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

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FEDERAL COMMUNICATIONS COMMISSION
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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 SIXTH SET OF DATA REQUESTS

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Sixth Set of Data Requests served on Verizon jointly by AT&T and WordCom on August 6, 2001.

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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 because the cumulative burden of responding to these 136 requests (some with multiple subparts), more than 400 prior requests (many with subparts), and subsequent requests, unfairly and excessively intereferes with Verizon's ability to prepare its case. Many of these 136 requests relate to Verizon's cost studies. Although the cost studies were filed on July 2, the present requests were not served until August 6. The timing of these requests impairs Verizon's ability to prepare its case because the same Verizon personnel whose expertise

is necessary for responding to these requests are currently preparing Verizon's rebuttal testimony.

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 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.

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 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."

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 discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia.

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, 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.

10. 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.

The General Objections identified above shall apply to each and every Data Request below.

DATA REQUESTS

1. Refer to the File "4.2 Exhibit Engineering Survey.DOC" in the unbundled loop studies. Provide the outside plant engineering survey data for all wire centers.

2. Provide the current average number of lines per household, by wire center if available.

3. Provide the current average number of lines per business, by wire center if available.

4. Produce Verizon's annual forecast of growth of major classes of telecommunication service for the last five years.

5. Explain, in detail, the methodology used to allocate the state-wide forecasts to central offices. Additionally, provide the forecasts of growth by central office for the last five years.

6. Provide the historical data for Verizon's true overall network fill for the last five years.

7. Provide Verizon's Business Plans for Enterprise, Retail & Wholesale organizations, including any such forecasts specific to Virginia.

8. Provide Verizon's Equipment Capacity Exhaust forecasts, including any such forecasts specific to Virginia.

9. Refer to the VCost DTU.

    a. Provide all support for the Data Repository Table "Indices," including all inputs required to calculate the figures identified as CPI, LAB_TRND, LCI, PRD_COMPOSITE, and TPI.

    b. Provide all support for the Data Repository Table "Expense_Inflation," including an explanation for the "Productivity Toggle" entries by "Expense Type Key."

10. Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "1.2 Scatter Diagram with Linear Trending.DOC" (VZVA 000015). Provide the data underlying the scatter diagrams shown on the bottom of the page.

11. Provide the Current-Cost-to-Book-Cost (CC/BC) ratios for the following asset accounts:

    a. Pole (2411)

    b. Aerial Metallic (2421.1)

    c. Conduit (2441)

    d. Underground Metallic (2422.1)

    e. Buried Metallic (2423.1)

    f. Building (2121)

    g. IntraBldg Metallic (2426.1)

h. Land (2111)

i. Aerial Fiber (2421.2)

j. Underground Fiber(2422.2)

k. Cxt Digital SPG (2232.21)

l. OrigTerm SPG (2362.7)

m. Buried Fiber (2423.2)

n. IntraBldg Fiber (2426.2)

o. OrigTerm NCTE (2362.8)

p. Digital Switch (2212)

q. Digital Circuit (2232.22)

12. Refer to the DS3 Loop study, File "VA B-7 DS3 HICAP_Loop.doc" (VZVA 001211-1308).

a. Provide the contents of the file in a usable spreadsheet format, including any embedded files or other files that support the figures.

b. Provide the File "Va HiCAM UNE DS3 CAR investments 5.0, June 2001.xls" referenced at VZVA 001230-1241.

c. Provide support for the mix of multiple customer and single customer RT (VZVA 001303).

d. Provide support for the equipment utilization factors (VZVA 001305).

e. Provide the File "Eng Data Rev 10_12_99.xls" identified as support for the mix of equipment by vendor (VZVA 001305), and any updated versions of files containing similar information.

f. Provide support for mix of systems and ring types (VZVA 001305).

g. Provide support for inputs used to calculate the cable utilization figures (VZVA 001307).

13. Refer to the Unbundled Subloop studies, File "VA_PART B-8 SUBLOOP.doc," Section 4.1, embedded file "VA 2W Components-Cells All.xls" (VZVA 001330-1333).

h. Provide the File "VA 2W Components-Cell 1.xls" that provides the figures linked in Tab "2W Cell 1" (VZVA 001331).

i. Provide the File "VA 2W Components-Cell 2.xls" that provides the figures linked in Tab "2W Cell 2" (VZVA 001332).

j. Provide the File "VA 2W Components-Cell 3.xls" that provides the figures linked in Tab "2W Cell 3" (VZVA 001333).

14. Refer to the Unbundled Subloop studies, File "VA_PART B-8 SUBLOOP.doc," Section 4.4, embedded file "VA LineSharing Study OSS.xls" (VZVA 001342-1345).

a. Provide support for the Telcordia and TGS costs and mix of capital and expense figures (VZVA 001345) used to calculate OSS costs.

b. Provide support for the annual software maintenance assumptions (VZVA 001344).

c. Provide support for all costs associated with Verizon internal ordering and billing of OSS.

d. Describe all modifications to OSS that may be required to satisfy Verizon UNE remand obligation to provide line sharing/splitting.

e. Explain why the additional OSS costs are not recovered from the charges for the OSS elements.

f. Describe how the line sharing/splitting functions relate to the request by a CLEC for a subloop element when the CLEC does not request sharing/splitting.

g. Provide documentation to show that the OSS costs are forward-looking.

15. Refer to the Subloop Feeder DS3 Loop study, File "VA PART B-9 DS3 Subloop.doc" (VZVA 001355-1450).

a. Provide the contents of the file in a usable spreadsheet format, including any embedded files or other files that support the figures.

b. Provide the File "Va HiCAM UNE DS3 Sub Loop Feeder investments 5.0, June 2001.xls" referenced at VZVA 001374-1386.

16. Refer to the EEL study File "VA_PART B-14EEL_Study.Doc," Section 5.6, embedded file "2000 VA EEL FLC_as of 061201.xls" (VZVA 001606-1607).

a. Describe all activities associated with the EEL testing function.

b. Provide support for the Trouble Report Testing Component (VZVA 001607).

c. Explain in detail the trouble report activity as it relates to the investment referenced in (b).

d. Is EEL testing a routine function?

e. Explain how frequently EEL testing is required when a CLEC requests EEL combination.

f. For 1999, provide the total number of troubles reported by end users, by cause of trouble.

g. Specifically, identify the troubles that are central office-related and explain the cause of the trouble.

17. Refer to the Unbundled Switching study, File "VA_PART C-8-1 Switch MOUSupp.xls."

a. Provide support for the growth factors for lines and trunks in Tab "EO MOU" (VZVA 002095).

b. Provide support for the number of umbilicals and miles per umbilical in Tab "UMB" (VZVA 002096).

18. Refer to the Entrance Facility study, File "VA_PART D-1 DS3_STS1_OC12.doc" (VZVA 002319-2442).

    a. Provide the contents of the file in a usable spreadsheet format, including any embedded files or other files that support the figures.

    b. Provide the File "Va HiCAM UNE HSAR investments 5.0 June 2001.xls" referenced at VZVA 002345-2355.

19. Refer to the IOF Transport study, File "VA PART D-2 IOF STUDY.doc." Provide the File "VA UNE 6_14_01.xls" referenced at VZVA 002468-2476.

20. Refer to the LIDB study, File "VA E-3 LIDB_STUDY.xls" (VZVA 002699-2749).

    a. Verify whether the LIDB query totals in Tab "5.1 Demand Support" (VZVA 002729) apply only to Calling Name Delivery function.

    b. If other activities are included in these totals, specify which activities and the number of queries associated with each function.

    c. Provide support for the FPC allocation to Verizon South assumption in Tabs "5.4 Software Exp Support" (VZVA 002743), "5.4 Mtce Exp Support" (VZVA 002744), and "5.4 FPC Labor Support" (VZVA 002748).

    d. Provide support for the labor and administrative allocation to LIDB assumption in Tab "5.4 FPC Labor Support" (VZVA 002748), and explain what other functions comprise the remaining portion.

21. Please provide a complete copy of the original documentation of each individual time estimate supplied by individual Verizon work center personnel, as described in Verizon's Panel Testimony at pages 306 and 311. Please also supply a copy of whatever electronic format(s) Verizon used to compile and/or total the individual time estimates.

22. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the claim at page 310 of Verizon's Panel Testimony that study work times were "adjusted to reflect future operating conditions." Please also identify each such adjustment incorporated into Verizon's study.

23. Please identify what, if any, assumption the work center personnel who supplied inputs to Verizon's non-recurring cost study were instructed to make regarding the percentage of loops in Verizon's network that would be provisioned over fiber feeder and DLC systems.

24. Please identify what, if any, assumption the work center personnel who supplied inputs to Verizon's non-recurring cost study were instructed to make regarding the specific type of DLC systems (make model) would be deployed in Verizon's network.

25. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the analysis by Andersen Consulting described at pages 313-315 of Verizon's Panel Testimony.

26. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the claim at page 313 of Verizon's Panel Testimony that the nonrecurring cost study data was "analyzed" and "validated for statistical accuracy."

27. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the claim at page 314 of Verizon's Panel Testimony that "[t]he results were then validated by more than 25 service representatives and their supervisors in the TISOC." Please provide all documentation associated with comments supplied by those evaluators.

28. Specifically who determined which "OSS electronic interfaces and productivity that will reduce the TISOC work times" as described by Verizon's Panel Testimony at page 314. Please also supply all documentation associated with the associated study adjustments and explain specifically how the magnitude of each individual adjustment was determined.

29. List the criteria that were applied to the study to ensure that the results of the non-recurring time surveys are representative of Verizon VA.

30. For each average work time estimated, 1) what was the size of each sample used in the development of each average work time? and 2) what was the size of the population from which each sample was taken?

31. Regarding the non-recurring time surveys reviewed by NERA (Verizon's Panel Testimony at page 323). Please provide the highest, lowest, average, and median times associated with each of the work activities analyzed.

32. Please provide complete copies of NERA's analysis of non-recurring time surveys (Verizon's Panel Testimony at page 323). Please also provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

33. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the statement at page 311 of Verizon's Panel Testimony that "Verizon cost analysts reviewed the activity work time estimates submitted by each respondent to remove outliers and to ensure that the studies were adequately documented."

34. Please identify the "cost analysts" referenced at page 311 of Verizon's Panel Testimony and provide each individual's qualifications and experience.

35. Please identify the "Verizon statistician" referenced at page 311 of Verizon's Panel Testimony and provide his/her qualifications and experience.

36. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the claim at page 311 of Verizon's Panel Testimony that that the "initial review process was conducted under the guidance of a Verizon statistician." Please include any instructions or directions the statistician provided to the cost analysts.

37. How did Verizon track Access to OSS costs? Please provide a complete list of project codes, account codes or other accounting designations that Verizon used to track Access to OSS costs. Please provide a complete description of each tracking code(s).

38. Please provide a complete breakdown of one-time development costs for Access to OSS by each tracking code listed in response to the previous request, for each of the years 1996-2000.

39. How did Verizon ensure that the costs assigned to Access to OSS one-time development costs were appropriately assigned?

40. Please provide copies of all instructions that were furnished to Verizon employees responsible for logging charges to the Access to OSS accounts regarding what to types of charges to log and how to report them, including internal memorandum, training materials, or other documentation.

41. Please provide copies of any instructions or guidelines that were provided to the employees responsible for reviewing charges made to implementation tracking codes regarding what charges would be appropriate.

42. How has Verizon ensured that its one-time development costs for Access to OSS were not included in its general expenses? Provide workpapers or other documentation.

43. What process did Verizon use to control Access to OSS costs and to ensure that they were reasonable?

44. Refer to Verizon's Exhibit Part F-15. Please provide a random sample of 100 time sheets that form the basis for Verizon's reported one-time Access to OSS development costs for 1996 and 1997.

45. Refer to Verizon's Exhibit Part F-15. Please provide the Contractor Invoices that form the basis for Verizon's reported one-time Access to OSS development costs for 1997.

46. Refer to Verizon's Exhibit Part F-15. Please explain in detail the Access to OSS "maintenance adjustment" that was applied to 1998 and 1999 expenses. Please identify the adjustment's specific source, identify the specific individual(s) responsible, provide the basis for the assumption (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

47. How was the 15% ongoing maintenance factor for Access to OSS developed?

48. Regarding the 15% ongoing maintenance factor for Access to OSS, please identify the adjustment's specific source, identify the specific individual(s) responsible, provide the basis for the assumption (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

49. Please list the "other Verizon software projects" referenced at page 277 of Verizon's Panel Testimony for which Verizon has used a 15% maintenance factor.

50. Please provide a complete copy of the "Special IS Study" that is referenced in Verizon's Exhibit Part F-15, Workpaper 3, OSS-Part A, Page 1, lines 3, 3a, 4 and 4a. Please also provide any supporting documentation for the study.

51. Refer to Verizon's Exhibit Part F-15, Workpaper 4, OSS-Part A, Page 1. What "Company Records" were used in determining the one-time development expenses. Please provide a complete explanation.

52. Refer to Verizon's Exhibit Part F-15, Workpaper 4, OSS-Part A, Page 2. Please explain what is meant by the note that "1996 and 1997 Gateway Wages are directly identified." How were they identified?

53. Refer to Verizon's Exhibit Part F-15, Workpaper 4, OSS-Part A, Page 6. Please explain why the Source for the Capital Investment for 1996 and 1997 was

"Company Records," whereas the Source for the Capital Investment for 1998 and 1998 was "Company Estimate." Please explain why the 1998 and 1999 could not be determined from company records. Please give a detailed explanation of how the investment was estimated and what was done to verify the estimate. Provide an studies or analyses that were preformed and any supporting documentation.

54. Please provide the basis for each of the "Annual Software System Maintenance" calculations in Verizon's Exhibit Part F-15, Workpaper 4, OSS-Part A, Pages 8-12. For each estimate, identify the specific individual(s) responsible, explain each individual's qualifications and experience, provide the basis for the assumption (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, presentations, *etc.*).

55. Refer to Verizon's Exhibit Part F-15. How was the projection of resold lines and UNE loops developed? Please identify the projection's specific source, identify the specific individual(s) responsible, provide the basis for the projection (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

56. Refer to Verizon's Exhibit Part F-15. Please explain Verizon's large projected drop in resale lines from 2001 to 2002. What is the basis of this assumption? Please provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

57. Refer to Verizon's Exhibit Part F-15. Why does Verizon believe that the rate of growth in resale lines, UNE loops and UNE platforms/combinations will decrease over time? What is the basis of this assumption? Please provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

58. Refer to Verizon's Exhibit Part F-15. Please explain in detail how Verizon extended its forecast beyond 2005. Why does Verizon believe that the number of resold and UNE loops will increase by the same number in each of the years from 2005 onward?

59. Please detail Verizon's development of the EF&I it used for line sharing splitter installation. Please also provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

60. Does the EF&I factor used in line sharing calculations reflect Verizon experience with any line sharing-specific or splitter-installation work activity? If yes, please describe with specificity.

61. What is the source for the "installation factor" that Verizon used in its splitter equipment support calculations? Please also provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*). Does this factor reflect Verizon experience with any line sharing-specific or splitter-installation work activity? If yes, please describe with specificity.

62. Has Verizon performed any analysis that would support the applicability of the EF&I factor used in line sharing calculations to splitter-specific installation work activity? If yes, please provide any such analysis.

63. Does Verizon intend to charge the same prices for line splitting as for line sharing? Please detail any differences from Verizon's proposed line sharing prices.

64. What square footage has Verizon assumed for a line sharing splitter equipment bay/ relay rack?

65. Refer to Verizon's Workpaper, Part B-15, Section 1, page 2 of 6. Please detail the Development of the "Circuit Digital-SPG (2232.21) - Network+Mktg+Other Support" factor. Please also provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*). Does this factor reflect Verizon VA experience with any line sharing-specific or splitter-installation work activity? If yes, please describe with specificity.

66. Refer to Verizon's Workpaper, Part B-15, Section 1,, page 3 of 6. Please detail the Development of the "Circuit Digital-SPG (2232.12) - Network (Other)" factor. Please also provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*). Does this factor reflect Verizon VA experience with any line sharing-specific or splitter-installation work activity? If yes, please describe with specificity.

67. Verizon's Workpaper, Part B-15, Section 1, page 3 of 6. Please detail the Development of the "Circuit Digital-SPG (2232.12) - Mktg+Other Support" factor. Please also provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*). Does this factor reflect Verizon VA experience with any line sharing-specific or splitter-installation work activity? If yes, please describe with specificity.

68. Has Verizon performed any analysis that would support the applicability of the factors referenced in the previous three requests to splitter-specific installation work activity? If yes, please provide any such analysis.

69. Please explain why under competitors ordering line sharing should be charged for Verizon "network administration, marketing and other support."

70. Please explain exactly what function(s) Verizon intends to perform and what investment or expenses it believes will cause it to incur the cost reported in its study of the "Administrative and Support (for Option A – Splitter in CLEC Cage)" rate element.

71. Refer to Verizon's Exhibit Part B-17, Line Sharing – OSS. Please provide the underlying demand forecast of line sharing lines. How was this projection of line sharing lines developed? Please identify the projection's specific source, identify the specific individual(s) responsible, provide the basis for the projection (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

72. Refer to Verizon's Part B-17, Line Sharing – OSS. Please provide the underlying demand forecast of line splitting lines. How was this projection of line splitting lines developed? Please identify the projection's specific source, identify the specific individual(s) responsible, provide the basis for the projection (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

73. Refer to Verizon's Part B-17, Line Sharing – OSS. Please provide the underlying demand forecast of subloops. How was this projection of subloops developed? Please identify the projection's specific source, identify the specific individual(s) responsible, provide the basis for the projection (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

74. When did the line sharing OSS become available for use?

75. Refer to Verizon's Part B-17, Line Sharing – OSS. Please provide a complete copy of the contract(s) with Telecordia.

76. Refer to Verizon's Part B-17, Line Sharing – OSS. What is the basis for Verizon's assumption that line sharing OSS costs should be spread across three years? Please provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

77. Is it technically feasible to provide a line sharing arrangement that includes a splitter mounted directly on Verizon's main distribution frame? If Verizon contends that it is technically infeasible to provide a line sharing arrangement that includes a splitter mounted directly on its main distribution frame, please provide a complete copy of all material that Verizon intends to rely on as the factual basis for that contention.

78. Please provide Verizon's best available estimate of appropriate TELRIC study labor rate for the Verizon employee who would install splitter cards in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate.

79. Please provide Verizon's best available estimate of appropriate TELRIC study labor rate for the Verizon employee who would place jumpers in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate.

80. Please provide Verizon's best available estimate of appropriate TELRIC study labor rate for the employee or contractor who would install tie cables in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate.

81. Please provide Verizon's best available estimate of appropriate TELRIC study labor rate for the employee or contractor who would install equipment racks or frames a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate.

82. Please provide Verizon's best available estimate of appropriate TELRIC study labor rate for the Verizon employee who would repair or maintain splitter equipment in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate.

83. Please supply Verizon's best estimate of the total hours of labor required to install 24 quad splitter cards in an existing rack mounted splitter shelf. Please also supply a description of the basis for and any documentation supporting Verizon's reply.

84. Please supply Verizon's best estimate of the total hours of labor required to install 6 16-line frame mounted splitters. Please also supply a description of the basis for and any documentation supporting Verizon's reply.

85. Please supply Verizon's best estimate of the total hours of labor required to install the type of relay rack used to hold splitter shelves. Please also supply a description of the basis for and any documentation supporting Verizon's reply.

86. Please supply Verizon's best estimate of the total hours of labor required to install the type of frame used to hold splitter shelves. Please also supply a description of the basis for and any documentation supporting Verizon's reply.

87. Please supply a complete copy of the contract(s) or other document establishing the current prices available to Verizon for DSL-related splitters.

88. Please supply a complete copy of the contract(s) or other document establishing the current prices available to Verizon for DSL-related splitter installation.

89. Please supply a complete copy of the contract(s) or other document establishing the current prices available to Verizon for DSL-related splitter shelves.

90. Please supply a complete copy of the contract(s) or other document establishing the current prices available to Verizon for DSL-related splitter racking.

91. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF)", Tab 3.1 Inputs. Please identify the specific source of each assumption listed. For each input assumption, please identify the specific individual(s) responsible for the assumption, provide the basis for the assumption (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

92. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF)", Tab 4.3 CLEC Support. Please identify the specific source of each assumption listed. For each input assumption, please identify the specific individual(s) responsible for the assumption, provide the basis for the assumption (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).

93. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF)", Tab 4.3 CLEC Support:

    a) How many support employees are assumed?
    b) How many hours of "CLEC Support" does each employee provide on average in a year?
    c) What do the employees responsible for "CLEC Support" do? Please provide a complete description of the "CLEC Support" activities performed.
    d) Are the employees responsible for "CLEC Support" dedicated entirely to Daily Usage File tasks? If not, please indicate what percentage of their time is spent on DUF tasks and describe the remainder of their jobs.
    e) Please describe in detail how Verizon tracks the DUF "CLEC Support" costs.
    f) Please explain why manual "CLEC Support" is necessary. Could any of these tasks be automated? If not, why not?

g) Please explain in detail how Verizon ensured that these labor costs have not been included in Verizon's general company expenses. Provide workpapers or documentation that this is the case.

94. What "CLEC Labor Cost" did Verizon incur in total in each of the years 1996, 1997, 1998, and 2000? Please specify the account designation that Verizon uses to track that cost in its reported ARMIS data.

95. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF)", Tab 3.1 Inputs. What does "CBO" stand for? Please give a detailed explanation of the "Records - CBO Operation." Please also explain in detail the basis for this projection and how Verizon arrived at this projection.

96. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF)", Tab 3.1 Inputs. Please give a detailed explanation of the "Data Transmission Records-Regional" demand. Please also explain in detail the basis for this projection and how Verizon arrived at this projection.

97. Referring to the previous two questions, please explain the difference between "Records - CBO Operation" demand and the "Data Transmission Records-Regional" demand. What does the "Data Transmission Records-Regional" demand include that "Records - CBO Operation" does not?

98. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF)." Please explain why the "Records - CBO Operation" is the appropriate demand to over which "CLEC Support" costs are spread.

99. Refer to Verizon's Part F-3, "Daily Usage File (DUF)." Please explain why the "Data Transmission Records-Regional" is the appropriate demand over which "Connect Direct Maintenance" costs are spread.

100. What was the actual "Records - CBO Operation" demand for each of the years 1996, 1997, 1998 and 2000?

101. What was the actual "Data Transmission Records-Regional" demand for each of the years 1996, 1997, 1998 and 2000?

102. How was the 1999 "Connect Direct Maintenance" cost determined?

103. If the 1999 "Connect Direct Maintenance" cost is based on actual expenses, how does Verizon track such expenses? Has Verizon made any adjustments to the 1999 value to project 2001 values, other than applying CPI? If Verizon made other adjustment, please explain thoroughly the adjustments, provide the basis and supporting documentation for each, and provide the unadjusted values. If there are no adjustments, please explain why the 1999 "Connect Direct Maintenance" cost should be used to project expenses in the future.

104. What "Connect Direct Maintenance" costs did Verizon incur in total in each of the years 1996, 1997, 1998, and 2000? Please specify the account designation that Verizon uses to track that cost in its reported ARMIS data.

105. Please explain in detail how Verizon ensured that "Connect Direct Maintenance" costs have not been included in Verizon's general company expenses. Provide workpapers or documentation that this is the case.

106. Refer to Verizon's Part F-3, "Daily Usage File (DUF), Tab 3.1 Inputs, line 24." Please give a detailed explanation of the "Software Expenses." How does this expense differ from the "Connect Direct Maintenance" cost?

107. What DUF "Software Expenses" did Verizon incur in total in each of the years 1996, 1997, 1998, and 2000? Please specify the account designation that Verizon uses to track that cost in its reported ARMIS data.

108. Please explain in detail how Verizon ensured DUF "Software Expenses" has not been included in Verizon's general company expenses. Provide workpapers or documentation that this is the case.

109. Refer to Verizon's Exhibit Part F-3, "Daily Usage File (DUF), Tab 4.4D-Conn Dir Sal & Wages. Please explain how "Data Transmission Wages and Salaries" costs differ from the "Software Expenses" and the "Connect Direct Maintenance" costs.

110. Please provide a complete technical description of the process that Verizon proposes to use to provide customized routing to UNE-based competitors. Please include a detailed description of the routing, functionality and resources used to provide customized routing and a description of any manual labor required to support the ongoing provision of customized routing.

111. Please identify each investment cost that Verizon claims it must incur in order to provide customized routing. For each investment that Verizon considers significant (*i.e.,* worth tracking and reporting in a cost study), please also identify the year in which the investment was incurred.

112. For each investment identified in response to the previous request, please specify the account designation and economic life that Verizon uses to track that cost in its reported ARMIS data.

113. Please identify each expense that Verizon claims it must incur in order to provide customized routing. For each significant ongoing expense please specify the account designation that Verizon uses to track that expense in its reported ARMIS data and the level of that expense in its year 2000 ARMIS filing.

114. For each capability that Verizon provides to competitors via the Customized Routing option (*e.g.*, the ability to route operator calls to a specific designated trunk group), please describe how Verizon provides the same functionality for its retail local exchange service operation (*e.g.*, Verizon uses routing tables in the switch to direct its retail customer's operator service calls to specific designated trunk groups).

115. Please identify each investment and expense that Verizon incurs to provide the retail functions described in the response to the previous request. Please also identify the account designation that Verizon uses to track that each identified investment and expense in its reported ARMIS data and the level of that cost in its year 2000 ARMIS filing.

116. Please identify specifically how Verizon's costs to provide retail customized routing like functions were treated in the retail services cost study that Verizon most recently submitted to the Commission.

117. Please describe any difference in the manner that Verizon records and books retail and wholesale-related costs to provide retail customized routing like functions. If wholesale-related (*i.e.*, UNE customer) costs are treated differently than retail-related costs, please explain the basis for and nature of each difference.

118. Please provide a complete technical description of the process that Verizon proposes to use to provide Daily Usage Files to UNE-based competitors. Please include a detailed description of the functionality and resources used to provide Daily Usage Files and a description of any manual labor required to support the ongoing provision of Daily Usage Files.

119. Please identify each investment cost that Verizon claims it must incur in order to provide Daily Usage Files. For each investment that Verizon considers significant (*i.e.*, worth tracking and reporting in a cost study), please also identify the year in which the investment was incurred.

120. For each investment identified in response to the previous request, please specify the account designation and economic life that Verizon uses to track that cost in its reported ARMIS data.

121. Please identify each expense that Verizon claims it must incur in order to provide Daily Usage Files. For each significant ongoing expense please specify the account designation that Verizon uses to track that expense in its reported ARMIS data and the level of that expense in its year 2000 ARMIS filing.

122. For each capability that Verizon provides to competitors via the Daily Usage File, please describe how Verizon provides the same functionality for its retail local exchange service operation.

123. Please identify each investment and expense that Verizon incurs to provide the retail functions described in the response to the previous request. Please also identify the account designation that Verizon uses to track that each identified investment and expense in its reported ARMIS data and the level of that cost in its year 2000 ARMIS filing.

124. Please identify specifically how Verizon's costs to provide retail Daily Usage File like functions were treated in the retail services cost study that Verizon most recently submitted to the Commission.

125. Please describe any difference in the manner that Verizon records and books retail and wholesale-related costs to provide a Daily Usage File like functions. If wholesale-related (*i.e.,* UNE customer) costs are treated differently than retail-related costs, please explain the basis for and nature of each difference.

126. Please provide a complete technical description of the process that Verizon proposes to use to provide Network Data Mover to UNE-based competitors. Please include a detailed description of the functionality and resources used to provide Network Data Mover and a description of any manual labor required to support the ongoing provision of Network Data Mover.

127. Please identify each investment cost that Verizon claims it must incur in order to provide Network Data Mover. For each investment that Verizon considers significant (*i.e.,* worth tracking and reporting in a cost study), please also identify the year in which the investment was incurred.

128. For each investment identified in response to the previous request, please specify the account designation and economic life that Verizon uses to track that cost in its reported ARMIS data.

129. Please identify each expense that Verizon claims it must incur in order to provide Network Data Mover. For each significant ongoing expense please specify the account designation that Verizon uses to track that expense in its reported ARMIS data and the level of that expense in its year 2000 ARMIS filing.

130. For each capability that Verizon provides to competitors via the network Data Mover, please describe how Verizon provides the same functionality for its retail local exchange service operation.

131. Please identify each investment and expense that Verizon incurs to provide the retail functions described in the response to the previous request. Please also identify the account designation that Verizon uses to track that each identified investment and expense in its reported ARMIS data and the level of that cost in its year 2000 ARMIS filing.

132. Please identify specifically how Verizon's costs to provide retail Network Data Mover like functionality were treated in the retail services cost study that Verizon most recently submitted to the Commission.

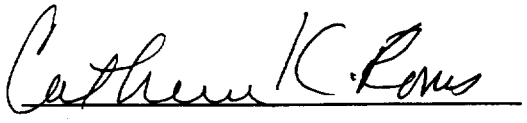
133. Please describe any difference in the manner that Verizon records and books retail and wholesale-related costs to provide a Network Data Mover like functions. If wholesale-related (*i.e.,* UNE customer) costs are treated differently than retail-related costs, please explain the basis for and nature of each difference.

134. For Verizon Virginia's region:
   a) What were the total resale lines in 1998, 1999 and 2000?
   b) What were the total UNE loops in 1998, 1999 and 2000?
   c) What were the total UNE platform and combinations in 1998, 1999 and 2000?

135. What is the total number of access lines that Verizon Virginia currently has in its region?

136. What is the total number of retail access lines that Verizon Virginia currently has in its region?

Respectfully submitted,



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Dated: August 9, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T/WorldCom's Sixth Set of Data Requests were served electronically and by overnight mail this 9th day of August, 2001, to:

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