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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

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

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the First Set of Data Requests served on Verizon jointly by AT&T and WordCom on July 24, 2001.

GENERAL OBJECTIONS

1. Verizon objects to the AT&T/WorldCom 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 the AT&T/WorldCom 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 the AT&T/WorldCom 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 the AT&T/WorldCom 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/or unduly burdensome.

5. Verizon objects to the AT&T/WorldCom 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 the AT&T/WorldCom 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 the AT&T/WorldCom 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 of Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(e)(5) of the Telecommunications Act of 1996*, 16 FCC Rcd 2326 (2001).

8. Verizon objects to the AT&T/WorldCom 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, WorldCom or any other entity.

9. Verizon objects to the AT&T/WorldCom 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 or WorldCom.

10. Verizon objects to the AT&T/WorldCom Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are vague or ambiguous.

SPECIFIC OBJECTIONS

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

ITEM: AT&T/WCOM 1-1

Refer to Folder "Part G-4 Investment Loadings," File "Part G-4b-VA 2000 Investment Loading Factors (6-1-2001).xls," which develops the investment loading factors (VZVA 004622-4692).

a. Fully describe the PICS/DCPR database, including any manuals, descriptions, models, and methodology associated with the development of these data.

b. Provide material and in-place costs ("Total Cost Installed") for 1999 placements in the same fashion as that of "VZ EF&I & Power DCPR Data - 1998.xls" (VZVA 004647-4653).

c. Provide copies of invoices, work orders, or other project tracking documents that show material and in-place costs ("Total Cost Installed") for 10 projects that are included in the PICS/DCPR values used to calculate the loading factors.

REPLY: See General Objections.

VZ VA # 240

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-2

Refer to Work Paper 1, Page 10 of the Investment Loading Factors study, also found at Sheet "WP1_Pg 10" of the file identified in ATT-VZVA-1, which develops the Land & Building factor (VZVA 004636).

a. Fully describe each of the "DCPR" and "FB Ledger" systems identified as sources of the data inputs, and identify the differences between how they report investments.

b. Provide any and all manuals, descriptions, models, and methodology associated with the development of these data.

c. Explain the use of 1999 data for this factor, as contrasted to the use of 1998 data for the investment loading factors for EF&I and Power.

d. Provide the entire "Separations / Part 64" report, including all cost pool allocations to account and sub-account and the accompanying definitions or documentation, used in File "VA L&B Distributions - 1999.xls" (VZVA 004639-4642).

REPLY: See General Objections.

VZ VA #241

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-3

Refer to Folder "Part G-9 RTU Factor," file, "Part G-9-VA RTU Factor_2000_documentation (6-1-2001).xls," which develops the Right to Use / Software factors (VZVA 004960-4968).

a. Provide the source of the actual expenditures for 1999 and 2000, and any related work papers or documentation supporting these figures.

b. Provide the source of the budget forecasts for 2001 and 2002, and any related work papers or documentation supporting these figures.

c. Fully describe the adjustment item found in Line 8 of the Software Budget Forecast (VZVA 004968).

REPLY: See General Objections. Verizon further objects to this request on the grounds that answering this request would require an extraordinarily burdensome and time-consuming study.

VZ VA #242

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-4

Refer to Folder "Part G-6 Property & Other Tax Factor," File "Part G-6 VA Prop-Oth Doc.xls," which develops the other tax factor (VZVA 004730-4733).

a. Provide column headings for the entries found on Sheet 1 "WP1 - Factor Development" (VZVA 004732).

b. Fully describe each account (e.g., "6690 5EBF Other").

c. Provide the basis on which each tax is calculated, including calculations that produce each figure.

d. Provide support for the statement that "property tax does not apply to Leased Investment," on Sheet 2 "WP 2 - Investments" (VZVA 004733).

REPLY: See General Objections.

VZ VA #243

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-5

Refer to Folder "Part G-7 Network Factors," File "Part G-7a - VA Network Exp Factors.xls," which develops the network factors (VZVA 004734-4948).

a. Provide the inputs required to calculate the revenue and expense adjustment figures on Sheet "WP4. Adjustmts" (VZVA 004735, 004752), including any related work papers or documentation supporting these values.

b. Provide the source of the 5% downward adjustment to metallic cable expenses, including any related work papers or documentation supporting these "technological improvements" (VZVA 004736, 004757).

c. Explain why investment in testing equipment is included with the expense factor (VZVA 004758).

d. For the expenses used to calculate the network factors (VZVA 004739-4766), identify the expenses associated with "Y2K compliance."

REPLY: See General Objections.

VZ VA #244

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-6	Refer to Folder "Part G-7 Network Factors," File "Part G-7b - Test Equip Inv.xls" (VZVA 004768-4828). Provide the methodology by which the "Plug-In Adjusted material Cost" and "Hardwire In-Place Cost" figures were identified.
REPLY:	See General Objections.

VZ VA #245

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM:
AT&T/WCOM 1-7

Refer to Folder "Part G-7 Network Factors," File "Part G-7g - L&B Expense.xls," Sheets "VZ South Owned Report" and "VZ South Capital Lease" (VZVA 004935-4948).

a. Identify the source of the figures.

b. Fully define each of the column headings, which are "cp_total," "cp_total1," "cp_total3," and "cp_totalall."

REPLY: See General Objections.

VZ VA #246

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-8	Refer to Folder "Part G-5 Marketing Factor," File "Part G-5c - Mktng VZ South Revenue.xls." Provide the basis for the account and sub-account assignments (VZVA 004690-4691).
REPLY:	See General Objections.

VZ VA #247

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-9

Refer to Folder "Part G-2 Common Overhead," File "Part G-2a - CommonvzW99 COM 12.95.xls," which develops the common overhead factor (VZVA 004485-4610).

a. Provide the inputs required to calculate the "% Avoided" figure for Total Operating Expense found in Sheet "WP 5 - Corporate Expense" (VZVA 004506).

b. Provide support for the "Booked Expense" figure in File "Part G-2d - CommOH FLC.xls" (Line 1 of VZVA 004589), and explain the difference from the "Total Company Expenses" figure used in Sheet "WP 2 - VZ-EAST" (VZVA 004491).

c. Provide the inputs required to calculate the "Capital Costs %" and "Expense Portion" figures in File "CommOH FLC.xls" (Lines 7 and 8 of VZVA 004589).

d. Provide the source of the figures used in Sheet "WP 2 - VZ-EAST" (VZVA 004489), including any calculations required to convert the Wholesale Support Investment Carrying Costs output by File "Part G-2b - SupportInvestCarryCosts.xls" (VZVA 004509).

e. Provide the inputs required to calculate the "CC/BC Ratio" figures used in File "Part G-2b - SupportInvestCarryCosts.xls" (Column "C" of VZVA 004507-4567).

f. Considered Corporate" figures in File "SupportInvestCarryCosts.xls" (Column "J" of VZVA 004507-4567).

g. Provide the source data, including definitions of each account and sub-account and an explanation of the methodology used to assign them, used to calculate the "Common % of Expense" figures in File "Part G-2c - CommOH Residual.xls" (Column "G" of VZVA 004575-4587).

REPLY: See General Objections.

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-10

Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "5.1 Utilization Fill Factors.XLS" (VZVA 000147-169).

a. Provide support and documentation for the assignment of "Uncomm" lines used to calculate copper feeder fill (VZVA 000152-155).

b. Provide support and documentation for the "Effective Fill Adj" figures used to calculate copper distribution fill (VZVA 000156-159), and explain the use of different figures by wire center.

REPLY: See General Objections.

VZ VA #249

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-11

Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "1.1 Cable Source Data.XLS" (VZVA 000009-23).

a. Provide the Vintage Retirement Unit Cost (VRUC) database identified as "VA_VRUC9799.mdb" (VZVA 000009), including all manuals, descriptions, and documentation.

b. Provide all inputs required to calculate the annual averages found in the column labeled "RUC RATE."

c. Does the VRUC database include costs for cable purchases, actual placements, or both?

d. Does the VRUC database include costs for new installations, upgrades to existing plant, or both?

e. Provide the inputs required to calculate the figures found in the column labeled "Cum TPI."

f. Provide copies of invoices, work orders, or other project tracking documents that show cost detail for 10 projects that are included in the VRUC values used to calculate copper and fiber cable investment.

REPLY: See General Objections.

VZ VA #250

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-12

Provide all current contracts for the placement of:

a. Buried copper and fiber cable facilities;

b. Aerial copper and fiber cable facilities;

c. Poles;

d. Underground copper and fiber cable facilities;

e. Conduit and manholes; and

f. Buried service wires.

REPLY: See General Objections.

VZ VA #251

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-13	Provide all current joint pole agreements with other utilities or service providers, including private or municipal entities.
REPLY:	See General Objections.

VZ VA #252

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-14	Provide all current joint buried agreements with other utilities or service providers, including private or municipal entities.
REPLY:	See General Objections.

VZ VA #253

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-15	Provide all current pole attachment agreements with other utilities or service providers, including private or municipal entities.
REPLY:	See General Objections.

VZ VA #254

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-16	Provide an explanation for each application of a forward-looking adjustment or conversion factor, the basis for each figure used, and any studies or other analyses used to determine or support each adjustment.
REPLY:	See General Objections.

VZ VA #255

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-17

Produce all analyses of the forward-looking cost of capital, and any documents that were relied upon or used in preparing the analysis, including work papers supporting the:

a. Cost of debt;

b. Cost of equity;

c. Debt/equity capital structure; and

d. Depreciation lives (economic lives).

REPLY: See General Objections.

VZ VA #256

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-18	Describe any factual basis for the implied assertion that the fill factors used in the cost study reflect efficient anticipated forward-looking fill levels.
REPLY:	See General Objections.

VZ VA #257

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-19	Describe in detail any actual experience in constructing a forward-looking network that supports the position that existing fill levels are the only fill levels appropriate for a forward-looking network.
REPLY:	See General Objections.

VZ VA #258

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-20

Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "8.2 Technology Mix Assumption.XLS" (VZVA 000183-000194).

a. Explain the difference between the two types of integrated DLC assumed in the studies (GR303 and TR08).

b. Provide the detailed "CX data" and "DA Data" (as identified on VZVA 000190) that was summarized to produce the state-wide totals, including data that show the extent and mix of technology by wire center.

c. Provide any forecasts, showing future expectations of absolute levels, investments, or mix of technology, by wire center if available, including any related work papers or documentation supporting these forecasts.

d. Provide any other work papers supporting the DLC figures identified as "Engineering Assumption" (VZVA 000188).

REPLY: See General Objections.

VZ VA #259

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-21

Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "4.1 Next Generation Digital Loop Carrier (NGDLC) Investments.XLS" (VZVA 000028-146).

a. Explain the rationale supporting the calculations that produce the "Number of RTs per COT" figures in Sheet "Summary" (VZVA 000031).

b. Provide the contract with Alcatel, issued April 20, 1999 (referenced in Sheet "Price List" and VZVA 000141).

c. Provide any contracts or other agreements (including price quotes) for each manufacturer or supplier of DLC equipment entered into (or received) since April 20, 1999.

REPLY: See General Objections.

VZ VA #260

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-22	Provide the source document identified as "Litespan Engineering & Planning OSP 363-205-010 issue 6" (VZVA 000186) in its entirety.
REPLY:	See General Objections.

VZ VA #261

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-23	Provide the following source documents identified on VZVA 000276 in their entirety: a. DSC Practice "Litespan" Vol. 2; b. Narrowband Services Application Guide; and c. Wideband Services Application Guide.
REPLY:	See General Objections.

VZ VA #262

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-24	Provide detail sufficient to categorize as replacement or growth the switch purchase and equipment sales information provided as "VA Switch Discount Support" (VZVA 03167-03240).
REPLY:	See General Objections. Verizon further objects to this request on the grounds that answering it would require a special study.

VZ VA #263

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-25	Provide all current switch purchase contracts or other agreements (including price quotes) for each vendor.
REPLY:	See General Objections.

VZ VA #264

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-26	Produce forecasts of switch replacements, by wire center if available, including any related work papers or documentation supporting these forecasts.
REPLY:	See General Objections.

VZ VA #265

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-27	Provide capital budgets or other plans for capital expenditures for switch upgrades, including any related work papers or documentation supporting these budgets or plans.
REPLY:	See General Objections.

VZ VA #266

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-28

For each switch vendor, provide the specific replacement discount applicable to each of the following SCIS discount categories:

a. Materials;

b. Engineering;

c. Installation;

d. Main distribution frame; and

e. Switch protector.

REPLY: See General Objections.

VZ VA #267

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-29	For each switch vendor, provide the specific growth discount applicable to each of the following SCIS discount categories: a. Materials, b. Engineering; c. Installation; d. Main distribution frame; and e. Switch protector.
REPLY:	See General Objections.

VZ VA #268

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-30	Produce all correspondence, memoranda, proposals, request for proposals, notes, or any other written documentation (such as notes of verbal discussions) reflecting discussions between Verizon and Lucent, Nortel or any other vendor of switch equipment regarding switch prices to be available to Verizon following the closing of the merger with GTE.
REPLY:	See General Objections.

VZ VA #269

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-31	State whether Verizon is currently in negotiations with any manufacturers of switch equipment that could affect prices paid for such equipment (whether new or growth). If your answer is in the affirmative, please provide all documents regarding these negotiations.
REPLY:	See General Objections.

VZ VA #270

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-32	If Verizon anticipates that the deployment of ATM switching will displace any of its existing Digital ESS switches, please identify those switching locations that will be displaced and their anticipated replacement date.
REPLY:	See General Objections.

VZ VA #271

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-33	Identify for each wire center the date of digital switch deployment and the number of working lines involved in the change from analog to digital switching technology.
REPLY:	See General Objections.

VZ VA #272

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-34	Provide copies of all documents (including all instructions, questionnaires, etc.) relating to the survey of outside plant characteristics.
REPLY:	See General Objections.

VZ VA #273

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-35

Regarding actual line growth since 1995:

a. What are the annual figures?

b. What percentage was for new lines at new locations that required placement of new cables?

c. What percentage was for second lines?

d. What percentage was for third lines?

REPLY: See General Objections.

VZ VA #274

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-36	Provide estimates of annual demand growth for the next five years by wire center and type of service.
REPLY:	See General Objections.

VZ VA #275

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-37	Provide estimates of annual demand growth for each feeder route. If the demand forecast extends beyond three years for any feeder route, provide the complete demand forecast by year for each of those feeder routes.
REPLY:	See General Objections. Verizon further objects to this request on the grounds that the requested information is not kept in the normal course of business. Answering this request would require an extraordinarily burdensome and time-consuming study.

VZ VA #276

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-38	For the forward-looking copper feeder fill factor used in the cost study, describe separately the portion that is for: a. Growth; b. Maintenance and repair; c. Administrative spare capacity; and d. Defective parts that will not be economical to fix.
REPLY:	See General Objections.

VZ VA #277

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-39	Please explain the method used by the cost study to recognize the fact that efficient companies will construct networks in an incremental fashion in response to growth and development.
REPLY:	See General Objections.

VZ VA #278

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-40	Provide a complete copy of the: a. Current outside plant engineering guidelines; and b. Outside plant engineering guidelines in effect immediately prior to the current guidelines, and explain the differences between the prior engineering guidelines and those currently in effect.
REPLY:	See General Objections.

VZ VA #279

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-41	Provide the detailed formulas and engineering guidelines or rules used to calculate and determine switch growth additions (analog line, GR303 line, digital trunk).
REPLY:	See General Objections.

VZ VA #280

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-42	Provide a complete listing of all switches, showing for each the switch manufacturer (Lucent, Nortel, etc.), switch type (DMS-100, DMS RSC, DMS-10, etc.), CLLI, number of lines, and number of trunks.
REPLY:	See General Objections.

VZ VA #281

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-43	Produce copies of all network planning documents (manuals or otherwise) that instruct Verizon's engineers how to select an appropriate objective fill factor when designing to the network.
REPLY:	See General Objections.

VZ VA #282

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-44	Produce copies of all manuals or documentation that define or describe "objective fill."
REPLY:	See General Objections.

VZ VA #283

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-45	Provide all documentation associated with the engineering, furnishing, and installation of Verizon's most recently installed digital tandem switch. Include all expenses associated with the installation including riggers, transportation, and heavy equipment, as well as all installation labor costs. Provide the total cost information on a per line basis.
REPLY:	See General Objections.

VZ VA #284

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-46	Provide all documentation associated with the engineering, furnishing, and installation of Verizon's most recently constructed power plant including the addition of rectifiers, batteries, fuse distribution bays, automatic breakers, microprocessor, and the standby emergency generator. Include all expenses associated with the installation including riggers, transportation, and heavy equipment, as well as all installation labor costs.
REPLY:	See General Objections.

VZ VA #285

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-47	Describe all efforts currently underway or under consideration by Verizon to install feeder cable, and indicate whether copper or fiber cable is included, in what proportion, and the factors taken into account in determining whether fiber or copper cable will be installed.
REPLY:	See General Objections.

VZ VA #286

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-48	For each of 1998, 1999 and 2000, identify the number of distribution relief jobs undertaken by Verizon. Provide documentation supporting each distribution relief job (such as Outside Plant Estimate Cases or other expenditure authorization) and showing the number of distribution lines relieved, the number of distribution lines after relief was completed and the total cost of the distribution relief job.
REPLY:	See General Objections. Verizon further objects to this request on the grounds that the requested information is not kept in the normal course of business. Answering this request would require an extraordinarily burdensome and time-consuming study.

VZ VA #287

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-49	What assumption is made regarding the timing of the installation of the forward-looking network? Specifically, are the assets that are needed to serve demand for a particular service placed considered to be placed in service as of 2000, 2001, or another?
REPLY:	See General Objections.

VZ VA #288

REQUEST:	AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1
DATED:	July 23, 2001
ITEM: AT&T/WCOM 1-50	Refer to File "3.6 Wire Center Related Values.DOC" in the Unbundled Loop studies (VZVA 000263 - 000268). Fully define the fields identified as "Density_Cell_I" and "WC_Class_ID," including the descriptions of each code used and the thresholds or other calculations that produce each classification (e.g., "8 M").
REPLY:	See General Objections.

VZ VA #289

REQUEST: AT&T Communications of Virginia, Inc., and Worldcom, Inc., Set #1

DATED: July 23, 2001

ITEM: AT&T/WCOM 1-51

Please produce the documents identified in the following list or, in the alternative, consent to other parties' use of copies of the same documents as produced by Verizon in other recent state UNE/USF proceedings. Because these documents were produced under proprietary arrangements, AT&T agrees to use these documents under the protection of the protective agreement in place in this proceeding. Please let us know if Verizon needs more information to determine the identify or location of these documents. If needed, we can produce complete copies for Verizon's review.

[BEGIN VERIZON PROPRIETARY]

a. Outside Plant Engineering Guidelines 1998-00397-OSP (East), PAR074 (West). These documents were produced in proceedings in New York, New Jersey and Maryland.

b. PG Flex NP-PS-98001

c. Outside Plant Deployment Guidelines 1998-00221-OSP

d. Digital Single Subscriber Carrier BA 917-100-936

e. Network Planning - Transport Planning PR - A96 - 123, FP - G96 – 014

f. Metallic Automated Cross Connect System TP - G98 – 001

g. Bell Atlantic Network Planning Guideline NP-G - 97 - 027 (April 1999) [This document was produced during the recent Maryland Universal Service Fund proceeding.]

h. Fundamental Planning Information Letter FP - IL - 96 – 021

i. Fundamental Planning Guideline FP-G- 97 – 005 [This document was produced during the recent Maryland Universal Service Fund proceeding.]

j. Fundamental Planning Guideline FP-G- 97-016

k. Network Planning Guideline NP-G- 99 –021 [This document was produced during the recent Maryland Universal Service Fund proceeding.]

l. Network Planning Guideline NP-G- 98-037

m. Loop Technologies Application Guidelines RL 95-06-001

n. TR 303 Transition Plan IDCU vs DCLU RL 93-02-017

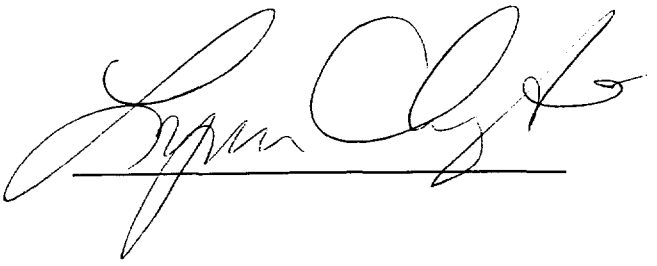
o. Unbundling Loops in TSI Equipped Digital Loop Carrier Systems RL 96-04-005
p. Integrated Digital Loop Carrier - TR 303 vs TR 008, J.L. Golden, March 24, 1992
q. Time Slot Interchange Applications in Remote Digital Terminals IL 93-07-002

[END VERIZON PROPRIETARY]

REPLY: See General Objections.

VZ VA #290

Respectfully submitted,



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Dated: July 27, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T and WorldCom's First Set of Data Requests were served electronically and by overnight mail this 27th day of July, 2001, to:

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