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FILE NO: 46001.000278

July 30, 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 Ninth Set of Data Requests.

Please do not hesitate to call me with any questions.

Very truly yours,

Kimberly Newman / cwc

Kimberly A. Newman

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

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JUL 30 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

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 NINTH 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 Ninth Set of Data Requests served on Verizon by AT&T Communications of Virginia ("AT&T") on July 25, 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, unduly burdensome or vague.

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 9-1 Please provide all analyses VZ has done to compare the vendor material net prices and discounts among Siemens, Nortel and Lucent switches.

REPLY: See General Objections.

VZ VA #308

ITEM: AT&T 9-2 Please provide all analyses VZ has done to compare the vendor list prices for Siemens, Nortel and Lucent switches to SCIS list prices.

REPLY: See General Objections.

VZ VA #309

ITEM: AT&T 9-3 Please provide all analyses VZ has done to compare the vendor net prices for Ericsson, Siemens, Nortel and Lucent switches compared to the SCIS switch total investment outputs.

REPLY: See General Objections.

VZ VA #310

ITEM: AT&T 9-4 If Verizon were to purchase a new switch in 2001, please identify the discounts, switch price per line and/or other pricing information that would be applicable for each switch manufacturer. Please specify the precise contract, quote, and/or other document that supports the discount and/or other pricing information provided. Please provide these documents.

REPLY: See General Objections.

VZ VA #311

ITEM: AT&T 9-5 Please identify the name, date and number of all the contracts that are in effect or other documentation for each switch manufacturer that could control the price of a new switch (host, standalone and/or remote). Please provide these contracts. If VZ claims there are no contracts currently in effect for new switch purchases for a particular switch manufacturer, please provide all documents concerning, supporting, referring or relating to this claim.

REPLY: See General Objections.

VZ VA #312

ITEM: AT&T 9-6 Please provide all contracts that are in effect or other documentation for each switch manufacturer that could control the price of switching hardware equipment (not included in the new switch documentation above).

REPLY: See General Objections.

VZ VA #313

ITEM: AT&T 9-7 Referencing the software expenditures in the RTU factor study:

a) Please correlate the FRC 1877 with the ARMIS account codes (i.e., 2212) and subaccounts.

b) Please identify and describe the ARMIS subaccounts for account 2212 shown on the investments page of the RTU factor study.

c) Please provide the documentation, calculations and analysis used to produce the RTU expenditures.

d) Please provide the RTU expenditures by ARMIS subaccounts. If this data is not available, please provide the lowest level of detail available.

e) Please define and explain the Projects portion of the software budget. Please provide examples of the types of RTUs contained in the Network Services, Enterprise Solutions and Retail Markets RTU forecasts.

f) Please explain the adjustment for 2001 Software Purchases.

g) Please explain what "growth" means on Line 2 of Software Budget.

h) Please provide the documentation, calculations and analysis used by the budget organization to produce the RTU 2001 RTU forecast.

i) Please provide the documentation, calculations and analysis used by the budget organization to produce the RTU 2002 RTU forecast.

j) Please identify whether any buy-out software is included in the expenditures or forecasts. Please identify the functions the software provides and specify the total dollar amount(s) of the buy-out and how much was allocated to each year in the RTU study. Please provide the contract or agreement supporting the buy-out.

k) Please explain the difference between the two Part G-9 RTU documentation files.

REPLY: See General Objections.

ITEM: AT&T 9-8 Referencing VA BHTD Support file – please explain each column in the file and how the data was used in the study.

REPLY: See General Objections.

VZ VA #315

ITEM: AT&T 9-9 Referencing the DS- Port cost study documentation, section 1.3, please explain what "processor investments" are included, how these investments were developed, and how VZ avoided double counting these processor investments in the switch MOU costs.

REPLY: See General Objections.

VZ VA #316

ITEM: AT&T 9-10 Please provide documentation so that a reviewer of the switch cost studies can identify precisely the SCIS output(s) that is used for each switch investment in the spreadsheets. Please provide documentation so that the reviewer can trace the UNE cost all the way back to a specific SCIS output.

REPLY: See General Objections.

VZ VA #317

ITEM: AT&T 9-11 Please identify any switches that are in VZ-VA's network, but not included in SCIS database. Please explain why they were excluded. Identify each excluded switch by CLLI and include the following information:

a) lines per switch
b) trunks per switch
c) host, remote, or standalone switch; and
d) switch manufacturer

REPLY: See General Objections.

VZ VA #318

ITEM: AT&T 9-12 Please provide the CCS growth trends or other data used to project the usage out to 2002.

REPLY: See General Objections.

VZ VA #319

ITEM: AT&T 9-13 Please state the year the SCIS/MO input data was collected and what year the data represents.

REPLY: See General Objections.

VZ VA #320

ITEM: AT&T 9-14 Please list each utilization factor for lines (different types) and trunks and explain how it was derived. Please provide all supporting documentation used to derive these factors.

REPLY: See General Objections.

VZ VA #321

ITEM: AT&T 9-15 Please state the year the SCIS/IN input data was collected and what year the data represents.

REPLY: See General Objections.

VZ VA #322

ITEM: AT&T 9-16 Please provide the following in electronic and paper format: list all switches currently deployed in Virginia by CLLI and provide the following information for each CLLI:

a) Vendor (Lucent, Nortel, etc.)
b) Type of switch (host, standalone, remote)
c) Number of lines
d) Number of trunks
e) Average processor utilization

REPLY: See General Objections.

VZ VA #323

ITEM: AT&T 9-17 No question asked (i.e., the number 17 was skipped).

VZ VA #324

ITEM: AT&T 9-18 Please provide the number of VZ's VA end office trunks (DS0s) for each year, 1996-2001. If all years are not available, please provide what is available.

REPLY: See General Objections.

VZ VA #325

ITEM: AT&T 9-19 Please provide a list of switch features that are currently available to VZ subscribers, but not included in the Verizon cost study either as a port additive or as a feature that is purported to be in the local switch usage. How does Verizon propose to provision and price a feature to a CLEC that is available, but not included in the Verizon cost study?

REPLY: See General Objections.

VZ VA #326

ITEM: AT&T 9-20 Please provide the SCIS/MO inputs used by Verizon in this docket in an uploadable Excel file.

REPLY: See General Objections.

VZ VA #327

ITEM: AT&T 9-21 Please provide the SCIS/IN database with inputs used by Verizon.

REPLY: See General Objections.

VZ VA #328

ITEM: AT&T 9-22 Please explain the difference in switch functions between the UNE switch terminating MOU and the reciprocal compensation terminating MOU.

REPLY: See General Objections.

VZ VA #329

ITEM: AT&T 9-23 Please explain the cost difference between the UNE switching terminating MOU and the reciprocal compensation terminating MOU. Please list each reason, describe and quantify the cost of each one that contributes to the difference between the two costs.

REPLY: See General Objections.

VZ VA #330

ITEM: AT&T 9-24 Please explain the difference in switch functions between the UNE tandem switching MOU and the reciprocal compensation tandem MOU.

REPLY: See General Objections.

VZ VA #331

ITEM: AT&T 9-25 Please explain the cost difference between the UNE tandem switching MOU and the reciprocal compensation tandem MOU. Please list each reason, describe and quantify the cost of each one that contributes to the difference between the two costs.

REPLY: See General Objections.

VZ VA #332

ITEM: AT&T 9-26 Please provide documentation for all feature SCIS/IN inputs used in Verizon's cost study. If documentation is not available, please identify the source for the inputs. Please explain the rationale and assumptions made for each input.

REPLY: See General Objections.

VZ VA #333

ITEM: AT&T 9-27 Please confirm or deny whether feature costs include any cost other than feature-related hardware. If yes, please list each feature that includes other costs, describe and quantify the non feature-related hardware costs that are included.

REPLY: See General Objections.

VZ VA #334

ITEM: AT&T 9-28 Please confirm or deny whether right to use fees are added to any of the feature costs. If yes, please list each feature that has right to use fees. Describe the right to use fee and quantify the cost associated with the fee for each feature.

REPLY: See General Objections.

VZ VA #335

ITEM: AT&T 9-29 For each feature included in Verizon's cost study that has a separate rate element, please provide the following as it pertains to VZ-VA's actual deployment: List the number of lines (or trunks, as appropriate) and penetration ratios (lines with feature compared to total lines) for each feature. Please also identify the lines and penetration ratios by switch technology (Lucent vs. Nortel) for each feature.

REPLY: See General Objections.

VZ VA #336

ITEM: AT&T 9-30 Please provide the following data about switch equipment forecasted by Verizon for Virginia for the period from January 1, 2001, to December 31, 2005, identified by CLLI:

(a) the number of new remotes expected to be installed (specify CLLI and vendor);
(b) the number of switches that will be replaced by a different switch manufacturer (specify CLLI and vendor and which ones, if any, were also included in part a above; and
(c) the number of remote switches that will be replaced by a new remote (specify CLLI, manufacturer, and which, if any, were included in parts a or b above); and
(d) the number of new host or standalone switches expected to be installed (specify vendor).

REPLY: See General Objections.

VZ VA #337