An additional eight copies have been provided in a separate envelope to be delivered to the arbitrator. Finally, an extra copy is enclosed to be file-stamped and returned.

If you have any questions, please do not hesitate to call me at 202-639-6058. Thank you very much for your assistance with this matter.

Very truly yours,



Jodie L. Kelley

No. of Copies rec'd
List ABCDE

0+3

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

**RESPONSES OF WORLDCOM, INC. TO
VERIZON VIRGINIA INC.'S FIRST SET
OF DATA REQUESTS**

CC Docket No. 00-218
Verizon Set #1
July 2, 2001

Q1. With regard to Issue III-16, do you agree that Verizon Virginia's language in § 6 of the Additional Services Attachment to Verizon Virginia's proposed interconnection agreement adequately and lawfully addresses the issue of referral announcements? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This issue has been resolved by the parties.

**CC Docket No. 00-218
Verizon Set #1
July 2, 2001**

Q2. With regard to Issue IV-47, do you agree that Verizon Virginia's language in §§ 10, 32.1 and 32.2 of Verizon Virginia's proposed interconnection agreement adequately and lawfully addresses the issue of the Parties' contact with each other's subscribers? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-47 of the parties' contact with each other's subscribers, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, the contract provisions dealing with contact with subscribers must clarify the term subscriber, state that each party is the primary contact for its own subscribers and set forth procedures for a party to handle inquiries that it may get from the other party's subscribers. Refer to WorldCom's Proposed Interconnection Agreement, Attachment VIII, Sections 1.1.1.1 through 1.1.1.3.

**CC Docket No. 00-218
Verizon Set #1
July 2, 2001**

Q3. With regard to Issue IV-56, do you agree that Verizon Virginia is not legally obligated to participate in the National Consumers Telecommunications Data Exchange? If your response is anything other than an unconditional "yes," please explain in detail every reason why.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-56, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, WorldCom does not agree with Verizon's assertion and believes the FCC has, in the past, compelled membership in industry associations. Further, Verizon needs to provide competitors with information on the credit worthiness of telephone subscribers. Because Verizon is the only local provider they are the only ones in a position to provide this information. Payment information can be provided in the CSR. Finally, Verizon has agreed in New York to participate in the National consumers Telecommunications Data Exchange.

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Verizon Set #1
July 2, 2001**

Q4. With regard to Issue IV-59, do you agree that WorldCom has access to relevant USOCs and FIDs for Verizon Virginia's "legacy" systems via Verizon Virginia's website and that USOCs for expressTRAK will be available on the website in July 2001? If your response is anything other than an unconditional "yes," please explain in detail every reason why.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including the issue IV-59, in its Direct Testimony to be filed on July 19, 2001. Subject to the above statement, WorldCom is reviewing USOCs and FIDs that Verizon recently provided to determine if they are readable/usable. However, this does not alleviate the need for a contractual obligation on this issue. Further, WorldCom cannot speculate as to whether USOCs for expressTRAK will be available on the Verizon website in July 2001.

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Verizon Set #1
July 2, 2001**

Q5. With regard to Issue IV-64, do you agree that Verizon Virginia's agreement to accept requests for expedited intervals, provided that interval is reasonable from an operational perspective and the customer is willing to pay the costs associated with an expedited interval, adequately and lawfully addresses the issue of expedited service? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's agreement is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-64, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, Verizon's statement in the question does not alleviate the need for a contractual obligation regarding this issue.

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Verizon Set #1
July 2, 2001**

Q6. With regard to Issue IV-74, do you agree that the processes of interim, standard and collocation billing are adequately and lawfully addressed in Verizon Virginia's Customer Support website? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's Customer Support website is unlawful or otherwise fails to address adequately this issue. Further, please explain in detail why any modifications to the processes of interim, standard and collocation billing should not be handled through the industry collaborative change management process.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-74, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, Verizon's processes of interim, standard and collocation billing must be memorialized in the interconnection agreement in addition to being present on the website.

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Verizon Set #1
July 2, 2001**

Q7. With regard to Issue IV-79, do you agree that the 911/E911 Attachment to the Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) adequately and lawfully addresses the 911/E911 requirements? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-79, in its Direct Testimony to be filed on July 19, 2001.

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July 2, 2001**

Q8. With regard to Issues IV-80 and 81, do you agree that §3 of the Additional Services Attachment to the Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) adequately and lawfully addresses Directory Assistance and Operator Services? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-80 and IV-81, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, Verizon should be required to provide Operator Services and Directory Assistance as UNEs until such time as Verizon can demonstrate that it provides customized routing per FCC rules.

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Verizon Set #1
July 2, 2001**

Q9. With regard to Issue IV-82, do you agree that §4 of the Additional Services Attachment to the Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) adequately and lawfully addresses Directory Assistance and Listing Service Requests? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-82, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, this issue has been resolved through agreed to modifications to Verizon's Section 4, subject to reviewing the limitation of liability and indemnification portions.

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Q10. With regard to Issue I-10, do you agree that §22 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses the issue of termination? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue I-10, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, WorldCom requires termination language to prevent Verizon from terminating the agreement without Commission oversight. WorldCom has proposed reasonable language that allows Verizon to invoke Commission jurisdiction when necessary.

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Q11. With regard to Issues III-15 and IV-107, do you agree that §28.16 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses the issue of intellectual property? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issues III-15 and IV-107, in its Direct Testimony to be filed on July 19, 2001.

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Q12. With regard to Issue IV-45, do you agree **that** §17 of the General Terms and Conditions of the Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) **adequately and lawfully** addresses the issue of fraud protection? If your response is anything **other than** an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is **premature**. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed **and** served in the "form of affidavits," with supporting documentation, expert reports **and** exhibits. In addition, the evidence shall be organized on an issue-by-issue basis **and** shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-45, in its Direct Testimony to be filed on July 19, 2001.

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Q13. With regard to Issue IV-88, do you agree to the modifications to Part A, §3.1 proposed by Verizon Virginia (see Response to Issue IV-88, Exhibit B to Verizon Virginia's Answer)? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

- a) If you do not agree to the modifications to Part A, §3.1 proposed by Verizon Virginia, do you agree that §28.8 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses assignment and delegation? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-88, in its Direct Testimony to be filed on July 19, 2001.

Subject to and without waiving the above, response, WorldCom believes that Verizon's changes impose a significant and unnecessary burden on the parties to seek and obtain prior written consent even in situations where one of the parties is merely carrying out an internal corporate restructuring. These types of restructurings can occur for any number of benign reasons (e.g., tax considerations or corporate consolidation). The Act does not give Verizon the right to so tightly restrict the other parties right to freely assign. For example, during the life of the first generation interconnection agreements MCI WorldCom under went an internal corporate restructuring that involved one of its local service providers (CLEC). All that was required and all that Verizon needed was notice of the fact that the restructuring had occurred and the resulting name changes. Verizon never once complained or took issue with that restructuring. The same has been true

reciprocally of Verizon's restructurings. It appears that the Verizon/AT&T language suffers **the** same defect. In fact, it is more burdensome because it requires the assigning party to make a showing that the assignee has a certain level of financial and other resources.

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Verizon Set #1
July 2, 2001**

Q39. With regard to Issue IV-91, do you agree that §§ 12.3 and 18.2 of the Verizon Virginia-proposed interconnection agreement with AT&T (see Response to Issue IV-91, Exhibit B to Verizon Virginia's Answer and Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully address the issue of branding? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-91, in its Direct Testimony to be filed on July 19, 2001.

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Q40. With regard to Issue IV-93, do you agree that § 12.10.3 of the Verizon Virginia-proposed interconnection agreement with AT&T (Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses the actions of Verizon Virginia employees while on the premises of a WorldCom customer? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-93, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, WorldCom requires language that insures that Verizon will not disparage WorldCom or its products and services to WorldCom's customers. In addition, the language must ensure that Verizon does not utilize visits to WorldCom customers as marketing/win back opportunities.

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Q41. With regard to Issue IV-94, do you agree to the modifications to Part A, §8.1 proposed by Verizon Virginia (see Response to Issue IV-94, Exhibit B to Verizon Virginia's Answer)? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-94, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, Verizon has not proposed any changes. Verizon simply stated that it wanted modifications that "make clear that the rates in the pricing attachment will change if the Commission or VSCC approve, order or allow rates to go into effect." Altering the prices in the contract based on rates that have simply gone "into effect" is unacceptable. It allows Verizon to unilaterally undercut the rates arbitrated in this proceeding and ordered by the FCC.

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Q42. With regard to Issue IV-95, do you agree to the modifications to Part A, §8.2 proposed by Verizon Virginia (see Response to Issue IV-95, Exhibit B to Verizon Virginia's Answer)? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-95, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above, response, WorldCom does not understand Verizon's concern and Verizon's modification introduces ambiguity into the contract. Verizon does an inadequate job of explaining its concern with respect to Issue IV-95. Further, Verizon's modification only confuses the application of the change in law provisions.

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Q43. With regard to Issue IV-97, do you agree to the modifications to Part A, §10 proposed by Verizon Virginia (see Response to Issue IV-97, Exhibit B to Verizon Virginia's Answer)? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

- a) If you do not agree to the modifications to Part A, §10 proposed by Verizon Virginia, do you agree that §§18.3 – 18.5 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses the issue of CPNI? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-97, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, Verizon's proposed changes would add two sections to the Confidentiality provisions that Verizon is otherwise agreeable to. The first section would permit Verizon to audit CPNI. WorldCom has already agreed -- in settling Issue IV-89 -- to include a provision in the audit provisions that allows each party to audit the other party's use and access to CPNI. Another provision doing the same thing would be redundant. Moreover, the second section would permit Verizon to monitor on a continuous basis WorldCom's use and access to CPNI. Such monitoring would allow for abuse by Verizon and serves no countervailing purpose. It appears that the Verizon and AT&T contract language suffers from the same defect. It contains a provision that allows Verizon to monitor AT&T's use and access to CPNI. Section 18.4 and 18.5, dealing with "Cooperation with Law Enforcement" and "Resolution of Annoyance/Harassing Calls" have nothing to do with CPNI and appear to be an incorrect cite by Verizon in its discovery request.

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Q44. With regard to Issue IV-98, do you agree to the modifications to Part A, §10.3.3 and Attachment VIII, §1.1.1.4 proposed by Verizon Virginia (see Response to Issue IV-98, Exhibit B to Verizon Virginia's Answer)? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-98, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above, response, WorldCom is not aware of any Applicable Law that permits Verizon to share the information it gathers or has access to in its wholesale operations with CLECs with its retail operations. Any such shared access or sharing of information between wholesale and retail operations is anti-competitive and not in the public interest.

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Q45. With regard to Issues IV-100 and 101, do you agree that §28.11 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) provides an adequate and lawful dispute resolution mechanism? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-100 and IV-101, in its Direct Testimony to be filed on July 19, 2001.

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Q46. With regard to Issue IV-106, do you agree that §24 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) provides an adequate and lawful indemnification mechanism? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-106, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, indemnification should be required from each party for third party claims brought against the other party, for which the first party was responsible. That is, if WorldCom is sued for something that Verizon caused, Verizon should indemnify WorldCom. Otherwise, WorldCom becomes financially responsible for things outside of WorldCom's control – that is, Verizon actions and omissions.

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Q47. With regard to Issue IV-110, do you agree that §§18.1 – 18.3 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses the issue of migration of service? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-110, in its Direct Testimony to be filed on July 19, 2001.

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Q48. With regard to Issue IV-113, do you agree to the modifications to §25.2 and 25.8 proposed by Verizon Virginia (see Response to Issue IV-113, Exhibit B to Verizon Virginia's Answer)? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-113, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, WorldCom notes that Section 25.8 proposed by Verizon does not include a reciprocity provision if the change of law benefits WorldCom and also that a 30-day transition seems relatively short.

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Q49. With **regard to Issue IV-116**, do you agree to the modifications to §25.6 proposed by Verizon **Virginia** (**see** Response to Issue IV-116, Exhibit B to Verizon Virginia's Answer)? If **your response** is anything other than an unconditional "yes," please explain in detail **every reason** that Verizon Virginia's proposed language is unlawful or otherwise fails to **address adequately** this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing **procedures** for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with **supporting** documentation, expert reports and exhibits. In addition, the evidence shall be **organized** on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or **information** considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, **issued** a letter that included a procedural schedule for the Verizon/WorldCom arbitration **before** the FCC. Per this schedule, Direct Testimony, as described above, is due from the **parties** on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide **its direct case**, including issue IV-116, in its Direct Testimony to be filed on July 19, 2001. **Subject to and without waiving** the above response, WorldCom notes that Verizon's **added** language regarding a stay of the agreement appears to be extreme – i.e. if the agreement is stayed (not in effect) during the lengthy appeals process, WorldCom's business plans could be on hold indefinitely.

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Q50. With regard to Issue IV-121, do you agree that §31 of the General Terms and Conditions of Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) adequately and lawfully addresses the remedies issue? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-121, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, language incorporating performance standards, metrics and self-executing remedies should be included in the interconnection agreement.

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Q50. With regard to Issue IV-121, do you agree that §31 of the General Terms and Conditions of Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) adequately and lawfully addresses the remedies issue? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-121, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, language incorporating performance standards, metrics and self-executing remedies should be included in the interconnection agreement.

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Q51. With regard to Issue IV-126, do you agree that § 28.7 of the agreement proposed by Verizon Virginia for interconnection with AT&T (see Exhibit C-3 to Verizon Virginia's Answer) adequately and lawfully addresses the collection and payment of taxes? If your response is anything other than an unconditional "yes," please explain in detail every reason that Verizon Virginia's proposed language is unlawful or otherwise fails to address adequately this issue.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-126, in its Direct Testimony to be filed on July 19, 2001.

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Q52. With regard to Issue IV-129, do you agree that the Glossary in Verizon Virginia Model Interconnection Agreement (see Exhibit C-1 to Verizon Virginia's Answer) provides adequate and lawful definitions? If your response is anything other than an unconditional "yes," please explain in detail which of Verizon Virginia's proposed definitions are unlawful or otherwise inadequate.

RESPONSE: This question is premature. Per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. In addition, the evidence shall be organized on an issue-by-issue basis and shall include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) On March 27, 2001, Dorothy Atwood, Chief of the Common Carrier Bureau, issued a letter that included a procedural schedule for the Verizon/WorldCom arbitration before the FCC. Per this schedule, Direct Testimony, as described above, is due from the parties on July 19, 2001. Per the FCC's procedural schedule, WorldCom will provide its direct case, including issue IV-129, in its Direct Testimony to be filed on July 19, 2001. Subject to and without waiving the above response, WorldCom does not generally agree with the definitions in Verizon's Glossary. Verizon's Glossary contains definitions that reflect its positions on numerous unresolved issues before the FCC. For example, Verizon's definition of Interconnection Point reflects a portion of its unreasonable and unlawful GRIPS proposal.