DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 21 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

| | | |
|---|---|---|
| In the Matter of<br>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<br>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<br>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 NINTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Ninth Set of Data Requests served on Verizon jointly by AT&T and WordCom on August 17, 2001.

No. of Copies rec'd 0+3
List ABCDE

## 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 35 requests (some with multiple subparts) and more than 600 prior requests (many with subparts) unfairly and excessively intereferes with Verizon's ability to prepare its case. 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. Exhibit Part H, Section J of Verizon's non-recurring cost filing, a June 9, 1999 letter, states that the "effort we are now undertaking will use the same approach, but is expanded to include wholesale and retail service order and provisioning activities throughout the entire footprint. Were survey requests and responses segregated or distinguished to any extent for retail as opposed to wholesale? If so, explain how.

2. AT&T/WorldCom have previously requested all NRCM survey responses and related documents. If Verizon has not already done so, produce all survey responses and summaries for retail as well as wholesale.

3. Part H, Section K, "Instructions for Providing Estimates of Average Time" directs survey respondents to call for assistance if they have questions about the nature of a particular work function or activity. Provide all logs of such requests for assistance and any related documents containing information about assistance requested and given.

4. Part H, Section L states that the final result produced by the panel will be fully populated matrices. Provide those matrices.

5. For each result on the matrices specifically describe the anticipated mechanization and process improvements on which the result was based.

6. Part H, Section M addresses updates to the non-recurring work activity studies. Provide all documentation memorializing the interviews conducted as described on both page 1 and page 2.

7. Describe each specific improvement in systems and work systems identified in the interviews.

8. List all revisions made in the non-recurring studies based upon the interviews.

9. Part H, Section M states that the Service Cost Analyst "will document the revisions and the reasons for them." Provide that documentation.

10. Provide the names and resumes of each and every subject matter expert who contributed to the forward looking adjustment made in the NRCM. Include their work experience that is directly relevant to the conclusions reached regarding adjustments in the NRCM.

11. Provide a copy of all documentation of the NERA review identified on page 323 of the July 31, 2001 Panel Testimony on Unbundled Network Element and Interconnection Costs.

12. Provide a copy of the productivity report for the MLAC identified on page 315 of the Panel Testimony.

13. Other than the difference described on pages 325 of the Panel Testimony, are there any other differences between the network assumed for the recurring cost model and the network assumed for the NRCM? If yes, list and describe all of the differences.

14. Page 302 of the Panel Testimony states that the studies submitted here are the same as those recently submitted in New York, New Jersey, Massachusetts, Maryland, Delaware and Virginia. Did Verizon submit NRCMs in each of those states which made the same network assumptions as the Verizon recurring cost studies submitted in each of those states?

15. If Verizon submitted NRCMs in any of those states with different network assumptions from the recurring studies in those states (similar to the difference identified in Question 25, identify which states and describe the differences.

16. Does the NRCM comply with TELRIC principles? If not, explain why.

17. Does the NRCM comply with the same TELRIC principles which Verizon applied to its recurring cost model? If not, explain why.

18. a. If AT&T requests an unbundled loop from Verizon, and Verizon dispatches a technician to make a cross-connection of the SAI in order to provide the service, will Verizon charge an NRC to AT&T for the field installation work?

    b. If AT&T subsequently cancels the service and another CLEC obtains the customer and requests the unbundled loop for that customer, are there any circumstances under which the second CLEC will use the same loop with the same cross connect in place? Under what circumstances, if any, will Verizon assess any charge to the second CLEC for the field installation work described in part a)? If there is a charge associated with this activity will it be recurring or non-recurring?

**NRCM Field Installation**

19. Under what circumstances will field installation charge be assessed? Specifically delineate each type or category of field work that would lead to a field installation

charge? Include a description of the tasks, the locations where the tasks will be accomplished and the equipment that will be worked on.

20. Provide the account and sub account codes where the activities described above are typically booked.

21. For each UNE to which Verizon applies a field installation charge, state the percentage of orders that will require such a charge. If Verizon does not have a percentage for a particular element, provide an estimate.

22. If Verizon does not have an estimate, please provide all information that a CLEC can use to estimate the number of orders it can expect will require a field installation charge.

**Functional Organization Descriptions**

23. Referring to Exhibit H, Section C, explain the JFC numbers next to each organizational name. Give the name of each account where related issues are booked, its purpose and use in the NRCM and its purpose and use in the company accounts generally.

24. Provide the same information for any JFC numbers used in the NRCM development but not identified in Section C.

25. For any account codes used for field installation work, identify the work groups whose activities are booked in those accounts, which activities are booked in which accounts, and any work done by those groups which is booked to those accounts but which is not included in the NRCM.

26. Define the Misdirect Out cost element.

27. Do any of the functional organizations listed in Section C perform database maintenance activities that are not included in the NRCM. If so, identify which groups and describe in detail what database maintenance activities each group performs on what systems. Provide the account codes for these activities.

**Activity Descriptions**

28. Referring to Exhibit H, Section D, identify each activity for which there is an analogous task which is typically accomplished by a mechanized process. For each mechanized process identify the systems which accomplish the task.

29. Under Facilities Management Center #17 and #29, define and describe LIVEWIRE and explain its function. Provide documentation of its development and use.

30. Under Field Installation #10 "Place block and/or drop wire" and #11, "Place Network Interface Device (NID)", identify where work activity time is reflected in the NRCM for each of these activities. Identify the specific elements and cells. If there are no non-zero values for these activities explain why they are included in the Activity Descriptions.

31. Are costs for placing drop wire and NIDs included in Verizon's recurring cost model? If so, identify where and identify the work groups and account codes involved.

**Annual Cost Factors**

32. Please refer to the Cost Methodology and Costing Process Manual for Unbundled Network Elements ("Cost Manual") at page 5 which states: "Annual Cost Factors ("ACFs") are used to translate TCI into annual costs for UNEs; they are also used to develop the final non-recurring costs from the identified labor expenses related to the provisioning of UNEs."
    a. Please identify and produce copies of all values that were used in the formulation of expense related ACFs as described in Verizon's Cost Methodology And Costing Process Manual ("Cost Manual").
    b. Please identify and produce detailed copies of all values that were used to translate total investment into annual costs for UNEs and were used to develop the final non-recurring costs from the identified non-recurring labor expenses related to the provisioning of UNEs.

33. The Cost Manual states at page 17: "In the case of expense-to-investment ACFs, the expenses that are incurred for specific plant accounts are directly attributed only to those investments, while expenses that are not specific to plant accounts are spread equally across all affected revenue-producing investments."
    a. Please identify all of the "plant accounts" and the values Verizon used to develop expense-to-investment ACFs.
    b. Please identify the total expenses that were "not specific to plant accounts, and were "spread equally across all affected revenue-producing investments." Please provide a table showing the "affected revenue-producing investments" and the amount that were applied.

34. At page 6, the Cost Manual states: "The Network ACFs are based on the jurisdiction-specific expenses incurred in the base year for repairing and rearranging plant and equipment, including the cost associated with responding to subscriber trouble reports ("R" dollars) and the cost associated with moves,

changes, rearrangements and upgrades to the network ("M" dollars). These expenses, which are captured by plant account, are divided by the jurisdiction-specific investments in the associated plant accounts to calculate the base Network ACF for each plant account."

a. Please provide the state specific expenses that Verizon used, "that have been incurred in the base year for repairing and rearranging plant and equipment."
b. Please represent these expenses by plant account code.
c. Please identify all departments that would be able to charge work/time to those plant accounts, and actual values that Verizon used to develop the Network ACF.

35. AT&T and WorldCom request that Verizon provide samples of the information (specifically described in the itemized requests below) produced by and contained in the various OSS as a result of actual orders for the UNE's listed in the table below:

| **VZ-NRCM UNE** |
|---|
| 1. Two Wire New Initial |
| 84. IDLC Two Wire New Initial |
| 3. Two Wire Hotcut Initial |
| 17. Line Port New Initial |
| 19. Line Port Hotcut Initial |
| 21. EO Trunk Port Initial |
| 36. Two Wire Analog-Digital UNE-P New Initial |
| 38. Two Wire Analog-Digital Conversion UNE-P Initial |
| 41. IOF DS-1 |
| 84. IDLC Two-Wire New Initial. |
| 86. IDLC Four Wire New Initial |

a. AT&T and WorldCom request to see the information produced as RMAs and or notices from Verizon's Facility Assignment Control System (FACS) and the results after manual tasks would have been completed by MLAC personal (MLAC TASK#1).

   1. Please include a copy of the order's "FACS" or "SOP" Service Order image, any and all notices produced by the FACS system, a FACS "history" showing all progress stages of the orders life, and the Assignment section produced as a result the work preformed by the MLAC. Please also include a narrative explaining why this type of UNE required the assistance of the MLAC workgroup.

b. AT&T and WorldCom request to see the information produced as RMAs and or notices, or any other data from Verizon's OSS representing the work required of the RCMAC work group.

   1. If appropriate please provide copies of the work required by RCMAC Task #3, please include all necessary data, transactions, etc., that is required to "release translation change."

   2. If appropriate please provide copy of the notification received through PARIS of need to perform a manual translation change on working service, and a copy of all following steps (and the associated data) required by RCMAC technician as reflected in task #2.

   3. If appropriate please provide a narrative and all supporting data explaining all actions require by the RCMAC technician as they obtain notification from the RCMC of trouble conditions on a CLEC end-user's line requiring RCMAC analysis and translation changes, as indicated in task #5.

c. AT&T and WorldCom request to see the information produced as RMAs and or notices from Verizon's FACS/TIRKS, WFA/C/DI/DO systems that would represent the necessary tasks of the CPC-Specials workgroup as indicated in the VZ-NRCM (CPC-SPECIALS Tasks 1 & 2).

   1. Please include a copy of the order's "FACS/TIRKS" or "SOP" Service Order image, any and all notices produced by the FACS/TIRKS system, a FACS/TIRKS "history" showing all progress stages of the orders life, and all data that would be required to update TIRKS to initiate work and make a final assignment of network facilities. Please also include a narrative explaining why this type of UNE required the assistance of the CPC-Specials workgroup.

d. AT&T and WorldCom request to see the information produced as RMAs and or notices from Verizon's FACS/TIRKS, WFA/C/DI/DO systems that would

represent the necessary tasks of the CPC-Message workgroup as indicated in the VZ-NRCM (CPC-MESSAGE Tasks 1 & 2).

1. Please include a copy of the order's "FACS/TIRKS" or "SOP" Service Order image, any and all notices produced by the FACS/TIRKS system, a FACS/TIRKS "history" showing all progress stages of the orders life, and all data that would be required to update TIRKS to make a final assignment of network facilities and release the order from TIRKS to WFA for coordination and dispatch.

e. AT&T and WorldCom request to see the information as produced from FOMS/TIRKS output (paper copy) that would represent CO FRAME task #3 as indicated in the VZ-NRCM. Please provide all steps and their associated data for the transactions to produce the output.

f. AT&T and WorldCom request to see the information produced in all OSS such as notices or RMA's, updates to OSS etc., that would involve the NOC (Tasks 1,2,3, 6, & 7) as indicated in the VZ-NRCM.

1. Please include a copy of all activity (before and after) representing the NOC work tasks 1,2,3, such as how they are notified that they have work to do, copies of OSSOI & Wordoc tables that need to be built manually and the required steps to build trunks in translations.

2. Please also provide copies showing how the NOC post completion into TIRKS, WFADI, WFAC (task #6).

3. Please also provide all necessary data that show how the NOC informs Software Translations of turn-up on 2W or OGT trunk for routing and what is required of Task #7.

g. AT&T and WorldCom request to see the information produced in any and all OSS that would involve the Software Provisioning workgroup as represented by task #1 such as all work steps involved in "Logging receipt of estimate and put translation on packet forms and electronically send to NOC.

h. AT&T and WorldCom request to see the information produced in any and all OSS that would involve the RCCC workgroup as represented by each particular UNE listed below.

1. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task #1 "Access WFA/C to begin coordination process. (Screener)"

2. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task #5 "Assign order to Technician.

(Screener)"

3. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task #6 "Perform administrative checks." In addition please provide a narrative as to what "administrative checks" were preformed.

4. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task #7 "Contact CPC to resolve design problems." Please provide a narrative as to how the RCCC technician knew there were design problems.

5. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task #14 "Update work activity in required systems."

6. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task #17 "Log DMARC order information and/or testing results in WFA/C."

7. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task # 26 "Complete the order." Please provide the FACS or FACS/TIRKS history showing before and after the completion was made.

8. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task # 35 "If NO access on Line: enter JEP/MFC in WFA/C & reschedule upon receipt of firm DD change"

9. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task # 21 & 22.

10. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task # 19 "Schedule required Bell Atlantic work teams." Please provide narrative as to all work required by this task.

11. If appropriate, please provide copies of input and output to OSS regarding the work involved in RCCC Task # 34 "Track roadblocks and problems throughout the life of an order using JEP and MFC codes in WFA/C along with proper log documentation." Please provide copies of an actual proper log documentation.

Respectfully submitted,

Michael E. Glover
Of Counsel

Richard D. Gary
Kelly L. Faglioni
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
(804) 788-8200

Karen Zacharia
David Hall
1320 North Court House Road
Eighth Floor
Arlington, Virginia 22201
(703) 974-2804

Catherine Kane Ronis
Lynn R. Charytan
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420

Lydia R. Pulley
600 E. Main St., 11th Floor Richmond, VA 23233
(804) 772-1547

Attorneys for Verizon

Of Counsel

Dated: August 21, 2001

## CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T/WorldCom's Ninth Set of Data Requests were served electronically and by either hand delivery or overnight mail this 21st day of August, 2001, to:

Dorothy Attwood (not served electronically)
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554*

Mark A. Keffer
Dan W. Long
Stephanie Baldanzi
AT&T
3033 Chain Bridge Road
Oakton, Virginia 22185

David Levy
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006*

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

and

Allen Feifeld, Esq. (not served electronically)
Kimberly Wild
WorldCom, Inc.
1133 19th Street, N.W.
Washington, D.C. 20036*

Mark S. Morelli

* Served by hand delivery.