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HUNTON & WILLIAMS

1900 K STREET, N.W.
WASHINGTON, D.C. 20006-1109

TEL 202 • 955 • 1500
FAX 202 • 778 • 2201

KIMBERLY A. NEWMAN
DIRECT DIAL: 202-778-2225
EMAIL: knewman@hunton.com

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July 11, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Hand

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

Re: ***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 Sixth Set of Data Requests.

Please do not hesitate to call me with any questions.

Very truly yours,

Kimberly Newman / awc

Kimberly A. Newman

cc: Dorothy T. Attwood (8 copies)(by hand)
David Levy, Esq.
Mark A. Keffer, Esq.

No. of Copies rec'd 0+3
List A B C D E

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

VERIZON VIRGINIA INC.'S OBJECTIONS TO AT&T'S SIXTH 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 Sixth Set of Data Requests served on Verizon by AT&T Communications of Virginia ("AT&T") on July 7, 2001.

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 Protective Order that was adopted and released on June 6, 2001. 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, 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).

8. 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 confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T or any other entity.

9. 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 redundant of prior data requests served by AT&T.

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:

ITEM: AT&T 6-1 Provide Verizon-Virginia line counts, by wire center, for residential, business, single-line business, special access and public lines, in an electronic form to the extent available for the years 1996, 1997, 1998, 1999 and 2000. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #194

ITEM: AT&T 6-2 Provide, by wire center, Verizon-Virginia end of year 2001 and end of year 2002 forecasted line counts for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #195

ITEM: AT&T 6-3 Provide statewide Verizon-Virginia forecasted line counts for the next five years (or as many years as are available) for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #196

ITEM: AT&T 6-4

Provide the following data for Verizon-Virginia's special access lines, by wire center and total for the state for the years 1996, 1997, 1998, 1999 and 2000 and forecasted for the next five years (or as many years as are available):

a. DS0 equivalents

b. Physical pairs equivalents.

REPLY: See General Objections.

VZ VA #197

ITEM: AT&T 6-5 Provide, by wire center, the number of buildings to which Verizon provides service. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #198

ITEM: AT&T 6-6 Provide, by wire center, the number of customers for which Verizon provides service. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #199

ITEM: AT&T 6-7

Provide the total route miles of Verizon-Virginia's distribution plant currently in service. Produce any and all documents concerning, referring or relating to the amount of distribution plant currently in service in Verizon Virginia's network.

a. Provide the total route miles dark fiber currently in Verizon-Virginia's distribution plant. Produce any and all documents concerning, referring or relating to the amount of distribution plant currently in service in Verizon Virginia's network.

REPLY:

See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #200

ITEM: AT&T 6-8

Provide the total route miles of Verizon-Virginia's feeder plant currently in service. Produce any and all documents concerning, referring or relating to the amount of feeder plant currently in service in Verizon-Virginia's network.

a. Provide the total route miles dark fiber currently in Verizon-Virginia's feeder plant. Produce any and all documents concerning, referring or relating to the amount of feeder plant currently in service in Verizon Virginia's network.

REPLY:

See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #201

ITEM: AT&T 6-9 Please identify the total route miles of Verizon-Virginia's interoffice plant currently in service. Produce any and all documents concerning, referring or relating to the amount of interoffice plant currently in service in Verizon-Virginia's network.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA # 202

ITEM: AT&T 6-10 Provide the percentage of Verizon-Virginia's total route miles that share both feeder and distribution facilities. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #203

ITEM: AT&T 6-11 Provide the percentage of Verizon-Virginia's feeder route that also carries distribution facilities (copper cable). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #204

ITEM: AT&T 6-12 Provide the percentage of Verizon-Virginia's distribution route that also carries feeder facilities (copper and/or feeder cable). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #205

ITEM: AT&T 6-13 Provide the percentage of Verizon-Virginia loop interoffice route that also carries interoffice feeder facilities (copper and/or fiber cable). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #206

ITEM: AT&T 6-14 Provide all contracts Verizon has executed over the past three years for the purchase of digital loop carrier equipment.

REPLY: See General Objections.

VZ VA #207

ITEM: AT&T 6-15 Provide all contracts Verizon has executed over the past three years for the purchase of digital loop carrier equipment for its Virginia network.

REPLY: See General Objections.

VZ VA #208

ITEM: AT&T 6-16 Please identify how Verizon believes fiber cable investment should be allocated among all of the services using a fiber sheath. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service on the same fiber, what portion of the fiber investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #209

ITEM: AT&T 6-17 Please identify how Verizon believes feeder structure investment should be allocated among all of the services using the feeder structure. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service on (or in) the same feeder structure, what portion of the feeder structure investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #210

ITEM: AT&T 6-18 Please identify how Verizon believes common equipment in the digital loop carrier investment should be allocated among all of the services using the digital loop carrier. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service in the same digital loop carrier cabinet, what portion of the digital loop carrier common equipment investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #211

ITEM: AT&T 6-19 Please identify how Verizon believes distribution structure investment should be allocated among all of the services using the distribution structure. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service on (or in) the same distribution structure, what portion of the distribution structure investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #212

ITEM: AT&T 6-20 Please provide a description of the process and analysis undertaken by Verizon in Virginia to determine when a tandem is "exhausted", and as a result requires supplements, additions and or other modifications which extend the capacity of tandem switching facilities.

a. Include details regarding how often the process is undertaken; the length of the applicable planning cycle; the name of the responsible department or persons that undertake the analysis; and a description of the specific analysis that is undertaken.
b. As part of the description of the analysis, include the standard used for identifying exhaust trunk terminations and/or processor capacity; all options considered for relieving tandem exhaust, as well as all assumptions and supporting data relied upon to undertake the analysis.
c. Please provide target fill points for tandem switches.
d. Include copies of any internal company documentation describing any and all of the above processes.

REPLY: See General Objections.

VZ VA #213

ITEM: AT&T 6-21 Identify each tandem in Virginia that is forecasted to be exhausted in the current planning cycle.

a. For each such tandem describe the relief options identified for that tandem (*e.g.*, change homing arrangement, add new switch, offload traffic) and whether that tandem's capacity could be expanded by adding a switch module.
b. If a new tandem switch is the relief option identified, indicate:
   (i) The location of the new tandem or tandems.
   (ii) Whether any tandems currently in place will have traffic offloaded to the new tandem, and if so, identify the existing tandem and the estimated amount of traffic to be offloaded to the new tandem.
   (iii) The estimated cost and time frame for implementation of the new tandem.

REPLY: See General Objections.

VZ VA #214

ITEM: AT&T 6-22 For each tandem in Virginia, please provide the following information:

a. Current total trunk terminations for each tandem.
b. Current trunks in service for each tandem.
c. Capacity of tandem by number of trunks tandem can serve assuming each trunk is active/in service.
d. Year by year forecasts of trunks in service for each tandem. Break down these forecasts by traffic type (Verizon traffic, IXC traffic, CLEC interconnection traffic and other) and indicate the basis for these forecasts.

REPLY: See General Objections.

VZ VA #215

ITEM: AT&T 6-23 Please list all the different types of traffic – (list VZ, IXCs, CLEC traffic types separately) - that traverse each Verizon tandem.

a. For each traffic type listed, please indicate whether Verizon imposes a traffic threshold on that traffic beyond which the "excess" traffic is either required to be removed from the tandem or an additional charge is imposed. Please specify the applicable traffic threshold as well as the applicable time frames, additional charges, and any other relevant considerations for each.
b. For those traffic types that have a traffic threshold imposed, explain why and how that limitation was developed. Include any and all studies or supporting documentation, including applicable network design standards relied upon to support the need for the limitation and to support the level of the established threshold.
c. For those traffic types listed that do not have an applicable traffic threshold, please explain why a threshold is not imposed.

REPLY: See General Objections.

VZ VA #216

ITEM: AT&T 6-24 Please provide all cost studies, testimony and other related documentation, including briefs, associated with Verizon tandem rates in Virginia.

REPLY: See General Objections. Verizon further objects to this request to the extent it seeks testimony to be filed in this case prior to the filing date established by the Commission for this proceeding.

VZ VA #217

ITEM: AT&T 6-25 Please explain how Verizon arrived at the proposed one DS-1 proposed traffic threshold set forth on page 20 of its Response. Include all applicable studies and assumptions that support this threshold.

REPLY: See General Objections.

VZ VA #218

ITEM: AT&T 6-26 Please provide all documented Verizon internal practices for grooming, i.e. systematic re-routing of, traffic off the tandem.

REPLY: See General Objections.

VZ VA #219

ITEM: AT&T 6-27 Please provide all documented Verizon policy descriptions that describe the threshold at which Verizon traffic is routed from tandem trunks to direct end office trunks.

REPLY: See General Objections.

VZ VA #220

ITEM: AT&T 6-28 With regard to trouble isolation in the plant connecting an MTE to Verizon's Central Office, is it Verizon's functionality in or at that cross-connection device where on-premises wiring is connected to Verizon's outside plant that permits remote testing (i.e., testing without a technician dispatch to the premises) of the facility between the central office separately from the facility between the point of cross-connection to the on-premises wiring and the retail customer station equipment. If the answer is dependent upon whether or not the on-premises wiring is owned or controlled by Verizon, please answer individually for each condition.

a. To the extent that a device is deployed that permits such remote testing and isolation of the trouble, identify the units(s) employed and state whether the cost of deploying and using such units is charged directly to the building owner?
   i. If so, identify and provide a copy of the tariff or contract that governing the terms, conditions and charges for such a device.
   ii. If the cost is not directly charged to the building owner, how are such costs recovered and what party determined that the device should be deployed?

REPLY: See General Objections.

VZ VA #221

ITEM: AT&T 6-29

In responding to question AT&T 2-16, Verizon makes the statement "Verizon Virginia states that the NID is now, and for many years has been, equipped with a lock on the network side." Verizon fails to respond with respect to whether it has a policy which makes any distinction between locations where premises wiring is owned or controlled by Verizon compared to locations where it is not.

Please state, in this regard, whether Verizon's policy makes any distinction between locations where premises wiring is owned or controlled by Verizon compared to locations where it is not.

a. Where Verizon cross-connects it outside plant facilities to on-premises wiring at an MTE building, what are Verizon's routine practices for limiting access to:
   i. the facilities and terminals upon which the facility from the Verizon central office terminate,
   ii. the facilities to the individual customer units and the terminals upon which the facilities terminate, and
   iii. the cross-connections between the two terminals described.
b. If practices differ, are the differing practices dependent upon whether or not the on-premises wiring is owned or controlled by Verizon. Please answer individually for each condition.
c. If the practices differ, are the differing practices dependent upon whether the cross-connection device is located within the MTE compared to being placed at a location external to the building, please state the separate treatments afforded.

REPLY: See General Objections.

VZ VA #222

ITEM: AT&T 6-30 Verizon responds to AT&T 2-28 in stating "it keeps no such information that specifies the premises as being an MTE." AT&T requests that Verizon respond to AT&T 2-28 with the clarification that AT&T was not asking if Verizon could separately identify MTEs. Rather it was seeking to understand the facility records that Verizon maintains for plant and equipment that it owns between an MPOE and the point of demarcation. With that understanding, does Verizon assert any ownership or control over any facilities or equipment located on any Virginia customer premises where those equipment and/or facilities are located between the MPOE and the point of demarcation? If so, please respond to AT&T 2-28 with respect to those equipment and/or facilities where Verizon asserts such ownership even if those specific equipment and/or facilities cannot be uniquely identified from other records of Verizon.

REPLY: See General Objections.

VZ VA #223

ITEM: AT&T 6-31 When on-premises wiring at an MTE is privately provided, does Verizon provide any information either directly or indirectly to the party managing the on-premises wiring that permits the retail customer unit to be connected to the appropriate outside plant pair used by Verizon to provide local service. If so, what information is provided and how is it conveyed?

REPLY: See General Objections.

VZ VA #224

ITEM: AT&T 6-32 With regard to trouble reports received for POTS, please provide the number of trouble reports received in the most recent 12 months by Verizon Virginia and, of that total, specify the percentage that were closed with the dispositions "no trouble found", "tested okay", "CPE", "inside wire" or other reasonably equivalent classifications or sub-classifications. If possible, the counts and percentages should be separately stated for business and residential classes of local services and, within each class of local service, by single unit and MTE premises.

REPLY: See General Objections.

VZ VA #225

Respectfully submitted,

Karen Zacharia / by permission CWC

Michael E. Glover
Of Counsel

Richard D. Gary
Kelly L. Faglioni
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
(804) 788-8200

Karen Zacharia
David Hall
1320 North Court House Road
Eighth Floor
Arlington, Virginia 22201
(703) 974-2804

Catherine Kane Ronis
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420

Lydia R. Pulley
600 E. Main St., 11th Floor Richmond, VA 23233
(804) 772-1547

Of Counsel

Attorneys for Verizon

Dated: July 11, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Sixth Set of Data Requests were served electronically and by overnight mail this 11th day of July, 2001, to:

Mark A. Keffer
Dan W. Long
Stephanie Baldanzi
AT&T
3033 Chain Bridge Road
Oakton, Virginia 22185
(703) 691-6046 (voice)
(703) 691-6093 (fax)

and

David Levy
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8214 (voice)
(202) 736-8711 (fax)

Constance Corry