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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 AND WORLDCOM'S FIFTH 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 Fifth Set of Data Requests served on Verizon jointly by AT&T and WordCom on August 2, 2001.

GENERAL OBJECTIONS

1. Verizon objects to AT&T and WorldCom'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 and WorldCom'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 and WorldCom'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 and WorldCom'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 and WorldCom'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 and WorldCom'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. According to the Arbitrator's letter of August 3, 2001, parties seeking information about Verizon's operations in other states must establish that "such information is relevant to the specific disputes over contract language presented in this proceeding."

7. Verizon objects to AT&T and WorldCom'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.

8. Verizon objects to AT&T and WorldCom'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, WorldCom or any other entity.

9. Verizon objects to AT&T and WorldCom'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 or WorldCom.

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:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-1	Please identify how Verizon VA's common equipment in the digital loop carrier investment is allocated among all of the services using the digital loop carrier within Verizon VA's network? Specifically, what portion of the digital loop carrier common equipment investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's network? Produce any and all documents concerning, referring or relating to the development of these data.
REPLY:	See general objections.

VZ VA #393

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-2	Please identify how Verizon VA's common equipment in the digital loop carrier investment is allocated among all of the services using the digital loop carrier within Verizon VA's cost model? What portion of the digital loop carrier common equipment investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's cost model?
REPLY:	See general objections.

VZ VA #394

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-3	Please identify how Verizon VA's fiber cable investment is allocated among all of the services using a fiber sheath within Verizon VA's network? Specifically, what portion of the fiber investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's network? Produce any and all documents concerning, referring or relating to the development of these data.
REPLY:	See general objections.

VZ VA #395

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-4	Please identify how Verizon VA's fiber cable investment is allocated among all of the services using a fiber sheath within Verizon VA's cost model? What portion of the fiber investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's cost model?
REPLY:	See general objections.

VZ VA #396

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-5	Please identify how Verizon VA's feeder structure investment is allocated among all of the services using the feeder structure within Verizon VA's network. Specifically, what portion of the feeder structure investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's network? Produce any and all documents concerning, referring or relating to the development of these data.
REPLY:	See general objections.

VZ VA #397

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-6	Please identify how Verizon feeder structure investment is allocated among all of the services using the feeder structure within Verizon VA's cost model. Specifically, what portion of the feeder structure investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's cost model?
REPLY:	See general objections.

VZ VA #398

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-7	Please identify how Verizon VA's distribution structure investment is allocated among all of the services using the distribution structure within Verizon VA's actual network. Specifically, what portion of the distribution structure investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's network? Produce any and all documents concerning, referring or relating to the development of these data.
REPLY:	See general objections.

VZ VA #399

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-8	Please identify how Verizon VA's distribution structure investment is allocated among all of the services using the distribution structure within Verizon VA's cost model? Specifically, what portion of the distribution structure investment is allocated to the POTS services and what portion to the DS1 service within Verizon VA's cost model?
REPLY:	See general objections.

VZ VA #400

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-9	Does any part of the recurring cost study assume the **capital investment** associated with the **cross-wire** that is necessary to connect the feeder component to the distribution component at the Feeder Distribution Interface (either directly or indirectly)? a. Please explain in detail all expenses that would be reflected in the recurring rates for UNE's regarding this cross-wire or the activity associated with its placement, rearrangement, or removal.
REPLY:	See general objections.

VZ VA #401

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-10	Do any plant accounting codes reflect the capital investment associated with the cross-wire that is necessary to connect the feeder component to the distribution component at the Feeder Distribution Interface (either directly or indirectly)??
REPLY:	See general objections.

VZ VA #402

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-11	Was any labor expense to place, move or re-arrange this cross-wire reflected in any plant account codes or any other accounting codes used in the development of recurring rates for UNE's (either directly or indirectly)?
REPLY:	See general objections.

VZ VA #403

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-12	Are cross-wires that are necessary to connect the feeder component to the distribution component at the Feeder Distribution Interface ever changed (i.e., placed, removed or re-arranged) in the course of resolving network related troubles? a. To what accounting codes would expenses be charged for these activities? b. Are these costs reflected in the recurring rates for UNE's?
REPLY:	See general objections.

VZ VA #404

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-13	Are cross-wires that are necessary to connect the feeder component to the distribution component at the Feeder Distribution Interface ever affected (i.e., placed, removed or re-arranged) as the result of engineering work order activity? a. To what accounting codes would expenses be charged for these activities? b. Are these costs reflected in the recurring rates for UNE's?
REPLY:	See general objections.

VZ VA #405

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-14	Are cross-wires that are necessary to connect the feeder component to the distribution component at the Feeder Distribution Interface ever changed (i.e., placed, removed or re-arrange) in the course of provisioning a service request (either Retail or Wholesale services)? a. To what accounting codes would expenses be charged for these activities? b. Are these costs reflected in the recurring rates for UNE's?
REPLY:	See general objections.

VZ VA #406

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-15	Please explain the frequency in which these cross-wires are removed when services (either Retail or Wholesale) are disconnected.
REPLY:	See general objections.

VZ VA #407

Verizon Virginia Inc.

State of Virginia

CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-16	Please explain the frequency in which these cross-wires are removed when Wholesale UNE's are disconnected that is reflected in the presentation of non-recurring cost (i.e., VZ-NRCM).
REPLY:	See general objections.

VZ VA #408

Verizon Virginia Inc.

State of Virginia

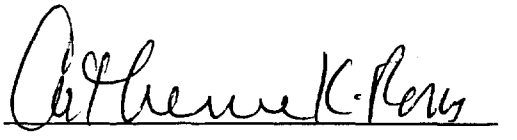
CC Docket Nos. 00-218, 00-249 and 00-251

Respondent:
Title:

REQUEST:	AT&T Communications of Virginia, Inc., and WorldCom, Inc., Set #5
DATED:	August 1, 2001
ITEM: AT&T/WCOM 5-17	Please provide a copy of all documentation, and or any studies or analyses, including any minutes, notes, handouts, presentations, or other documents reflecting any communications, or meetings, or other exchanges between or among some or all of persons or subject matter experts concerning the values contained in the "Connect - Average Work Time" , "Connect - Typical Occurrence Percentages" or "Connect - Forward Looking Adjustment Percentages" , "Disconnect - Average Work Time" or "Disconnect - Typical Occurrence Percentages" "Disconnect - Forward Looking Adjustment Percentages)" worksheets contained in VZ-NRCM that may have been used for the model's development, or its methodology, underlying assumptions, work time estimates, operation, or results.
REPLY:	See general objections.

VZ VA #409

Respectfully submitted,



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Dated: August 7, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T/WorldCom's Fifth Set of Data Requests were served electronically and by overnight mail this 7th day of August, 2001, to:

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