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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ATTACHMENT C

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 AT&T Communications of Virginia, 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.	)	**CC Docket No. 00-251**
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**

AT&T and WorldCom's First Set Of Data Requests To Verizon Virginia

AT&T Communications of Virginia, Inc., TCG Virginia, Inc., ACC National Telecom Corp., MediaOne of Virginia and MediaOne Telecommunications of Virginia, Inc. (together, "AT&T") and WorldCom, Inc. ("WCOM") hereby propound the following data requests upon Verizon Virginia Inc. ("VZ-VA"), to be answered by those officers, employees or agents of VZ-VA as may be cognizant of the requested information and who are authorized to answer on behalf of VZ-VA.

These data requests are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had

they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. AT&T reserves the right to propound additional data requests and to request additional documents as and if additional information is required.

The data requests are to be answered in writing under oath and documents are to be furnished within fifteen (15) days after service, and served in-hand upon the undersigned within the time period prescribed by the Commission.

Instructions:

A. The obligation to respond to these Data Requests is ongoing. As additional responsive materials become available, please provide them.

B. In response to each Data Request please answer each question on a separate sheet of paper restating the question in full and identify the person or persons who prepared the response. For any information claimed to be unavailable, please state the reason why it is unavailable and provide any information that is available which is similar to the requested information.

C. If you object to any part of a data request, answer all parts of such request to which you do not object, and as to each part to which you do object, within three days of the receipt of the request, separately set forth the specific basis for the objection.

D. If any document or information is withheld on the ground of privilege, within three days of the receipt of the request, please identify the document, provide a summary of the document, and state the basis for the privilege asserted.

E. With respect to any document related to any matter addressed in the attached data request, if the document is not in your possession, but you know or believe that it exists, you are requested to identify and indicate to the best of your ability the present or last known location of the document and its custodian.

F. For any information that you claim is unavailable, state the reason why it is unavailable and provide any information that is available which is similar to the requested information.

G. If you assert that any document related to any matter addressed in any question in the attached data request has been destroyed or transferred beyond your control, please state the following: (a) identify by full name, official title, and address(es), any person who destroyed the document and any person involved in ordering the destruction of the document; (b) state the time, place and method of, and reasons for its destruction, including any and all documents relating to the order or act of such destruction; (c) if destroyed or disposed of by operation of a document destruction program or retention policy, identify and produce a copy of the guideline, policy, or manual describing the document destruction program or retention policy; (d) if transferred, identify the person authorizing transfer and state the time, place, and method of, and reason for, its transfer, including any and all documents relating to the transfer; (e) identify each and every person listed as an addressor, addressee, or indicated on blind copies, or to whom it was distributed, shown, or explained; and (f) state or identify the date, subject matter, number of pages, attachments, and appendices of the document.

H. In responding to each question in the attached data request, please provide information available from all your corporate and individual files, from any affiliated companies, from all companies over which you exercise control or that exercise control over you, from all past and present board members, officers, and employees of any such companies, and from all attorneys, investigators, and representatives of any such companies.

I. If a response to any of the attached data requests requires any calculations, analyses, assumptions or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies, and include all work papers relating thereto.

J. Whenever specific information, such as a date or figure, is requested and you are unable to give the exact information, give your best estimate thereof.

K. Provide one copy of all responses to these Data Requests to each of the following:

Mark Keffer, Esq.
Danny Long
AT&T Communications of Virginia, Inc.
3033 Chain Bridge Road,
Room B155

Oakton, Virginia 22185-0001

and

Jodie L. Kelley, Esq.
Jenner & Block LLC
601 Thirteenth Street, N.W.
Washington, D.C. 20005

and

Allen Freifeld, Esq.
Kimberly Wild, Esq.
WorldCom, Inc.
1133 19th Street, N.W.
Washington, D.C. 20036

Definitions

As used herein, the following terms have the meaning as set forth below:

1. The term "VZ-VA" or "the Company" or "you" shall include Verizon Virginia Inc. and its former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose as well as any affiliates providing service in Virginia, including but not limited to Verizon Advanced Data, Inc ("VADI") and Verizon Advanced Data – Virginia, Inc ("VADVA").

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which VZ-VA or its agents or representatives have knowledge which is relevant to the answer called for by the data request.

3. The terms "document" or "documents" as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, including but not limited to material consisting of letters, words, or numbers, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographing, magnetic impulse, mechanical or electronic recording, or other form of data compilation, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes,

reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

(a) are now or were formerly in your possession, custody or control; or

(b) are known or believed to be responsive to these data requests, regardless of who has or formerly had custody, possession or control.

4. The term "date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

5. The term "person" or "persons" means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

6. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

7. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

8. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it,

the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of VZ-PA or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization, for such disposition, and state the date or approximate date thereof.

9. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

10. The term "oral communication" means any utterance heard, whether in person, by telephone, or otherwise.

11. The term "identify the sources" means to identify and specify all documents and non-written communications upon which you rely in support of the allegation, contention, conclusion, position or answer in question, to state the references drawn from each such source upon which you rely in support of such allegation, contention, conclusion, position or answer and to identify all individuals whom you know to be knowledgeable with respect to the subject matter of such allegation, contention, conclusion, position or answer. Where a source is a public record (e.g., a newspaper, trade journal, judicial or administrative opinion), a quotation and page reference of the material relied upon shall be supplied.

12. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

13. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the data requests and request any information or

documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

14. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

DATA REQUESTS

1. Please provide year-to-date 2001 additions and retirements for each account and subaccount (e.g.-metallic and non-metallic) and in total pursuant to FCC books.

2. For each year, 1990 through 2000, please provide for each account and subaccount (e.g. – metallic and non-metallic) and in total the following data for Maryland pursuant to FCC books:

   a. Beginning-of-year plant in service and depreciation reserve balance
   b. End-of-year plant in service and depreciation reserve balance
   c. Plant additions
   d. Plant retirements
   e. Depreciation accruals
   f. Transfers and adjustments.

3. Please provide data in Request 1 pursuant to intrastate books, if different.

4. Please provide current planning forecast for data in Request 1 for years 2001 forward.

5. Please provide current planning forecast for provision of cable television services in Virginia, and identify technology (i.e. – DSL, Fiber/Coax, Wireless).

6. Please provide current planning forecast for provision of DSL services in Virginia.

7. Please provide copy of latest earnings or surveillance report filed with Virginia State Corporation Commission.

8. Please provide list of projection lives and future net salvage percents as currently prescribed by the Virginia State Corporation Commission, and relevant documentation (i.e. – Commission Order, correspondence, etc.)

9. Please provide current planning forecast for ATM switch deployment.

10. Please identify whether the Company's ATM deployment will be as an "overlay" network, or will replace digital switches.

11. If the company anticipates that the deployment of ATM switching will displace any of its existing switches, please identify those switching locations which will be displaced and their anticipated replacement date.

12. Please provide current planning forecast for SONET deployment.

13. Please provide current planning forecast for fiber in the distribution network.

14. Please provide actual deployment data for ATM, SONET and fiber in distribution network.

15. Please provide copies of 1990-2000 ARMIS 43-07 reports for Maryland.

16. Please provide a copy of latest "Average Life Indications Based on Full Mortality Study" for each account.

17. In addition to what is specified in question one, please provide year-to-date 2001 additions and retirements for each account and subaccount (e.g.- metallic and non-metallic) and in total pursuant to FCC books

Respectfully submitted

_____

Mark Keffer

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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**

AT&T and WorldCom's Third Set Of Data Requests To Verizon Virginia

AT&T Communications of Virginia, Inc., TCG Virginia, Inc., ACC National Telecom Corp., MediaOne of Virginia and MediaOne Telecommunications of Virginia, Inc. (together, "AT&T") and WorldCom, Inc. ("WCOM") hereby propound the following data requests upon Verizon Virginia Inc. ("VZ-VA"), to be answered by those officers, employees or agents of VZ-VA as may be cognizant of the requested information and who are authorized to answer on behalf of VZ-VA.

These data requests are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had

they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. AT&T reserves the right to propound additional data requests and to request additional documents as and if additional information is required.

The data requests are to be answered in writing under oath and documents are to be furnished within fifteen (15) days after service, and served in-hand upon the undersigned within the time period prescribed by the Commission.

Instructions:

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H. In responding to each question in the attached data request, please provide information available from all your corporate and individual files, from any affiliated companies, from all companies over which you exercise control or that exercise control over you, from all past and present board members, officers, and employees of any such companies, and from all attorneys, investigators, and representatives of any such companies.

I. If a response to any of the attached data requests requires any calculations, analyses, assumptions or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies, and include all work papers relating thereto.

J. Whenever specific information, such as a date or figure, is requested and you are unable to give the exact information, give your best estimate thereof.

K. Provide one copy of all responses to these Data Requests to each of the following:

Mark Keffer, Esq.
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3033 Chain Bridge Road,
Room B155

Oakton, Virginia 22185-0001

and

Jodie L. Kelley
Jenner & Block LLC
601 Thirteenth Street, N.W.
Washington, D.C. 20005

and

Allen Freifeld
Kimberly Wild
WorldCom, Inc.
1133 19th Street, N.W.
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Definitions

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1. The term "VZ-VA" or "the Company" or "you" shall include Verizon Virginia Inc. and its former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose as well as any affiliates providing service in Virginia, including but not limited to Verizon Advanced Data, Inc ("VADI") and Verizon Advanced Data – Virginia, Inc ("VADVA").

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which VZ-VA or its agents or representatives have knowledge which is relevant to the answer called for by the data request.

3. The terms "document" or "documents" as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, including but not limited to material consisting of letters, words, or numbers, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographing, magnetic impulse, mechanical or electronic recording, or other form of data compilation, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes,

reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

(a) are now or were formerly in your possession, custody or control; or

(b) are known or believed to be responsive to these data requests, regardless of who has or formerly had custody, possession or control.

4. The term "date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

5. The term "person" or "persons" means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

6. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

7. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

8. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it,

the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of VZ-PA or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization, for such disposition, and state the date or approximate date thereof.

9. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

10. The term "oral communication" means any utterance heard, whether in person, by telephone, or otherwise.

11. The term "identify the sources" means to identify and specify all documents and non-written communications upon which you rely in support of the allegation, contention, conclusion, position or answer in question, to state the references drawn from each such source upon which you rely in support of such allegation, contention, conclusion, position or answer and to identify all individuals whom you know to be knowledgeable with respect to the subject matter of such allegation, contention, conclusion, position or answer. Where a source is a public record (e.g., a newspaper, trade journal, judicial or administrative opinion), a quotation and page reference of the material relied upon shall be supplied.

12. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

13. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the data requests and request any information or

documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

14. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

DATA REQUESTS

1. Provide the definition that Verizon uses to calculate the lines, channels, and/or loops counted in ARMIS 4308 for Verizon Virginia for each type of lines (i.e. residential, business, single line business, special access lines and public).

    a. If the definition has changed within the past 7 years, provide the prior definition(s) and new definition(s) and the years applicable to each definition?

2. Do the total switched lines reported on Verizon Virginia's ARMIS 4308 report, [Total_Switch_Acc_Lines_dj] include the following: resold lines ("TSR"), UNE-P, BRI ISDN, PRI ISDN, Frame Relay, ATM, ADSL, or lines used specifically by Verizon Virginia for its official business purposes.

3. Define the special access line counts that Verizon-VA has reported to the FCC in the following ARMIS Report 4308, Line 320 categories: Spec_Acc_Lines_Analog_dk and Spec_Acc_Lines_Digital_dl.

    a. Are these lines leased only by IXCs to meet their POPs?

    b. Do ISPs lease special access lines?

    c. How many line equivalents is one PRI ISDN?

    d. Is unused capacity included?

    e. If an OC48 is partially lit, is it still counted as an OC48?

    f. When an aggregator is leasing OC48 transport services but only using part of the connection for IXC traffic, is it all counted as a special access service?

    g. Can an IXC or any other aggregator lease a special access line under interstate tariff and use it exclusively or predominantly for intraLATA purposes?

4. Define the private line counts reported on line 1451 in the FCC's ARMIS 4304 report [# C&WF - CAT.1 EXC.LINE PRIV.LINE.LOOPS FOR ALLOC.]

    a. Does line 1451 of the ARMIS 4304 report facilities or channels?

    b. Are copper voice grade lines, fiber facilities or both are reported in this ARMIS account?

    c. Are special access facilities included in this line count?

    d. Are these point-to-point connections between customers?

    e. Are xDSL services included?

    f. Are Verizon line counts included in this total?

    g. Are dedicated lines connected to the end-user at one end which pass though a Verizon switch and then to another carrier's network included.

5. Provide the definition that Verizon uses to calculate the line counts included in Verizon Communications Investor Quarterly, for each type of lines (i.e. residential, business, single line business, special access lines and public)?

    a. If the definitions have changed within the past 7 years, provide the prior definition(s) and new definition(s) and the years applicable to each definition?

    b. Explain the difference for which line counts are included in this report, but absent from the 4308 report filed with the FCC?

6. Do the total special access lines, reported on a DS0- equivalent basis, included in Verizon Communications Investor Quarterly, include the following: resold lines ("TSR"), UNE- P, BRI ISDN, PRI ISDN, Frame Relay, ATM, ADSL, private line under state tariffs, interstate special access lines, lines used for interoffice trunking, fiber rings-SONET for end user or leases, high capacity UNE loop or lines used for specifically by Verizon Virginia for its official business purposes?

    a. How many DS0 equivalents per BRI, ISDN, PRI ISDN, ADSL, fractional DS1, DS1, DS3, OC3 OC12, etc?

    b. Are leased lines included in the total line count?

    c. Are unused capacity included in the total?

    d. How is the utilization of high capacity service approximated?

    e. If a high capacity service is going through a CO node, is the service counted twice?

f. How would Verizon count a leased OC48 ring with 5 connections points that each have 1 DS3 going to an individual customer?

7. Provide the definition that Verizon uses to calculate the special access line counts reported on Verizon Communications Investor Quarterly?

   a. If the definition has changed within the past 7 years, provide the prior definition(s) and new definition(s) and the years applicable to each definition?

   b. Are these lines leased only by IXCs to meet their POPs?

   c. Do ISPs lease special access lines?

   d. How many line equivalents is one PRI ISDN?

   e. Is unused capacity included?

   f. If an OC48 is partially lit, is it still counted as an OC48?

   g. When an aggregator is leasing OC48 transport services but only using part of the connection for IXC traffic, is it all counted as a special access service?

8. Do the total switched lines reported on Verizon Communications Investor Quarterly include the following: resold lines ("TSR"), UNE- P, BRI ISDN, PRI ISDN, Frame Relay, ATM, ADSL, or lines used for specifically by Verizon Virginia for its official business purposes?

9. Please provide all studies, analyses, and/or documentation of DS1 and DS3 costs and the relationship between the costs of these services for Verizon (the parent organization, Verizon-Virginia, (including Verizon- former Bell Atlantic and former GTE) for 1998, 1999, 2000 and 2001 and any projections developed for any portion of the 2002-2006 time period.

10. Please provide all studies, analyses, and/or documentation of DS1 and DS3 costs and the relationship between the rates for these services for Verizon (the parent organization including former Bell Atlantic and former GTE) and Verizon-Virginia) for 1998, 1999, 2000 and 2001 and any projections developed for any portion of the 2002-2006 time period.

11. Please provide Verizon-VA's common support expenses, including, but not limited to, the following ARMIS accounts Other PPE (ARMIS 6510), Network operations (ARMIS Acct 6530), Marketing (ARMIS 6610), Services expenses (6620), General and Administrative (6720), and Executive and Planning (6710) for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted), separately reported for the former Bell Atlantic-VA and former GTE-VA.

a. For the ARMIS account Other PPE (ARMIS 6510), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic –VA and GTE-VA.

b. For each ARMIS sub-account for network operations expense including Power (6531), Network Administration (6532), Testing (6533), Plant Operations Administration (6534), Engineering (6535)), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for former Bell Atlantic –VA and GTE-VA.

c. For each ARMIS sub-account for Marketing (ARMIS 6610), including: Product Management (6611), Sales (6612), Product Advertising (6613), Marketing Expense (6610), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic –VA and GTE-VA.

d. For each ARMIS sub-account for Services expenses (6620), including Call Completion (6621), Number Services (6622), Customer Services (6623), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic –VA and GTE-VA.

e. For each ARMIS sub-account of Executive and Planning (6710), including Executive (6711) and Planning (6712), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic –VA and GTE-VA.

f. For each ARMIS sub-account of General and Administrative (6720), including Accounting & Finance (6721), External Relations (6722), Human Resource (6723), Information Management (6724), Legal (6725), Procurement (6726), Research & Development (6727), and Other General & Administrative (6728), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic –VA and GTE-VA.

12. Please provide any documents, including but not limited to reports, analysis and forecasts, prepared for or by Verizon (the parent organization) and Verizon-VA, separately for the former Bell Atlantic-VA and former GTE-VA, that forecast any or all of the following common support expenses categories for the next five years: Other PPE (6510), Network operations (6530), Marketing (6610), Services expenses (6620), General and Administrative (6720), and Executive and Planning (6710). Produce any and all documents concerning, referring or relating to the development of these data.

13. Please separately identify all costs associated with or expected to be incurred as a direct result of the Bell Atlantic/GTE merger in 2000 (actual), 2001 (actual YTD and forecasted) and 2002, 2003 and 2004 for Verizon (the parent organization) and Verizon-VA, separately identifying the costs attributable to former Bell Atlantic-VA and GTE-VA. Please identify these costs as recurring or non-recurring and provide a description of the expenditure. Produce any and all documents concerning, referring or relating to the development of these data.

14. Please provide all studies or analyses that forecast or estimate the cost savings associated with the Bell Atlantic-GTE merger, for the parent Verizon and Verizon-VA (i.e. the combination of the former Bell Atlantic-VA and GTE-VA). Produce any and all documents concerning, referring or relating to the development of these data.

15. Please provide a list of all services offered by Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately. At a minimum include POTS, HDSL, ADSL, 2-wire loop, 4-wire loop, PBX, ISDN, Centrex.

    a. For the services identified in above, please provide the number of subscribers for 1998, 1999 2000 and 2001 (YTD and forecasted) for Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately.

    b. For each service identified above, please provide the rates associated with each service for 1998, 1999 2000 and 2001 (YTD and forecasted). To the extent that a rate for a particular service is customer specific, please provide the average rate, the minimum rate and the maximum rate provided by Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately, for each of the services during each year specified above.

    c. For each service identified above, please provide the capacity of each service, or average capacity, if actual capacity is not available, on a DS-0 equivalent basis for Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately,.

16. Provide the following data for Verizon-VA for 2001 (ytd), 2001 (est.), 2002, 2003, 2004 and 2005.

    a. Number of calls completion: local, intralata, intrastate and interstate

b. Dial equipment minutes: local, intrastate and interstate

17. Provide all contracts Verizon has executed over the past three years for the purchase of digital loop carrier equipment.

    a. Please separately identify the contracts for Verizon, the parent company, Verizon-VA, the former Bell Atlantic-VA, and the former GTE-VA.

    b. Please provide all supporting analyses, including market surveys, bids and any other documentation used to develop each of these contracts.

    c. Please describe in detail the purchasing practice of DLC equipment. At a minimum provide the following information:

        i. Describe the solicitation process of DLC equipment undertaken, by Verizon (parent) and Verizon- VA (separately for the former Bell Atlantic-VA and the former GTE-VA) over the past three years.

        ii. Detail each purchase of DLC equipment made over the past three years. List the equipment purchased, the vendor purchased from, the date of purchase, the quantity purchased and the cost incurred by Verizon (parent) and Verizon- VA (separately for the former Bell Atlantic-VA and the former GTE-VA)

18. Please quantify the amount of fiber cable (in route miles) that comprises the distribution plant for Verizon-VA. If the information is not known then provide the best estimate. Produce any and all documents concerning, referring or relating to the development of these data.

19. Referencing Verizon's Cost Studies, See "2.4 Summary of Costs by Wire Center.DOC" located in the "VA UNBUNDLED LOOP/ 2w_buls" subfolder, submitted electronically, please explain the differences between the DENSITY_CELL_ID and the TELRIC_CELL_ID by wire center. Explain the methodology behind how these zones are determined.

20. Provide any information that Verizon –Virginia has that discusses the coordination or financial responsibility of telephone plant within new housing developments within Verizon's service territory.

21. Please fill in the following table with statistics from Verizon Virginia's actual network and that which appears in their cost model filed in this proceeding

	Data	Unit	Actual Verizon Network	Reported in Verizon's Cost Model in this Proceeding
	Total Route Miles			
1	Underground Distribution	Miles		
2	Buried Distribution	Miles		
3	Arial Distribution	Miles		
4	Underground Copper Feeder	Miles		
5	Buried Copper Feeder	Miles		
6	Arial Copper Feeder	Miles		
7	Underground Fiber Feeder	Miles		
8	Buried Fiber Feeder	Miles		
9	Arial Fiber Feeder	Miles		
10	Underground Transport	Miles		
11	Buried Transport	Miles		
12	Arial Transport	Miles		
	Other Data			
13	Number of Households	Number		
14	Number of DLCs	Number		
15	Number of FDIs	Number		
16	Trunk Ports	Number		
17	Announcement Trunks	Number		
18	E-911 Trunks	Number		
19	Intercept Trunks	Number		
20	Direct and Tandem Access Trunks	Number		
21	Intralata Toll Trunks	Number		
22	Direct Local and IntraLATA toll tr	Number		
23	Number of switches	Number		
24	Number of remote switches	Number		
25	Number of stand-alone switches	Number		
26	Verizon Owned Poles	Number		
27	Poles used by Verizon	Number		
28	Verizon Owned Poles Shared with Other Utilities	Number		
29	Verizon Owned Conduit	Miles		
30	Conduit used by Verizon	Miles		
31	Verizon Owned Conduit Shared with Other Utilities	Miles		