

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, ie. 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,

Michael E. Glover
Of Counsel

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Of Counsel

Attorneys for Verizon

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:

Mark A. Keffer
James J. Maloney
AT&T
3033 Chain Bridge Road
Oakton, Virginia 2218.5
(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)

DOCKET FILE COPY DUPLICATE

EX PARTE OR LATE FILED



Patricia E. Koch
Assistant Vice President
Federal Regulatory

RECEIVED

APR 10 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1300 I Street, N.W., Floor 400W
Washington, DC 20005

Phone 202 515-2543
Fax 202 336-7866
patricia.e.koch@verizon.com

April 10, 2001

Ms. Margalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: EX PARTE CC Docket No. 98-184

Dear Ms. Salas:

This is to provide notice that the attached letter from Gordon Evans to Dorothy Attwood should be filed in the above referenced matter. Specifically, the letter requests the Commission's concurrence in two limited instances before the sunset of the advanced services affiliate requirement in the Bell Atlantic-GTE merger order.

The attached letter to Dorothy Attwood describes more fully the request. Two copies of this notice are being submitted to the Secretary of the FCC in accordance with section 1.1206 of the Commission's rules.

Very truly yours

Attachment

cc: Ms. Attwood
Ms. Carey
Ms. Matthey
Mr. Reynolds

RECEIVED

APR 10 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Gordon R. Evans
Vice President
Federal Regulatory



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2527
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gordon.r.evans@verizon.com

April 9, 2001

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Dear Ms. Attwood:

I am writing to seek the Commission's concurrence concerning the Verizon incumbent telephone companies' owning advanced services equipment in two limited instances before the sunset of the advanced services affiliate requirement in the Bell Atlantic-GTE merger order.¹

This request is very narrow, and would promote the public interest in deployment of advanced services without disadvantaging Verizon's competitors.

In the first case, Verizon has a unique opportunity to deploy fiber-to-the-home technology in a new community. This request would allow Verizon to do so in a way that would allow other carriers to use Verizon's fiber facilities to reach their customers.

In the second case, Verizon is considering a limited deployment of DSL capabilities in remote terminals later this year in order to offer a wholesale transport service to other carriers and to offer retail DSL service to its own customers. This request would allow Verizon to buy, install and test the central office equipment needed to do this. Verizon is not here requesting authority to install advanced services equipment in the remote terminals themselves, however, or to provide DSL service through its operating local telephone companies. Verizon would still need additional authority from this Commission to provide such services through its telephone companies prior to the time the separate affiliate requirement automatically sunsets as a result of the D.C. Circuit's decision in *ASCENT v. FCC*.

Fiber to the home. The builder of a new residential housing development in Virginia has asked Verizon to provide fiber to all the homes in the development. The developer is on a tight schedule. It wants to open its visitor center in July and have model homes equipped by October, with the first residents moving in before the end of the year.

¹

GTE Corp., 15 FCC Rcd 14032, App. D (2000) ("Merger Conditions").

Fiber to the home can provide consumers with combinations of services that are unavailable with copper and most hybrid fiber-copper systems, including high speed Internet access and video capabilities. These services are both ordinary telephone exchange services and "advanced services" as that term is defined in the Merger Conditions.²

The fiber-to-the-home technology being deployed for this community uses an Ethernet switch and special router that together function much like an optical concentration device (OCD) to perform routing and aggregation of packet data.³ This equipment allows multiple carriers to send their data signals over individual customer fiber loops. This would permit these carriers to serve their customers over Verizon's fiber facilities through interconnection at the serving central office or facilities terminal. As a result, this equipment provides a quintessential network function and needs to be owned and operated by the operating telephone company. The Commission, however, has previously classified similar equipment as advanced service equipment that must be owned by the separate data affiliate.

Allowing Verizon to own and operate this equipment is strongly in the public interest. This equipment will permit Verizon to allow other carriers to provide service to their customers over the fiber-to-the-home architecture. It will give Verizon an opportunity to begin using fiber-to-the-home capabilities, initially in a limited installation of a few hundred homes. It will also give Verizon experience operating with next generation networks in multi-carrier environments. Verizon technical personnel would be pleased to discuss the technical aspects of the fiber-to-the-home architecture with you or your staff in more detail.

Installation of OCDs. Verizon is installing more fiber-fed DLC equipment in its local feeder plant and is considering deployment of DSL capabilities on that architecture. Verizon could utilize this architecture to offer a wholesale DSL packet transport service to other carriers,⁴ as well as to provide retail DSL service to consumers.

An important step in this service offering is the procurement, installation and testing of OCDs in our central offices. Because the Commission has found that OCDs are Advanced Services Equipment, a Verizon local exchange carrier could not own this equipment under the Merger Conditions.⁵

² "For purposes of these Conditions, the term 'Advanced Services' means intrastate or interstate wireline telecommunications services, such as ADSL, IDSL, xDSL, Frame Relay, and asynchronous transfer mode ('ATM') that rely on packetized technology and have the capability of supporting transmissions speeds of at least 56 kilobits per second in both directions." Merger Conditions § I.2.

³ The Commission has found that an OCD "should be classified as Advanced Services Equipment." *Ameritech Corp.*, 15 FCC Rcd 17521 ¶ 18 (2000).

⁴ The wholesale service would be offered from the customer's point of demarcation to a CLEC's collocation arrangement at a serving central office.

⁵ Merger Conditions § I.3.d.

Verizon has discussed this wholesale DSL packet transport offering with other carriers at a number of industry meetings. One issue of particular concern to many of the carriers is timing — when would Verizon commit to providing the service and how long would it take from that commitment for the service to be widely available. Allowing Verizon to install OCDs and to begin the testing process would significantly reduce the time it would take Verizon to bring such a service on line.⁶

The relief Verizon seeks here is similar to the special temporary authority the Commission routinely grants carriers as stop-gap measures to serve the public interest, convenience and necessity.⁷

For these reasons, we request your prompt concurrence to permit Verizon to be able to meet the customer's request for a fiber-to-the-home architecture and to install the equipment that would be needed to support the deployment of DSL capabilities over fiber-fed digital loop carrier for wholesale and retail customers.

If you have any questions, please give me a call.

Sincerely,



Gordon R. Evans
Vice President
Federal Regulatory

cc: Michelle Carey
Carol Matthey
Glenn Reynolds

⁶ These services would also require the purchase and installation of other advanced services equipment, such as integrated DSL-capable cards for remote terminals. However, there is less lead time involved with this equipment than there is to deploy OCDs in central offices.

⁷ *E.g.*, 47 C.F.R. §§ 21.25, 23.28, 25.120, 74.633, 76.29, 78.33. For example, the Commission granted a Verizon telephone company special temporary authority to extend a technical trial of an innovative video service until the commercial service became available. Letter from James Schlichting, Chief, Policy and Program Planning Division, Common Carrier Bureau, to Marie Breslin, Bell Atlantic Network Services, Inc., dated September 27, 1994, 1994 FCC LEXIS 4938.

Before the
Federal Communications Commission
Washington, D.C. 20554

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

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of July, 2001, a copy of AT&T Communications of Virginia, Inc.'s Supplemental Comments on its Motion to Compel was sent via hand delivery, Federal Express and/or by email to:

Dorothy Attwood, Chief
Common Carrier Bureau
Federal Communications Commission
Room 5-C450
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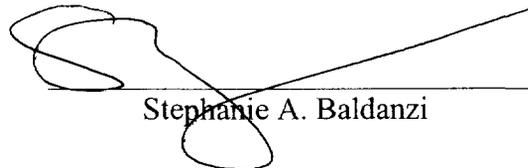
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