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NOV - 5 2001

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November 5, 2001

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

FILE NO: 46001.000278

**By Hand Delivery**

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

*WorldCom, Cox, and AT&T ads. Verizon*  
CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

During the non-cost phase of the hearings in these arbitrations, Verizon VA, Inc. ("Verizon VA") was requested to provide certain information to the Arbitrator in the form of responses to "record requests." In response to those requests, enclosed please find four copies of Verizon VA's (1) public Exhibits 61 through 82 and (2) proprietary Exhibits 63A, 63B, and 63D, for which Verizon VA moves admission into the record.

Verizon VA also was asked to provide an updated Exhibit List. The enclosed Exhibit List is updated for the non-cost phase of hearing and includes a listing of the responses to record requests, discussed above. Four copies are included.

Finally, enclosed please find four copies of the Second Revised Joint Decision Point Lists ("JDPL") for the UNE, General Terms and Conditions, Rights of Way, and Miscellaneous panels. WorldCom, AT&T, and Cox will be providing the remaining JDPLs separately.

Please do not hesitate to call me with any questions.

No. of Copies rec'd 013  
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Ms. Magalie R. Salas  
November 5, 2001  
Page 2

Sincerely,

A handwritten signature in cursive script that reads "Kelly L. Faglioni".

Kelly L. Faglioni  
Counsel for Verizon

KLF/ar  
Enclosures

cc: Dorothy T. Attwood, Chief, Common Carrier Bureau (8 copies)  
Jeffery Dygert (3 copies for use as hearing exhibits)  
Katherine Farroba (w/o encl.)  
John Stanley (w/o encl.)

with enclosures:

Jodie L. Kelley, counsel for WorldCom  
Kimberly Wild, counsel for WorldCom  
David Levy, counsel for AT&T  
Mark A. Keffer, counsel for AT&T  
J.G. Harrington, counsel for Cox  
Carrington F. Philip, counsel for Cox

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VERIZON VA EXHIBIT LIST

Exhibit	Description
1.	Unbundled Network Elements Direct Testimony on Non-Mediation Issues (filed 7/31/01)
2.	Advanced Services Panel Direct Testimony on Non-Mediation Issues (filed 7/31/01)
3.	Resale Direct Testimony on Non-Mediation Issues (filed 7/31/01)
4.	Network Architecture Direct Testimony on Non-Mediation Issues (filed 7/31/01)
5.	Intercarrier Compensation Direct Testimony on Non-Mediation Issues (filed 7/31/01)
6.	Business Process Direct Testimony on Non-Mediation Issues (filed 7/31/01)
7.	Pricing Terms and Conditions Testimony on Non-Mediation Issues (filed 7/31/01)
8.	Unbundled Network Elements Direct Testimony on Mediation Issues (filed 8/17/01)
9.	Network Architecture Direct Testimony on Mediation Issues (filed 8/17/01)
10.	Business Process Direct Testimony on Mediation Issues (filed 8/17/01)
11.	Pricing Terms and Conditions Direct Testimony on Mediation Issues (filed 8/17/01)
12.	Miscellaneous Direct Testimony on Mediation Issues (filed 8/17/01)
13.	General Terms and Conditions Direct Testimony on Mediation Issues (filed 8/17/01)
14.	Rights of Way Direct Testimony on Mediation Issues (filed 8/17/01)
15.	Unbundled Network Elements Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
16.	Advanced Services Panel Corrected Rebuttal Testimony on Non-Mediation Issues (filed 8/30/01)
17.	Resale Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
18.	Network Architecture Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
19.	Intercarrier Compensation Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
20.	Business Process Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
21.	Pricing Terms and Conditions Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
22.	General Terms and Conditions Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
23.	Unbundled Network Elements Additional Direct Testimony on Mediation Issues (filed 8/31/01)
24.	Unbundled Network Elements Rebuttal Testimony on Mediation Issues (filed 9/5/01)
25.	Resale Rebuttal Testimony on Mediation Issues (filed 9/5/01)
26.	Network Architecture Rebuttal Testimony on Mediation Issues (filed 9/5/01)
27.	Business Process Rebuttal Testimony on Mediation Issues (filed 9/5/01)
28.	Pricing Terms and Conditions Rebuttal Testimony on Mediation Issues (filed 9/5/01)
29.	Miscellaneous Rebuttal Testimony on Mediation Issues (filed 9/5/01)
30.	General Terms and Conditions Rebuttal Testimony on Mediation Issues (filed 9/5/01)
31.	Rights of Way Rebuttal Testimony on Mediation Issues (filed 9/5/01)

32.	Verizon Line Splitting Announcement (filed 5/31/01)
33.	Corrections to Exhibit C-1 to Verizon VA's Answer (errata on proposed contract language)
34.	Errata to UNE Rebuttal Testimony on Mediations Issues (Exhibit 24)
35.	Qwest Service Interval Guide
36.	Errata to UNE testimony at Exhibits 1, 8, 15, and 23
37.	AT&T Data Request Response 2-25 (there are 2 exhibits submitted as Exhibit 37)
38.	FCC Report on Data or High Speed Services for Internet Access
39.	AT&T offers to Purchase Excite
40.	AT&T Broadband Report July 2001
41.	Notes/Minutes from NY Collaborative
42.	Sept. 4, 2001 Order of the Mass. DTE
43.	Errata to Advanced Services Testimony (Exhibit 16)
44.	AT&T Data Request Response 2-28
45.	Excerpt from transcript of Talbott testimony in North Carolina
46.	Maps
47.	Verizon Cost Testimony of 7/31/01
48.	Don Albert Drawings on cross-examination
49.	Don Albert Drawings on cross-examination
50.	Don Albert Drawings on cross-examination
51.	Don Albert Drawings on cross-examination
52.	Pete D'Amico Drawings
53.	Don Albert Drawings on re-direct
54.	VFX Diagram for Network interconnection discussions
55.	Verizon's May 14, 2001 letter regarding ISP Order
56.	Errata to Business Process Testimony (Exhibits 12 and 29)
57.	Verizon's Proposed Contract Language to WorldCom on Issue VI-1(AA)
58.	Declaration of Jonathan Smith
59.	Don Albert Drawing relating to on Issue VII-6
60.	Verizon's proposed contract language on 911 issues
61.	Unbundled Network Elements Panel Record Request: Interconnection Agreement in Texas (dedicated transport – multiplexing)

62.	Unbundled Network Elements Panel Record Request: Billing history on LIDB dips
63.	Advanced Services Panel Record Request: Methods and Procedures and Service Descriptions Agree Upon in NY DSL Collaborative Minutes
64.	Network Architecture Panel Record Request: IPs within local calling area
65.	Network Architecture Panel Record Request: Newport News tandem
66.	Network Architecture Panel Record Request: Mass. deadline for mid-span meet
67.	Network Architecture Panel Record Request: Number of CO's subtending tandem
68.	Network Architecture Panel Record Request: Mass Arbitration Order on mid-span meet
69.	Intercarrier Compensation Panel Record Request: Intercarrier compensation post-ISP Remand Order
70.	Miscellaneous Panel Record Request: WorldCom contract excerpts on billing for information services traffic
71.	Network Architecture Panel Record Request: Termination of tandem transit
72.	Network Architecture Panel Record Request: MECAB on liability
73.	Network Architecture Panel Record Request: MECAB on audits
74.	Network Architecture Panel Record Request: MECAB on electronic data transfer
75.	Network Architecture Panel Record Request: MECAB on error reporting
76.	Network Architecture Panel Record Request: MECAB on meet point billing
77.	Network Architecture Panel Record Request: NY and Mass cites on CPN
78.	Network Architecture Panel Record Request: Other carriers who agreed on CPN
79.	Intercarrier Compensation Panel Record Request: Verizon's proposal on intercarrier comp.
80.	Intercarrier Compensation Panel Record Request: Geographic location vs. NPA-NXX
81.	Intercarrier Compensation Panel Record Request: Corrected Exhibit 27
82.	Intercarrier Compensation Panel Record Request: Verizon's proposed billing language

**Index to Verizon VA Exhibits  
Submitted in Response to Record Requests**

Exhibit No.	Description
61.	Verizon Ex. 61 – Unbundled Network Elements Panel Record Request: Interconnection Agreement in Texas (dedicated transport – multiplexing)
62.	Verizon Ex. 62 – Unbundled Network Elements Panel Record Request: Billing history on LIDB dips
63.	Verizon Ex. 63 – Advanced Services Panel Record Request: Methods and Procedures and Service Descriptions Agree Upon in NY DSL Collaborative Minutes
64.	Verizon Ex. 64 – Network Architecture Panel Record Request: IPs within local calling area
65.	Verizon Ex. 65 – Network Architecture Panel Record Request: Newport News tandem
66.	Verizon Ex. 66 – Network Architecture Panel Record Request: Mass. deadline for mid-span meet
67.	Verizon Ex. 67 – Network Architecture Panel Record Request: Number of CO's subtending tandem
68.	Verizon Ex. 68 – Network Architecture Panel Record Request: Mass Arbitration Order on mid-span meet
69.	Verizon Ex. 69 – Intercarrier Compensation Panel Record Request: Intercarrier compensation post-ISP Remand Order
70.	Verizon Ex. 70 – Miscellaneous Panel Record Request: WorldCom contract excerpts on billing for information services traffic
71.	Verizon Ex. 71 – Network Architecture Panel Record Request: Termination of tandem transit
72.	Verizon Ex. 72 – Network Architecture Panel Record Request: MECAB on liability
73.	Verizon Ex. 73 – Network Architecture Panel Record Request: MECAB on audits
74.	Verizon Ex. 74 – Network Architecture Panel Record Request: MECAB on electronic data transfer
75.	Verizon Ex. 75 – Network Architecture Panel Record Request: MECAB on error reporting
76.	Verizon Ex. 76 – Network Architecture Panel Record Request: MECAB on meet point billing

Exhibit No.	Description
77.	Verizon Ex. 77 – Network Architecture Panel Record Request: NY and Mass cites on CPN
78.	Verizon Ex. 78 – Network Architecture Panel Record Request: Other carriers who agreed on CPN
79.	Verizon Ex. 79 – Intercarrier Compensation Panel Record Request: Verizon's proposal on intercarrier comp.
80.	Verizon Ex. 80 – Intercarrier Compensation Panel Record Request: Geographic location vs. NPA-NXX
81.	Verizon Ex. 81 – Intercarrier Compensation Panel Record Request: Corrected Exhibit 27
82.	Verizon Ex. 82 – Intercarrier Compensation Panel Record Request: Verizon's proposed billing language



**Unbundled Network Elements Panel Record Request**

**Request:** Verizon VA was asked to determine if it provided in its Interconnection Agreement in Texas unbundled dedicated transport with multiplexing at the end of the transport. Tr. at 421.

**Response:** Verizon does not offer in Texas unbundled dedicated transport with multiplexing at the end of the transport.



**Unbundled Network Elements Panel Record Request**

**Request:** Verizon VA was requested to determine from the date of the First Report and Order (August 8, 1996) until the date of the Supplemental Clarification Order (June 2, 2000) whether Verizon VA's billing relationship with WorldCom for LIDB dips reflected two billing rates for that service. Tr. 645-46. In addition, Verizon VA was asked to determine what is the current practice since June 2000. Tr. 648.

**Response:** WorldCom processed all LIDB dips through its interexchange carrier point code (prefix 244) prior to 1996 and through the first quarter of 2000. These LIDB dips were paid by WorldCom at the rate in Verizon VA FCC Tariff No. 1. Beginning in the second quarter, 2000, MCIMetro established a point code (prefix 216) as a competitive local exchange company (CLEC). Following the establishment of the MCIMetro point code, the data dramatically shows on Attachment 62A and B that by September 2000 and continuing to the present virtually all of WorldCom's LIDB dips were being reported through its MCIMetro point code 216 and being paid by WorldCom at the rate for a LIDB UNE for local service. The data on Attachment 62A and B are for the former Bell Atlantic southern states, including Virginia; separate data for Virginia is not available.



**LIDB dips per Quarter by MCI WorldCom**  
**January 1, 1996-June 30, 2001**

	<b>MCI 244 (IXC)</b>	<b>MCI 216 (CLEC)</b>
1 <sup>ST</sup> Q 96	11,733,015	0
2d Q 96	15,309,127	0
3d Q 96	17,825,679	0
4 <sup>th</sup> Q 96	15,257,533	0
1 <sup>st</sup> Q 97	9,256,744	0
2d Q 97	15,105,415	0
3d Q 97	17,959,089	0
4 <sup>th</sup> Q 97	10,266,991	0
1 <sup>st</sup> Q 98	15,737,486	0
2d Q 98	17,604,529	0
3d Q 98	6,659,232	0
4 <sup>th</sup> Q 98	31,420,495	0
1 <sup>st</sup> Q 99	15,280,385	0
2d Q 99	8,123,094	0
3d Q 99	24,671,534	0
4 <sup>th</sup> Q 99	15,434,611	0
1 <sup>st</sup> Q 00	12,856,469	0
2d Q 00	12,718,241	59,242
3d Q 00	6,383,083	11,087,244
4 <sup>th</sup> Q 00	48,648	12,927,808
1 <sup>st</sup> Q 01	47,904	11,366,244
2d Q 01	41,309	12,064,964

Note: Point Code 244 is assigned to MCI WorldCom's IXC  
Point Code 216 is assigned to MCI WorldCom's CLEC



**Advanced Services Panel Record Request**

**Request:** Please provide the methods and procedures and service descriptions that have been agreed upon in the New York DSL Collaborative minutes. (TR. 874:11-875: 14).

**Response:** See the attached documents 63A through D. Documents contained in Attachments 63A, B, and D are confidential, and are being provided under seal subject to the protective order in this proceeding.

In addition, the service descriptions for the two scenarios implemented in October 2001 were included in Verizon Exhibit 16 as Rebuttal Exhibit ASP-4, and the minutes from Collaborative meetings are maintained on the New York Service Commission's web page at <http://www.dps.state.ny.us/DSLproced.html>. The minutes from the August 7, 2001 meeting were introduced as Verizon Exhibit 41.

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

[INTENTIONALLY DELETED: SEE PROPRIETARY VERSION]

NOTICE:

Not for use or disclosure outside the Verizon Companies except under written agreement.

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

[INTENTIONALLY DELETED: SEE PROPRIETARY VERSION]

9/15/2001

*As a result of further collaborative discussions, the following steps would be required to accomplish disconnecting data from a line splitting arrangement:*

*An existing Line Splitting customer wishes to disconnect data and convert the loop and port to a UNE P and retain voice service only.*

*The CLEC may migrate an existing Line Splitting arrangement to voice only by disconnecting the data, converting the loop and port to UNE -P and retaining the same voice provider.*

*The status of the Line Splitting account pre-migration is as follows:*

- 1. The end user is receiving a CLEC bill for both voice and data service.*
- 2. The VLEC is receiving Line Splitting charges from Verizon.*
- 3. The loop and port are connected to the DLEC splitter.*

*The following activities would occur to implement the disconnect of data and the return of voice only service (UNE-P):*

- 1. Either the VLEC or the DLEC may issue the disconnect data only order by submitting an LSR using the appropriate ACNA and populating the corresponding CCNA in the LSP field.*
- 2. The TN, and circuit ID are required on the order.*
- 3. The FOC and Provisioning Completion Notice (PCN) goes to the entity which submitted the order.*
- 4. The Billing Completion Notice (BCN) goes to the underlying billing party (VLEC)*
- 5. The line loss notice goes from the entity which submitted the LSR to the partnering VLEC/DLEC.*
- 6. The loop and port are disconnected from the splitter.*
- 7. The loop and port are converted back to a UNE-P.*
- 8. The VLEC receives charges from Verizon to convert the loop and port back to a UNE-P.*



NETWORK SERVICES

Verizon VA Exhibit 63D

Issue 1.0 Date: 06/27/01  
Bulletin Number: 2001-00425-OSP

## ENGINEERING & PLANNING SUPPORT

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**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**



**Network Architecture Panel Record Request**

**Request:** Is it Verizon's Position that CLECs would be required to have an interconnection point at each co-location site within a local calling area, or it Verizon's position that CLECs would only have to have one interconnection point within a local calling area? Tr. 1082.

**Response:** The CLECs would have to establish one interconnection point ("IP") within a local calling area. Tr. 1320.



**Network Architecture Panel Record Request**

**Request:** Is the Newport News tandem an access tandem? Tr. 1272-1273.

**Response:** The Newport News tandem is not an access tandem. Tr. 1273.