Appendix A:

Exhibit 1: Reply Comments of Conversent, Dkt. No. 04-313 et al., (filed Oct. 19, 2004)

REDACTED-FOR PUBLIC INSPECTION

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

In the Matter of	)	
	)	
Unbundled Access to Network Elements	)	WC Docket No. 04-313
	)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338

REPLY COMMENTS OF CONVERSENT COMMUNICATIONS, LLC

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ATTORNEYS FOR CONVERSENT COMMUNICATIONS, LLC

October 19, 2004

REDACTED-FOR PUBLIC INSPECTION

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Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338

REPLY COMMENTS OF CONVERSENT COMMUNICATIONS, LLC

Conversent Communications, LLC ("Conversent") hereby submits its reply comments in the above-captioned proceeding.

I. INTRODUCTION AND SUMMARY

Conversent is a signatory to and fully supports the comments and reply comments of ALTS *et al.*, filed in this proceeding. Conversent files these reply comments to supplement the record regarding the implications of the various impairment tests for loops and transport proposed in this proceeding. For its analysis, Conversent chose three states in which it operates: Massachusetts, Rhode Island and New Jersey. These states were selected because there is available data for them to permit a comparison of the results yielded by the application of the impairment triggers adopted in the *Triennial Review Order*, and largely upheld by the D.C. Circuit,[1] with the impairment tests proposed by incumbent LECs. Specifically, Conversent compared[2] the results of the loop

[1] *See United States Telecomm. Ass'n v. FCC*, 359 F.3d 554, 574-5 (D.C. Cir.), *cert. denied*, No. 04-12, 2004 WL 2069543 (Oct. 12, 2004) ("*USTA II*").

[2] Conversent is in the process of preparing the backup materials used for this comparison for filing in this docket and will file those materials shortly after filing these reply comments.

and transport unbundling tests proposed by Bellsouth, SBC and Verizon[3] in their comments in this proceeding with the transport routes and loop locations that Verizon alleged in the state implementation proceedings would be removed under the *Triennial Review Order* triggers.

As the New York PSC's comments in this proceeding demonstrate, Verizon substantially overstated the routes and locations that would be eliminated under the *Triennial Review Order* triggers.[4] Nevertheless, as demonstrated herein, even Verizon's unreliably broad interpretation of the transmission UNEs that would be eliminated under the *Triennial Review Order* triggers would yield far fewer false negatives (incorrect findings of non-impairment) than the tests proposed by the incumbents in their comments.

In fact, the Conversent study demonstrates that the incumbents' proposed tests would remove many more routes and locations than the *Triennial Review Order* triggers. Given that those triggers are consistent with the requirements of Section 251(d)(2), the enormous differential between the results of the *Triennial Review Order* triggers on one

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[3] SBC's proposal would eliminate all unbundling for loops above DS1 and DS1s unbundling would be eliminated in wire centers with over 15,000 loops. *See* SBC Comments at 88-89. One prong of Verizon's loop proposal would eliminate all loop unbundling in wire centers where there are 5,000 or more total business lines (retail and wholesale). *See* Verizon Comments at 82. Bellsouth would eliminate all loop unbundling in central offices with 5,000 or more business access lines. *See* Bellsouth Comments at 44. Because Qwest's proposes to effectively eliminate all loop unbundling, ALTS believes that such a risible position does not merit serious discussion. *See* Qwest Comments at 5-7 (asserting that the mere availability of tariffed special access services precludes a finding of impairment). For transport, Bellsouth and Verizon would eliminate unbundling for all wire centers with more than 5,000 business access lines. *See* Verizon Comments at 82; Bellsouth Comments at 39. SBC would eliminate unbundling between wire centers with more than 10,000 business access lines and between wire centers with more than 10,000 business access lines, and those with more than 5,000 business access lines. *See* SBC Comments at 69-70.

[4] *See New York PSC Comments* at ii (showing that while Verizon alleged that there were 4141 routes for which there should have been a finding of non-impairment in New York, the NY PSC determined that only 135 of these routes met any *Triennial Review Order* triggers).

hand and the incumbents' tests on the other demonstrates that the incumbents grossly understate the scope of actual impairment for transmission facilities.

II. COMPARISON OF *TRIENNIAL REVIEW ORDER* TRIGGERS FOR LOOPS AND TRANSPORT WITH ILEC PROPOSALS

Because the incumbents refuse to make available the number of business access lines served by their wire centers, the only publicly available data that Conversent could obtain regarding business access lines was generated by PNR Associates for purposes of designing the forward-looking high-cost subsidy model for non-rural LECs. The data actually represents estimates of total business lines based on publicly available secondary sources such as Dun & Bradstreet's database of business locations, the LERG, census data, and incumbent LEC wire center boundaries.[5] The PNR data may understate the number of transport routes and loop locations in each state that would no longer be subject to unbundling, because, as noted above, this data does not include wire centers owned by rural LECs. Nevertheless, Conversent used the PNR data for its study and, where possible, supplemented that data with a limited amount of proprietary data regarding actual access lines per wire center.

Of the three states studied, such proprietary data is only available for New Jersey. Pursuant to the protective order in this proceeding, the New Jersey Ratepayer Advocate submitted actual wire center density data in its comments in this proceeding.[6] This data shows the actual number of business access lines in most New Jersey wire centers. Forty

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[5] *See Federal-State Board on Universal Service, Forward Looking Mechanism for High-Cost Support for Non-Rural LECs,* Tenth Report and Order, 14 FCC Rcd 20156, ¶ 51 (1999).

[6] *See* Comments of New Jersey Division of the Ratepayer Advocate, Declaration of Susan Baldwin, Confidential Attachment, SMB-10 at 1-6.

of the 203 wire centers that are included on the PNR list for New Jersey are not included in the New Jersey proprietary data because the latter includes only the Newark and Camden MSAs. Moreover, the New Jersey proprietary data only includes the number of *retail* business access lines and therefore likely understates the number of total business access lines. Therefore, any conclusions reached based on this data are likely to be conservative. In any event, for its study Conversent used the proprietary data for those New Jersey wire centers for which was available.

A. Loop Unbundling: Massachusetts

In the Massachusetts *Triennial Review Order* implementation proceeding, Verizon MA claimed that 70 customer locations met either the self-provisioning or wholesale impairment triggers. According to Verizon, there were 15 customer locations that met the DS1 wholesale trigger. With respect to DS3 loops, Verizon stated that 67 customer locations met the self-provisioning trigger, and 12 meet the wholesale trigger. Finally, Verizon claimed that there were 17 customer locations meeting the dark fiber self-provisioning trigger.[7]

Using PNR data for the 266 wire centers in Massachusetts, there would be no unbundling for any of the customer locations served by 86 of those wire centers under the Bellsouth and Verizon tests. Under SBC's test, all DS3 and dark fiber loops in all wire centers would no longer be subject to unbundling, while DS-1 loops would not have to be unbundled in 22 wire centers. These results of the incumbents' proposed tests would

[7] *See* Verizon Massachusetts, Supplemental Testimony of John Conroy and John White, D.T.E. 03-60 at 17 (Dec. 19, 2003) ("*VZ MA Testimony*").

obviously result in many more UNE loops being eliminated than was the case under the *Triennial Review Order* triggers.

B. Loop Unbundling: Rhode Island

Verizon did not place into the record a loops case in Rhode Island. Using PNR data, of the 30 wire centers in Rhode Island, there would be no unbundling for any location in 12 wire centers under Verizon and Bellsouth's 5,000 business access line test, and under SBC's test, there would be no unbundling for DS3 and dark fiber in any wire center and no unbundling of DS1 loops in 2 wire centers under SBC's 15,000 business access line test for DS1 loops.

C. Loop Unbundling: New Jersey

Verizon argued in the New Jersey *Triennial Review Order* unbundling proceeding that 41 customer locations met either the wholesale or self-provisioning triggers for loops in New Jersey. Specifically, according to Verizon there were 4 customer locations that met the DS-1 wholesale trigger. With respect to DS-3 loops, 4 customer locations met the self-provisioning trigger, and 4 met the wholesale trigger. Finally, Verizon argued that there were 41 customer locations meeting the dark fiber self-provisioning trigger.[8]

Using PNR data, of the 203 wire centers in New Jersey, there would be no unbundling of any loops for any customer in 126 wire centers under Verizon and Bellsouth's 5,000 business access line test. Under SBC's test, there would be no unbundling of DS3 or dark fiber loops and no unbundling of DS1 loops in 62 wire centers under SBC's 15,000 business access line test for DS1 loops.

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[8] *See* Verizon NJ Inc., Supplemental Testimony of Harold E. West III and John White on Behalf of Verizon New Jersey Inc., Docket No. TO03090705 at 25 (Jan 16, 2004) ("*VZ NJ Testimony*").

Using only the proprietary retail business access per wire center data covering 163 New Jersey wire centers, there would be no loop unbundling in **[proprietary begin]** xxx**[proprietary end]** wire centers under Verizon and Bellsouth's 5,000 business access line test. Under SBC's test, there would be no unbundling of DS3 or dark fiber loops in any location and no unbundling of DS1 loops in **[proprietary begin]** xxx **[proprietary end]** wire centers under SBC's 15,000 business access line test for DS1 loops. As noted above, because the proprietary data does not include wholesale business access lines, that data likely understates the number of wire centers that will be taken off of the loop unbundling list.

D. Methodology for Transport Analysis

To determine the total number of possible transport routes in each state that would no longer be subject to unbundling under the RBOC tests, we performed a number of algebraic calculations.[9] For example, using the PNR data, there were 86 wire centers in Massachusetts with more than 5,000 business access lines. Therefore, 86 was used for N to determine how many routes would no longer be subject to unbundling under the Verizon and Bellsouth tests. This calculation was slightly altered for SBC to take into account its two part test.[10]

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[9] Where N is the total number of wire centers meeting each carrier's test and K is two (two being the number of wire centers required for a direct transport route), the following formula yields the number of transport routes in each state:

$$ {}^{n}C_{k} = \frac{n!}{(n-k)!\,k!} $$

[10] To determine the number of wire center routes that would meet SBC's test, Conversent performed the following calculation where N_1 is the number of wire centers with greater than 10,000 business access lines and N_2 is the number of wire centers between 5,000 and 10,000 business access lines:

E. Transport Unbundling: Massachusetts

Under the *Triennial Review Order* triggers, Verizon claimed that 194 routes met one or both of the FCC's triggers for DS1, DS3 and dark fiber transport in Massachusetts. *See VA MA Testimony* at 6. According to Verizon, there were 186 routes that met one or both of the FCC's triggers for dark fiber transport, 182 routes that met the self-provisioning trigger for dark fiber and 57 routes that met the wholesale trigger for dark fiber. Verizon asserted further that there were, 145 routes that met the self-provisioning trigger for DS3 and 174 routes that met the wholesale trigger for DS1 and DS3 transport. 185 routes met either the self-provisioning trigger for DS1 and DS3 transport. *See id.* at 9-11.

According to the PNR data, there are 266 wire centers in Massachusetts. Under the Bellsouth and Verizon tests, 3655 routes would no longer be subject to unbundling for any type of transport. Under SBC's test, 2914 unique routes would be taken off the unbundling list for any type of transport.

F. Transport Unbundling: Rhode Island

Under the *Triennial Review Order* triggers, Verizon claimed that in Rhode Island, 25 routes met one or both of the FCC's wholesale or self-provisioning triggers for dark fiber transport, eight routes met one or both of the FCC's triggers for DS3 transport and 5 routes met the FCC's wholesale trigger for DS1 transport.[11]

(continued)

$$^{n}C_{k} = \frac{n!_{1}}{(n_1 - k)!\ k!} \quad + \quad n_1 * n_2$$

[11] *See* Verizon Rhode Island, Direct Panel Testimony of Verizon Rhode Island, Theresa L. O'Brien and John White, Docket No. 3550 at 44 (Dec. 8, 2003).

According to the PNR data, there are 30 wire centers in Rhode Island. Under the Bellsouth and Verizon tests, 66 routes would no longer be subject to unbundling for any type of transport. Under SBC's test, 60 routes would be removed from the unbundling list for any type of transport.

G. Transport Unbundling: New Jersey

Under the *Triennial Review Order* triggers, Verizon claimed that, in New Jersey, 182 routes met the self-provisioning trigger for dark fiber and 572 met the wholesale trigger for dark fiber. *VZ NJ Testimony* at 7-8. Verizon claimed that there were also 572 routes that met the FCC's wholesale trigger for DS1s and DS3s transport respectively, (*see id.* at 8) and 182 routes met the self-provisioning trigger for DS3 level capacity. *See id.* at 7-8.

According to the PNR data, there are 203 wire centers in New Jersey. Under the Bellsouth and Verizon tests, 7875 routes would no longer be subject to unbundling for any type of transport. Under SBC's test, 7095 routes would be removed from the unbundling list for any type of transport.

Using the proprietary data for the 163 wire centers for which the New Jersey Ratepayer Advocate provided data, **[proprietary begin]** xxx **[proprietary end]** routes would no longer be subject to unbundling under Verizon and Bellsouth's tests for any type of transport. Under SBC's test, **[proprietary begin]** xxx **[proprietary end]** routes would be taken off the unbundling list for any type of transport.

III. CONCLUSION

It is clear from the simple study described herein that the incumbents' proposed impairment tests for loops and transport go far, far beyond anything contemplated by the

Commission as a fair reading of the impairment test in the *Triennial Review Order*. Given the fundamental soundness of the impairment triggers adopted in that order, the Commission must reject the incumbents' proposals as grossly unreliable measures of impairment. The Commission should therefore adopt the impairment triggers proposed in the ALTS comments in this proceeding.

/s/

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Appendix B:

Spreadsheets calculating which of the dark fiber interoffice transport routes Verizon asserted met the *Triennial Review Order* triggers would no longer be unbundled under ILEC and ALTS transport tests

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Spreadsheets calculating which of the dark fiber interoffice transport routes Verizon asserted met the *Triennial Review Order* triggers would no longer be unbundled under ILEC and ALTS transport tests

Exhibit 1: Massachusetts

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order self-provisioning or wholesale trigger for interoffice dark fiber transport in Massachussets LATA 126 and 128 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

					BS and VZ transport tests	SBC Transport test	ALTS Transport Test
CLLI1	CLLI1Name	Business Lines	CLLI2Name	Business Lines	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
HLYKMAMA	HOLYOKE	15,788	SPRINGFIELD1	30,132	No	No	Triggers
NATNMAMA	NORTHAMPTON	11,283	SPRINGFIELD1	30,132	No	No	Triggers
BLRCMAAN	BILLERICA	11,728	HARRISON	60,552	No	No	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	BOWDOIN1	49,084	No	?	?
BSTNMABE	BOSTONBACKBAY1	Not Found	BURLINGTON	14,688	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	CAMBRIDGE	34,728	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	CAMBRIDGETANDEM1	Not Found	?	?	?
BSTNMABE	BOSTONBACKBAY1	Not Found	FRAMINGHAM1	23,736	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	FRANKLINSTREET1	24,140	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	HARRISON	60,552	No	?	?
BSTNMABE	BOSTONBACKBAY1	Not Found	LAWRENCE	30,022	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	LEXINGTON1	15,835	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	MALDEN	35,953	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	MARLBORO1	14,314	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	NEWTON	26,922	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	QUINCY	22,174	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	WALTHAMSPRINGSTREET	22,464	No	?	Triggers
BSTNMABE	BOSTONBACKBAY1	Not Found	WALTHAMWESTSTREET	Not Found	?	?	?
BSTNMABE	BOSTONBACKBAY1	Not Found	WORCESTER1	45,162	No	?	?
BSTNMABO	BOWDOIN1	49,084	BURLINGTON	14,688	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	CAMBRIDGE	34,728	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	CAMBRIDGETANDEM1	Not Found	No	?	?
BSTNMABO	BOWDOIN1	49,084	FRAMINGHAM1	23,736	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	FRANKLINSTREET1	24,140	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	HARRISON	60,552	No	No	No
BSTNMABO	BOWDOIN1	49,084	LAWRENCE	30,022	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	LEXINGTON1	15,835	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	MALDEN	35,953	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	MARLBORO1	14,314	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	NEWTON	26,922	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	QUINCY	22,174	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
BSTNMABO	BOWDOIN1	49,084	WALTHAMWESTSTREET	Not Found	No	?	?
BSTNMABO	BOWDOIN1	49,084	WORCESTER1	45,162	No	No	No
BRNTMAWA	BRAINTREE	15,385	BOSTONBACKBAY1	Not Found	No	?	Triggers
BRNTMAWA	BRAINTREE	15,385	BOWDOIN1	49,084	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	BROCKTON	23,349	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	CAMBRIDGE	34,728	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	CAMBRIDGETANDEM1	Not Found	No	?	Triggers
BRNTMAWA	BRAINTREE	15,385	FRANKLINSTREET1	24,140	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	HARRISON	60,552	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	LAWRENCE	30,022	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	LEXINGTON1	15,835	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order self-provisioning or wholesale trigger for interoffice dark fiber transport in Massachussets LATA 126 and 128 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

					BS and VZ transport tests	SBC Transport test	ALTS Transport Test
CLLI1	CLLI1Name	Business Lines	CLLI2Name	Business Lines	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
BRNTMAWA	BRAINTREE	15,385	LOWELL1	20,859	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	MALDEN	35,953	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	MARLBORO1	14,314	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	QUINCY	22,174	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	ROCKLAND	8,834	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	SALEM	11,278	No	No	Triggers
BRNTMAWA	BRAINTREE	15,385	WORCESTER1	45,162	No	No	Triggers
BRTNMACR	BROCKTON	23,349	BOSTONBACKBAY1	Not Found	No	?	Triggers
BRTNMACR	BROCKTON	23,349	BOWDOIN1	49,084	No	No	Triggers
BRTNMACR	BROCKTON	23,349	CAMBRIDGE	34,728	No	No	Triggers
BRTNMACR	BROCKTON	23,349	CAMBRIDGETANDEM1	Not Found	No	?	Triggers
BRTNMACR	BROCKTON	23,349	FRAMINGHAM1	23,736	No	No	Triggers
BRTNMACR	BROCKTON	23,349	FRANKLINSTREET1	24,140	No	No	Triggers
BRTNMACR	BROCKTON	23,349	HARRISON	60,552	No	No	Triggers
BRTNMACR	BROCKTON	23,349	LAWRENCE	30,022	No	No	Triggers
BRTNMACR	BROCKTON	23,349	LOWELL1	20,859	No	No	Triggers
BRTNMACR	BROCKTON	23,349	MALDEN	35,953	No	No	Triggers
BRTNMACR	BROCKTON	23,349	MARLBORO1	14,314	No	No	Triggers
BRTNMACR	BROCKTON	23,349	QUINCY	22,174	No	No	Triggers
BRTNMACR	BROCKTON	23,349	ROCKLAND	8,834	No	No	Triggers
BRTNMACR	BROCKTON	23,349	SALEM	11,278	No	No	Triggers
BRTNMACR	BROCKTON	23,349	WORCESTER1	45,162	No	No	Triggers
BRTNMACO	BROCKTONTANDEM1	Not Found	CAMBRIDGE	Not Found	?	?	?
BRTNMACO	BROCKTONTANDEM1	Not Found	CAMBRIDGETANDEM1	Not Found	?	?	?
BRTNMACO	BROCKTONTANDEM1	Not Found	FRAMINGHAM1	Not Found	?	?	?
BRTNMACO	BROCKTONTANDEM1	Not Found	LAWRENCE	Not Found	?	?	?
BURLMABE	BURLINGTON	14,688	CAMBRIDGE	34,728	No	No	Triggers
BURLMABE	BURLINGTON	14,688	CAMBRIDGETANDEM1	Not Found	No	?	Triggers
BURLMABE	BURLINGTON	14,688	FRAMINGHAM1	23,736	No	No	Triggers
BURLMABE	BURLINGTON	14,688	LAWRENCE	30,022	No	No	Triggers
BURLMABE	BURLINGTON	14,688	LEXINGTON1	15,835	No	No	Triggers
BURLMABE	BURLINGTON	14,688	MARLBORO1	14,314	No	No	Triggers
BURLMABE	BURLINGTON	14,688	NEWTON	26,922	No	No	Triggers
BURLMABE	BURLINGTON	14,688	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
BURLMABE	BURLINGTON	14,688	WALTHAMWESTSTREET	Not Found	No	?	Triggers
BURLMABE	BURLINGTON	14,688	WORCESTER1	45,162	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	FRAMINGHAM1	23,736	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	LAWRENCE	30,022	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	LEXINGTON1	15,835	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	MALDEN	35,953	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	MARLBORO1	14,314	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	NEWTON	26,922	No	No	Triggers
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This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order self-provisioning or wholesale trigger for interoffice dark fiber transport in Massachussets LATA 126 and 128 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

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					BS and VZ transport tests	SBC Transport test	ALTS Transport Test
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CMBRMAWA	CAMBRIDGE	34,728	SALEM	11,278	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
CMBRMAWA	CAMBRIDGE	34,728	WALTHAMWESTSTREET	Not Found	No	?	Triggers
CMBRMAWA	CAMBRIDGE	34,728	WORCESTER1	45,162	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	CAMBRIDGE	34,728	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	FRAMINGHAM1	23,736	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	LAWRENCE	30,022	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	LEXINGTON1	15,835	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	LOWELL1	20,859	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	MALDEN	35,953	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	MARLBORO1	14,314	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	NEWTON	26,922	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	QUINCY	22,174	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	ROCKLAND	8,834	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	SALEM	11,278	No	?	?
CMBRMABE	CAMBRIDGETANDEM1	Not Found	SOMERVILLE1	13,741	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	WALTHAMSPRINGSTREET	22,464	No	?	Triggers
CMBRMABE	CAMBRIDGETANDEM1	Not Found	WALTHAMWESTSTREET	Not Found	?	?	?
CMBRMABE	CAMBRIDGETANDEM1	Not Found	WORCESTER1	45,162	No	?	?
FRMNMAUN	FRAMINGHAM1	23,736	LAWRENCE	30,022	No	No	Triggers
FRMNMAUN	FRAMINGHAM1	23,736	LEXINGTON1	15,835	No	No	Triggers
FRMNMAUN	FRAMINGHAM1	23,736	MARLBORO1	14,314	No	No	Triggers
FRMNMAUN	FRAMINGHAM1	23,736	QUINCY	22,174	No	No	Triggers
FRMNMAUN	FRAMINGHAM1	23,736	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
FRMNMAUN	FRAMINGHAM1	23,736	WALTHAMWESTSTREET	Not Found	No	?	Triggers
FRMNMAUN	FRAMINGHAM1	23,736	WORCESTER1	45,162	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	BURLINGTON	14,688	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	CAMBRIDGE	34,728	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	CAMBRIDGETANDEM1	Not Found	No	?	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	FRAMINGHAM1	23,736	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	HARRISON	60,552	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	LAWRENCE	30,022	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	LEXINGTON1	15,835	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	MALDEN	35,953	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	MARLBORO1	14,314	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	NEWTON	26,922	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	QUINCY	22,174	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	WALTHAMWESTSTREET	Not Found	No	?	Triggers
BSTNMAFR	FRANKLINSTREET1	24,140	WORCESTER1	45,162	No	No	Triggers
BSTNMAHA	HARRISON	60,552	BURLINGTON	14,688	No	No	Triggers
BSTNMAHA	HARRISON	60,552	CAMBRIDGE	34,728	No	No	Triggers
BSTNMAHA	HARRISON	60,552	CAMBRIDGETANDEM1	Not Found	No	?	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order self-provisioning or wholesale trigger for interoffice dark fiber transport in Massachussets LATA 126 and 128 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

					BS and VZ transport tests	SBC Transport test	ALTS Transport Test
CLLI1	CLLI1Name	Business Lines	CLLI2Name	Business Lines	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
BSTNMAHA	HARRISON	60,552	FRAMINGHAM1	23,736	No	No	Triggers
BSTNMAHA	HARRISON	60,552	LAWRENCE	30,022	No	No	Triggers
BSTNMAHA	HARRISON	60,552	LEXINGTON1	15,835	No	No	Triggers
BSTNMAHA	HARRISON	60,552	LOWELL1	20,859	No	No	Triggers
BSTNMAHA	HARRISON	60,552	MALDEN	35,953	No	No	Triggers
BSTNMAHA	HARRISON	60,552	MARLBORO1	14,314	No	No	Triggers
BSTNMAHA	HARRISON	60,552	NEWTON	26,922	No	No	Triggers
BSTNMAHA	HARRISON	60,552	QUINCY	22,174	No	No	Triggers
BSTNMAHA	HARRISON	60,552	SALEM	11,278	No	No	Triggers
BSTNMAHA	HARRISON	60,552	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
BSTNMAHA	HARRISON	60,552	WALTHAMWESTSTREET	Not Found	No	?	Triggers
BSTNMAHA	HARRISON	60,552	WORCESTER1	45,162	No	No	No
LWRNMACA	LAWRENCE	30,022	LEXINGTON1	15,835	No	No	Triggers
LWRNMACA	LAWRENCE	30,022	MALDEN	35,953	No	No	Triggers
LWRNMACA	LAWRENCE	30,022	MARLBORO1	14,314	No	No	Triggers
LWRNMACA	LAWRENCE	30,022	QUINCY	22,174	No	No	Triggers
LWRNMACA	LAWRENCE	30,022	ROCKLAND	8,834	No	No	Triggers
LWRNMACA	LAWRENCE	30,022	SALEM	11,278	No	No	Triggers
LWRNMACA	LAWRENCE	30,022	WALTHAMWESTSTREET	Not Found	No	?	Triggers
LWRNMACA	LAWRENCE	30,022	WORCESTER1	45,162	No	No	Triggers
LXTNMAWA	LEXINGTON1	15,835	MALDEN	35,953	No	No	Triggers
LXTNMAWA	LEXINGTON1	15,835	MARLBORO1	14,314	No	No	Triggers
LXTNMAWA	LEXINGTON1	15,835	NEWTON	26,922	No	No	Triggers
LXTNMAWA	LEXINGTON1	15,835	QUINCY	22,174	No	No	Triggers
LXTNMAWA	LEXINGTON1	15,835	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
LXTNMAWA	LEXINGTON1	15,835	WALTHAMWESTSTREET	Not Found	No	?	Triggers
LXTNMAWA	LEXINGTON1	15,835	WORCESTER1	45,162	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	LAWRENCE	30,022	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	MALDEN	35,953	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	MARLBORO1	14,314	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	QUINCY	22,174	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	ROCKLAND	8,834	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	SALEM	11,278	No	No	Triggers
LWLLMAAP	LOWELL1	20,859	WORCESTER1	45,162	No	No	Triggers
MLDNMAEL	MALDEN	35,953	MARLBORO1	14,314	No	No	Triggers
MLDNMAEL	MALDEN	35,953	QUINCY	22,174	No	No	Triggers
MLDNMAEL	MALDEN	35,953	ROCKLAND	8,834	No	No	Triggers
MLDNMAEL	MALDEN	35,953	SALEM	11,278	No	No	Triggers
MLDNMAEL	MALDEN	35,953	WORCESTER1	45,162	No	No	Triggers
MRBOMAMA	MARLBORO1	14,314	QUINCY	22,174	No	No	Triggers
MRBOMAMA	MARLBORO1	14,314	ROCKLAND	8,834	No	No	Triggers
MRBOMAMA	MARLBORO1	14,314	SALEM	11,278	No	No	Triggers
MRBOMAMA	MARLBORO1	14,314	WALTHAMWESTSTREET	Not Found	No	?	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order self-provisioning or wholesale trigger for interoffice dark fiber transport in Massachussets LATA 126 and 128 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

					BS and VZ transport tests	SBC Transport test	ALTS Transport Test
CLLI1	CLLI1Name	Business Lines	CLLI2Name	Business Lines	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
MRBOMAMA	MARLBORO1	14,314	WORCESTER1	45,162	No	No	Triggers
NWTNMAWA	NEWTON	26,922	WALTHAMSPRINGSTREET	22,464	No	No	Triggers
NWTNMAWA	NEWTON	26,922	WALTHAMWESTSTREET	Not Found	No	?	Triggers
NRBOMASC	NORTHBORO	6,993	WESTBORO	9,638	No	No	Yes
NRBOMASC	NORTHBORO	6,993	WORCESTER1	45,162	No	No	Triggers
QNCYMAHA	QUINCY	22,174	ROCKLAND	8,834	No	No	Triggers
QNCYMAHA	QUINCY	22,174	SALEM	11,278	No	No	Triggers
QNCYMAHA	QUINCY	22,174	WORCESTER1	45,162	No	No	Triggers
RKLDMAWE	ROCKLAND	8,834	SALEM	11,278	No	No	Triggers
RKLDMAWE	ROCKLAND	8,834	WORCESTER1	45,162	No	No	Triggers
SALMMANO	SALEM	11,278	WORCESTER1	45,162	No	No	Triggers
WLHMMASP	WALTHAMSPRINGSTREET	22,464	WALTHAMWESTSTREET	Not Found	No	?	Triggers
WLHMMAWE	WALTHAMWESTSTREET	Not Found	WORCESTER1	45,162	No	?	?
WRCSMACE	WORCESTER1	45,162	WESTBORO	9,638	No	No	Triggers

Appendix B:

Spreadsheets calculating which of the dark fiber interoffice transport routes Verizon asserted met the *Triennial Review Order* triggers would no longer be unbundled under ILEC and ALTS transport tests

Exhibit 2: Rhode Island

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met Triennial Review Order wholesale trigger for interoffice dark fiber transport in Rhode Island LATA 130 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						BS and VZ transport tests	SBC transport tests	ALTS transport test
WIRE CENTER 1	WIRE CENTER 1NAME	Business Lines WC1	WIRE CENTER 2	WIRE CENTER 2 NAME	Business Lines WC2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
ASTNRIAN	ASHTON	4,652	NPRVRIMS	CENTREDALE	7,782	No	Yes	Yes
ASTNRIAN	ASHTON	4,652	PRVDRIBR	BROAD STREET	13,801	No	Yes	Triggers
ASTNRIAN	ASHTON	4,652	PRVDRIWA	WASHINGTON STREET	40,722	No	Yes	Triggers
ASTNRIAN	ASHTON	4,652	PWTCRIHI	PAWTUCKET	22,188	No	Yes	Triggers
ASTNRIAN	ASHTON	4,652	WNSCRICL	WOONSOCKET	12,040	No	Yes	Triggers
CNTNRIPH	CRANSTON	12,045	PRVDRIBR	BROAD STREET	13,801	No	No	Triggers
CNTNRIPH	CRANSTON	12,045	PRVDRIWA	WASHINGTON STREET	40,722	No	No	Triggers
CNTNRIPH	CRANSTON	12,045	PWTCRIHI	PAWTUCKET	22,188	No	No	Triggers
CNTNRIPH	CRANSTON	12,045	WNSCRICL	WOONSOCKET	12,040	No	No	Triggers
CNTNRIPH	CRANSTON	12,045	WRWKRIWS	WARWICK	14,411	No	No	Triggers
EPRVRINB	EAST PROVIDENCE	12,615	PRVDRIWA	WASHINGTON STREET	40,722	No	No	Triggers
EPRVRINB	EAST PROVIDENCE	12,615	PWTCRIHI	PAWTUCKET	22,188	No	No	Triggers
NPRVRIMS	CENTREDALE	7,782	PRVDRIBR	BROAD STREET	13,801	No	No	Triggers
NPRVRIMS	CENTREDALE	7,782	PRVDRIWA	WASHINGTON STREET	40,722	No	No	Triggers
NPRVRIMS	CENTREDALE	7,782	PWTCRIHI	PAWTUCKET	22,188	No	No	Triggers
NPRVRIMS	CENTREDALE	7,782	WNSCRICL	WOONSOCKET	12,040	No	No	Triggers
PRVDRIBR	BROAD STREET	13,801	PRVDRIWA	WASHINGTON STREET	40,722	No	No	Triggers
PRVDRIBR	BROAD STREET	13,801	PWTCRIHI	PAWTUCKET	22,188	No	No	Triggers
PRVDRIBR	BROAD STREET	13,801	WNSCRICL	WOONSOCKET	12,040	No	No	Triggers
PRVDRIBR	BROAD STREET	13,801	WRWKRIWS	WARWICK	14,411	No	No	Triggers
PRVDRIWA	WASHINGTON STREET	40,722	PWTCRIHI	PAWTUCKET	22,188	No	No	Triggers
PRVDRIWA	WASHINGTON STREET	40,722	WNSCRICL	WOONSOCKET	12,040	No	No	Triggers
PRVDRIWA	WASHINGTON STREET	40,722	WRWKRIWS	WARWICK	14,411	No	No	Triggers
PWTCRIHI	PAWTUCKET	22,188	WNSCRICL	WOONSOCKET	12,040	No	No	Triggers
PWTCRIHI	PAWTUCKET	22,188	WRWKRIWS	WARWICK	14,411	No	No	Triggers

Appendix B:

Spreadsheets calculating which of the dark fiber interoffice transport routes Verizon asserted met the *Triennial Review Order* triggers would no longer be unbundled under ILEC and ALTS transport tests

Exhibit 3: New Jersey

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 222 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						VZ and BS Transport Tests	SBC Transport test	ALTS Transport Test
CLLI 1	CLLI 1 Name	Business Lines C1	CLLI 2	CLLI 2 Name	Business Lines C2	**No unbundling where 5,000 or more on at least one end**	**No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000**	**Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes**
CMDNNJCE	CAMDEN	15,888	LRSPNJLS	LAUREL SPRINGS	17,655	**No**	**No**	**Triggers**
			MHVLNJME	MERCHANTVILLE	23,878	**No**	**No**	**Triggers**
LRSPNJLS	LAUREL SPRINGS	17,655	MHVLNJME	MERCHANTVILLE	23,878	**No**	**No**	**Triggers**
			PNNKNJPN	PENNS NECK	17,281	**No**	**No**	**Triggers**
			PRTNNJPC	PRINCETON	14,044	**No**	**No**	**Triggers**
			TRENNJTE	TRENTON	43,931	**No**	**No**	**Triggers**
PNNKNJPN	PENNS NECK	17,281	PRTNNJPC	PRINCETON	14,044	**No**	**No**	**Triggers**
			TRENNJTE	TRENTON	43,931	**No**	**No**	**Triggers**
PRTNNJPC	PRINCETON	14,044	TRENNJTE	TRENTON	43,931	**No**	**No**	**Triggers**

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						BS and VZ Tests	SBC Test	ALTS Test
CLLI 1	CLLI 1 Name	Business Line C1	CLLI 2	CLLI 2 Name	Business Lines C2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
BDBKNJBD	BOUND BROOK	18,218	BDMNNJ01	BEDMINSTER	5,086	No	No	Triggers
			BNTNNJBN	BOONTON	15,173	No	No	Triggers
			ELZBNJEL	ELIZABETH	37,174	No	No	Triggers
			FRFDNJFA	FAIRFIELD	29,520	No	No	Triggers
			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			JRCYNJBR	BERGEN	32,933	No	No	Triggers
			JRCYNJJO	JOURNAL SQUARE	35,722	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			MTCHNJMT	METUCHEN	28,025	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	?
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
BDMNNJ01	BEDMINSTER	5,086	BNTNNJBN	BOONTON	15,173	No	No	Triggers
			ELZBNJEL	ELIZABETH	37,174	No	No	Triggers
			FRFDNJFA	FAIRFIELD	29,520	No	No	Triggers
			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			JRCYNJBR	BERGEN	32,933	No	No	Triggers
			JRCYNJJO	JOURNAL SQUARE	35,722	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			MTCHNJMT	METUCHEN	28,025	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	?
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
BNTNNJBN	BOONTON	15,173	ELZBNJEL	ELIZABETH	37,174	No	No	Triggers
			ENWDNJEN	ENGLEWOOD	32,873	No	No	Triggers
			EORNNJEO	EAST ORANGE	21,494	No	No	Triggers
			FRFDNJFA	FAIRFIELD	29,520	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						BS and VZ Tests	SBC Test	ALTS Test
CLLI 1	CLLI 1 Name	Business Line C1	CLLI 2	CLLI 2 Name	Business Lines C2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
			FTLENJLE	LEONIA	22,867	No	No	Triggers
			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			HLDLNJWE	WESTWOOD	29,085	No	No	Triggers
			JRCYNJBR	BERGEN	32,933	No	No	Triggers
			JRCYNJJO	JOURNAL SQUARE	35,722	No	No	Triggers
			LVTNNJLI	LIVINGSTON	13,876	No	No	Triggers
			MDSNNJMA	MADISON	14,858	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			MTCHNJMT	METUCHEN	28,025	No	No	Triggers
			MTCLNJMC	MONTCLAIR	19,743	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			PTSNNJAR	PATERSON	32,485	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RHWYNJRA	RAHWAY	19,546	No	No	Triggers
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
BYNNNJ02	BAYONNE	14,140	ELZBNJEL	ELIZABETH	37,174	No	No	Triggers
			EORNNJEO	EAST ORANGE	21,494	No	No	Triggers
			FRFDNJFA	FAIRFIELD	29,520	No	No	Triggers
			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			JRCYNJBR	BERGEN	32,933	No	No	Triggers
			JRCYNJJO	JOURNAL SQUARE	35,722	No	No	Triggers
			LTFLNJLF	LITTLE FALLS	16,604	No	No	Triggers
			LVTNNJLI	LIVINGSTON	13,876	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						BS and VZ Tests	SBC Test	ALTS Test
CLLI 1	CLLI 1 Name	Business Line C1	CLLI 2	CLLI 2 Name	Business Lines C2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
EDSNNJED	EDISON	23,511	ELZBNJEL	ELIZABETH	37,174	No	No	Triggers
			EORNNJEO	EAST ORANGE	21,494	No	No	Triggers
			FRFDNJFA	FAIRFIELD	29,520	No	No	Triggers
			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			JRCYNJBR	BERGEN	32,933	No	No	Triggers
			JRCYNJJO	JOURNAL SQUARE	35,722	No	No	Triggers
			LVTNNJLI	LIVINGSTON	13,876	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
ELZBNJEL	ELIZABETH	37,174	ENWDNJEN	ENGLEWOOD	32,873	No	No	Triggers
			EORNNJEO	EAST ORANGE	21,494	No	No	Triggers
			FRFDNJFA	FAIRFIELD	29,520	No	No	Triggers
			FTLENJLE	LEONIA	22,867	No	No	Triggers
			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			HLDLNJWE	WESTWOOD	29,085	No	No	Triggers
			JRCYNJBR	BERGEN	32,933	No	No	Triggers
			JRCYNJJO	JOURNAL SQUARE	35,722	No	No	Triggers
			LTFLNJLF	LITTLE FALLS	16,604	No	No	Triggers
			LTFYNJLF	LITTLE FERRY	24,442	No	No	Triggers
			LVTNNJLI	LIVINGSTON	13,876	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

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CLLI 1	CLLI 1 Name	Business Line C1	CLLI 2	CLLI 2 Name	Business Lines C2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
			MDSNNJMA	MADISON	14,858	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			MTCHNJMT	METUCHEN	28,025	No	No	Triggers
			MTCLNJMC	MONTCLAIR	19,743	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	No	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			PTSNNJAR	PATERSON	32,485	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RHWYNJRA	RAHWAY	19,546	No	No	Triggers
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
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			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

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			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PTSNNJAR	PATERSON	32,485	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
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			MTCLNJMC	MONTCLAIR	19,743	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	No	Triggers
			NWRKNJ02	MARKET	50,198	No	?	Triggers
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			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
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			HCKNNJHK	HACKENSACK	42,017	No	No	Triggers
			HLDLNJWE	WESTWOOD	29,085	No	No	Triggers
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			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RHWYNJRA	RAHWAY	19,546	No	No	Triggers
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
JRCYNJJO	JOURNAL SQUARE	35,722	LTFLNJLF	LITTLE FALLS	16,604	No	No	Triggers
			LTFYNJLF	LITTLE FERRY	24,442	No	No	Triggers
			LVTNNJLI	LIVINGSTON	13,876	No	No	Triggers
			MDSNNJMA	MADISON	14,858	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			MTCHNJMT	METUCHEN	28,025	No	No	Triggers
			MTCLNJMC	MONTCLAIR	19,743	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			PTSNNJAR	PATERSON	32,485	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RHWYNJRA	RAHWAY	19,546	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						BS and VZ Tests	SBC Test	ALTS Test
CLLI 1	CLLI 1 Name	Business Line C1	CLLI 2	CLLI 2 Name	Business Lines C2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
LTFLNJLF	LITTLE FALLS	16,604	LVTNNJLI	LIVINGSTON	13,876	No	No	Triggers
			MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
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			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
LTFYNJLF	LITTLE FERRY	24,442	MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	No	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
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LVTNNJLI	LIVINGSTON	13,876	MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
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This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

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			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RHWYNJRA	RAHWAY	19,546	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
MDSNNJMA	MADISON	14,858	MRTWNJMR	MORRISTOWN	40,587	No	No	Triggers
			MTCLNJMC	MONTCLAIR	19,743	No	No	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PTSNNJAR	PATERSON	32,485	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	No	Triggers
			RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
MRTWNJMR	MORRISTOWN	40,587	MTCHNJMT	METUCHEN	28,025	No	No	Triggers
			MTCLNJMC	MONTCLAIR	19,743	No	No	Triggers
			NBRGNJNB	NORTH BERGEN	23,220	No	No	Triggers
			NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	No
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	No
			PSWYNJPI	PISCATAWAY	13,282	No	No	Triggers
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			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
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This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

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			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
MTCHNJMT	METUCHEN	28,025	NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
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			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
MTCLNJMC	MONTCLAIR	19,743	NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PLFDNJPF	PLAINFIELD	34,490	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			PTSNNJAR	PATERSON	32,485	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
			RGWDNJRW	RIDGEWOOD	30,107	No	No	Triggers
			RMSYNJRM	RAMSEY	27,744	No	No	Triggers
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			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
NBRGNJNB	NORTH BERGEN	23,220	NBWKNJNB	NEW BRUNSWICK	#N/A	No	?	Triggers
			NWRKNJ02	MARKET	50,198	No	No	Triggers
			NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
			PSSCNJPS	PASSAIC	45,516	No	No	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
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NBWKNJNB	NEW BRUNSWICK	#N/A	NWRKNJ02	MARKET	50,198	No	?	?
			NWRKNJIR	IRONBOUND	27,194	No	?	Triggers
			PSSCNJPS	PASSAIC	45,516	No	?	?
			PSWYNJPI	PISCATAWAY	13,282	No	?	Triggers
			RCPKNJ02	ROCHELLE PARK	20,897	No	?	Triggers
			RTFRNJRU	RUTHERFORD	38,012	No	?	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	?	Triggers
			UNCYNJ02	UNION CITY	39,965	No	?	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	?	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	?	Triggers
NWRKNJ02	MARKET	50,198	NWRKNJIR	IRONBOUND	27,194	No	No	Triggers
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			RCPKNJ02	ROCHELLE PARK	20,897	No	No	Triggers
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			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
RTFRNJRU	RUTHERFORD	38,012	RVEDNJOR	ORADELL	19,216	No	No	Triggers
			SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			SOVLNJSM	SOMERVILLE	23,547	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
RVEDNJOR	ORADELL	19,216	SMMTNJSM	SUMMIT	14,624	No	No	Triggers
			UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
SMMTNJSM	SUMMIT	14,624	UNCYNJ02	UNION CITY	39,965	No	No	Triggers

This chart utilizes the PNR data regarding access lines per wire center to identify the routes Verizon contended met the Triennial Review Order wholesale trigger for interoffice dark fiber transport in New Jersey LATA 224 and applies the impairment tests proposed by Bellsouth, Verizon, SBC and ALTS to those routes

Legend: "not found" means the PNR data was not availble; "yes" means the faciltity would continue to be a UNE under the relevant test; "no" means the facility would not continue to be a UNE under the relevant test; "triggers" means the TRO triggers would apply and "?" means data was not sufficient to determine if test was met

						BS and VZ Tests	SBC Test	ALTS Test
CLLI 1	CLLI 1 Name	Business Line C1	CLLI 2	CLLI 2 Name	Business Lines C2	No unbundling where 5,000 or more on at least one end	No unbundling between 5,000 and 10,000 on one end and over 10,000 on the other or both ends over 10,000	Unbundling where less than 10,000 on both ends, no unbundling where both ends over 40,000, TRO triggers applied on all other routes
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
SOVLNJSM	SOMERVILLE	23,547	UNCYNJ02	UNION CITY	39,965	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
UNCYNJ02	UNION CITY	39,965	WDBRNJWD	WOODBRIDGE	16,638	No	No	Triggers
			WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
			WORNNJWO	WEST ORANGE	13,796	No	No	Triggers
WDBRNJWD	WOODBRIDGE	16,638	WHIPNJWH	WHIPPANY	26,551	No	No	Triggers
WHIPNJWH	WHIPPANY	26,551	WORNNJWO	WEST ORANGE	13,796	No	No	Triggers

Appendix C:

Spreadsheets calculating the total number of interoffice transport routes that would be unbundled in Massachusetts, Rhode Island and New Jersey under the impairment tests proposed by the ILECs and ALTS

Appendix C:

Spreadsheets calculating the total number of interoffice transport routes that would be unbundled in Massachusetts, Rhode Island and New Jersey under the impairment tests proposed by the ILECs and ALTS

Exhibit 1: Massachusetts

HAI Model Release FCC - Expense Module Wire Center Level Calculations For Massachusetts		RBOC Loop and Transport Tests				ALTS Transport Test		
clli	business lines	Over 5000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Below 10,000	Between 10,000 and 40,000	Over 40,000
ACSHMAPL	4,551					1		
ACTNMAMA	7,630	1		1		1		
ADMSMAMA	1,522					1		
AGWMMARO	3,874					1		
AMHRMAFE	2,047					1		
AMHRMASP	3,188					1		
AMSBMAPL	3,006					1		
ANDVMAEL	9,870	1		1		1		
ARTNMAPL	6,761	1		1		1		
ASFDMAMA	58					1		
ASHBMASO	233					1		
ASHMMAPL	467					1		
ASLDMAMA	3,143					1		
ASNTMAMA	492					1		
ATHOMARI	3,258					1		
ATLBMABA	7,285	1		1		1		
AUBNMALG	4,412					1		
AYERMAPL	2,915					1		
BARRMAJA	398					1		
BCKTMAWA	6					1		
BDFRMAPA	8,512	1		1		1		
BITNMAWI	13,300	1	1				1	
BKLIMAMA	26,186	1	1		1		1	
BLMTMALE	5,309	1		1		1		
BLNDMAGL	12					1		
BLRCMAAN	11,728	1	1				1	
BLTWMAJA	1,267					1		
BMFDMAWA	83					1		
BOTNMAMA	1,099					1		
BRLNMAHI	247					1		
BRNRMACH	152					1		
BRNSMAMA	1,544					1		
BRNTMAWA	15,385	1	1		1		1	
BRPKMAWI	3,123						1	
BRTNMACR	23,349	1	1		1	1		
BRWRMACH	2,460					1		
BRWSMAYA	1,047					1		
BRYVMAUN	2,265					1		
BSRVMAST	4,008					1		
BSTNMABO	49,084	1	1		1			1
BSTNMAFR	24,140	1	1		1		1	
BSTNMAHA	60,552	1	1		1			1
BURLMABE	14,688	1	1				1	
BVRLMAEL	9,762	1		1		1		
BYTNMAMA	968					1		
BZBYMAPE	2,184					1		
CATNMANM	925					1		
CHCPMARI	5,325	1		1		1		
CHCPMAWE	3,314					1		
CHESMAMU	32					1		
CHFDMASB	73					1		
CHFRMANO	7,549	1		1		1		
CHHMMAOH	1,560					1		
CHLMMAST	19					1		
CHLSMACH	7,289	1		1		1		
CHMTMASO	2					1		
CLRNMAYA	8					1		
CLTNMACH	3,697					1		
CMBRMA01	14,018	1	1				1	
CMBRMAWA	34,728	1	1		1		1	
CMTNMAMA	6					1		
CNCRMAWA	7,828	1		1		1		
CNTNMAWA	10,715	1	1			1		
CNWYMASH	48					1		
CRVRMAMA	896					1		
CTMTMADE	579					1		
DDHMMAWA	14,071	1	1				1	
DGTNMAEL	363					1		
DLTNMACA	1,114					1		
DNNSMAYA	697					1		

HAI Model Release FCC - Expense Module Wire Center Level Calculations For Massachusetts		RBOC Loop and Transport Tests				ALTS Transport Test		
clli	business lines	Over 5000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Below 10,000	Between 10,000 and 40,000	Over 40,000
DNVSMAHI	13,173	1	1				1	
DRCHMAAD	12,646	1	1				1	
DRCTMAMM	1,549					1		
DXBRMACH	1,639					1		
EBSTMASA	6,229	1		1		1		
EBWRMABE	1,613					1		
EDGLMAMA	636					1		
EDGRMAPP	14					1		
EHMPMARA	3,024					1		
ELNMMAPL	3,902					1		
ESSXMASP	875					1		
ESTNMANM	4,519					1		
FKLNMAMC	6,999	1		1		1		
FLMOMAMG	4,856					1		
FLRVMANM	26,956	1	1		1		1	
FRMNMAUN	23,736	1	1		1		1	
FTBGMAMA	10,598	1	1				1	
FXBOMACO	3,771					1		
GFTNMAWO	2,423					1		
GLCSMAEL	5,949	1		1		1		
GLVLMAHI	33					1		
GNDLMASU	9,691	1		1		1		
GNFDMACH	6,620	1		1		1		
GRBRMASC	2,114					1		
GRNRMAWE	4,796					1		
GRTNMAHO	946					1		
GRTWMAWI	1,728					1		
GRVIMAWG	75					1		
HBTNMAMA	227					1		
HDSNMAFR	6,164	1		1		1		
HLDNMAHO	2,304					1		
HLSTMACH	3,208					1		
HLYKMAMA	15,788	1	1		1		1	
HMPDMAMA	606					1		
HMTNMAWI	1,191					1		
HNDLMASO	138					1		
HNHMMAGR	9,317	1		1		1		
HNTNMAMA	80					1		
HNVRMACO	4,034					1		
HPTNMAHR	2,712					1		
HRVRMALI	364					1		
HRWCMAMA	1,498					1		
HSTNMAMA	58					1		
HTFDMACH	921					1		
HVHLMAWI	12,362	1	1				1	
HYNSMAOC	11,319	1	1				1	
HYPKMAHA	4,328					1		
INORMARL	2,864					1		
IPSWMACO	3,229					1		
KGTNMASL	2,483					1		
LCSRMAGR	1,768					1		
LDLWMAWI	2,164					1		
LEE_MAHI	822					1		
LENXMAWA	1,272					1		
LGMDMALO	1,436					1		
LMNSMASC	9,113	1		1		1		
LNBGMASC	796					1		
LTTNMAKI	2,718					1		
LWLLMAAP	20,859	1	1		1		1	
LWRNMACA	30,022	1	1		1		1	
LXTNMAWA	15,835	1	1		1	1		
LYFDMACA	1,142					1		
LYNNMACH	18,330	1	1		1		1	
MARNMAMI	1,021					1		
MDLBMAJA	4,299					1		
MEFDMAPL	2,518					1		
MEWYMAVI	1,407					1		
MLBRMAGR	2,561						1	
MLDNMAEL	35,953	1	1		1		1	
MLFLMACR	241					1		

HAI Model Release FCC - Expense Module Wire Center Level Calculations For Massachusetts		RBOC Loop and Transport Tests				ALTS Transport Test		
clli	business lines	Over 5000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Below 10,000	Between 10,000 and 40,000	Over 40,000
MLFRMAWA	10,385	1	1				1	
MLISMAMA	2,324					1		
MLTNMAAD	5,139	1		1		1		
MNCHMASU	1,253					1		
MNFDMABR	4,966					1		
MNMTMAMA	627					1		
MNSNMAMA	691					1		
MRBLMAPL	3,667					1		
MRBOMAMA	14,314	1	1				1	
MRFDMAMA	2,810					1		
MRMCMACE	686					1		
MSHPMAGN	1,580					1		
MTAGMACE	115					1		
MTPSMAMH	1,200					1		
MYNRMAWA	3,648					1		
NADMMASU	2,791					1		
NATLMAOE	6,726	1		1		1		
NATNMAMA	11,283	1	1				1	
NBFDMASM	1,615					1		
NBFRMAAE	21,172	1	1		1		1	
NBPTMAGR	8,224	1		1		1		
NCHLMAGR	1,572					1		
NCKTMAUN	2,796					1		
NDHMMAPI	14,015	1	1				1	
NFRMMAED	2,459					1		
NRBOMASC	6,993	1		1		1		
NRDGMACE	2,970					1		
NRFDMAMA	394					1		
NRTNMATA	2,139					1		
NRWDMAVE	14,343	1	1				1	
NRWLMAMA	1,793					1		
NTCKMAEC	12,747	1	1				1	
NWTNMAWA	26,922	1	1		1		1	
OKHMMARU	88					1		
ORLNMAYA	1,795					1		
ORNGMASM	683					1		
OSVLMAWB	2,045					1		
OTISMAEO	2					1		
OXFRMAWH	1,729					1		
PBDYMACE	9,499	1		1		1		
PLMOMACO	8,377	1		1		1		
PLMRMAPL	2,403					1		
PPRLMAHI	1,353					1		
PRTNMABO	535					1		
PRVNMAWI	2,185					1		
PTFDMAFE	11,780	1	1				1	
PTRSMAEA	6					1		
QNCYMAHA	22,174	1	1		1		1	
RCPTMAMA	1,220					1		
RDNGMALI	5,048	1		1		1		
REVRMABE	5,623	1		1		1		
RHBTMABA	1,213					1		
RKLDMAWE	8,834	1		1		1		
RNDHMAME	9,270	1		1		1		
ROCHMANO	781					1		
RSSLMAMA	16					1		
RTLDMAMA	677					1		
RWLYMAHA	1,281					1		
RXBRMAWA	13,795	1	1				1	
SAGSMACE	5,661	1		1		1		
SALMMANO	11,278	1	1				1	
SBDGMAMA	3,630					1		
SBTNMAEF	8,169	1		1			1	
SCNSMABH	2					1		
SCTTMAFP	2,469					1		
SDBRMABP	4,403					1		
SDFDMACO	1,361					1		
SGMRMAYA	2,380					1		
SGTNMAWA	8,201	1		1		1		
SHFDMAMA	290					1		

HAI Model Release FCC - Expense Module
Wire Center Level Calculations For Massachusetts

clli	business lines	RBOC Loop and Transport Tests: Over 5000	Over 10,000	Between 5,000 and 10,000	Over 15,000	ALTS Transport Test: Below 10,000	Between 10,000 and 40,000	Over 40,000
SHRNMAHI	2,819					1		
SHRWMAGR	5,638	1		1		1		
SHRYMACH	607					1		
SLFLMACR	601					1		
SNDSMAOT	49					1		
SOVLMACE	13,741	1	1				1	
SPFDMAWO	30,132	1	1		1		1	
SPNCMAME	1,430					1		
STBGMAMA	2,142					1		
STBRMAPI	2					1		
STNGMABR	985					1		
SWCKMACO	1,144					1		
TMTNMAME	472					1		
TNTNMAPL	14,997	1	1				1	
TPFDMACE	2,106					1		
TRFLMAAA	1,319					1		
TWBYMARO	6,499	1		1			1	
TWNSMARA	1,368					1		
TYNGMAKE	2,293					1		
UPTNMAPI	604					1		
UXBRMACO	1,273					1		
VYHVMAED	53					1		
WAHMMAHI	2,859					1		
WAREMABA	1,626					1		
WBSTMANE	4,481					1		
WBTNMAPR	2,084					1		
WHMNMAWA	2,191					1		
WHVLMAPA	2,540					1		
WKFDMABE	12,392	1	1			1	1	
WLBGMAMA	466					1		
WLBRMAMA	1,807					1		
WLHMMASP	22,464	1	1		1		1	
WLLFMAMA	136					1		
WLMGMAMA	12,208	1	1				1	
WLPLMASS	4,494					1		
WLSLMALA	7,614	1		1		1		
WLTWMAWA	1,521					1		
WMNSMAEL	800					1		
WNCHMAMA	25,219	1	1		1		1	
WNDNMAGR	1,497					1		
WNTHMAMA	1,816					1		
WNWBMAMA	678					1		
WOTNMAWI	91					1		
WPBDMAPI	1,799					1		
WRCSMACE	45,162	1	1		1			1
WRHMMASO	1,978					1		
WRRNMAQU	17					1		
WRXBMABE	8,105	1		1		1		
WSBGMALE	94					1		
WSBOMASU	9,638	1		1		1		
WSFDMAWA	7,391	1		1		1		
WSFRMADE	4,062					1		
WSPTMADR	1,445					1		
WTTWMAWC	8,561	1		1		1		
WYLDMABP	1,592					1		
WYMOMAMI	10,477	1	1				1	
Total number of wire centers meeting each threshold		86	47	39	22	219	45	3
Total number of transport routes meeting each threshold		3655	1081	741	231	23871	990	3

Total number of non-rural wire centers in Massachusetts	266
Number of possible transport routes between 5,000 and 10,000 and more than 10,000	1833
Total number of routes Meeting SBC Test	2914

Appendix C:

Spreadsheets calculating the total number of interoffice transport routes that would be unbundled in Massachusetts, Rhode Island and New Jersey under the impairment tests proposed by the ILECs and ALTS

Exhibit 2: Rhode Island

HAI Model Release FCC - Expense Module
Wire Center Level Calculations for Rhode Island

clli	business lines	RBOC Loop and Transport Tests: Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	ALTS Transport Tests: Under 10,000	Between 10,000 and 40,000	Over 40,000
ASTNRIAN	4,652					1		
ASWYRIYB	340					1		
BLISRIOT	-					1		
CNTNRIPH	12,045	1	1				1	
CNTYRIST	1,310					1		
CRLNRIMA	576					1		
EGRNRICH	4,414					1		
EPRVRINB	12,615	1	1				1	
GLCSRIWG	1,888					1		
HPVYRIMA	499					1		
JMTWRINA	613					1		
LTCMRIWE	379					1		
NKTWRIPH	2,507					1		
NPRVRIMS	7,782	1		1		1		
NRGNRIMA	6,203	1		1		1		
NWPTRIBU	10,065	1	1				1	
PRVDRIBR	13,801	1	1				1	
PRVDRIWA	40,722	1	1		1			1
PSCGRIPA	1,826						1	
PTMORIEM	2,303					1		
PWTCRIHI	22,188	1	1		1		1	
RVSDRISO	1,593					1		
SCTTRISI	1,018					1		
TVTNRIHA	1,477					1		
WKPGRIWA	819					1		
WNSCRICL	12,040	1	1				1	
WRLYRIMA	3,426					1		
WRRNRIEV	6,190	1		1		1		
WRWKRIWS	14,411	1	1				1	
WWWKRIMA	8,921	1		1		1		
Total number of wire centers meeting each threshold		12	8	4	2	21	8	1
Total number of transport routes meeting each threshold		66	28	6	1	210	28	0

Total number of non-rural wire centers in Rhode Island	30
Number of possible transport routes between 5,000 and 10,000 and more than 10,000	32
Total number of routes meeting SBC test	60

Appendix C:

Spreadsheets calculating the total number of interoffice transport routes that would be unbundled in Massachusetts, Rhode Island and New Jersey under the impairment tests proposed by the ILECs and ALTS

Exhibit 3: New Jersey (Contains confidential information)

HAI Model Release FCC - Expense Module Wire Center Level Calculations for New Jersey		RBOC Loop and Transport Tests for New Jersey				ALTS Transport Tests			Proprietary New Jersey Data	RBOC Loop and Transport Tests				Info missing
clli	business lines	Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Under 10,000	Between 10,000 and 40,000	Over 40,000		Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	
ABSCNJ02	2,293					1								1
ALTWNJAL	2,618					1			[xxxxxx]					
ASPKNJAP	15,017	1	1		1		1		[xxxxxx]					
ATCYNJAC	21,895	1	1		1		1							1
ATHGNJAH	2,599					1			[xxxxxx]					
AVLNNJ01	1,818					1								1
BCHNNJ01	1,078					1			[xxxxxx]					
BDBKNJBD	18,218	1	1		1		1		[xxxxxx]					
BDMNNJ01	5,086	1		1		1			[xxxxxx]					
BGTNNJBG	5,657	1		1		1								1
BKWDNJBW	6,729	1		1		1			[xxxxxx]					
BLFDNJBL	9,445	1		1		1			[xxxxxx]					
BLVLNJBE	7,350	1		1		1			[xxxxxx]					
BNTNNJBN	15,173	1	1		1		1		[xxxxxx]					
BOTWNJBO	3,283					1			[xxxxxx]					
BRGTNJ01	1,638					1			[xxxxxx]					
BRIGNJ01	1,288					1								1
BRLNNJBR	7,527	1		1		1			[xxxxxx]					
BRVLNJBE	9,206	1		1		1			[xxxxxx]					
BURLNJBU	9,234	1		1		1			[xxxxxx]					
BWMLNJ01	1,463					1			[xxxxxx]					
BWTWNJBT	4,098					1			[xxxxxx]					
BYNNNJ02	14,140	1	1				1		[xxxxxx]					
BYVLNJBV	2,413					1			[xxxxxx]					
CARTNJCA	4,550					1			[xxxxxx]					
CDVLNJCD	102					1								1
CFPKNJCS	15,685	1	1		1		1		[xxxxxx]					
CFTNNJCF	13,488	1	1				1		[xxxxxx]					
CLSTNJCO	16,634	1	1		1		1		[xxxxxx]					
CLWDNJCW	6,503	1		1		1			[xxxxxx]					
CLWLNJCW	14,367	1	1				1		[xxxxxx]					
CMCHNJCH	4,471					1								1
CMDNNJCE	15,888	1	1		1		1		[xxxxxx]					
CNFRNJCR	13,731	1	1				1		[xxxxxx]					
CNMNNJRT	5,690	1		1		1			[xxxxxx]					
CRHLNJCH	8,091	1		1		1			[xxxxxx]					
DNLNNJDU	8,423	1		1		1			[xxxxxx]					
DNVLNJRK	15,799	1	1		1		1		[xxxxxx]					
DOVRNJDO	13,326	1	1				1		[xxxxxx]					
DUMTNJDM	10,526	1	1				1		[xxxxxx]					
EATNNJEA	10,464	1	1				1		[xxxxxx]					
EDSNNJED	23,511	1	1		1		1		[xxxxxx]					
EDVRNJ01	4,005					1			[xxxxxx]					
EGTWNJET	3,673					1			[xxxxxx]					
EHCYNJEH	1,911					1								1
ELZBNJEL	37,174	1	1		1		1		[xxxxxx]					
EMERNJEM	363					1			[xxxxxx]					
ENVLNJEW	17,353	1	1		1		1							1
ENWDNJEN	32,873	1	1		1		1		[xxxxxx]					
EORNNJEO	21,494	1	1		1		1		[xxxxxx]					
ERLKNJEL	2,008					1			[xxxxxx]					
FKRVNJ01	3,633					1			[xxxxxx]					
FKVLNJFK	27					1			[xxxxxx]					
FLRNNJFL	885					1			[xxxxxx]					
FNPKNJFP	8,137	1		1		1			[xxxxxx]					
FRDLNJ01	3,764					1			[xxxxxx]					
FRDSNJFR	12,576	1	1				1		[xxxxxx]					
FRFDNJFA	29,520	1	1		1		1		[xxxxxx]					
FRHDNJFH	24,994	1	1		1		1		[xxxxxx]					
FRLNNJFL	17,769	1	1		1		1		[xxxxxx]					
FTLENJLE	22,867	1	1		1		1		[xxxxxx]					
GLBONJGB	9,275	1		1		1			[xxxxxx]					
GLCYNJGL	7,077	1		1		1			[xxxxxx]					

HAI Model Release FCC - Expense Module Wire Center Level Calculations for New Jersey		RBOC Loop and Transport Tests for New Jersey				ALTS Transport Tests			Proprietary New Jersey Data	RBOC Loop and Transport Tests				Info missing
clli	business lines	Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Under 10,000	Between 10,000 and 40,000	Over 40,000		Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	
HBVLNJ01	4,714					1			[xxxxxx]					
HCKNNJHK	42,017	1	1		1			1	[xxxxxx]					
HDFDNJHD	20,485	1	1		1		1		[xxxxxx]					
HITNNJHI	7,473	1		1		1								1
HKTNNJHT	5,236	1		1		1								1
HLDLNJWE	29,085	1	1		1		1		[xxxxxx]					
HLDNNJ01	22,457	1	1		1		1		[xxxxxx]					
HMTNNJHA	6,093	1		1		1								1
HOLMNJHO	1,609					1			[xxxxxx]					
HPWLNJHP	1,412					1								1
IVTNNJES	12,701	1	1				1		[xxxxxx]					
JMBGNJJA	1,716					1			[xxxxxx]					
JRCYNJBR	32,933	1	1		1		1		[xxxxxx]					
JRCYNJJO	35,722	1	1		1		1		[xxxxxx]					
KNBGNJKE	3,105					1			[xxxxxx]					
KRNYNJKN	12,620	1	1				1		[xxxxxx]					
KYPTNJKY	17,251	1	1		1		1		[xxxxxx]					
LDVLNJLD	899					1								1
LEHTNJ01	2,348					1			[xxxxxx]					
LGBRNJLB	13,288	1	1				1		[xxxxxx]					
LKHRNJ01	1,301					1			[xxxxxx]					
LKWDNJLK	19,970	1	1		1		1		[xxxxxx]					
LMVLNJLV	1,956					1			[xxxxxx]					
LNDNNJ01	6,907	1		1		1			[xxxxxx]					
LNNGNJHC	3,230					1			[xxxxxx]					
LOTPNJ01	3,528					1								1
LRSPNJLS	17,655	1	1		1		1							1
LTFLNJLF	16,604	1	1		1		1		[xxxxxx]					
LTFYNJLF	24,442	1	1		1		1		[xxxxxx]					
LVLTNJSP	2,299					1			[xxxxxx]					
LVTNNJLI	13,876	1	1				1		[xxxxxx]					
MARLNJMA	17,358	1	1		1		1		[xxxxxx]					
MCTWNJPN	29					1								1
MCVLNJMC	14,279	1	1				1							1
MDFDNJ01	6,155	1		1		1			[xxxxxx]					
MDSNNJMA	14,858	1	1				1		[xxxxxx]					
MDTWNJMD	4,428					1			[xxxxxx]					
MGTNNJMI	5,211	1		1		1			[xxxxxx]					
MHVLNJME	23,878	1	1		1		1		[xxxxxx]					
MLBNNJMB	20,761	1	1		1		1		[xxxxxx]					
MLDGNJ01	2,178					1								1
MLHLNJMH	448					1			[xxxxxx]					
MLVLNJMI	6,747	1		1		1								1
MNHMNJMD	1,638					1			[xxxxxx]					
MNHWNJ01	3,880					1			[xxxxxx]					
MNJTNJ01	6,571	1		1		1			[xxxxxx]					
MNSQNJ01	6,206	1		1		1			[xxxxxx]					
MNTUNJWE	2,071					1			[xxxxxx]					
MRTWNJMR	40,587	1	1		1			1	[xxxxxx]					
MSTWNJMO	26,008	1	1		1		1		[xxxxxx]					
MTCHNJMT	28,025	1	1		1		1		[xxxxxx]					
MTCLNJMC	19,743	1	1		1		1		[xxxxxx]					
MTHLNJMH	6,560	1		1		1			[xxxxxx]					
MTVWNJMV	18,030	1	1		1		1		[xxxxxx]					
NBRGNJNB	23,220	1	1		1		1		[xxxxxx]					
NEGPNJ01	1,273					1			[xxxxxx]					
NFLDNJNF	2,323					1			[xxxxxx]					
NPTUNJNT	6,898	1		1		1			[xxxxxx]					
NSHNNJ01	957					1			[xxxxxx]					
NTCNNJ01	3,820					1			[xxxxxx]					
NTLYNJNU	11,158	1	1				1		[xxxxxx]					
NWPVNJMH	12,592	1	1				1		[xxxxxx]					
NWRKNJ02	50,198	1	1		1			1	[xxxxxx]					

HAI Model Release FCC - Expense Module Wire Center Level Calculations for New Jersey		RBOC Loop and Transport Tests for New Jersey				ALTS Transport Tests			Proprietary New Jersey Data	RBOC Loop and Transport Tests				Info missing
clli	business lines	Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Under 10,000	Between 10,000 and 40,000	Over 40,000		Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	
NWRKNJ03	17,532	1	1		1		1		[xxxxxx]					
NWRKNJIR	27,194	1	1		1		1		[xxxxxx]					
NWRKNJWA	5,688	1		1		1			[xxxxxx]					
OCCYNJOC	3,847					1								1
OKLDNJ01	6,277	1		1		1			[xxxxxx]					
ORNTNJOE	1,650					1			[xxxxxx]					
PAMBNJPM	10,406	1	1				1		[xxxxxx]					
PGRVNJPG	1,639					1			[xxxxxx]					
PHBGNJPH	5,958	1		1		1								1
PLBONJPB	3,624					1			[xxxxxx]					
PLFDNJPF	34,490	1	1		1		1		[xxxxxx]					
PLRMNJ01	1,305					1								1
PMTNNJPB	799					1			[xxxxxx]					
PNNKNJPN	17,281	1	1		1		1							1
PNTNNJPN	2,588					1								1
PNVLNJPV	1,485					1			[xxxxxx]					
PRPLNJPA	5,038	1		1		1			[xxxxxx]					
PRTNNJPC	14,044	1	1				1							1
PSSCNJPS	45,516	1	1		1			1	[xxxxxx]					
PSVLNJPL	12,806	1	1				1							1
PSWYNJPI	13,282	1	1				1		[xxxxxx]					
PTPLNJPP	8,313	1		1		1			[xxxxxx]					
PTSNNJAR	32,485	1	1		1		1							1
RBVLNJRB	6,966	1		1		1			[xxxxxx]					
RCPKNJ02	20,897	1	1		1		1		[xxxxxx]					
RDBKNJRB	24,383	1	1		1		1		[xxxxxx]					
RGWDNJRW	30,107	1	1		1		1		[xxxxxx]					
RHWYNJRA	19,546	1	1		1		1		[xxxxxx]					
RMSYNJRM	27,744	1	1		1		1		[xxxxxx]					
RNMDNJBK	2,788					1			[xxxxxx]					
RSLLNJRL	20,104	1	1		1		1		[xxxxxx]					
RTFRNJRU	38,012	1	1		1		1		[xxxxxx]					
RVDLNJPL	19,492	1	1		1		1		[xxxxxx]					
RVEDNJOR	19,216	1	1		1		1		[xxxxxx]					
RVSDNJRS	4,281					1			[xxxxxx]					
SALMNJSA	3,097					1			[xxxxxx]					
SICYNJSI	1,631					1								1
SMMTNJSM	14,624	1	1				1		[xxxxxx]					
SMPTNJ01	5,819	1		1		1								1
SORGNJSO	10,974	1	1				1		[xxxxxx]					
SORVNJSR	17,477	1	1		1		1		[xxxxxx]					
SOVLNJSM	23,547	1	1		1		1							1
SPLKNJSL	9,792	1		1		1			[xxxxxx]					
SPMLNJ01	741					1			[xxxxxx]					
SPWDNJSW	3,006					1			[xxxxxx]					
SRCYNJ01	1,704					1			[xxxxxx]					
SUCCNJSU	6,175	1		1		1			[xxxxxx]					
SWBONJSW	1,242					1			[xxxxxx]					
SYRVNJSA	5,478	1		1		1			[xxxxxx]					
TKHONJTK	148					1								1
TMRVNJTR	17,565	1	1		1		1		[xxxxxx]					
TRENNJTE	43,931	1	1		1			1						1
UNCYNJ02	39,965	1	1		1		1		[xxxxxx]					
UNINNJUV	22,724	1	1		1		1		[xxxxxx]					
VLLSNJ02	1,550					1								1
VNCYNJVN	3,740					1								1
VNHSNJVH	1,490					1			[xxxxxx]					
VNLDNJVL	12,706	1	1				1							1
VNTWNJ01	1,231					1			[xxxxxx]					
WASHNJWA	2,347					1								1
WDBINJDS	324					1								1
WDBRNJWD	16,638	1	1		1		1		[xxxxxx]					
WDBYNJWB	8,783	1		1		1			[xxxxxx]					

HAI Model Release FCC - Expense Module Wire Center Level Calculations for New Jersey		RBOC Loop and Transport Tests for New Jersey				ALTS Transport Tests			Proprietary New Jersey Data	RBOC Loop and Transport Tests				Info missing
clli	business lines	Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	Under 10,000	Between 10,000 and 40,000	Over 40,000		Over 5,000	Over 10,000	Between 5,000 and 10,000	Over 15,000	
WDPTNJWP	1,493					1			[xxxxxx]					
WDTWNJWT	619					1			[xxxxxx]					
WHHRNJWH	4,096					1								1
WHIPNJWH	26,551	1	1		1		1		[xxxxxx]					
WHNGNJ01	1,316					1			[xxxxxx]					
WLBONJWB	3,737					1			[xxxxxx]					
WLTWNJ02	4,858					1			[xxxxxx]					
WLWDNJWI	6,139	1		1		1								1
WMFRNJ01	2,296					1			[xxxxxx]					
WORNNJWO	13,796	1	1				1		[xxxxxx]					
WOVLNJWO	7,840	1		1		1			[xxxxxx]					
WRTWNJFD	1,413					1			[xxxxxx]					
WSFDNJWS	17,371	1	1		1		1		[xxxxxx]					
WYCKNJWK	6,009	1		1		1			[xxxxxx]					
Total number of wire centers meeting each threshhold		126	86	40	62	117	81	5						40
Total number of transport routes meeting each threshold		7875	3655	780	1581	6786	3240	10						

Total number of non-rural wire centers in New Jersey	203	Total number of non-rural wire centers in New Jersey for which proprietary data exists	163
Number of possible transport routes between wire centers with 5,000 and 10,000 and more than 10,000	3440	Number of possible transport routes between 5,000 and 10,000 and more than 10,000	[xxxxxx]
Total Number of routes meeting SBC test	7095	Total Number of routes meeting SBC test	[xxxxxx]

Appendix D:

Verizon testimony and data submitted in state TRO proceedings

Appendix D:

Verizon testimony and data submitted in state TRO proceedings

Exhibit 1: Massachusetts

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers	)	D.T.E. 03-60

SUPPLEMENTAL PANEL TESTIMONY OF VERIZON MASSACHUSETTS

(Mass Market Switching, Transport and Loops)

Members of the Panel:

John Conroy
John White

December 19, 2003

1 **Introduction**

2 Q. Please state your names and occupations.

3 A. My name is John Conroy, and I am Vice President – Regulatory for Verizon
4 Massachusetts. My name is John White, and I am currently the President of 8
5 Degree Research and Consulting, Inc., located in North Salem, New York. I
6 recently retired from employment with Verizon Communications.

7 Q. Are you the same John Conroy and John White that filed direct testimony in this
8 proceeding?

9 A. Yes, we are.

10 Q. What is the purpose of your supplemental testimony?

11 A. The purpose of our supplemental testimony is to present additional evidence
12 demonstrating that under the standards set forth in the Federal Communications
13 Commission's ("FCC") Triennial Review Order, Verizon MA is not required to
14 unbundle mass market switching in the identified markets, dedicated transport for
15 the specific routes, or high capacity loops at the customer locations described in
16 this testimony. The additional evidence takes into account the information
17 received from the CLECs that responded to the Department's information
18 requests dated October 9, 2003.

19 Q. What are the results of your review of the CLECs' information responses?

20 A. For mass market switching, the data provided by the CLECs confirm that they are
21 using their own switches to provide voice grade service that meets the FCC's non-
22 impairment triggers in all of the markets we identified in our initial testimony:

Density Zones 1, 2 and 3 in the Boston-Cambridge-Quincy MSA; Density Zone 3 in the Providence-New Bedford-Fall River MSA; and Density Zones 2 and 3 in the Springfield and Worcester MSAs. For interoffice transport, the CLEC discovery data confirmed that the FCC's non-impairment triggers have been met by the presence of CLEC transport facilities on 186 routes between Verizon MA wire centers. For high capacity loops, the CLEC data demonstrate that 70 buildings meet the FCC's triggers and should therefore be eliminated as locations to which Verizon MA is required to provide unbundled high capacity loops. We describe these results in greater detail below.

Mass Market Switching

Q. What additional data did you evaluate with respect to the mass market switching trigger?

A. In response to the Department's First Set of Information Requests, several CLECs provided a list of the wire centers where they provide telephone service to mass market customers at the DS0 level of service utilizing their own switching. In addition, those CLECs provided the total number of voice grade equivalent lines provided to customers in each wire center. Verizon MA has reviewed and analyzed this information in an effort to assess how the CLECs' self-reported data compares to the information Verizon MA analyzed and submitted as part of its Initial Direct Testimony. The first step in Verizon MA's analysis was to accumulate each CLEC's response for each wire center that Verizon MA had

evaluated in its Initial Direct Testimony. Verizon MA then modified Attachment 2 of its Initial Direct Testimony by adding a column representing CLEC counts of mass market DS0s, summarized on a Density Zone and MSA basis. This comparison is shown on Attachment 1, Part 1, attached to this Supplemental Testimony.

Q. Did all of the CLECs provide the information requested in the Department's information requests?

A. No. For example, AT&T's responses to the Department's information requests did not specify the wire centers or provide the line counts where it provides local circuit switching to mass market customers. As a result, with respect to AT&T, Verizon MA continues to rely solely on the evidence it produced in the Line Count Study filed with our Initial Direct Testimony which identifies where AT&T is providing local circuit switching on a DS0 basis. In addition, some carriers did not answer the Department's questions or the answers were unspecific. In those cases, Verizon MA has not included the data in Attachment 1.

Q. What were the results of your analysis?

A. As demonstrated in Attachment 1, the CLEC responses confirm that the study results produced in our Initial Direct Testimony are consistent with CLEC data. Moreover, Attachment 1 shows that there are additional CLECs providing service to mass market customers using their own switches that were not included in our Initial Direct Testimony. CLECs that are included in Attachment 1 based solely on their responses to the Department's information requests are highlighted in

bold-faced print. Regardless of whether the data is reviewed using only the Verizon MA study results, only the CLEC responses, or a combination of both, the results clearly demonstrate that, as indicated in our Initial Direct Testimony, Verizon MA meets the self-provisioning trigger for mass market switching in Density Zones 1, 2 and 3 in the Boston-Cambridge-Quincy MSA; Density Zone 3 in the Providence-New Bedford-Fall River MSA; and Density Zones 2 and 3 in the Springfield and Worcester MSAs.

Q. Did you perform any other analysis on the CLEC-provided data on local switching?

A. Yes. As noted above, Verizon MA compared the CLEC-provided data with Verizon MA data on a wire center basis as well. That comparison, shown on Attachment 1, Part 2 confirms that the Verizon MA evidence presented in its Initial Direct Testimony accurately reflects the extent to which CLECs are using their own switches to provide local exchange service to mass market customers in Massachusetts. As discussed in our Initial Direct Testimony, although Verizon MA does not believe it is appropriate to evaluate the mass market switching trigger on a wire center basis, the results of the summary of the CLEC responses demonstrates that in each wire center where Verizon MA's data demonstrated there are three or more CLECs serving mass market customers, CLEC data confirms Verizon MA data.

Q. Does your analysis of the CLEC provided data change your proposal regarding mass market switching?

A. No. The CLECs' data responses confirm that CLECs are actively operating in Massachusetts and Verizon MA's evidence and conclusion that the self-provisioning trigger for mass market switching is satisfied in Density Zones 1, 2 and 3 in the Boston-Cambridge-Quincy MSA; Density Zone 3 in the Providence-New Bedford-Fall River MSA; and Density Zones 2 and 3 in the Springfield and Worcester MSAs.

Dedicated Interoffice Transport

Q. What additional data did you evaluate with respect to the triggers for dedicated interoffice transport?

A. In response to the Department's First Set of Information Requests, many carriers identified multiple Verizon MA wire centers where they have either self-provisioned transport facilities or obtained dedicated transport facilities from a provider other than Verizon MA. Carriers also identified in their responses whether they offer transport facilities on a wholesale basis to other carriers. Verizon MA reviewed the data provided by the CLECs and compared that data to the evidence presented in our direct testimony.[1]

Q. What supplemental evidence does Verizon MA have for the analysis of dedicated interoffice transport?

[1] Verizon MA notes that not all carriers have responded to all of the Department's information requests. Moreover, Verizon MA has identified numerous problems and inadequacies with certain responses of a number of carriers. The absence of full and complete responses to the Department's information requests may well result in an undercount of transport facilities under the self-provisioning carrier or wholesale provider triggers.

A. Verizon MA's initial transport triggers case presented evidence showing that three or more self-provisioning carriers, or two or more wholesale transport providers, have installed transport facilities that directly or indirectly connect 194 pairs of Verizon MA wire centers. Verizon MA's initial conclusion that 194 interoffice routes meet one or both of the FCC's triggers for DS1, DS3 and dark fiber transport was based on its own information about which carriers have operational, fiber-based collocation, or on industry knowledge or other information that is publicly available. This is described in detail in Verizon MA's Initial Direct Testimony. Verizon MA now has incorporated into its dedicated transport triggers analysis information provided by CLECs in response to the Department's First Set of Information Requests. In response to request DTE 1-1, for instance, numerous carriers provided listings of Verizon MA wire centers at which they have deployed transport facilities that directly or indirectly provide connections to other Verizon MA wire centers. Additionally, in response to request DTE 1-2, carriers listed Verizon MA wire centers at which they have obtained, from a carrier other than Verizon MA, transport facilities that directly or indirectly provide connections to other Verizon MA wire centers and identified the underlying wholesale transport provider(s). In response to the Department's information requests, carriers that have self-provisioned transport facilities into a Verizon MA wire center also indicated whether they offer those dedicated

1 transport facilities (connecting Verizon MA wire centers) to competing carriers on
2 a wholesale basis.[2]
3 Q. Do the competing carriers' responses to the Department's information requests
4 provide additional information on the routes that carriers offer at wholesale?
5 A. Yes. Request DTE 1-4 required carriers to identify whether they provide
6 dedicated transport to other carriers and, if so, to state the capacity of each facility
7 that connects to a Verizon MA wire center. Verizon MA's supplemental analysis
8 reflects this new information. With the exception of one carrier, if a carrier
9 responded to DTE 1-4 that it does not offer dedicated transport services in
10 Massachusetts to other carriers on a wholesale basis, Verizon MA did not identify
11 that carrier as a wholesale provider of transport services for purposes of its
12 analysis. Verizon MA did not change the wholesale designation of one carrier,
13 however, because although that carrier claimed not to offer wholesale transport
14 facilities, other carriers indicated that they were, in fact, obtaining transport
15 facilities or services on a wholesale basis from that carrier. Thus, Verizon MA
16 reasonably concluded that this carrier is both a wholesale provider and a self-
17 provisioning competing carrier since reliable third-party evidence supporting this
18 conclusion was presented to the Department.
19 Q. How did Verizon MA identify the capacities at which the wholesale providers
20 offer dedicated transport?

[2] Certain providers identified by Verizon MA herein as wholesale transport providers did not respond to the Department's Subpoena Duces Tecum. These companies include NEESCom and NEON Communications. Accordingly, Verizon MA relied on other internal information or on publicly available data to determine whether these carriers provide wholesale transport facilities.

A. Verizon MA relied on carriers' responses to requests DTE 1-3 and 1-4 (where available) to determine on a route-by-route basis, the level of capacity a competing carrier has obtained from a provider other than Verizon MA and/or the type and capacity of transport facilities offered to other carriers on a wholesale basis. If a carrier did not provide a response to the Department's information requests or did not provide a full or complete answer that would enable Verizon MA to determine the type and/or capacity of facilities, Verizon MA made reasonable assumptions for each provider. For instance, Verizon MA assumes that most carriers build fiber transport networks with sufficient capacity to meet future transport and connectivity requirements. NEON, for example, states on its website that its network is built with available capacity at all bandwidth levels from DS3s to OC48s. Additionally, many transport providers offer dark fiber facilities as an alternative to their managed transport services. Therefore, unless Verizon MA has evidence that a particular carrier does not offer a particular capacity level, Verizon MA assumed all wholesale providers make transport available at each capacity level (DS1, DS3 and dark fiber). This is consistent with our Initial Direct Testimony that demonstrated that the capacity of fiber is almost entirely a function of the electronics and can be operated at DS1, DS3, OC48 or higher. In contrast, Fibertech Networks and NEESCom declare in their website materials that they offer dark fiber only and typically leave it to their customers to light the fiber by installing multiplexing equipment. In its supplemental analysis, therefore, Verizon MA treats Fibertech and NEESCom as providers of only dark

fiber transport facilities (and not of DS1 and DS3 facilities). Absent similar specific evidence that the carriers identified in Attachments 3.C and 3.F refuse to sell DS1 and DS3 services, and dark fiber, on a particular route, the Department should find that these providers will sell DS1 and DS3 transport as well as dark fiber facilities on their routes.

Q. What are the results of Verizon MA's analysis of this additional evidence?

A. After incorporating the responses to the Department's discovery and making the adjustments described above, Verizon MA's evidence demonstrates that there are 186 direct routes that meet one or both of the FCC's two objective triggers for dark fiber transport (two in LATA 126, and 184 in LATA 128). Verizon MA's evidence further shows 185 direct routes – all of which are in LATA 128 – meet one or both of the FCC's triggers for DS3 dedicated transport. Verizon MA's evidence also shows that there are 174 direct routes, all in LATA 128, meeting the FCC's wholesale trigger. Only the wholesale trigger applies to DS1 capacity transport. Attachment 2 includes maps that show, by LATA, each of these routes.

Q. Please describe the evidence of transport routes in Massachusetts meeting the self-provisioning trigger for dark fiber.

A. The evidence shows that there are 182 routes between pairs of Verizon wire centers in Massachusetts meeting the FCC's self-provisioning trigger for dark fiber. Two (2) routes meet the trigger in LATA 126 and 180 routes meet the trigger in LATA 128. Each pair has (at least) the same three unaffiliated competing carriers with operational, fiber-based collocation facilities. The evidence showing that these

1 routes meet the trigger is presented in Attachments 3.A and 3.B, which identify the
2 relevant pair of wire centers for each route by LATA.[3]
3 Q. Please describe Verizon MA's evidence of transport routes meeting the FCC's
4 wholesale trigger for dark fiber.
5 A. In Massachusetts, 57 pairs of Verizon MA wire centers meet the FCC's wholesale
6 trigger for dark fiber. All of these routes are found in LATA 128. Each pair of wire
7 centers has (at least) the same two or more carriers that offer dark fiber facilities to
8 other carriers. Verizon MA's evidence that these transport routes meet the FCC's
9 wholesale trigger for dark fiber is shown by Verizon MA wire center and wholesale
10 provider in Attachment 3.C.
11 Q. Please describe the number of routes that satisfy either the self provisioning trigger
12 or the wholesale trigger for dark fiber.
13 A. Attachment 3.D lists the 186 routes (or pairs of wire centers) that satisfy either the
14 self-provisioning trigger for dark fiber or the wholesale trigger for dark fiber. The
15 total number of routes that satisfy either trigger is smaller than the sum of the routes
16 that meet the self-provisioning trigger (182) and the routes that meet the wholesale
17 trigger (57) because there is substantial overlap in the two sets of routes, *i.e.* many
18 routes satisfy both triggers.

[3] The proprietary versions of Attachments 3 A, B, C, E and F also identify the particular CLECs. These proprietary attachments are being filed with the Department and served on those parties that have signed the Protective Agreement in this proceeding. CLEC names are removed from the public versions of these Attachments.

Q. Please describe the evidence of transport routes in Massachusetts meeting the self-provisioning test for DS3 dedicated transport.

A. There are 145 routes between pairs of Verizon MA wire centers in Massachusetts meeting the FCC's self-provisioning trigger for DS3 dedicated transport. Each pair has (at least) the same three unaffiliated competing carriers with operational, fiber-based collocation facilities. The evidence showing that these routes meet the trigger is presented in Attachment 3.E, which shows the relevant routes by the wire centers they connect.

Q. Please describe Verizon MA's evidence of transport routes meeting the FCC's wholesale trigger for DS3 and DS1 dedicated transport.

A. In Massachusetts, 174 pairs of Verizon MA wire centers meet the FCC's wholesale trigger for DS1 and DS3 dedicated transport. Each pair of wire centers has (at least) the same two or more carriers that offer wholesale dedicated transport services to other carriers. The evidence showing that these routes meet the wholesale trigger for DS1 and DS3 transport is shown in Attachment 3.F.

Q. Please describe the number of routes that satisfy either the self-provisioning trigger or the wholesale trigger for DS3 dedicated transport?

A. Attachment 3.G lists the 185 routes that meet either the self-provisioning trigger for DS3 dedicated transport or the wholesale trigger for DS1 and DS3 dedicated transport in Massachusetts. Again, the total number of routes that satisfy either trigger is smaller than the sum of the routes that meet the self-provisioning trigger and the wholesale trigger because many of the routes meet both of the triggers.

1

2 **High Capacity Loops**

3 Q. What evidence does Verizon MA have for the analysis of high capacity loop
4 facilities?

5 A. In our November 14, 2003 Initial Direct Testimony, we indicated that Verizon MA
6 was unable to identify customer locations meeting the hi-cap loop triggers because
7 information on CLEC loop deployment was in the hands of the CLECs and Verizon
8 MA was not able to take carriers' responses to the Department's First Set of
9 Information Requests into account due to the timing of the carriers' responses.
10 Since that time, Verizon MA has reviewed responses to the Department's hi-cap
11 loop information requests. Verizon MA can now identify customer locations in
12 Massachusetts that satisfy the hi-cap loop triggers.

13 Q. Please describe the FCC's objective triggers for identifying the customer locations
14 for which competing carriers are not impaired without access to Verizon MA's hi-
15 cap loop facilities.

16 A. In its *Triennial Review Order*, the FCC found that requesting carriers are impaired
17 on a nationwide basis without access to unbundled dark fiber, DS1, and DS3 hi-cap
18 loop facilities serving the enterprise market. *Triennial Review Order* ¶¶ 311-14,
19 320-27. The FCC recognized, however, that competing carriers often self-provision
20 hi-cap facilities or obtain them on a wholesale basis from carriers other than the
21 ILEC. *Id.* ¶¶ 328-39. Consequently, the FCC authorized the state commissions to
22 determine the specific customer locations that meet one of two objective triggers —

which show that CLECs are already providing non-ILEC hi-cap facilities, either to themselves (self-provisioning trigger) or to other carriers (wholesale trigger). If a state commission finds that either trigger is met for a specific loop capacity at a specific customer location, the state commission must make a finding of non-impairment, and the ILEC will no longer be required to unbundle that loop capacity to that customer location. *Triennial Review Order* ¶ 328; *see also* 47 C.F.R. §51.319(a)(4)-(6). In other words, when a customer location meets one of the FCC's triggers, the state commission conducting the customer location-specific review must find that the FCC's national finding of impairment has been overcome for the relevant loop capacity.

The first of the FCC triggers looks at whether competing carriers have self-deployed or self-provisioned dark fiber or DS3 capacity loop facilities. Under the self-provisioning trigger for dark fiber, the Department must find no impairment if two or more unaffiliated competing carriers have deployed to a particular customer location their own dark fiber facilities. *Triennial Review Order* ¶¶ 332-334; 47 C.F.R. § 51.319(a)(6)(i). Dark Fiber obtained under a long-term indefeasible right of use is considered to be that carrier's own fiber for purpose of applying the self-provisioning trigger. *Triennial Review Order* ¶ 333 n. 981; 47 C.F.R. § 51.319(a)(6)(i). Under the self-provisioning trigger for DS3 loop facilities, the Department must find no impairment if two or more unaffiliated competing carriers have (i) deployed to a particular customer location their own dark fiber facilities and are serving customers via those facilities at that location, or (ii) deployed DS3

facilities by attaching their own electronics to activate dark fiber facilities obtained under a long-term indefeasible right of use and are serving customers via those facilities at that location. *Triennial Review Order* ¶¶ 332-334; 47 C.F.R. § 51.319(a)(5)(i)(A).

The second FCC trigger looks at whether DS1 or DS3 loop facilities are available from other carriers on a wholesale basis. Under this test, competing carriers are not impaired without access to Verizon MA's DS1 or DS3 facilities if two or more competing providers (including intermodal providers of service comparable in quality to the ILEC) not affiliated with each other or the ILEC each (i) has deployed its own DS1 or DS3 facilities; (ii) offers a DS1 or DS3 loop over its own facilities on a widely available wholesale basis to other carriers desiring to serve customers at that location; and (iii) has access to the entire customer location (including each individual unit within that location). *Triennial Review Order* ¶ 337; 47 C.F.R. § 51.319(a)(4)(ii), 47 C.F.R. § 51.319(a)(5)(i)(B). Dark fiber obtained on an unbundled, leased, or purchased basis from another carrier counts as the buying carrier's own DS1 or DS3 loop facility if that carrier attaches its own electronics and offers the activated fiber at wholesale. *Id.*

Q. What is a customer location?

A. The FCC distinguishes between "customer locations" and individual units within that location. *See Triennial Review Order* ¶ 337. This distinction indicates that a customer location is a building, not an individual unit or suite in a multi-unit building.

1 Q. The FCC's two triggers apply to different "capacities" of loops. What determines
2 the capacity at which fiber loop facilities operate?
3 A. The capacity of a fiber optic loop is almost exclusively based on the electronic
4 equipment that a carrier attaches to activate or "light" the fiber. *See Triennial*
5 *Review Order* ¶311. As the FCC found in its *Triennial Review Order*, when carriers
6 self-deploy fiber they usually do so at the OCn level. *Id.* ¶ 298. Indeed, the
7 underlying capacity of a strand of dark fiber is comparable in total capacity to an
8 OCn loop, which can operate at a wide range of capacities. *See id.* ¶ 311. Many
9 CLECs that serve customers over their own DS1 loops have previously deployed an
10 OCn level facility that they are using to serve other customers at lower loops
11 capacity levels. *Id.* n. 859. Fiber optic cable is also "channelized"— that is, larger
12 capacity facilities are subdivided into smaller capacity facilities — by attaching the
13 appropriate electronics at both ends of the fiber cable to provide these various
14 capacities. For example, lower capacity DS1 and DS3 facilities are channelized
15 simultaneously within the larger capacity OC12 or OC48 facility. The electronic
16 equipment used to activate these various levels of capacity is widely available.
17 Q. What does it mean to operate a fiber optic loop facility at OCn, DS1, or DS3 levels
18 of capacity?
19 A. As with transport, OCn loops refer to the technical distinction (*i.e.*, Optical Carrier
20 or "OC") and the capacity (*i.e.*, "n") of fiber optic cable. For example, an optical
21 carrier-level 3 — or OC3 capacity circuit contains the equivalent of up to three DS3
22 circuits (an OC3 is approximately 155 Mbps, while three DS3s are 135 Mbps), but

terminates on a different type of electronic interface.

DS1 and DS3 loops likewise refer to the technical distinction (*i.e.*, Digital Signal or "DS") and capacity. The elemental speed is a DS0, which is a voice grade line with a bandwidth of 64 Kbps. A DS1 capacity circuit contains the equivalent of 24 voice-grade or DS0 channels. A DS3 capacity circuit contains the equivalent of 28 DS1 channels or 672 DS0 channels.

Q. The FCC's loop triggers are separately applied to dark fiber facilities. What is dark fiber?

A. Dark fiber is the unused fiber within an existing fiber optic cable that has not yet been activated through electronics to render it capable of carrying communications services. *Triennial Review Order* ¶ 311. Dark fiber has virtually unlimited capacity, and it is the electronics that define the capacity. *Id.* n. 909.

Q. Which Department information requests did Verizon MA use to compile data on customer locations satisfying the loop triggers?

A. The Department asked three information requests relevant to the loop triggers: DTE 1-11, 1-12 and 1-13.

Q. Did all of the CLECs provide the information requested in the Department's information requests?

A. No. For example, three competing carriers did not identify the capacity of the loops identified in response to Department information request DTE 1-11. In these instances, Verizon MA assumed (and the Department should find) that these carriers have provisioned dark fiber, DS1, and DS3 loops unless they present evidence to the

contrary. Similarly, one carrier did not identify whether any of its deployed loops are provided to itself or on a wholesale basis as requested in Department request DTE 1-12. However, for the reasons outlined in more detail below, Verizon MA assumed, and the Department should find, that the carrier offers these loops on a wholesale basis unless it presents evidence that it does not.

Q. Please describe Verizon MA's evidence of customer locations in Massachusetts that meet the FCC's hi-cap loop triggers.

A. Verizon MA has evidence that 70 customer locations meet either of the FCC's triggers. There are 15 customer locations that meet the DS1 wholesale trigger. With respect to DS3 loops, 67 customer locations meet the self-provisioning trigger, and 12 meet the wholesale trigger. Finally, there are 17 customer locations meeting the dark fiber self-provisioning trigger. The total number of locations that satisfy either trigger is smaller than the sum of the locations that meet the self provisioning trigger and the wholesale trigger because there is overlap in the two sets of locations, i.e. some satisfy both triggers. Attachment 4 identifies each customer location meeting the triggers. The proprietary version of this attachment identifies the CLECs with loop facilities at each customer location. CLEC names are removed from the public versions of Attachment 4.

Q. Can any fiber loop facility deployed by a CLEC be used to provide a DS1 or DS3 loop?

A. Yes. In identifying the customer locations meeting the FCC's triggers, Verizon MA made the reasonable assumption that when competing carriers deploy fiber and

1 attach OCn electronics (*e.g.*, OC48 multiplexers), they then subdivide — *i.e.*,
2 channelize — the OCn system into the lower transport levels required by their
3 customers, including DS3s or DS1s. This is consistent with the FCC's finding
4 (discussed above) that many CLECs that serve customers over their own DS1 loops
5 have previously deployed an OCn level facility that they are using to serve other
6 customers at lower loop capacity levels. *Id.* n. 859.

7 While fiber loop facilities are capable of operating at various levels of capacity, the
8 capacity of the fiber is almost entirely a function of the electronics that a carrier
9 attaches, not something inherent in the fiber itself. Once the fiber is deployed, it is
10 operated at a DS1, DS3, OC48 or higher level — or at all of these levels
11 simultaneously — simply by changing the electronics. The electronics used to
12 channelize the OCn system to DS1 and DS3 transport levels are commonly
13 available.

14 Verizon MA's assumption that competing carriers who deploy fiber optics generally
15 build OCn level transport facilities, capable of channelization to DS1 or DS3, is
16 consistent with standard industry practice. Few if any carriers deploy fiber loop
17 facilities to accommodate only a DS1 or only a DS3. To the contrary, as the FCC
18 found in its *Triennial Review Order,* carriers deploying fiber predominantly do so at
19 the OCn level. *Triennial Review Order* ¶ 289. For example, in response to
20 Department request DTE 1-11, one competing carrier stated that it deploys loops at
21 the OC48 capacity Verizon MA generally deploys loops at OC3 or OC12 capacity.
22 These OCn facilities are then subdivided or channelized to a DS1 or DS3 level

because these are the levels at which service is typically requested by end user customers.

The assumptions underlying Verizon MA's self-deployment trigger case are entirely consistent with the way fiber loop facilities commonly are constructed and operated. The Department therefore should find that CLECs who have deployed fiber optic loop facilities have provisioned DS1 and DS3 circuits — unless a carrier shows, for a particular customer location, that it does not have any DS1 or DS3 circuits.

Q. Do these fiber loop facilities also contain dark fiber?

A. Absent evidence to the contrary, it reasonably can be assumed that all self-provisioned fiber loop facilities have dark fiber. Since dark fiber is simply fiber optic cable "that has not been activated through connections to electronics that light it, and thereby render it capable of carrying communications," (*Triennial Review Order* ¶ 311), all fiber loop facilities, regardless of the capacities at which they now operate, once consisted entirely of dark fiber. Put differently, evidence of "lit" fiber is also evidence that a carrier has self-provisioned dark fiber.

Additionally, as a matter of standard industry network engineering design and sound economics, the vast majority of self-provisioned fiber loop facilities will have spare dark fibers. As the FCC recognized, dark fiber exits in a carrier's network as unused fiber available because that carrier has deployed fiber in the first instance for the express purpose of lighting certain strands of it to serve a particular customer location. *Triennial Review Order* ¶ 312. The FCC explained,

> When a fiber build decision is made, carriers take advantage of the fact that they are already incurring substantial fixed costs to obtain the rights-of-way, dig up streets, and trench cable, to lay more fiber than they immediately need. Once the significant fiber construction cost is incurred, the record reflects that it is relatively easy and inexpensive to install fiber strands in excess of current demand at that time to maximize the use of conduit and avoid the need to incur duplicate costs to retrench the same location in the future if demand for additional fiber facilities occurs.

Id.

Thus, fiber facilities are always installed with extra fiber to meet projected demand growth. Furthermore, fiber cables are commonly manufactured and deployed in increments of 12 fiber strands (*i.e.*, 12, 24, 48, etc., fibers per cable). Verizon MA therefore assumed (and the Department should find) that CLECs who have deployed fiber optic loop facilities also have dark fiber deployed at that location— unless a carrier shows, for a particular customer location, that it does not have any dark fiber at that location.

Q. How did Verizon MA identify carriers offering loop facilities on a wholesale basis, and the capacities at which those facilities are offered?

A. Verizon MA primarily relied on carriers to self-identify themselves as wholesale providers in response to the Department's loop information requests. Where CLECs failed to provide responses to Department request DTE 1-11, Verizon MA assumed that these carriers are wholesale providers unless they provide information indicating that they are not. Similarly, some carriers state that loops at some customer locations are provided to other carriers at wholesale, but not others. If a carrier is

willing to offer loops at some customer locations, the Department should assume that it is willing to do so at all customer locations—unless a carrier indicates that it is not. Verizon MA was also able to find some evidence of CLEC wholesale providers to supplement responses to the Department information requests. As with its transport evidence, Verizon MA identified carriers that hold themselves out as wholesale providers on their websites.[4] If a carrier holds itself out as a wholesale provider on its website — and does not limit its representation to particular locations or to exclude loops —Verizon MA identified the carrier as a wholesale provider.

Finally, Verizon MA assumes that a carrier that has deployed fiber loop facilities and is willing to provide those facilities to other carriers is providing (or is willing to provide) various levels of capacity at wholesale, including dark fiber, DS1, and DS3. Therefore, unless there is specific evidence that a carrier refused to sell other carriers specific capacities and dark fiber on a particular transport route, the Department should find that a wholesale provider will sell DS1 and DS3 transport over its fiber facilities, as well as dark fiber.

Based on the discovery responses and information on carrier websites, Verizon MA has identified five competing carriers who offer loop facilities on a wholesale basis. Again, unless competing carriers provide particularized, location-specific evidence, the Department should rely on Verizon MA's evidence of a carrier's general willingness to offer its loop facilities on a wholesale basis and treat all such carriers'

[4] For example, RCN's Chief Strategy Officer indicates on its website that it is "seeking opportunities to wholesale the excess capacity of RCN's fiber-optic Megaband Network, improving the company's product offerings and adding to its bundles." (www.mci.com/telecom_wholesale/index.jsp)

loop facilities as available for leasing at wholesale.

Q. Did competing carriers provide information regarding whether they have access to an entire customer location?

A. No. Competing carriers did not specifically state whether they have access to the entire building to which they have deployed loop facilities. However, it is reasonable to assume that a competing carrier does have access to the entire location unless that carrier presents evidence to the contrary.

Q. Did the competing carriers provide information regarding whether they serve end user customers over DS3 facilities they have deployed?

A. No. Competing carriers did not specifically state whether they serve end-user customers over the DS3 facilities that they have deployed. However, discounting the locations specifically identified as providing dark fiber only, or being provided to other carriers at wholesale, it is reasonable to assume that a competing carrier is serving end-user customers at the locations identified in response to Department request DTE 1-11. In such cases where a carrier has connected high capacity (OCn, DS3, DS1) transport facilities, through multiplexing equipment, to a switch, it is reasonable to assume that voice-grade equivalent (*i.e.*, DS0) traffic is being carried within the channels of the high capacity transport. Operationally, in the circuit-switched network, there is no other valid reason to connect such transport to a switch. Finally, Verizon MA also assumed that competing carriers are not serving customers in building that house Verizon MA central offices and excluded those buildings from its high capacity loop trigger analysis.

1 Q. Does this conclude your testimony?

2 A. Yes, it does.

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Count of CLEC NAME				CLECNum			
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	020	024	025	066
HLYKMAMA	HOLYOKE	SPFDMAWO	SPRINGFIELD 1		1	1	1
NATNMAMA	NORTHAMPTON	SPFDMAWO	SPRINGFIELD 1	1	1		1

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Count				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	022	025	026	029	033	035	044	050	053	060	068	075
BLRCMAAN	BILLERICA	BSTNMAHA	HARRISON					1	1	1							
BRNTMAWA	BRAINTREE	BRTNMACR	BROCKTON	1		1	1										
		BSTNMABE	BOSTON BACK BAY	1			1	1									
		BSTNMABO	BOWDOIN	1			1	1									
		BSTNMAFR	FRANKLIN STREET	1			1	1									
		BSTNMAHA	HARRISON	1			1	1									
		CMBRMABE	CAMBRIDGE TANDEM	1			1	1									
		CMBRMAWA	CAMBRIDGE	1			1	1									
		LWLLMAAP	LOWELL	1		1	1										
		LWRNMACA	LAWRENCE	1			1	1									
		LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1			1	1									
		QNCYMAHA	QUINCY	1			1	1									
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1		1	1										
		WRCSMACE	WORCESTER	1			1	1									
BRTNMACO	BROCKTON TANDEM	CMBRMABE	CAMBRIDGE TANDEM	1							1	1					
		CMBRMAWA	CAMBRIDGE	1							1	1					
		FRMNMAUN	FRAMINGHAM	1							1	1					
		LWRNMACA	LAWRENCE	1							1	1					
BRTNMACR	BROCKTON	BSTNMABE	BOSTON BACK BAY	1			1				1						
		BSTNMABO	BOWDOIN	1			1				1						
		BSTNMAFR	FRANKLIN STREET	1			1				1						
		BSTNMAHA	HARRISON	1	1		1										
		CMBRMABE	CAMBRIDGE TANDEM	1		1	1				1						
		CMBRMAWA	CAMBRIDGE	1	1		1										
		FRMNMAUN	FRAMINGHAM	1	1						1						
		LWLLMAAP	LOWELL	1		1	1										
		LWRNMACA	LAWRENCE	1	1		1										
		MLDNMAEL	MALDEN	1		1	1										
		MRBOMAMA	MARLBORO	1	1		1										
		QNCYMAHA	QUINCY	1		1	1				1						
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1	1		1										
		WRCSMACE	WORCESTER	1	1		1										
BSTNMABE	BOSTON BACK BAY	BSTNMABO	BOWDOIN	1			1	1		1			1	1			
		BSTNMAFR	FRANKLIN STREET	1			1	1									
		BSTNMAHA	HARRISON	1			1	1		1			1				
		BURLMABE	BURLINGTON	1				1						1			
		CMBRMABE	CAMBRIDGE TANDEM	1			1	1		1			1	1			
		CMBRMAWA	CAMBRIDGE	1			1	1		1			1	1			
		FRMNMAUN	FRAMINGHAM	1				1			1					1	
		LWRNMACA	LAWRENCE	1			1	1									

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Count				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	022	025	026	029	033	035	044	050	053	060	068	075
BSTNMABE	BOSTON BACK BAY	LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1			1	1									
		NWTNMAWA	NEWTON	1				1		1							
		QNCYMAHA	QUINCY	1			1	1									
		WLHMMASP	WALTHAM SPRING STREET	1				1		1				1			
		WLHMMAWE	WALTHAM WEST STREET	1				1					1				
		WRCSMACE	WORCESTER	1			1	1									
BSTNMABO	BOWDOIN	BSTNMAFR	FRANKLIN STREET	1			1	1									
		BSTNMAHA	HARRISON	1			1	1		1			1				
		BURLMABE	BURLINGTON	1				1						1			
		CMBRMABE	CAMBRIDGE TANDEM	1			1	1		1			1	1			
		CMBRMAWA	CAMBRIDGE	1			1	1		1			1	1			
		FRMNMAUN	FRAMINGHAM	1				1			1					1	
		LWRNMACA	LAWRENCE	1			1	1									
		LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1			1	1									
		NWTNMAWA	NEWTON	1				1		1							
		QNCYMAHA	QUINCY	1			1	1									
		WLHMMASP	WALTHAM SPRING STREET	1				1		1				1			
		WLHMMAWE	WALTHAM WEST STREET	1				1					1				
		WRCSMACE	WORCESTER	1			1	1									
BSTNMAFR	FRANKLIN STREET	BSTNMAHA	HARRISON	1			1	1									
		BURLMABE	BURLINGTON	1				1							1		
		CMBRMABE	CAMBRIDGE TANDEM	1			1	1									
		CMBRMAWA	CAMBRIDGE	1			1	1									
		FRMNMAUN	FRAMINGHAM	1				1			1						
		LWRNMACA	LAWRENCE	1			1	1									
		LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1			1	1									
		NWTNMAWA	NEWTON	1				1							1		
		QNCYMAHA	QUINCY	1			1	1									
		WLHMMASP	WALTHAM SPRING STREET	1				1							1		
		WLHMMAWE	WALTHAM WEST STREET	1				1							1		
		WRCSMACE	WORCESTER	1			1	1									
BSTNMAHA	HARRISON	BURLMABE	BURLINGTON	1	1			1									
		CMBRMABE	CAMBRIDGE TANDEM	1			1	1		1			1				
		CMBRMAWA	CAMBRIDGE	1	1		1	1		1			1				
		FRMNMAUN	FRAMINGHAM	1	1			1									
		LWLLMAAP	LOWELL	1			1		1								
		LWRNMACA	LAWRENCE	1	1		1	1	1								1
		LXTNMAWA	LEXINGTON	1			1	1									

MASSACHUSETTS LATA 128

Count				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	022	025	026	029	033	035	044	050	053	060	068	075
BSTNMAHA	HARRISON	MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1	1		1	1									
		NWTNMAWA	NEWTON	1				1		1							
		QNCYMAHA	QUINCY	1			1	1									
		SALMMANO	SALEM	1	1		1										
		WLHMMASP	WALTHAM SPRING STREET	1				1		1							
		WLHMMAWE	WALTHAM WEST STREET	1	1			1					1				
		WRCSMACE	WORCESTER	1	1		1	1	1								
BURLMABE	BURLINGTON	CMBRMABE	CAMBRIDGE TANDEM	1				1						1			
		CMBRMAWA	CAMBRIDGE	1	1			1						1			
		FRMNMAUN	FRAMINGHAM	1	1			1									
		LWRNMACA	LAWRENCE	1	1			1									
		LXTNMAWA	LEXINGTON	1				1							1	1	
		MRBOMAMA	MARLBORO	1	1			1									
		NWTNMAWA	NEWTON	1				1							1		
		WLHMMASP	WALTHAM SPRING STREET	1				1						1			
		WLHMMAWE	WALTHAM WEST STREET	1	1			1									
		WRCSMACE	WORCESTER	1	1			1									
CMBRMABE	CAMBRIDGE TANDEM	CMBRMAWA	CAMBRIDGE	1			1	1		1		1	1	1			
		FRMNMAUN	FRAMINGHAM	1				1				1					
		LWLLMAAP	LOWELL	1		1	1										
		LWRNMACA	LAWRENCE	1			1	1				1					
		LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1			1	1									
		NWTNMAWA	NEWTON	1				1		1							
		QNCYMAHA	QUINCY	1			1	1									
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1		1	1										
		WLHMMASP	WALTHAM SPRING STREET	1				1		1				1			
		WLHMMAWE	WALTHAM WEST STREET	1				1					1				
		WRCSMACE	WORCESTER	1			1	1									
CMBRMAWA	CAMBRIDGE	FRMNMAUN	FRAMINGHAM	1	1			1				1					
		LWRNMACA	LAWRENCE	1	1		1	1				1					
		LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1	1		1	1									
		NWTNMAWA	NEWTON	1				1		1							
		QNCYMAHA	QUINCY	1			1	1									
		SALMMANO	SALEM	1	1		1										
		WLHMMASP	WALTHAM SPRING STREET	1				1		1				1			
		WLHMMAWE	WALTHAM WEST STREET	1	1			1					1				
		WRCSMACE	WORCESTER	1	1		1	1									
FRMNMAUN	FRAMINGHAM	LWRNMACA	LAWRENCE	1	1			1				1					

MASSACHUSETTS LATA 128

Count				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	022	025	026	029	033	035	044	050	053	060	068	075
FRMNMAUN	FRAMINGHAM	LXTNMAWA	LEXINGTON	1				1								1	
		MRBOMAMA	MARLBORO	1	1			1									
		QNCYMAHA	QUINCY	1				1			1						
		WLHMMASP	WALTHAM SPRING STREET	1				1								1	
		WLHMMAWE	WALTHAM WEST STREET	1	1			1									
		WRCSMACE	WORCESTER	1	1			1									
LWLLMAAP	LOWELL	LWRNMACA	LAWRENCE	1			1		1								
		MLDNMAEL	MALDEN	1		1	1										
		MRBOMAMA	MARLBORO	1		1	1										
		QNCYMAHA	QUINCY	1		1	1										
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1		1	1										
		WRCSMACE	WORCESTER	1			1		1								
LWRNMACA	LAWRENCE	LXTNMAWA	LEXINGTON	1			1	1									
		MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1	1		1	1									
		QNCYMAHA	QUINCY	1			1	1									
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1	1		1										
		WLHMMAWE	WALTHAM WEST STREET	1	1			1									
		WRCSMACE	WORCESTER	1	1		1	1	1								
LXTNMAWA	LEXINGTON	MLDNMAEL	MALDEN	1			1	1									
		MRBOMAMA	MARLBORO	1			1	1									
		NWTNMAWA	NEWTON	1				1							1		
		QNCYMAHA	QUINCY	1			1	1									
		WLHMMASP	WALTHAM SPRING STREET	1				1							1	1	
		WLHMMAWE	WALTHAM WEST STREET	1				1							1	1	
		WRCSMACE	WORCESTER	1			1	1									
MLDNMAEL	MALDEN	MRBOMAMA	MARLBORO	1			1	1									
		QNCYMAHA	QUINCY	1			1	1									
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1		1	1										
		WRCSMACE	WORCESTER	1			1	1									
MRBOMAMA	MARLBORO	QNCYMAHA	QUINCY	1			1	1									
		RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1	1		1										
		WLHMMAWE	WALTHAM WEST STREET	1	1			1									
		WRCSMACE	WORCESTER	1	1		1	1									
NWTNMAWA	NEWTON	WLHMMASP	WALTHAM SPRING STREET	1				1		1							
		WLHMMAWE	WALTHAM WEST STREET	1				1							1		
QNCYMAHA	QUINCY	RKLDMAWE	ROCKLAND	1		1	1										
		SALMMANO	SALEM	1		1	1										
		WRCSMACE	WORCESTER	1			1	1									
RKLDMAWE	ROCKLAND	SALMMANO	SALEM	1		1	1										

MASSACHUSETTS LATA 128

Count				CLECNum													
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	022	025	026	029	033	035	044	050	053	060	068	075
RKLDMAWE	ROCKLAND	WRCSMACE	WORCESTER	1		1	1										
SALMMANO	SALEM	WRCSMACE	WORCESTER	1	1		1										
WLHMMASP	WALTHAM SPRING STREET	WLHMMAWE	WALTHAM WEST STREET	1				1							1	1	
WLHMMAWE	WALTHAM WEST STREET	WRCSMACE	WORCESTER	1	1			1									

MASSACHUSETTS LATA 128

Count of CLEC Nm				CLEC Num						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	022	035	053	060	066	068	
BRTNMACR	BROCKTON	CMBRMABE	CAMBRIDGE TANDEM	1	1					
		LWRNMACA	LAWRENCE	1	1					
		QNCYMAHA	QUINCY	1	1					
		WRCSMACE	WORCESTER	1	1					
BSTNMABE	BOSTON BACK BAY	BSTNMABO	BOWDOIN		1	1	1		1	
		BSTNMAFR	FRANKLIN STREET		1		1			
		BSTNMAHA	HARRISON		1		1		1	
		BURLMABE	BURLINGTON			1	1		1	
		CMBRMABE	CAMBRIDGE TANDEM		1	1	1		1	
		CMBRMAWA	CAMBRIDGE		1	1	1			
		FRMNMAUN	FRAMINGHAM		1				1	
		LXTNMAWA	LEXINGTON				1		1	
		WLHMMASP	WALTHAM SPRING STREET			1	1		1	
		WLHMMAWE	WALTHAM WEST STREET				1		1	
BSTNMABO	BOWDOIN	BSTNMAFR	FRANKLIN STREET		1		1			
		BSTNMAHA	HARRISON		1		1		1	
		BURLMABE	BURLINGTON			1	1		1	
		CMBRMABE	CAMBRIDGE TANDEM		1	1	1		1	
		CMBRMAWA	CAMBRIDGE		1	1	1			
		FRMNMAUN	FRAMINGHAM		1				1	
		LXTNMAWA	LEXINGTON				1		1	
		WLHMMASP	WALTHAM SPRING STREET			1	1		1	
		WLHMMAWE	WALTHAM WEST STREET				1		1	
BSTNMAFR	FRANKLIN STREET	BSTNMAHA	HARRISON		1		1			
		CMBRMABE	CAMBRIDGE TANDEM		1		1			
		CMBRMAWA	CAMBRIDGE		1		1			
BSTNMAHA	HARRISON	BURLMABE	BURLINGTON				1		1	
		CMBRMABE	CAMBRIDGE TANDEM		1		1		1	
		CMBRMAWA	CAMBRIDGE		1		1			
		FRMNMAUN	FRAMINGHAM		1				1	
		LXTNMAWA	LEXINGTON				1		1	
		WLHMMASP	WALTHAM SPRING STREET				1		1	
		WLHMMAWE	WALTHAM WEST STREET				1		1	
BURLMABE	BURLINGTON	CMBRMABE	CAMBRIDGE TANDEM			1	1		1	
		CMBRMAWA	CAMBRIDGE			1	1			
		LXTNMAWA	LEXINGTON				1		1	
		WLHMMASP	WALTHAM SPRING STREET			1	1		1	
		WLHMMAWE	WALTHAM WEST STREET				1		1	
CMBRMABE	CAMBRIDGE TANDEM	CMBRMAWA	CAMBRIDGE		1	1	1			
		FRMNMAUN	FRAMINGHAM		1				1	
		LWRNMACA	LAWRENCE	1	1					
		LXTNMAWA	LEXINGTON				1		1	
		QNCYMAHA	QUINCY	1	1					
		SOVLMACE	SOMERVILLE	1					1	

DIRECT ROUTES MEETING THE FCC's WHOLESALE TRIGGER FOR DARK FIBER

Public Version
Attachment 3.C

MASSACHUSETTS LATA 128										
Count of CLEC Nm				CLEC Num						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	022	035	053	060	066	068	
CMBRMABE	CAMBRIDGE TANDEM	WLHMMASP	WALTHAM SPRING STREET			1	1		1	
		WLHMMAWE	WALTHAM WEST STREET				1		1	
		WRCSMACE	WORCESTER	1	1					
CMBRMAWA	CAMBRIDGE	WLHMMASP	WALTHAM SPRING STREET			1	1			
LWRNMACA	LAWRENCE	QNCYMAHA	QUINCY	1	1					
		WRCSMACE	WORCESTER	1	1					
LXTNMAWA	LEXINGTON	WLHMMASP	WALTHAM SPRING STREET				1		1	
		WLHMMAWE	WALTHAM WEST STREET				1		1	
NRBOMASC	NORTHBORO	WRCSMACE	WORCESTER	1				1		
		WSBOMASU	WESTBORO	1				1		
QNCYMAHA	QUINCY	WRCSMACE	WORCESTER	1	1					
WLHMMASP	WALTHAM SPRING STREET	WLHMMAWE	WALTHAM WEST STREET				1		1	
WRCSMACE	WORCESTER	WSBOMASU	WESTBORO	1				1		

MASSACHUSETTS LATAs 126 & 128

CLLI1	CLLI1Name	CLLI2	CLLI2Name	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
HLYKMAMA	HOLYOKE	SPFDMAWO	SPRINGFIELD 1	126	Y	
NATNMAMA	NORTHAMPTON	SPFDMAWO	SPRINGFIELD 1	126	Y	
BLRCMAAN	BILLERICA	BSTNMAHA	HARRISON	128	Y	
BSTNMABE	BOSTON BACK BAY 1	BSTNMABO	BOWDOIN 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BURLMABE	BURLINGTON	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BSTNMAFR	FRANKLIN STREET 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BSTNMAHA	HARRISON	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	LWRNMACA	LAWRENCE	128	Y	
BSTNMABE	BOSTON BACK BAY 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	MLDNMAEL	MALDEN	128	Y	
BSTNMABE	BOSTON BACK BAY 1	MRBOMAMA	MARLBORO 1	128	Y	
BSTNMABE	BOSTON BACK BAY 1	NWTNMAWA	NEWTON	128	Y	
BSTNMABE	BOSTON BACK BAY 1	QNCYMAHA	QUINCY	128	Y	
BSTNMABE	BOSTON BACK BAY 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	WRCSMACE	WORCESTER 1	128	Y	
BSTNMABO	BOWDOIN 1	BURLMABE	BURLINGTON	128	Y	Y
BSTNMABO	BOWDOIN 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMABO	BOWDOIN 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMABO	BOWDOIN 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BSTNMABO	BOWDOIN 1	BSTNMAFR	FRANKLIN STREET 1	128	Y	Y
BSTNMABO	BOWDOIN 1	BSTNMAHA	HARRISON	128	Y	Y
BSTNMABO	BOWDOIN 1	LWRNMACA	LAWRENCE	128	Y	
BSTNMABO	BOWDOIN 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMABO	BOWDOIN 1	MLDNMAEL	MALDEN	128	Y	
BSTNMABO	BOWDOIN 1	MRBOMAMA	MARLBORO 1	128	Y	
BSTNMABO	BOWDOIN 1	NWTNMAWA	NEWTON	128	Y	
BSTNMABO	BOWDOIN 1	QNCYMAHA	QUINCY	128	Y	
BSTNMABO	BOWDOIN 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMABO	BOWDOIN 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BSTNMABO	BOWDOIN 1	WRCSMACE	WORCESTER 1	128	Y	
BRNTMAWA	BRAINTREE	BSTNMABE	BOSTON BACK BAY 1	128	Y	
BRNTMAWA	BRAINTREE	BSTNMABO	BOWDOIN 1	128	Y	
BRNTMAWA	BRAINTREE	BRTNMACR	BROCKTON	128	Y	
BRNTMAWA	BRAINTREE	CMBRMAWA	CAMBRIDGE	128	Y	
BRNTMAWA	BRAINTREE	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	
BRNTMAWA	BRAINTREE	BSTNMAFR	FRANKLIN STREET 1	128	Y	
BRNTMAWA	BRAINTREE	BSTNMAHA	HARRISON	128	Y	
BRNTMAWA	BRAINTREE	LWRNMACA	LAWRENCE	128	Y	
BRNTMAWA	BRAINTREE	LXTNMAWA	LEXINGTON 1	128	Y	
BRNTMAWA	BRAINTREE	LWLLMAAP	LOWELL 1	128	Y	
BRNTMAWA	BRAINTREE	MLDNMAEL	MALDEN	128	Y	

MASSACHUSETTS LATAs 126 & 128

CLLI1	CLLI1Name	CLLI2	CLLI2Name	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
BRNTMAWA	BRAINTREE	MRBOMAMA	MARLBORO 1	128	Y	
BRNTMAWA	BRAINTREE	QNCYMAHA	QUINCY	128	Y	
BRNTMAWA	BRAINTREE	RKLDMAWE	ROCKLAND	128	Y	
BRNTMAWA	BRAINTREE	SALMMANO	SALEM	128	Y	
BRNTMAWA	BRAINTREE	WRCSMACE	WORCESTER 1	128	Y	
BRTNMACR	BROCKTON	BSTNMABE	BOSTON BACK BAY 1	128	Y	
BRTNMACR	BROCKTON	BSTNMABO	BOWDOIN 1	128	Y	
BRTNMACR	BROCKTON	CMBRMAWA	CAMBRIDGE	128	Y	
BRTNMACR	BROCKTON	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BRTNMACR	BROCKTON	FRMNMAUN	FRAMINGHAM 1	128	Y	
BRTNMACR	BROCKTON	BSTNMAFR	FRANKLIN STREET 1	128	Y	
BRTNMACR	BROCKTON	BSTNMAHA	HARRISON	128	Y	
BRTNMACR	BROCKTON	LWRNMACA	LAWRENCE	128	Y	Y
BRTNMACR	BROCKTON	LWLLMAAP	LOWELL 1	128	Y	
BRTNMACR	BROCKTON	MLDNMAEL	MALDEN	128	Y	
BRTNMACR	BROCKTON	MRBOMAMA	MARLBORO 1	128	Y	
BRTNMACR	BROCKTON	QNCYMAHA	QUINCY	128	Y	Y
BRTNMACR	BROCKTON	RKLDMAWE	ROCKLAND	128	Y	
BRTNMACR	BROCKTON	SALMMANO	SALEM	128	Y	
BRTNMACR	BROCKTON	WRCSMACE	WORCESTER 1	128	Y	Y
BRTNMACO	BROCKTON TANDEM 1	CMBRMAWA	CAMBRIDGE	128	Y	
BRTNMACO	BROCKTON TANDEM 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	
BRTNMACO	BROCKTON TANDEM 1	FRMNMAUN	FRAMINGHAM 1	128	Y	
BRTNMACO	BROCKTON TANDEM 1	LWRNMACA	LAWRENCE	128	Y	
BURLMABE	BURLINGTON	CMBRMAWA	CAMBRIDGE	128	Y	Y
BURLMABE	BURLINGTON	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BURLMABE	BURLINGTON	FRMNMAUN	FRAMINGHAM 1	128	Y	
BURLMABE	BURLINGTON	LWRNMACA	LAWRENCE	128	Y	
BURLMABE	BURLINGTON	LXTNMAWA	LEXINGTON 1	128	Y	Y
BURLMABE	BURLINGTON	MRBOMAMA	MARLBORO 1	128	Y	
BURLMABE	BURLINGTON	NWTNMAWA	NEWTON	128	Y	
BURLMABE	BURLINGTON	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BURLMABE	BURLINGTON	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BURLMABE	BURLINGTON	WRCSMACE	WORCESTER 1	128	Y	
CMBRMAWA	CAMBRIDGE	FRMNMAUN	FRAMINGHAM 1	128	Y	
CMBRMAWA	CAMBRIDGE	LWRNMACA	LAWRENCE	128	Y	
CMBRMAWA	CAMBRIDGE	LXTNMAWA	LEXINGTON 1	128	Y	
CMBRMAWA	CAMBRIDGE	MLDNMAEL	MALDEN	128	Y	
CMBRMAWA	CAMBRIDGE	MRBOMAMA	MARLBORO 1	128	Y	
CMBRMAWA	CAMBRIDGE	NWTNMAWA	NEWTON	128	Y	
CMBRMAWA	CAMBRIDGE	QNCYMAHA	QUINCY	128	Y	
CMBRMAWA	CAMBRIDGE	SALMMANO	SALEM	128	Y	
CMBRMAWA	CAMBRIDGE	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
CMBRMAWA	CAMBRIDGE	WLHMMAWE	WALTHAM WEST STREET	128	Y	
CMBRMAWA	CAMBRIDGE	WRCSMACE	WORCESTER 1	128	Y	

MASSACHUSETTS LATAs 126 & 128

CLLI1	CLLI1Name	CLLI2	CLLI2Name	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
CMBRMABE	CAMBRIDGE TANDEM 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	LWRNMACA	LAWRENCE	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	LWLLMAAP	LOWELL 1	128	Y	
CMBRMABE	CAMBRIDGE TANDEM 1	MLDNMAEL	MALDEN	128	Y	
CMBRMABE	CAMBRIDGE TANDEM 1	MRBOMAMA	MARLBORO 1	128	Y	
CMBRMABE	CAMBRIDGE TANDEM 1	NWTNMAWA	NEWTON	128	Y	
CMBRMABE	CAMBRIDGE TANDEM 1	QNCYMAHA	QUINCY	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	RKLDMAWE	ROCKLAND	128	Y	
CMBRMABE	CAMBRIDGE TANDEM 1	SALMMANO	SALEM	128	Y	
CMBRMABE	CAMBRIDGE TANDEM 1	SOVLMACE	SOMERVILLE 1	128		Y
CMBRMABE	CAMBRIDGE TANDEM 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	WRCSMACE	WORCESTER 1	128	Y	Y
FRMNMAUN	FRAMINGHAM 1	LWRNMACA	LAWRENCE	128	Y	
FRMNMAUN	FRAMINGHAM 1	LXTNMAWA	LEXINGTON 1	128	Y	
FRMNMAUN	FRAMINGHAM 1	MRBOMAMA	MARLBORO 1	128	Y	
FRMNMAUN	FRAMINGHAM 1	QNCYMAHA	QUINCY	128	Y	
FRMNMAUN	FRAMINGHAM 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	
FRMNMAUN	FRAMINGHAM 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	
FRMNMAUN	FRAMINGHAM 1	WRCSMACE	WORCESTER 1	128	Y	
BSTNMAFR	FRANKLIN STREET 1	BURLMABE	BURLINGTON	128	Y	
BSTNMAFR	FRANKLIN STREET 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	FRMNMAUN	FRAMINGHAM 1	128	Y	
BSTNMAFR	FRANKLIN STREET 1	BSTNMAHA	HARRISON	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	LWRNMACA	LAWRENCE	128	Y	
BSTNMAFR	FRANKLIN STREET 1	LXTNMAWA	LEXINGTON 1	128	Y	
BSTNMAFR	FRANKLIN STREET 1	MLDNMAEL	MALDEN	128	Y	
BSTNMAFR	FRANKLIN STREET 1	MRBOMAMA	MARLBORO 1	128	Y	
BSTNMAFR	FRANKLIN STREET 1	NWTNMAWA	NEWTON	128	Y	
BSTNMAFR	FRANKLIN STREET 1	QNCYMAHA	QUINCY	128	Y	
BSTNMAFR	FRANKLIN STREET 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	
BSTNMAFR	FRANKLIN STREET 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	
BSTNMAFR	FRANKLIN STREET 1	WRCSMACE	WORCESTER 1	128	Y	
BSTNMAHA	HARRISON	BURLMABE	BURLINGTON	128	Y	Y
BSTNMAHA	HARRISON	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMAHA	HARRISON	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMAHA	HARRISON	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BSTNMAHA	HARRISON	LWRNMACA	LAWRENCE	128	Y	
BSTNMAHA	HARRISON	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMAHA	HARRISON	LWLLMAAP	LOWELL 1	128	Y	
BSTNMAHA	HARRISON	MLDNMAEL	MALDEN	128	Y	
BSTNMAHA	HARRISON	MRBOMAMA	MARLBORO 1	128	Y	

MASSACHUSETTS LATAs 126 & 128

CLLI1	CLLI1Name	CLLI2	CLLI2Name	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
BSTNMAHA	HARRISON	NWTNMAWA	NEWTON	128	Y	
BSTNMAHA	HARRISON	QNCYMAHA	QUINCY	128	Y	
BSTNMAHA	HARRISON	SALMMANO	SALEM	128	Y	
BSTNMAHA	HARRISON	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMAHA	HARRISON	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BSTNMAHA	HARRISON	WRCSMACE	WORCESTER 1	128	Y	
LWRNMACA	LAWRENCE	LXTNMAWA	LEXINGTON 1	128	Y	
LWRNMACA	LAWRENCE	MLDNMAEL	MALDEN	128	Y	
LWRNMACA	LAWRENCE	MRBOMAMA	MARLBORO 1	128	Y	
LWRNMACA	LAWRENCE	QNCYMAHA	QUINCY	128	Y	Y
LWRNMACA	LAWRENCE	RKLDMAWE	ROCKLAND	128	Y	
LWRNMACA	LAWRENCE	SALMMANO	SALEM	128	Y	
LWRNMACA	LAWRENCE	WLHMMAWE	WALTHAM WEST STREET	128	Y	
LWRNMACA	LAWRENCE	WRCSMACE	WORCESTER 1	128	Y	Y
LXTNMAWA	LEXINGTON 1	MLDNMAEL	MALDEN	128	Y	
LXTNMAWA	LEXINGTON 1	MRBOMAMA	MARLBORO 1	128	Y	
LXTNMAWA	LEXINGTON 1	NWTNMAWA	NEWTON	128	Y	
LXTNMAWA	LEXINGTON 1	QNCYMAHA	QUINCY	128	Y	
LXTNMAWA	LEXINGTON 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
LXTNMAWA	LEXINGTON 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
LXTNMAWA	LEXINGTON 1	WRCSMACE	WORCESTER 1	128	Y	
LWLLMAAP	LOWELL 1	LWRNMACA	LAWRENCE	128	Y	
LWLLMAAP	LOWELL 1	MLDNMAEL	MALDEN	128	Y	
LWLLMAAP	LOWELL 1	MRBOMAMA	MARLBORO 1	128	Y	
LWLLMAAP	LOWELL 1	QNCYMAHA	QUINCY	128	Y	
LWLLMAAP	LOWELL 1	RKLDMAWE	ROCKLAND	128	Y	
LWLLMAAP	LOWELL 1	SALMMANO	SALEM	128	Y	
LWLLMAAP	LOWELL 1	WRCSMACE	WORCESTER 1	128	Y	
MLDNMAEL	MALDEN	MRBOMAMA	MARLBORO 1	128	Y	
MLDNMAEL	MALDEN	QNCYMAHA	QUINCY	128	Y	
MLDNMAEL	MALDEN	RKLDMAWE	ROCKLAND	128	Y	
MLDNMAEL	MALDEN	SALMMANO	SALEM	128	Y	
MLDNMAEL	MALDEN	WRCSMACE	WORCESTER 1	128	Y	
MRBOMAMA	MARLBORO 1	QNCYMAHA	QUINCY	128	Y	
MRBOMAMA	MARLBORO 1	RKLDMAWE	ROCKLAND	128	Y	
MRBOMAMA	MARLBORO 1	SALMMANO	SALEM	128	Y	
MRBOMAMA	MARLBORO 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	
MRBOMAMA	MARLBORO 1	WRCSMACE	WORCESTER 1	128	Y	
NWTNMAWA	NEWTON	WLHMMASP	WALTHAM SPRING STREET	128	Y	
NWTNMAWA	NEWTON	WLHMMAWE	WALTHAM WEST STREET	128	Y	
NRBOMASC	NORTHBORO	WSBOMASU	WESTBORO	128		Y
NRBOMASC	NORTHBORO	WRCSMACE	WORCESTER 1	128		Y
QNCYMAHA	QUINCY	RKLDMAWE	ROCKLAND	128	Y	
QNCYMAHA	QUINCY	SALMMANO	SALEM	128	Y	
QNCYMAHA	QUINCY	WRCSMACE	WORCESTER 1	128	Y	Y

MASSACHUSETTS LATAs 126 & 128

CLLI1	CLLI1Name	CLLI2	CLLI2Name	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
RKLDMAWE	ROCKLAND	SALMMANO	SALEM	128	Y	
RKLDMAWE	ROCKLAND	WRCSMACE	WORCESTER 1	128	Y	
SALMMANO	SALEM	WRCSMACE	WORCESTER 1	128	Y	
WLHMMASP	WALTHAM SPRING STREET	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
WLHMMAWE	WALTHAM WEST STREET	WRCSMACE	WORCESTER 1	128	Y	
WRCSMACE	WORCESTER 1	WSBOMASU	WESTBORO	128		Y

MASSACHUSETTS LATA 128

Count of CLEC Nm				CLECNum											
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	025	026	029	033	035	038	044	050	053	075
BLRCMAAN	BILLERICA	BSTNMAHA	HARRISON				1	1	1						
BRNTMAWA	BRAINTREE	BSTNMABE	BOSTON BACK BAY	1		1	1								
		BSTNMABO	BOWDOIN	1		1	1								
		BSTNMAFR	FRANKLIN STREET	1		1	1								
		BSTNMAHA	HARRISON	1		1	1								
		CMBRMABE	CAMBRIDGE TANDEM	1		1	1								
		CMBRMAWA	CAMBRIDGE	1		1	1								
		LWRNMACA	LAWRENCE	1		1	1								
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1		1	1								
		QNCYMAHA	QUINCY	1		1	1								
		WRCSMACE	WORCESTER	1		1	1								
BRTNMACO	BROCKTON TANDEM	CMBRMABE	CAMBRIDGE TANDEM	1						1		1			
		CMBRMAWA	CAMBRIDGE	1						1		1			
		FRMNMAUN	FRAMINGHAM	1						1		1			
		LWRNMACA	LAWRENCE	1						1		1			
BRTNMACR	BROCKTON	BSTNMABE	BOSTON BACK BAY	1		1				1					
		BSTNMABO	BOWDOIN	1		1				1					
		BSTNMAFR	FRANKLIN STREET	1		1				1					
		BSTNMAHA	HARRISON	1	1	1									
		CMBRMABE	CAMBRIDGE TANDEM	1		1				1					
		CMBRMAWA	CAMBRIDGE	1	1	1									
		FRMNMAUN	FRAMINGHAM	1	1					1					
		LWRNMACA	LAWRENCE	1	1	1									
		MRBOMAMA	MARLBORO	1	1	1									
		QNCYMAHA	QUINCY	1		1				1					
		SALMMANO	SALEM	1	1	1									
		WRCSMACE	WORCESTER	1	1	1									
BSTNMABE	BOSTON BACK BAY	BSTNMABO	BOWDOIN	1		1	1		1				1	1	
		BSTNMAFR	FRANKLIN STREET	1		1	1								
		BSTNMAHA	HARRISON	1		1	1		1				1		
		BURLMABE	BURLINGTON	1			1							1	
		CMBRMABE	CAMBRIDGE TANDEM	1		1	1		1				1	1	
		CMBRMAWA	CAMBRIDGE	1		1	1		1				1	1	
		FRMNMAUN	FRAMINGHAM	1			1			1					
		LWRNMACA	LAWRENCE	1		1	1								
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1		1	1								
		NWTNMAWA	NEWTON	1			1		1						
		QNCYMAHA	QUINCY	1		1	1								
		WLHMMASP	WALTHAM SPRING STREET	1			1		1					1	
		WLHMMAWE	WALTHAM WEST STREET	1			1						1		

MASSACHUSETTS LATA 128

Count of CLEC Nm				CLECNum											
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	025	026	029	033	035	038	044	050	053	075
BSTNMABE	BOSTON BACK BAY	WRCSMACE	WORCESTER	1		1	1								
BSTNMABO	BOWDOIN	BSTNMAFR	FRANKLIN STREET	1		1	1								
		BSTNMAHA	HARRISON	1		1	1		1				1		
		BURLMABE	BURLINGTON	1			1							1	
		CMBRMABE	CAMBRIDGE TANDEM	1		1	1		1				1	1	
		CMBRMAWA	CAMBRIDGE	1		1	1		1				1	1	
		FRMNMAUN	FRAMINGHAM	1			1			1					
		LWRNMACA	LAWRENCE	1		1	1								
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1		1	1								
		NWTNMAWA	NEWTON	1			1		1						
		QNCYMAHA	QUINCY	1		1	1								
		WLHMMASP	WALTHAM SPRING STREET	1			1		1					1	
		WLHMMAWE	WALTHAM WEST STREET	1			1						1		
		WRCSMACE	WORCESTER	1		1	1								
BSTNMAFR	FRANKLIN STREET	BSTNMAHA	HARRISON	1		1	1								
		CMBRMABE	CAMBRIDGE TANDEM	1		1	1								
		CMBRMAWA	CAMBRIDGE	1		1	1								
		FRMNMAUN	FRAMINGHAM	1			1			1					
		LWRNMACA	LAWRENCE	1		1	1								
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1		1	1								
		QNCYMAHA	QUINCY	1		1	1								
		WLHMMASP	WALTHAM SPRING STREET	1			1				1				
		WRCSMACE	WORCESTER	1		1	1								
BSTNMAHA	HARRISON	BURLMABE	BURLINGTON	1	1		1								
		CMBRMABE	CAMBRIDGE TANDEM	1		1	1		1				1		
		CMBRMAWA	CAMBRIDGE	1	1	1	1		1				1		
		FRMNMAUN	FRAMINGHAM	1	1		1								
		LWLLMAAP	LOWELL	1		1		1							
		LWRNMACA	LAWRENCE	1	1	1	1	1							1
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1	1	1	1								
		NWTNMAWA	NEWTON	1			1		1						
		QNCYMAHA	QUINCY	1		1	1								
		SALMMANO	SALEM	1	1	1									
		WLHMMASP	WALTHAM SPRING STREET	1			1		1						
		WLHMMAWE	WALTHAM WEST STREET	1	1		1						1		
		WRCSMACE	WORCESTER	1	1	1	1	1							
BURLMABE	BURLINGTON	CMBRMABE	CAMBRIDGE TANDEM	1			1							1	
		CMBRMAWA	CAMBRIDGE	1	1		1							1	

MASSACHUSETTS LATA 128

Count of CLEC Nm				CLECNum											
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	025	026	029	033	035	038	044	050	053	075
BURLMABE	BURLINGTON	FRMNMAUN	FRAMINGHAM	1	1		1								
		LWRNMACA	LAWRENCE	1	1		1								
		MRBOMAMA	MARLBORO	1	1		1								
		WLHMMASP	WALTHAM SPRING STREET	1			1							1	
		WLHMMAWE	WALTHAM WEST STREET	1	1		1								
		WRCSMACE	WORCESTER	1	1		1								
CMBRMABE	CAMBRIDGE TANDEM	CMBRMAWA	CAMBRIDGE	1		1	1		1			1	1	1	
		FRMNMAUN	FRAMINGHAM	1			1					1			
		LWRNMACA	LAWRENCE	1		1	1					1			
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1		1	1								
		NWTNMAWA	NEWTON	1			1		1						
		QNCYMAHA	QUINCY	1		1	1								
		WLHMMASP	WALTHAM SPRING STREET	1			1		1					1	
		WLHMMAWE	WALTHAM WEST STREET	1			1						1		
		WRCSMACE	WORCESTER	1		1	1								
CMBRMAWA	CAMBRIDGE	FRMNMAUN	FRAMINGHAM	1	1		1					1			
		LWRNMACA	LAWRENCE	1	1	1	1					1			
		LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1	1	1	1								
		NWTNMAWA	NEWTON	1			1		1						
		QNCYMAHA	QUINCY	1		1	1								
		SALMMANO	SALEM	1	1	1									
		WLHMMASP	WALTHAM SPRING STREET	1			1		1					1	
		WLHMMAWE	WALTHAM WEST STREET	1	1		1						1		
		WRCSMACE	WORCESTER	1	1	1	1								
FRMNMAUN	FRAMINGHAM	LWRNMACA	LAWRENCE	1	1		1					1			
		MRBOMAMA	MARLBORO	1	1		1								
		QNCYMAHA	QUINCY	1			1			1					
		WLHMMAWE	WALTHAM WEST STREET	1	1		1								
		WRCSMACE	WORCESTER	1	1		1								
LWLLMAAP	LOWELL	LWRNMACA	LAWRENCE	1		1		1							
		WRCSMACE	WORCESTER	1		1		1							
LWRNMACA	LAWRENCE	LXTNMAWA	LEXINGTON	1		1	1								
		MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1	1	1	1								
		QNCYMAHA	QUINCY	1		1	1								
		SALMMANO	SALEM	1	1	1									
		WLHMMAWE	WALTHAM WEST STREET	1	1		1								
		WRCSMACE	WORCESTER	1	1	1	1	1							
LXTNMAWA	LEXINGTON	MLDNMAEL	MALDEN	1		1	1								
		MRBOMAMA	MARLBORO	1		1	1								

MASSACHUSETTS LATA 128

Count of CLEC Nm				CLECNum											
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	020	025	026	029	033	035	038	044	050	053	075
LXTNMAWA	LEXINGTON	QNCYMAHA	QUINCY	1		1	1								
		WRCSMACE	WORCESTER	1		1	1								
MLDNMAEL	MALDEN	MRBOMAMA	MARLBORO	1		1	1								
		QNCYMAHA	QUINCY	1		1	1								
		WRCSMACE	WORCESTER	1		1	1								
MRBOMAMA	MARLBORO	QNCYMAHA	QUINCY	1		1	1								
		SALMMANO	SALEM	1	1	1									
		WLHMMAWE	WALTHAM WEST STREET	1	1		1								
		WRCSMACE	WORCESTER	1	1	1	1								
NWTNMAWA	NEWTON	WLHMMASP	WALTHAM SPRING STREET	1			1		1						
QNCYMAHA	QUINCY	WRCSMACE	WORCESTER	1		1	1								
SALMMANO	SALEM	WRCSMACE	WORCESTER	1	1	1									
WLHMMAWE	WALTHAM WEST STREET	WRCSMACE	WORCESTER	1	1		1								

MASSACHUSETTS LATA 128

Count of CLECNm				CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	026	035	038	044	053	
BRNTMAWA	BRAINTREE	BSTNMABE	BOSTON BACK BAY 1	1	1					
		BSTNMABO	BOWDOIN 1	1	1					
		BSTNMAFR	FRANKLIN STREET 1	1	1					
		BSTNMAHA	HARRISON	1	1					
		BURLMABE	BURLINGTON	1	1					
		CMBRMABE	CAMBRIDGE TANDEM 1	1	1					
		CMBRMAWA	CAMBRIDGE	1	1					
		FRMNMAUN	FRAMINGHAM 1	1	1					
		LWRNMACA	LAWRENCE	1	1					
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1					
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
BRTNMACO	BROCKTON TANDEM	BRTNMACR	BROCKTON	1		1				
		BSTNMABE	BOSTON BACK BAY 1	1		1				
		BSTNMABO	BOWDOIN 1	1		1				
		BSTNMAFR	FRANKLIN STREET 1	1		1				
		BSTNMAHA	HARRISON	1		1				
		CMBRMABE	CAMBRIDGE TANDEM 1	1		1		1		
		CMBRMAWA	CAMBRIDGE	1		1		1		
		FRMNMAUN	FRAMINGHAM 1	1		1		1		
		LWRNMACA	LAWRENCE	1		1		1		
		QNCYMAHA	QUINCY	1		1				
		WRCSMACE	WORCESTER 1	1		1				
BRTNMACR	BROCKTON	BSTNMABE	BOSTON BACK BAY 1	1		1				
		BSTNMABO	BOWDOIN 1	1		1				
		BSTNMAFR	FRANKLIN STREET 1	1		1				
		BSTNMAHA	HARRISON	1		1				
		CMBRMABE	CAMBRIDGE TANDEM 1	1		1				
		CMBRMAWA	CAMBRIDGE	1		1				
		FRMNMAUN	FRAMINGHAM 1	1		1				
		LWRNMACA	LAWRENCE	1		1				
		QNCYMAHA	QUINCY	1		1				
		WRCSMACE	WORCESTER 1	1		1				
BSTNMABE	BOSTON BACK BAY	BSTNMABO	BOWDOIN 1	1	1	1	1		1	
		BSTNMAFR	FRANKLIN STREET 1	1	1	1	1			
		BSTNMAHA	HARRISON	1	1	1	1			
		BURLMABE	BURLINGTON	1	1				1	
		CMBRMABE	CAMBRIDGE TANDEM 1	1	1	1	1		1	
		CMBRMAWA	CAMBRIDGE	1	1	1	1		1	

MASSACHUSETTS LATA 128

Count of CLECNm				CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	026	035	038	044	053	
BSTNMABE	BOSTON BACK BAY	FRMNMAUN	FRAMINGHAM 1	1	1	1				
		LWRNMACA	LAWRENCE	1	1	1				
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1		1		1	
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
BSTNMABO	BOWDOIN	BSTNMAFR	FRANKLIN STREET 1	1	1	1	1			
		BSTNMAHA	HARRISON	1	1	1	1			
		BURLMABE	BURLINGTON	1	1				1	
		CMBRMABE	CAMBRIDGE TANDEM 1	1	1	1	1		1	
		CMBRMAWA	CAMBRIDGE	1	1	1	1		1	
		FRMNMAUN	FRAMINGHAM 1	1	1	1				
		LWRNMACA	LAWRENCE	1	1	1				
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1		1		1	
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
BSTNMAFR	FRANKLIN STREET	BSTNMAHA	HARRISON	1	1	1	1			
		BURLMABE	BURLINGTON	1	1					
		CMBRMABE	CAMBRIDGE TANDEM 1	1	1	1	1			
		CMBRMAWA	CAMBRIDGE	1	1	1	1			
		FRMNMAUN	FRAMINGHAM 1	1	1	1				
		LWRNMACA	LAWRENCE	1	1	1				
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1		1			
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
BSTNMAHA	HARRISON	BURLMABE	BURLINGTON	1	1					
		CMBRMABE	CAMBRIDGE TANDEM 1	1	1	1	1			
		CMBRMAWA	CAMBRIDGE	1	1	1	1			
		FRMNMAUN	FRAMINGHAM 1	1	1	1				
		LWRNMACA	LAWRENCE	1	1	1				

MASSACHUSETTS LATA 128

Count of CLECNm				CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	026	035	038	044	053	
BSTNMAHA	HARRISON	LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1		1			
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
BURLMABE	BURLINGTON	CMBRMABE	CAMBRIDGE TANDEM 1	1	1				1	
		CMBRMAWA	CAMBRIDGE	1	1				1	
		FRMNMAUN	FRAMINGHAM 1	1	1					
		LWRNMACA	LAWRENCE	1	1					
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1					
		WLHMMASP	WALTHAM SPRING STREET	1	1				1	
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
CMBRMABE	CAMBRIDGE TANDEM	CMBRMAWA	CAMBRIDGE	1	1	1	1	1	1	
		FRMNMAUN	FRAMINGHAM 1	1	1	1		1		
		LWRNMACA	LAWRENCE	1	1	1		1		
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1		1		1	
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
CMBRMAWA	CAMBRIDGE	FRMNMAUN	FRAMINGHAM 1	1	1	1		1		
		LWRNMACA	LAWRENCE	1	1	1		1		
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1		1		1	
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
FRMNMAUN	FRAMINGHAM	LWRNMACA	LAWRENCE	1	1	1		1		
		LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					

MASSACHUSETTS LATA 128

Count of CLECNm				CLECNum						
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	026	035	038	044	053	
FRMNMAUN	FRAMINGHAM	MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
LWRNMACA	LAWRENCE	LXTNMAWA	LEXINGTON 1	1	1					
		MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1	1				
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
LXTNMAWA	LEXINGTON	MLDNMAEL	MALDEN	1	1					
		MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1					
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
MLDNMAEL	MALDEN	MRBOMAMA	MARLBORO 1	1	1					
		NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1					
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
MRBOMAMA	MARLBORO	NWTNMAWA	NEWTON	1	1					
		QNCYMAHA	QUINCY	1	1					
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
NWTNMAWA	NEWTON	QNCYMAHA	QUINCY	1	1					
		WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
QNCYMAHA	QUINCY	WLHMMASP	WALTHAM SPRING STREET	1	1					
		WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1	1				
WLHMMASP	WALTHAM SPRING STREET	WLHMMAWE	WALTHAM WEST STREET	1	1					
		WRCSMACE	WORCESTER 1	1	1					
WLHMMAWE	WALTHAM WEST STREET	WRCSMACE	WORCESTER 1	1	1					

MASSACHUSETTS LATA 128

WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
BLRCMAAN	BILLERICA	BSTNMAHA	HARRISON	128	Y	
BRNTMAWA	BRAINTREE	BSTNMABE	BOSTON BACK BAY 1	128	Y	Y
BRNTMAWA	BRAINTREE	BSTNMABO	BOWDOIN 1	128	Y	Y
BRNTMAWA	BRAINTREE	BSTNMAFR	FRANKLIN STREET 1	128	Y	Y
BRNTMAWA	BRAINTREE	BSTNMAHA	HARRISON	128	Y	Y
BRNTMAWA	BRAINTREE	BURLMABE	BURLINGTON	128		Y
BRNTMAWA	BRAINTREE	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BRNTMAWA	BRAINTREE	CMBRMAWA	CAMBRIDGE	128	Y	Y
BRNTMAWA	BRAINTREE	FRMNMAUN	FRAMINGHAM 1	128		Y
BRNTMAWA	BRAINTREE	LWRNMACA	LAWRENCE	128	Y	Y
BRNTMAWA	BRAINTREE	LXTNMAWA	LEXINGTON 1	128	Y	Y
BRNTMAWA	BRAINTREE	MLDNMAEL	MALDEN	128	Y	Y
BRNTMAWA	BRAINTREE	MRBOMAMA	MARLBORO 1	128	Y	Y
BRNTMAWA	BRAINTREE	NWTNMAWA	NEWTON	128		Y
BRNTMAWA	BRAINTREE	QNCYMAHA	QUINCY	128	Y	Y
BRNTMAWA	BRAINTREE	WLHMMASP	WALTHAM SPRING STREET	128		Y
BRNTMAWA	BRAINTREE	WLHMMAWE	WALTHAM WEST STREET	128		Y
BRNTMAWA	BRAINTREE	WRCSMACE	WORCESTER 1	128	Y	Y
BRTNMACO	BROCKTON TANDEM 1	BRTNMACR	BROCKTON	128		Y
BRTNMACO	BROCKTON TANDEM 1	BSTNMABE	BOSTON BACK BAY 1	128		Y
BRTNMACO	BROCKTON TANDEM 1	BSTNMABO	BOWDOIN 1	128		Y
BRTNMACO	BROCKTON TANDEM 1	BSTNMAFR	FRANKLIN STREET 1	128		Y
BRTNMACO	BROCKTON TANDEM 1	BSTNMAHA	HARRISON	128		Y
BRTNMACO	BROCKTON TANDEM 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BRTNMACO	BROCKTON TANDEM 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BRTNMACO	BROCKTON TANDEM 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BRTNMACO	BROCKTON TANDEM 1	LWRNMACA	LAWRENCE	128	Y	Y
BRTNMACO	BROCKTON TANDEM 1	QNCYMAHA	QUINCY	128		Y
BRTNMACO	BROCKTON TANDEM 1	WRCSMACE	WORCESTER 1	128		Y
BRTNMACR	BROCKTON	BSTNMABE	BOSTON BACK BAY 1	128	Y	Y
BRTNMACR	BROCKTON	BSTNMABO	BOWDOIN 1	128	Y	Y
BRTNMACR	BROCKTON	BSTNMAFR	FRANKLIN STREET 1	128	Y	Y
BRTNMACR	BROCKTON	BSTNMAHA	HARRISON	128	Y	Y
BRTNMACR	BROCKTON	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BRTNMACR	BROCKTON	CMBRMAWA	CAMBRIDGE	128	Y	Y
BRTNMACR	BROCKTON	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BRTNMACR	BROCKTON	LWRNMACA	LAWRENCE	128	Y	Y
BRTNMACR	BROCKTON	MRBOMAMA	MARLBORO 1	128	Y	
BRTNMACR	BROCKTON	QNCYMAHA	QUINCY	128	Y	Y
BRTNMACR	BROCKTON	SALMMANO	SALEM	128	Y	
BRTNMACR	BROCKTON	WRCSMACE	WORCESTER 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BSTNMABO	BOWDOIN 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BSTNMAFR	FRANKLIN STREET 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BSTNMAHA	HARRISON	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	BURLMABE	BURLINGTON	128	Y	Y

MASSACHUSETTS LATA 128

WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
BSTNMABE	BOSTON BACK BAY 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	LWRNMACA	LAWRENCE	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	MLDNMAEL	MALDEN	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	MRBOMAMA	MARLBORO 1	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	NWTNMAWA	NEWTON	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	QNCYMAHA	QUINCY	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BSTNMABE	BOSTON BACK BAY 1	WRCSMACE	WORCESTER 1	128	Y	Y
BSTNMABO	BOWDOIN 1	BSTNMAFR	FRANKLIN STREET 1	128	Y	Y
BSTNMABO	BOWDOIN 1	BSTNMAHA	HARRISON	128	Y	Y
BSTNMABO	BOWDOIN 1	BURLMABE	BURLINGTON	128	Y	Y
BSTNMABO	BOWDOIN 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMABO	BOWDOIN 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMABO	BOWDOIN 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BSTNMABO	BOWDOIN 1	LWRNMACA	LAWRENCE	128	Y	Y
BSTNMABO	BOWDOIN 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMABO	BOWDOIN 1	MLDNMAEL	MALDEN	128	Y	Y
BSTNMABO	BOWDOIN 1	MRBOMAMA	MARLBORO 1	128	Y	Y
BSTNMABO	BOWDOIN 1	NWTNMAWA	NEWTON	128	Y	Y
BSTNMABO	BOWDOIN 1	QNCYMAHA	QUINCY	128	Y	Y
BSTNMABO	BOWDOIN 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMABO	BOWDOIN 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BSTNMABO	BOWDOIN 1	WRCSMACE	WORCESTER 1	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	BSTNMAHA	HARRISON	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	BURLMABE	BURLINGTON	128		Y
BSTNMAFR	FRANKLIN STREET 1	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	LWRNMACA	LAWRENCE	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	MLDNMAEL	MALDEN	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	MRBOMAMA	MARLBORO 1	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	NWTNMAWA	NEWTON	128		Y
BSTNMAFR	FRANKLIN STREET 1	QNCYMAHA	QUINCY	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMAFR	FRANKLIN STREET 1	WLHMMAWE	WALTHAM WEST STREET	128		Y
BSTNMAFR	FRANKLIN STREET 1	WRCSMACE	WORCESTER 1	128	Y	Y
BSTNMAHA	HARRISON	BURLMABE	BURLINGTON	128	Y	Y
BSTNMAHA	HARRISON	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BSTNMAHA	HARRISON	CMBRMAWA	CAMBRIDGE	128	Y	Y
BSTNMAHA	HARRISON	FRMNMAUN	FRAMINGHAM 1	128	Y	Y

MASSACHUSETTS LATA 128

WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
BSTNMAHA	HARRISON	LWLLMAAP	LOWELL 1	128	Y	
BSTNMAHA	HARRISON	LWRNMACA	LAWRENCE	128	Y	Y
BSTNMAHA	HARRISON	LXTNMAWA	LEXINGTON 1	128	Y	Y
BSTNMAHA	HARRISON	MLDNMAEL	MALDEN	128	Y	Y
BSTNMAHA	HARRISON	MRBOMAMA	MARLBORO 1	128	Y	Y
BSTNMAHA	HARRISON	NWTNMAWA	NEWTON	128	Y	Y
BSTNMAHA	HARRISON	QNCYMAHA	QUINCY	128	Y	Y
BSTNMAHA	HARRISON	SALMMANO	SALEM	128	Y	
BSTNMAHA	HARRISON	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BSTNMAHA	HARRISON	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BSTNMAHA	HARRISON	WRCSMACE	WORCESTER 1	128	Y	Y
BURLMABE	BURLINGTON	CMBRMABE	CAMBRIDGE TANDEM 1	128	Y	Y
BURLMABE	BURLINGTON	CMBRMAWA	CAMBRIDGE	128	Y	Y
BURLMABE	BURLINGTON	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
BURLMABE	BURLINGTON	LWRNMACA	LAWRENCE	128	Y	Y
BURLMABE	BURLINGTON	LXTNMAWA	LEXINGTON 1	128		Y
BURLMABE	BURLINGTON	MLDNMAEL	MALDEN	128		Y
BURLMABE	BURLINGTON	MRBOMAMA	MARLBORO 1	128	Y	Y
BURLMABE	BURLINGTON	NWTNMAWA	NEWTON	128		Y
BURLMABE	BURLINGTON	QNCYMAHA	QUINCY	128		Y
BURLMABE	BURLINGTON	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
BURLMABE	BURLINGTON	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
BURLMABE	BURLINGTON	WRCSMACE	WORCESTER 1	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	CMBRMAWA	CAMBRIDGE	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	LWRNMACA	LAWRENCE	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	LXTNMAWA	LEXINGTON 1	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	MLDNMAEL	MALDEN	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	MRBOMAMA	MARLBORO 1	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	NWTNMAWA	NEWTON	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	QNCYMAHA	QUINCY	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
CMBRMABE	CAMBRIDGE TANDEM 1	WRCSMACE	WORCESTER 1	128	Y	Y
CMBRMAWA	CAMBRIDGE	FRMNMAUN	FRAMINGHAM 1	128	Y	Y
CMBRMAWA	CAMBRIDGE	LWRNMACA	LAWRENCE	128	Y	Y
CMBRMAWA	CAMBRIDGE	LXTNMAWA	LEXINGTON 1	128	Y	Y
CMBRMAWA	CAMBRIDGE	MLDNMAEL	MALDEN	128	Y	Y
CMBRMAWA	CAMBRIDGE	MRBOMAMA	MARLBORO 1	128	Y	Y
CMBRMAWA	CAMBRIDGE	NWTNMAWA	NEWTON	128	Y	Y
CMBRMAWA	CAMBRIDGE	QNCYMAHA	QUINCY	128	Y	Y
CMBRMAWA	CAMBRIDGE	SALMMANO	SALEM	128	Y	
CMBRMAWA	CAMBRIDGE	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
CMBRMAWA	CAMBRIDGE	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
CMBRMAWA	CAMBRIDGE	WRCSMACE	WORCESTER 1	128	Y	Y

MASSACHUSETTS LATA 128

WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
FRMNMAUN	FRAMINGHAM 1	LWRNMACA	LAWRENCE	128	Y	Y
FRMNMAUN	FRAMINGHAM 1	LXTNMAWA	LEXINGTON 1	128		Y
FRMNMAUN	FRAMINGHAM 1	MLDNMAEL	MALDEN	128		Y
FRMNMAUN	FRAMINGHAM 1	MRBOMAMA	MARLBORO 1	128	Y	Y
FRMNMAUN	FRAMINGHAM 1	NWTNMAWA	NEWTON	128		Y
FRMNMAUN	FRAMINGHAM 1	QNCYMAHA	QUINCY	128	Y	Y
FRMNMAUN	FRAMINGHAM 1	WLHMMASP	WALTHAM SPRING STREET	128		Y
FRMNMAUN	FRAMINGHAM 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
FRMNMAUN	FRAMINGHAM 1	WRCSMACE	WORCESTER 1	128	Y	Y
LWLLMAAP	LOWELL 1	LWRNMACA	LAWRENCE	128	Y	
LWLLMAAP	LOWELL 1	WRCSMACE	WORCESTER 1	128	Y	
LWRNMACA	LAWRENCE	LXTNMAWA	LEXINGTON 1	128	Y	Y
LWRNMACA	LAWRENCE	MLDNMAEL	MALDEN	128	Y	Y
LWRNMACA	LAWRENCE	MRBOMAMA	MARLBORO 1	128	Y	Y
LWRNMACA	LAWRENCE	NWTNMAWA	NEWTON	128		Y
LWRNMACA	LAWRENCE	QNCYMAHA	QUINCY	128	Y	Y
LWRNMACA	LAWRENCE	SALMMANO	SALEM	128	Y	
LWRNMACA	LAWRENCE	WLHMMASP	WALTHAM SPRING STREET	128		Y
LWRNMACA	LAWRENCE	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
LWRNMACA	LAWRENCE	WRCSMACE	WORCESTER 1	128	Y	Y
LXTNMAWA	LEXINGTON 1	MLDNMAEL	MALDEN	128	Y	Y
LXTNMAWA	LEXINGTON 1	MRBOMAMA	MARLBORO 1	128	Y	Y
LXTNMAWA	LEXINGTON 1	NWTNMAWA	NEWTON	128		Y
LXTNMAWA	LEXINGTON 1	QNCYMAHA	QUINCY	128	Y	Y
LXTNMAWA	LEXINGTON 1	WLHMMASP	WALTHAM SPRING STREET	128		Y
LXTNMAWA	LEXINGTON 1	WLHMMAWE	WALTHAM WEST STREET	128		Y
LXTNMAWA	LEXINGTON 1	WRCSMACE	WORCESTER 1	128	Y	Y
MLDNMAEL	MALDEN	MRBOMAMA	MARLBORO 1	128	Y	Y
MLDNMAEL	MALDEN	NWTNMAWA	NEWTON	128		Y
MLDNMAEL	MALDEN	QNCYMAHA	QUINCY	128	Y	Y
MLDNMAEL	MALDEN	WLHMMASP	WALTHAM SPRING STREET	128		Y
MLDNMAEL	MALDEN	WLHMMAWE	WALTHAM WEST STREET	128		Y
MLDNMAEL	MALDEN	WRCSMACE	WORCESTER 1	128	Y	Y
MRBOMAMA	MARLBORO 1	NWTNMAWA	NEWTON	128		Y
MRBOMAMA	MARLBORO 1	QNCYMAHA	QUINCY	128	Y	Y
MRBOMAMA	MARLBORO 1	SALMMANO	SALEM	128	Y	
MRBOMAMA	MARLBORO 1	WLHMMASP	WALTHAM SPRING STREET	128		Y
MRBOMAMA	MARLBORO 1	WLHMMAWE	WALTHAM WEST STREET	128	Y	Y
MRBOMAMA	MARLBORO 1	WRCSMACE	WORCESTER 1	128	Y	Y
NWTNMAWA	NEWTON	QNCYMAHA	QUINCY	128		Y
NWTNMAWA	NEWTON	WLHMMASP	WALTHAM SPRING STREET	128	Y	Y
NWTNMAWA	NEWTON	WLHMMAWE	WALTHAM WEST STREET	128		Y
NWTNMAWA	NEWTON	WRCSMACE	WORCESTER 1	128		Y
QNCYMAHA	QUINCY	WLHMMASP	WALTHAM SPRING STREET	128		Y
QNCYMAHA	QUINCY	WLHMMAWE	WALTHAM WEST STREET	128		Y

MASSACHUSETTS LATA 128

WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	LATA	Self-Provider Test Met?	Wholesale-Provider Test Met?
QNCYMAHA	QUINCY	WRCSMACE	WORCESTER 1	128	Y	Y
SALMMANO	SALEM	WRCSMACE	WORCESTER 1	128	Y	
WLHMMASP	WALTHAM SPRING STREET	WLHMMAWE	WALTHAM WEST STREET	128		Y
WLHMMASP	WALTHAM SPRING STREET	WRCSMACE	WORCESTER 1	128		Y
WLHMMAWE	WALTHAM WEST STREET	WRCSMACE	WORCESTER 1	128	Y	Y

Massachusetts Customer Locations Meeting the FCC's Loop Triggers

Street Address	City	State	Zip	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-3 Wholesale Trigger	DS-1 Wholesale Trigger
400 Minuteman Rd	Andover	MA	01810	003		X		
				026		X		
1 Beacon St	Boston	MA	02108	003		X		
				026		X		X
				007				X
1 Boston Pl	Boston	MA	02108	003		X		
				026		X		X
				053		X		X
1 Federal St	Boston	MA	02110	003		X		
				026		X		
1 Post Office Sq	Boston	MA	02109	003		X		
				026		X		
1 Summer St	Boston	MA	02110	003		X		
				044	X	X	X	X
				026	X	X	X	X
				053	X	X	X	X
				089	X		X	X
10 High St	Boston	MA	02110	003	X	X		
				044	X	X		
100 Federal St	Boston	MA	02110	003		X		
				026		X		
100 Franklin St	Boston	MA	02110	003		X		
				026		X		
100 Summer St	Boston	MA	02110	003		X		
				026		X		
109 Brookline Ave	Boston	MA	02215	003		X		
				026		X		
125 High St	Boston	MA	02110	003		X		
				026		X		
125 Summer St	Boston	MA	02110	003		X		
				026		X		
2 Copley Pl	Boston	MA	02116	003		X		
				026		X		
20 Winthrop Sq	Boston	MA	02110	003		X		
				026		X		
200 Clarendon St	Boston	MA	02116	003		X		
				026		X	X	X
				053			X	X
230 Congress St	Boston	MA	02110	003	X	X		
				026	X	X		X
				007	X			X
225 Franklin St	Boston	MA	02110	003	X	X		
				026	X	X		
260 Franklin St	Boston	MA	02110	003		X		
				026		X		
265 Franklin St	Boston	MA	02110	003	X	X		
				026	X	X		
28 State St	Boston	MA	02109	003		X		
				026		X		
330 Stuart St	Boston	MA	02116	003		X		
				026		X		
4 Copley Pl	Boston	MA	02116	003		X		
				026		X		
451 D St	Boston	MA	02210	003		X		
				026		X		
50 Milk St	Boston	MA	02109	003		X		
				026		X		
53 State St	Boston	MA	02109	003	X	X		
				026	X	X		
500 Boylston St	Boston	MA	02116	003		X		

Massachusetts Customer Locations Meeting the FCC's Loop Triggers

Street Address	City	State	Zip	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-3 Wholesale Trigger	DS-1 Wholesale Trigger
				026		X		

Massachusetts Customer Locations Meeting the FCC's Loop Triggers

Street Address	City	State	Zip	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-3 Wholesale Trigger	DS-1 Wholesale Trigger
501 Boylston St	Boston	MA	02116	003		X		
				026		X		
60 State St	Boston	MA	02109	003		X		
				026		X		
600 Atlantic Ave	Boston	MA	02210	003		X		
				026		X		
75 Francis St	Boston	MA	02115	003		X		
				026		X		
75 State St	Boston	MA	02109	003		X		
				026		X		
800 Boylston St	Boston	MA	02199	003	X	X		
				044	X	X	X	X
				026	X	X	X	X
82 Devonshire St	Boston	MA	02109	003	X	X		
				026	X	X		
900 Boylston St	Boston	MA	02115	003		X		
				026		X		
99 High St	Boston	MA	02110	003		X		
				026		X		
99 Summer St	Boston	MA	02110	003		X		
				026		X		
12 Blanchard Rd	Burlington	MA	01803	003		X		
				026		X		
200 Wheeler Rd	Burlington	MA	01803	003		X		
				026		X		
1 Broadway	Cambridge	MA	02142	003		X		
				026		X		
1 Kendall Sq	Cambridge	MA	02139	003		X		
				026		X		
1 Main St	Cambridge	MA	02142	044	X		X	X
				053	X		X	X
1 Memorial Dr	Cambridge	MA	02142	003		X		
				026		X		
1 Rogers St	Cambridge	MA	02142	003		X		
				026		X		
10 Moulton St	Cambridge	MA	02138	044	X	X	X	X
				026	X	X	X	X
101 Main St	Cambridge	MA	02142	026				X
				053				X
1000 Massachusetts Ave	Cambridge	MA	02138	003		X		
				026		X		
250 Bent St	Cambridge	MA	02141	044	X	X	X	X
				026	X	X	X	X
300 Bent St	Cambridge	MA	02141	003		X		
				044	X	X	X	X
				026	X	X	X	X
				053	X	X	X	X
400 Main St	Cambridge	MA	02142	003	X			
				026	X			
640 Memorial Dr	Cambridge	MA	02139	026	X	X	X	X
				053	X	X	X	X
89 Fulkerson St	Cambridge	MA	02141	044	X	X	X	X
				026	X	X	X	X
56 Roland St	Charlestown	MA	02129	003		X		
				026		X		

Massachusetts Customer Locations Meeting the FCC's Loop Triggers

Street Address	City	State	Zip	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-3 Wholesale Trigger	DS-1 Wholesale Trigger
825 Waverly St	Framingham	MA	01702	003		X		
				026		X		
75 Reed Rd	Hudson	MA	01749	003		X		
				026		X		
244 Wood St	Lexington	MA	02421	003		X		
				026		X		
300 Puritan Way	Marlborough	MA	01752	003		X		
				026		X		
400 Puritan Way	Marlborough	MA	01752	003		X		
				026		X		
10 Presidents Lndg	Medford	MA	02155	003		X		
				026		X		
1776 Heritage Dr	Quincy	MA	02171	003		X		
				026		X		
234 Copeland St	Quincy	MA	02169	003		X		
				026		X		
70 Innerbelt Rd	Somerville	MA	02143	003		X		
				026		X		
1441 Main St	Springfield	MA	01103	003		X		
				026		X		
175 Wyman St	Waltham	MA	02451	003		X		
				026	X		X	X
				053	X		X	X
1025 Main St	Waltham	MA	02451	003		X		
				026		X		
1100 Winter St	Waltham	MA	02451	003		X		
				026		X		
404 Wyman St	Waltham	MA	02451	003		X		
				026		X		
580 Winter St	Waltham	MA		003		X		
				053		X	X	
				089			X	
600 Winter St	Waltham	MA	02451	003		X		
				026	X	X	X	X
				053	X	X	X	X
600 Friberg Pkwy	Westborough	MA	01581	003		X		
				026		X		

Appendix D:

Verizon testimony and data submitted in state TRO proceedings

Exhibit 2: Rhode Island

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IMPLEMENTATION OF THE REQUIREMENTS OF THE FEDERAL COMMUNICATIONS COMMISSION'S TRIENNIAL REVIEW ORDER	)	Docket No. 3550

DIRECT PANEL TESTIMONY OF VERIZON RHODE ISLAND

(Mass Market Switching, Transport, and Loops)

Members of the Panel:

Theresa L. O'Brien
John White

December 8, 2003

Direct Testimony of Theresa L. O'Brien
and John White
on behalf of Verizon Rhode Island
PUC Docket No. 3550
December 8, 2003

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ATTACHMENTS:

Attachment 1: Proprietary map showing locations of CLEC switches being used to provide local service in Rhode Island

Attachment 2: Proprietary charts showing the results of the Line Count Study with the E911 additions, by density zone and wire center

Attachment 3: Proprietary map illustrating the markets where CLEC activity meets the self-provisioning trigger in Rhode Island

Attachment 4: Chart of CLEC tariff references

Attachment 5: Three maps depicting transport routes by LATA

Attachment 6: Proprietary evidence of the direct transport routes meeting the FCC's triggers for dark fiber, DS3 and DS1 capacity levels

Attachment 7: Proprietary copies of the Methods and Procedure for conducting the physical inspections and verification forms

CLEC Proprietary Attachment

I. INTRODUCTION

Q. MS. O'BRIEN, PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.

A. My name is Theresa L. O'Brien, and I am Vice President – Regulatory for Verizon Rhode Island ("Verizon RI"). My business address is 234 Washington Street, Providence, Rhode Island.

Q. PLEASE DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.

A. I received my Bachelor of Science Degree in Accounting from Bentley College, Waltham, Massachusetts, in 1980, and later received a Master of Business Administration from Northeastern University. I began my career as a supervisor in Corporate Accounting at New England Telephone ("NET") in 1980 and held various assignments of increasing responsibility in Corporate Budgets, Marketing, Access Markets, and Public Relations before assuming the position of Director – Regulatory in May of 1995. In December 2001, I was named Vice President – Regulatory Affairs.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE RI PUBLIC UTILITIES COMMISSION?

A. Yes. I have appeared as a witness before the Commission in numerous regulatory proceedings.

Q. MR. WHITE, PLEASE STATE YOUR FULL NAME.

A. My name is John White. My business address is New Salem, New York.

Q. BY WHOM ARE YOU EMPLOYED, AND IN WHAT CAPACITY?

A. I am currently the president of 8 Degree Research and Consulting, Inc., located in

New Salem, New York. I recently retired from employment with Verizon Services Corporation as an Executive Director for Fiber to the Premises for Verizon.

Q. PLEASE BRIEFLY DESCRIBE YOUR EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY AND EDUCATIONAL BACKGROUND.

A. I was employed by Verizon or by its affiliates and predecessor companies from 1966 to 2003. Before joining Verizon, I worked for a number of engineering and construction firms. During my first 12 years at Verizon, I was involved in every aspect of Outside Plant telephone engineering. From 1979 to 1994, I held managerial positions in Construction, Installation and Maintenance, and Engineering, in both line and staff capacities. I was then appointed Executive Director for Transport Technology Planning in 1994 and became Executive Director Wholesale Services in June 2000 with a responsibility for introduction of wholesale digital services. In March of 2003, I was appointed Executive Director for Fiber to the Premises. I began undergraduate engineering studies at the University of Buffalo and went on to receive a Bachelors Degree in Business Administration and a Masters in Business Administration from Pace University. I have also continued graduate work at Pace University in Finance and Economics as part of Doctorate of Professional Studies Program.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE RHODE ISLAND PUBLIC UTILITIES COMMISSION?

A. Yes. I have previously testified before the Commission as well as before state regulatory agencies in Massachusetts, Maine and New Hampshire.

Q. MS. O'BRIEN AND MR. WHITE, WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of our testimony is to present evidence demonstrating that under the standards set forth in the Federal Communications Commission's ("FCC") *Triennial Review Order*, Verizon Rhode Island ("Verizon RI") is not required to unbundle mass market switching for the relevant markets nor dedicated transport for the specific routes described in our testimony.

The *Triennial Review Order* established a two-step process for demonstrating "no impairment." As a threshold matter, we understand that the Commission must find no impairment if certain objective tests or "triggers" are satisfied. If the triggers are met, then the Commission is required to find no impairment without further analysis. Only if the triggers are not met would the Commission proceed to the second step and consider evidence of "potential deployment" of the relevant network elements. For both mass market switching and dedicated transport, this testimony demonstrates that the FCC's objective triggers are satisfied for particular markets and specific transport routes.

Section II of our testimony addresses the FCC's triggers for mass market switching. We describe the two triggers established by the FCC for mass market switching, which are "a principal mechanism for use by states in evaluating whether requesting carriers are in fact not impaired in a particular market." *Triennial Review Order* ¶ 498. A trigger is a set of objective standards established by the FCC that, if met, requires the state Commission to find "no impairment." Next, we describe the relevant market definitions for applying the triggers, including the geographic

1 market and the cutoff point for differentiating between "mass market" and "DS1
2 enterprise" customers within the relevant geographic market. Third, we describe the
3 evidence that Verizon RI has gathered to support its showing under the self-
4 provisioning trigger for mass market switching. Fourth, we identify the markets in
5 Rhode Island that meet the FCC's switching trigger based on the evidence. In
6 particular, the testimony demonstrates that there are a substantial number of CLECs
7 that are using their own switching to serve mass market customers within Verizon
8 RI's service territory in Rhode Island. As a result, those market areas satisfy the
9 FCC's switching trigger within Density Zones 1 (Urban) and 2 (Suburban) in the
10 Providence-New Bedford-Fall River MSA.
11 Section III of our testimony shows that Verizon RI is not required to unbundle
12 dedicated transport on specific fiber transport routes based on the two objective
13 triggers set forth in the FCC's *Triennial Review Order*. The FCC requires a state
14 commission to find that competing carriers are not impaired without access to
15 Verizon RI's unbundled dedicated interoffice transmission (or transport) facilities if
16 Verizon RI meets either of two objective triggers. Our testimony describes the
17 FCC's triggers and applies them in Rhode Island. We then present evidence, drawn
18 from internal and public sources and CLEC responses to discovery, showing that
19 other carriers have deployed fiber transport routes in specific areas of the state
20 meeting one or both of the FCC's triggers.
21 In Section IV, we briefly address the issue of high capacity loops and explain why
22 Verizon RI declines to present evidence for the elimination of the unbundling

requirement with respect to high capacity loops at this time or in this docket, but that Verizon RI reserves its right to do so in a future proceeding.

II. MASS MARKET SWITCHING TRIGGERS

Q. PLEASE EXPLAIN THE FCC'S TRIGGER ANALYSIS FOR MASS MARKET SWITCHING.

A. In the *Triennial Review Order*, the FCC found that "there are few barriers to deploying competitive switches to serve customers in the enterprise market at the DS1 capacity and above, and thus no operational or economic impairment on a national basis." *Triennial Review Order* ¶ 451. By contrast, the FCC determined that, on a national basis, CLECs are impaired without access to unbundled local circuit switching for mass market customers (*i.e.*, residential and business customers served over loops operating below the DS1 level). *Triennial Review Order* ¶ 459. Nevertheless, the FCC recognized that "a more granular analysis may reveal that a particular market is not subject to impairment in the absence of unbundled local switching." *Triennial Review Order* ¶ 461. Therefore, the FCC directed the states to apply a two-step process to determine whether there is no impairment in a particular market within a state.

First, state commissions must apply two mandatory, objective triggers, which look at evidence of actual facilities-based competition in the market. Under the "self-provisioning trigger," a state "must find 'no impairment' when three or more unaffiliated competing carriers are serving mass market customers in a particular

1 market with the use of their own switches." *Triennial Review Order* ¶ 501. Under
2 the "competitive wholesale trigger," states must find no impairment where there are
3 two or more unaffiliated CLECs that offer wholesale switching service to other
4 carriers in a particular market using their own switches. *Triennial Review Order* ¶
5 504. There are currently few wholesale providers of switching, other than ILECs.
6 Therefore, Verizon RI is not attempting at this time to make a showing under the
7 competitive wholesale facilities trigger for switching, but will rely instead on the
8 self-provisioning trigger.
9 It is only after the Commission has examined the objective trigger evidence, and
10 made a determination that neither trigger is met in a market, that the Commission
11 may then conduct an analysis of the potential for CLECs to deploy their own
12 switches to serve mass market customers in the relevant geographic market, given
13 economic and operational conditions in that market. *Triennial Review Order* ¶ 506.
14 Of course, if the triggers have been met – indicating that a number of real world
15 CLECs are already operating their own switches in a market – there is no need to
16 prove in theory that they potentially might operate in that market. Verizon RI does
17 not intend to offer a potential deployment case in Rhode Island at this time, and
18 therefore, this testimony does not analyze the potential for new switch deployment.
19 It presents only objective evidence of actual existing CLEC switch deployment
20 under the trigger test.

21 **Q. IN APPLYING THE SELF-PROVISIONING TRIGGER, MAY THE**
22 **COMMISSION LOOK AT SUBJECTIVE EVIDENCE OF IMPAIRMENT?**

23 A. No. The self-provisioning trigger is deliberately objective. It is assessed entirely

through the application of data, rather than by the consideration of more subjective experiences, theories, estimates, opinions, and predictions. This objectivity allows trigger determinations to be made quickly and accurately, and avoids the need for "protracted proceedings." *Triennial Review Order* ¶ 498. In fact, other than the objective count of CLECs, the FCC indicated that "states shall not evaluate any other factors, such as the financial stability or well-being of the competitive switch providers." *Triennial Review Order* ¶ 500 .

In its September 17, 2003 *Errata*, the FCC clarified that subjective considerations, such as a CLEC's economic and operational ability to serve all customers in a market, or a CLEC's willingness to do so, do not apply to the self-provisioning switching trigger. *Errata* at No. 21. Instead, this trigger is straightforward: the Commission must find "no impairment" for unbundled switching when three or more unaffiliated competing carriers are serving mass market customers in a particular market.

A. Market Definition

Q. HOW IS THE RELEVANT GEOGRAPHIC MARKET DEFINED FOR THE TRIGGER ANALYSIS?

A. The FCC instructed the states to apply the switching triggers on a granular basis to each identifiable geographic market in the state. Rule 319(d)(2)(i) provides:

> Market definition. A state commission shall define the markets in which it will evaluate impairment by determining the relevant geographic area to include in each market. In defining markets, a state commission shall take into consideration the locations of mass market customers actually being served (if any) by

> competitors, the variation in factors affecting competitors' ability to serve each group of customers, and competitors' ability to target and serve specific markets profitably and efficiently using currently available technologies. A state commission shall not define the relevant geographic area as the entire state.

47 C.F.R. § 51.319(d)(2)(i). The FCC gave further guidance in the text of the Order, cautioning "states should not define the market so narrowly that a competitor serving that market alone would not be able to take advantage of available scale and scope economies from serving a wider market." *Triennial Review Order* ¶ 495. Moreover, the FCC expected that the market definition for switching would be broader than for transport (which is narrowly defined by the FCC on a route-by-route basis), since "a switch can theoretically serve wide areas." *Triennial Review Order* ¶ 495 n.1536.

The FCC noted that a state commission may choose to consider various factors, including "how UNE loop rates vary across the state" and "how retail rates vary geographically," among other considerations. *Triennial Review Order* ¶ 496. However, it is not necessary to reinvent the wheel, since the FCC authorized state commissions to use existing geographic market definitions, including UNE loop rate zones, for the purposes of the trigger analysis. *Triennial Review Order* ¶ 496.

Q. WHAT IS THE APPROPRIATE GEOGRAPHIC MARKET DEFINITION FOR RHODE ISLAND?

A. The Commission should adopt an existing geographic market definition for application of the self-provisioning trigger. Among the existing definitions, Metropolitan Statistical Areas ("MSAs") and Density Zones are the most

1 appropriate. MSAs have well-established geographic boundaries set by the federal
2 Office of Management and Budget ("OMB") that are available from publicly
3 available sources and are specifically designed to capture economic communities of
4 interest.[1] For this reason, MSAs have been used to define local markets for purposes
5 of telecommunications regulation. For example, the FCC itself used MSAs for its
6 existing unbundled switching carve-out for end users with 4 or more DS0 lines.[2] In
7 addition, in its *Pricing Flexibility Order*, the FCC held that "MSAs best reflect the
8 scope of competitive entry, and therefore are a logical basis for measuring the extent
9 of competition."[3]

10 However, Rhode Island is unique in that the entire state is comprised of a single
11 MSA. Given that the FCC prohibited the Commission from defining a
12 geographic market as encompassing the entire state, *Triennial Review Order* ¶
13 495, n. 1536, Verizon RI recommends that the Commission define the market
14 more narrowly, by differentiating among the UNE Density Zones within the
15 MSA. The Rhode Island UNE Density Zones meet each of the three criteria for
16 defining the market established by the FCC. First, the Density Zones reflect "the
17 locations of customers actually being served" by competitors using their own
18 switches. *See* Attachment 2, showing the number of CLECs currently providing
19 service in Rhode Island by Density Zone and wire center.

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1 See Office of Management and Budget, Bulletin No. 03-04, Attachment (June 6, 2003).

2 Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Third Report and Order and Fourth Notice of Proposed Rulemaking (rel. November 5, 1999) (the "UNE Remand Order") at ¶¶ 276-98; Triennial Review Order at ¶ 497.

3 Access Charge Reform, Fifth Report and Order and FNPRM, 14 FCC Rcd. 14,221 (August 27, 1999) ("Pricing Flexibility Order").

1 Second, the three density zones that were approved by the RI PUC in Docket No.
2 2681 were determined based upon the number of access lines per square mile.
3 Since access line density is a major variant in the determination of costs, the RI
4 Density Zones take into account "variation of factors affecting competitors'
5 ability to serve each group of customers." *Triennial Review Order* ¶ 495. For
6 example, Verizon RI's UNE loop rate in Density Zone 1 (Urban) ($11.19) is more
7 than 40% lower than the loop rate in Density Zone 3 (Rural) ($19.13). As the
8 FCC recognized, "if UNE loop rates vary substantially across a state, and this
9 variation is likely to lead to a different finding concerning the existence of
10 impairment in different parts of the state, the state commission should consider
11 separating zones with high and low UNE loop rates for purposes of assessing
12 impairment." *Triennial Review Order* ¶ 496 n.1538. Moreover, Verizon RI's flat
13 rates for residential service vary with the number of access lines a caller can reach
14 with a local call, so that the highest rates (and thus the highest potential revenues
15 for CLECs) are most often found in the most densely populated areas of the state.
16 Consequently, both revenue potential and ease of serving customers are, by and
17 large, already reflected in the existing UNE Density Zones established by the
18 Commission. Thus, CLECs face similar competitive conditions within each
19 Density Zone and face different conditions in each of the three Zones.

20 Third, all three Rhode Island Density Zones fall within a single MSA, which
21 reflects the geographic reach of newspaper, radio, and television advertising.
22 Consequently, CLECs are able to target customers in all three Zones

"economically and efficiently." *Triennial Review Order* ¶ 495. Therefore, the Rhode Island Density Zones as previously established by the Commission define the appropriate geographic markets for the Commission's analysis of mass market switching in this proceeding.

Q. SHOULD THE COMMISSION DEFINE THE RELEVANT GEOGRAPHIC MARKET AT THE WIRE CENTER LEVEL?

A. No, it should not. Defining the market at such an overly granular level would completely ignore available scale and scope economies that the CLEC would enjoy by serving a wider market, contrary to the admonition of the FCC. Requiring that the trigger be satisfied in every individual wire center would completely ignore similar competitive conditions in other areas within the same "community of interest" and in adjoining areas with similar densities of customers and potential revenues. Moreover, CLECs do not enter the mass market at the wire center level, nor do they make their decisions to deploy switches to serve a particular market on a wire center-by-wire center basis, or even at the rate center level. As AT&T argued in an arbitration proceeding with Verizon New Jersey before the New Jersey Public Utilities Board, "[e]fficiency demands that CLECs deploy switches to serve broad geographic areas, and not within each specific rate center for which Verizon has built out its network."[4] Therefore, wire centers are too small and under-inclusive for purposes of the impairment analysis, and would result in a finding of impairment where there clearly is none based on the objective criteria presented in this

[4] Panel Rebuttal Testimony of AT&T Communications of NJ, L.P. et al., Docket No. TO00110893 (March 18, 2003), at 46.

1 testimony.

2 **Q. HOW SHOULD THE COMMISSION DIFFERENTIATE BETWEEN**
3 **MASS MARKET CUSTOMERS AND DS1 ENTERPRISE CUSTOMERS**
4 **IN RHODE ISLAND?**

5 A. According to the FCC, "DS1 enterprise customers are characterized by relatively
6 intense, often data-centric, demand for telecommunications service sufficient to
7 justify service via high-capacity loops at the DS1 capacity and above." *Triennial*
8 *Review Order* ¶ 451. Therefore, for the purposes of its impairment analysis, DS1
9 enterprise customers are "those customers for which it is economically feasible for a
10 competing carrier to provide voice service with its own switch using a DS1 or above
11 loop." *Triennial Review Order* ¶ 451 n. 1376.

12 Mass market customers, on the other hand, "are analog voice customers that
13 purchase only a limited number of POTS lines, and can only be economically
14 served via DS0 loops." *Triennial Review Order* ¶ 497. "Mass market" refers not
15 only to residential customers, but also to business customers that do not use DS1
16 capacity facilities. The FCC recognized that, "[a]t some point, customers taking a
17 sufficient number of multiple DS0 loops could be served in a manner similar to
18 that described above for enterprise customers – that is, voice services provided
19 over one or several DS1s, including the same variety and quality of services and
20 customer care that enterprise customers receive." *Triennial Review Order* ¶ 497.
21 However, the FCC left it to the states to determine where the cutoff point should
22 be between mass market and enterprise customers, which "may be the point

1 where it makes economic sense for a multi-line customer to be served via a DS1
2 loop." *Id.*

3 At its simplest, this "cutoff" should be between customers actually being served
4 with one or more voice grade DS0 circuits and customers actually being served by
5 DS1 loops. It is the objective behavior of the CLEC that should drive the
6 determination of whether or not it "makes economic sense" for that CLEC to
7 serve particular customers over DS1 loops, rather than over multiple voice grade
8 DS0 lines. If a CLEC is currently serving a customer using DS0 loops –
9 regardless of how many – it has already made the determination on its own that it
10 is most economical to serve the customer as a mass-market customer, rather than
11 as a DS1 enterprise customer. In other words, if it made "economic sense" to
12 serve the customer over a DS1, then the CLEC would, in fact, be doing so. This
13 objective test is more reliable, and grounded in the realities of the marketplace,
14 than an arbitrary "cutoff" at a particular number of lines, regardless of whether the
15 customer is actually being served as a DS1 customer. Indeed, AT&T has argued
16 that the FCC should define mass market customers as "any customer location that
17 a CLEC serves with voice-grade loops." Comments of AT&T Corp. at 204-205,
18 *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange*
19 *Carriers*, WC Docket No. 01-338 (FCC filed Apr. 5, 2003). Moreover, other
20 CLECs have argued for a crossover point as high as 18 lines or more, claiming,
21 for example, that a lower cut-off for mass market customers "does not reflect the
22 real-world economics of serving a customer through self-provisioned switching,

and should be changed [to 18 lines] to reflect those economic realities." Comments of Z-Tel Communications Inc., *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 01-338 (FCC filed Apr. 5, 2003), at 50-51 (emphasis added).

Therefore, the mass market "cut-off" should reflect the economic realities of serving real world customers – as reflected by the CLECs' marketplace choice between deploying DS0 loops or DS1 loops to particular customer locations. If the CLEC has made the economic decision to treat the customer as a mass market customer and to serve the customer location using voice-grade loops, then the DS0 lines at that customer location should be counted as such for the purposes of the switching impairment analysis.

B. Evidence Of Actual Deployment In Rhode Island

Q. HAS THERE BEEN SUBSTANTIAL DEPLOYMENT OF CLEC-OWNED SWITCHES IN RHODE ISLAND?

A. Yes. The record of competitive switch deployment in Rhode Island establishes that competitors are already serving customers of all kinds using their own switches on a widespread basis throughout the State. Seven competing carriers of all sizes have deployed 7 *known* local circuit switches that are physically located within Rhode Island and serve Rhode Island customers.[5] *See* Table 1 below.

[5] The information in this table reflects data as it appears in the Local Exchange Routing Guide ("LERG"). There may be instances in which a CLEC switch is assigned to a particular CLEC in the LERG, but where it has in fact been assigned for use by another competitive carrier, such as a successor carrier. See Telcordia, February 2003 LERG.

Table 1. CLECs That Have Deployed Local Circuit Switches in Rhode Island

CLEC	Switch Total	CLEC	Switch Total
AT&T	1	Cox Communications	1
Choice One	1	NECLEC LLC	1
Connect!	1	WorldCom	1
Conversent	1		

Source: February 2003 LERG.

This is also consistent with the responses that the CLECs have filed to the Commission's Data Requests 1-1 and 1-2(a) in this case.

In addition, CLEC packet switches are already a very significant competitive alternative to ILEC circuit switches, as the FCC has recognized. Packet switches substitute for circuit switches to the extent that traffic can be routed directly to a packet switch, without first being routed through a circuit switch. All forms of telecommunications traffic can now be transmitted and switched, end-to-end, in digital rather than analog format.

To illustrate the significant deployment of switches of all kinds, the map attached as Attachment 1 shows the locations of CLEC switches being used to provide local service in Rhode Island (including packet switches, circuit switches, remote switches and "soft" switches), based on data obtained from the Local Exchange Routing Guide ("LERG") and from the CLEC responses to the Commission's Data Requests.

Q. ARE CLECS USING THESE SWITCHES TO SERVE MASS MARKET CUSTOMERS IN RHODE ISLAND?

A. Yes, the evidence clearly demonstrates that many of these switches are being used

for mass market services, as we explain below. Indeed, the geographic range of many of the switches currently used by CLECs to serve Rhode Island encompasses the entire state.[6]

Q. WHAT TYPE OF EVIDENCE DID VERIZON RI USE TO SATISFY THE SELF-PROVISIONING TRIGGER?

A. Verizon RI has collected and analyzed data, at the wire center level, using two sources of data, which it maintains. First, Verizon RI used its internal databases to determine where, and to whom, Verizon leases stand-alone UNE loops in Rhode Island (the "Line Count Study"). Second, Verizon supplemented the Line Count Study with residential listings in the E911 database to determine the number of residential customers served by carriers that bypass Verizon RI's network to serve mass market customers over their own loop facilities (such as cable telephony providers) and to identify those carriers.

Q. HOW DOES THE LINE COUNT STUDY SHOW WHERE CLECS ARE PROVIDING THEIR OWN MASS MARKET SWITCHING?

A. Voice service carriers that lease stand-alone UNE loops from Verizon RI, without unbundled switching from Verizon RI, are necessarily using their own switches to provide service to the customers connected to those loops. Therefore, to determine where CLECs are serving mass market customers, Verizon RI identified, by wire center, all CLECs leasing loops from Verizon RI as of June 30, 2003, below the DS1 level, that is, 2-wire or 4-wire stand-alone voice grade loops (including EELs).

[6] See CLEC Responses to PUC 1-1(d) and 1-2(a); see also UNE Remand Order ¶ 261 ("[S]witches deployed by competitive LECs may be able to serve a larger geographic area than switches deployed by the incumbent LEC, thereby reducing the direct, fixed cost of purchasing circuit switching capacity and allowing requesting carriers to create their own switching efficiencies.").

Verizon RI counted the number of individual UNE loops ordered at each customer address (not merely each building address, since there may be multiple customer addresses within a building). Verizon RI counted affiliated carriers as a single carrier to avoid double-counting affiliates within a particular wire center. In addition, Verizon RI did not count CLECs that provide solely data services over copper loop facilities, without offering voice services.

Q. DOES THE LINE COUNT STUDY ALONE CAPTURE ALL MASS MARKET CUSTOMERS SERVED BY CLECS USING THEIR SWITCHES?

A. No. The Line Count Study is under-inclusive because it does not identify CLECs that serve mass market customers using both their own switching and their own loop facilities, thus by-passing Verizon RI's network entirely. The most obvious of these are cable telephony providers that use their own cable facilities, along with their own switching, to provide telecommunications services to their (largely) residential customers. In its rules, the FCC expressly includes "intermodal providers of service comparable in quality to that of the incumbent LEC" for the purposes of the switching triggers. 47 C.F.R. § 51.319(d)(2)(iii)(A)(1)-(2). Although the FCC found that wireless service was not yet comparable to ILEC services for the purposes of the triggers and thus it did "not expect state commissions to consider CMRS providers in their application of the triggers," *Triennial Review Order* ¶ 1549 n.499, it imposed no such limitation on cable telephony, which offers the same voice quality and broadband capabilities to customers as traditional voice service over telephone company loops.

1 Cox Communications first deployed circuit-switched cable telephony in New
2 England in 1998.[7] Cox provides service to residential and business customers over
3 its cable facilities in West Warwick,[8] and in other areas of the state. Cox
4 Communications is the largest cable operator in Rhode Island, covering 305,300
5 subscribers, or approximately 97 percent of all cable customers in the state.[9]
6 According to one recent news article, "[t]he company provides service, or plans to,
7 in 38 of Rhode Island's 39 communities."[10] John Wolfe, Vice President of
8 Government and Public Affairs for Cox New England, has stated that Cox's
9 "business plan for Rhode Island has always been to serve the entire state."[11] Indeed,
10 by order issued on August 6, 2003, the Commission granted Cox status as an
11 "Eligible Telecommunications Carrier" under §214 of the Telecommunications Act
12 of 1996, in part based on Cox's certification that it offers all nine of the services that
13 are supported by the federal universal service support mechanisms throughout its
14 service area.
15 Cox Marketing Vice President Doreen Studley has reported that, in Rhode Island,
16 Cox cable modem and cable telephony penetration rates are at or above the

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7 CED/iNDEPTH, Convergence Emergence: The Advanced Services Deployment Handbook at 18 (Oct. 2002).

8 New Paradigm Resources Group, CLEC Report 2003, Chapter 6 – Cox Communications, Inc. at 8-10 (17th ed, 2003).

9 K. Yanity, Cox Communications Welcomes New Challenge in East Providence, R.I., Providence Journal (Aug. 23, 2003); J. Castellucci, Cox Will Continue Council Coverage – For Now, Providence Journal-Bulletin, Blackstone Valley Edition (Nov. 5, 2003).

10 T. Barmann, Rhode Island Cable Subscribers Should Know What Their Options Are, Providence Journal (Mar. 31, 2003).

11 M. Scanlon, Showdown in Bristol County, Cable World (Mar. 10, 2003).

1 company's nationwide average.[12] Recently, Cox Business Services reached its
2 100,000th customer location in New England.[13]
3
4 **Q. HOW HAS VERIZON RI IDENTIFIED CUSTOMERS OF CLECS**
5 **BYPASSING ITS NETWORK?**
6 A. To determine the location of these bypass customers, Verizon RI looked at
7 residential listings in the E911 database for customers of Cox Communications in
8 Rhode Island.
9 **Q. WHAT DO THE LINE COUNT STUDY AND E911 DATA SHOW?**
10 A. The results of the Line Count Study with the E911 additions described above are set
11 forth in the charts attached to this testimony as Attachment 2. The first page of
12 Attachment 2 shows the number of CLECs serving mass market customers in Rhode
13 Island by Density Zone. The remainder of Attachment 2 details the same
14 information broken down by wire center. In addition, the map attached as
15 Attachment 3 illustrates graphically the markets where, based on this data, CLEC
16 activity meets the self-provisioning trigger in Rhode Island. In particular,
17 Attachment 3 shows the number of CLECs serving mass-market customers by
18 density zone within the MSA in Rhode Island based on the data in Attachment 2.
19 As the data and the map demonstrate, Verizon RI meets the mass market switching
20 trigger in Density Zones 1 and 2 within the Providence-New Bedford-Fall River
21 MSA. In particular, the data show that there are a total of 6 unaffiliated CLECs

[12] M. Scanlon, Big Growth Spurt In a Small Region, Cable World (Jan. 20, 2003).

[13] Technology and Trust Drive Upward Growth of Cox Business Services, Business Wire (Oct. 27, 2003).

currently serving mass market customers with their own switches in these two Density Zones. In addition to the objective evidence that they are serving mass market customers from the Line Count Study and E911 data, each of these carriers holds itself out as providing voice service to residential or business customers, or both, in Rhode Island. *See* Attachment 4 (CLEC Tariff References).

Q. ARE THERE ANY OTHER CARRIERS PROVIDING VOICE SERVICE TO MASS MARKET CUSTOMERS IN THE RELEVANT GEOGRAPHIC MARKETS USING THEIR OWN SWITCHES THAT ARE NOT CAPTURED BY THIS DATA?

A. Yes. For example, the data do not capture competition from packet-switched, Internet Protocol telephony service, such as the service provided by Vonage – "the broadband phone company."[14] Vonage provides phone service to customers over residential broadband Internet connections, such as cable modem service. Vonage claims to be the "fastest growing telephone company in the US," with more than 70,000 lines in 1,900 active rate centers in over 100 US markets. It claims to be adding 10,000 lines per month, and that it transmits more than 3.0 million calls per week over its VoIP network.[15] Vonage represents that its service is not just comparable in quality, but superior to, Verizon service. Vonage refers to itself as an "all-inclusive home phone service" that is "like the home phone service you have today - only better!"[16] It claims to be the "key to easy and affordable communications, by offering flat-rate calling plans that include all of the features, as

[14] See Vonage, Vonage DigitalVoice: The Broadband Phone Company, http://www.vonage.com/.

[15] Vonage Press Release, Vonage Announces Private Label Agreement with CableAmerica (December 2, 2003).

[16] http://www.vonage.com/learn_tour.php.

1 well as many features not available from Verizon like online voicemail retrieval and
2 area code selection."[17]
3 Vonage is marketing its services in Rhode Island. According to press releases,
4 Vonage launched its DigitalVoice service using VoIP technology in Rhode Island in
5 January 2002, "enabling Vonage customers to keep their current numbers or choose
6 telephone numbers within the 401 area code." [18] According to its consumer website,
7 Vonage is currently offering service in Newport, Portsmouth, Providence and
8 Warwick.[19] In fact, in announcing the launching of service in New Hampshire,
9 Vonage's CEO stated "[t]he addition of New Hampshire and Western Massachusetts
10 completes our New England roll-out extending affordable, unlimited voice service to
11 two-thirds of consumers and small businesses across the region."[20] To date,
12 however, Verizon RI has not been able to identify the physical location of actual
13 Vonage customers based on Verizon RI's own data, and thus Verizon RI has not
14 counted Vonage toward its trigger showing at this time.

15 **Q. ARE THERE ANY OTHER REASONS WHY VERIZON RI'S TRIGGER**
16 **DATA UNDERCOUNT THE NUMBER OF MASS MARKET**
17 **CUSTOMERS SERVED BY COMPETITIVE SWITCHES?**

18 A. Yes. For example, the Line Count Study and the E911 data do not include
19 business customers of Cox, who are served using Cox's own loop facilities. The
20 E911 database does not differentiate between mass market business customers and

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[17] Vonage Press Room, News, Vonage, A Leading Provider of Broadband Phone Service is Now Serving New Bedford, (Nov. 2, 2003) (quoting Vonage chairman and CEO Jeffrey Citron), http://www.vonage.com/corporate/press_news.php?PR=2003_11_02_0.

[18] See Vonage Press Release, Vonage DigitalVoice comes to Rhode Island (January 13, 2002).

[19] Vonage, Available Area Codes, http://www.vonage.com/area_codes.php.

[20] Vonage Press Release, Vonage Launches Service in New Hampshire (January 14, 2002).

1 DS1 enterprise customers. For this reason, rather than make an arbitrary assumption
2 about how many of Cox's business customers appearing in the database are mass
3 market, Verizon RI did not count any of the Cox business customers in its analysis at
4 this time. However, based on Cox's Response to PUC 1-2(i), Cox appears to be
5 serving approximately ******See* CLEC Proprietary Attachment, Item 1*** mass
6 market business customers by way of approximately ******See* CLEC Proprietary
7 Attachment, Item 2*** analog lines.
8 The Line Count Study and E911 database also fail to capture a large number of mass
9 market customers located in apartment buildings and multi-tenant office buildings,
10 whose lines are aggregated on DS1 facilities, and then disaggregated onto separate
11 DS0 lines to serve multiple customers within the building. These residential and
12 business customers do not meet the definition of DS1 enterprise customers because
13 they are not, on an individual customer line-count basis, served using a DS1. It is
14 only when they are aggregated with other mass-market customers that it makes
15 economic sense to use a DS1 to serve them collectively. Although several CLEC
16 affiliates of incumbent LECs have taken this approach,[21] the information regarding
17 the number and location of these customers is uniquely within the knowledge of the
18 CLECs, and Verizon RI has limited ability to capture this data for the purposes of its
19 initial case. It is difficult to estimate the extent of the impact including these
20 customers could have on the results we present. While we do not have a figure for
21 Rhode Island, an industry source indicated that approximately 30-35 percent of the

[21] New Paradigm Resources Group, Inc., Competitive IOC Report 2001, Ch. 4 at 2 (1st ed. 2001).

population nationwide lives in multi-dwelling units that might be served in this manner.[22]

Q. HOW DOES VERIZON'S TRIGGER DATA COMPARE WITH DATA PROVIDED BY THE CLECS IN RESPONSE TO THE COMMISSION'S FIRST SET OF DATA REQUESTS?

A. The CLECs' Data Responses confirm Verizon RI's trigger data and our conclusion that the triggers for mass market switching are satisfied in Density Zones 1 and 2 in Rhode Island. With the exception of WorldCom, which has failed to answer the relevant Data Requests (PUC 1-2(e) and (f)), each of the six CLECs whom Verizon's data show as providing service to the mass market in Zones 1 and 2 over its own switch in Rhode Island has confirmed that fact through their Data Responses. *See* Responses of CLECs to PUC 1-2(e) and (f).

[22] See, e.g., Robert Currey, Vice Chairman, RCN Corporation, Prepared Testimony before the Senate Subcommittee on Antitrust, Business Rights, and Competition, Committee on the Judiciary, Cable and Video: Competitive Choices, Federal News Service (Apr. 4, 2001) ("About 30-35 percent of the population lives in multiple dwelling units (MDUs), such as apartments, cooperatives or condominiums.").

C. Conclusion Regarding Local Switching Triggers

Q. PLEASE SUMMARIZE YOUR CONCLUSION REGARDING THE LOCAL SWITCHING TRIGGERS.

A. As the data in Attachments 2 and 3 and the CLEC Responses to the Commission's Data Requests show, Verizon RI meets the mass market switching trigger in Density Zones 1 and 2 of the Providence-New Bedford-Fall River MSA. Therefore, the Commission should find no impairment in each of these markets in Rhode Island.

III. DEDICATED INTEROFFICE TRANSPORT TRIGGERS

A. Description of the Triggers for Dedicated Interoffice Transport

Q. BY WAY OF BACKGROUND, WHAT ARE DEDICATED INTEROFFICE TRANSPORT FACILITIES?

A. "Dedicated interoffice transmission facilities" (transport) are facilities dedicated to a particular customer or competitive carrier that it uses for transmission among incumbent LEC central offices and tandem offices." *Triennial Review Order* ¶ 361. The FCC's definition, therefore, excludes "shared transport," which are transmission facilities shared by more than one carrier. *Triennial Review Order* ¶ 361, n.1100, ¶ 533, n.1633.

Q. PLEASE DESCRIBE THE FCC'S TWO OBJECTIVE TRIGGERS FOR IDENTIFYING THE INTEROFFICE TRANSPORT ROUTES FOR WHICH COMPETING CARRIERS ARE NOT IMPAIRED WITHOUT ACCESS TO VERIZON'S FACILITIES.

A. In its *Triennial Review Order*, the FCC found that requesting carriers are impaired

1 on a nationwide basis without access to unbundled dark fiber, DS1, and DS3
2 dedicated transport facilities. *Triennial Review Order* ¶ 359. The FCC recognized,
3 however, that competing carriers often self-provision dedicated transport facilities or
4 obtain them on a wholesale basis from carriers other than the incumbent LEC. The
5 FCC authorized the state commissions to determine the specific routes that meet one
6 or both of two objective triggers – which show that CLECs are already providing
7 non-ILEC transport facilities, either to themselves (self-provisioning trigger) or to
8 other carriers (wholesale trigger). If a state commission finds that either trigger is
9 met for a route, the state commission "must make a finding of non-impairment," and
10 "the incumbent LEC will no longer be required to unbundle that transport along that
11 route[.]" *Triennial Review Order* ¶¶ 400, 411; *see also Triennial Review Order* ¶
12 405. In other words, when a transport route meets one or both of the FCC's triggers,
13 the state commission conducting the route-specific review must find that the FCC's
14 national finding of impairment has been overcome.
15 The first of the FCC triggers evaluates whether competing carriers have self-
16 deployed or self-provisioned dark fiber and DS3 capacity transport facilities. Under
17 the self-provisioning trigger, the Commission must find no impairment if three or
18 more unaffiliated competing carriers have deployed along a particular route their
19 own dark fiber or DS3 transport facilities. *Triennial Review Order* ¶¶ 405-411. The
20 FCC has also determined that the self-provisioning trigger is satisfied if, on a
21 particular route and for dark fiber and DS3 facilities, there are at least two
22 unaffiliated competing carriers using their own interoffice transport facilities, and at

1 least one additional carrier willing to provide transport facilities at wholesale. *See*
2 *Triennial Review Order* ¶ 408 n.1264. Leased "dark fiber" is considered to be that
3 carrier's own fiber for purpose of applying the self-provisioning trigger. If a carrier
4 has attached its own electronics to activate leased dark fiber at a DS3 level, the
5 activated fiber is also considered the carrier's own DS3 facility for the purpose of the
6 self provisioning trigger. *Triennial Review Order* ¶ 408.
7 The second FCC trigger looks at whether dark fiber, DS1, and DS3 interoffice
8 transport facilities are available from other carriers on a wholesale basis. Under this
9 test, competing carriers are not impaired without access to Verizon RI's transport
10 facilities if there are "two or more alternative transport providers, not affiliated with
11 each other or the incumbent LEC, immediately capable and willing to provide
12 transport at a specific capacity along a given route between incumbent LEC switches
13 or wire centers." *Triennial Review Order* ¶ 400. Dark fiber that is leased from a
14 carrier other than the incumbent LEC, and then offered on a wholesale basis, is
15 considered to be the buying carrier's own dark fiber. Similarly, dark fiber leased
16 from Verizon RI counts as the buying carrier's own fiber if that carrier attaches its
17 own electronics and offers the activated fiber at wholesale. *Triennial Review Order*
18 ¶ 416.
19 **Q. WHAT IS A ROUTE?**
20
21 A. As defined by the FCC, a "route" is any direct or indirect connection between two
22 Verizon RI wire centers or switches. In other words, "a 'route' may connect
23 Verizon RI wire centers or switches that are not directly connected to each other."

Triennial Review Order ¶ 402 n.1246. Thus, under the FCC's definition of a route, if a pair of Verizon RI wire centers meets either of the FCC's two triggers, competing carriers are not entitled to unbundled access to Verizon RI dedicated interoffice transmission facilities that directly or indirectly connect that pair of wire centers.

Q. WHAT DOES THE FCC REQUIRE AS FAR AS OPERATIONAL READINESS?

A. To count toward the triggers, the FCC requires the transmission facility to be operationally ready to provide transport between Verizon RI wire centers. This condition is satisfied if a carrier has an operational collocation arrangement and has pulled fiber into that arrangement (generally known as "fiber-based collocation"). The FCC made clear in its *Triennial Review Order* that "[c]ollocation may be in a more traditional collocation space or fiber can be terminated on a fiber distribution frame." *Triennial Review Order* ¶ 406 n.1257.

Q. PLEASE SUMMARIZE THE FCC'S RULES CONCERNING ITS TWO OBJECTIVE TRIGGERS FOR DEDICATED INTEROFFICE TRANSPORT.

A. To summarize the FCC's regulations:

- The FCC's self-provisioning trigger requires that a route connecting a pair of Verizon RI wire centers have at least the same three competing carriers (or at least the same two competing carriers and a wholesale provider), with operational, fiber-based collocation arrangements, and that these carriers have deployed dark fiber or DS3 level transport facilities.

- The FCC's wholesale trigger requires that a route connecting a pair of Verizon RI wire centers have at least two wholesale providers, with operational, fiber-based collocation arrangements, offering dark fiber, DS1 or DS3 level transport facilities to other carriers.
- If either trigger is met, Verizon RI is no longer required to make available unbundled dedicated transport on any Verizon RI transmission routes that directly or indirectly connect that pair of Verizon wire centers.

Q. THE FCC'S TWO TRIGGERS APPLY TO DIFFERENT "CAPACITIES" OF TRANSPORT. WHAT DETERMINES THE CAPACITY AT WHICH FIBER TRANSPORT FACILITIES OPERATE?

A. The capacity of fiber optic cable is almost exclusively based on the equipment that a carrier attaches to activate or "light" the fiber. As the FCC found in its *Triennial Review Order*, when carriers deploy new transport facilities, they deploy fiber optic facilities, and those facilities can operate at a wide range of capacities, from DS0 to OC192. *Triennial Review Order* ¶ 372. Fiber optic cable is also "channelized" – that is, larger capacity facilities are subdivided into smaller capacity facilities – by attaching the appropriate electronics at both ends of the fiber cable to provide these various capacities. For example, lower capacity DS1 and DS3 facilities are channelized simultaneously within the larger capacity OC12 or OC48 facility. The electronic equipment used to activate these various levels of capacity is widely available.

Q. WHAT DOES IT MEAN TO OPERATE A FIBER OPTIC TRANSPORT FACILITY AT OCN, DS1, OR DS3 LEVELS OF CAPACITY?

A. OCn transport refers to the technical distinction (*i.e.*, Optical Carrier or "OC") and the capacity (*i.e.*, "n") of fiber optic cable. For example, an optical carrier-level 3 – or OC3 capacity circuit – is capable of transporting up to three DS3 circuits (an OC3 is approximately 155 Mbps, while three DS3s are 135 Mbps), but terminates on a different type of electronic interface.

DS1 and DS3 transport likewise refer to the technical distinction (*i.e.*, Digital Signal or "DS") and capacity. The elemental DS speed is 64 Kbps, also known as a DS0, which is predominantly used to transport voice grade circuits. A DS1 capacity circuit contains the equivalent of 24 voice-grade or DS0 channels. A DS3 capacity circuit contains the equivalent of 28 DS1 channels or 672 DS0 channels.

Q. THE FCC'S DEDICATED TRANSPORT TRIGGERS ARE SEPARATELY APPLIED TO DARK FIBER FACILITIES. WHAT IS DARK FIBER?

A. Dark fiber is fiber optic strands of cable that have been deployed, but have not been activated or "lit" through connections to electronics (which would make the fiber capable of carrying communications). *See, e.g.*, *Triennial Review Order* ¶¶ 359 n.1097, 381.

B. Verizon RI's Evidence Of Routes Meeting The Triggers

Q. PLEASE DESCRIBE VERIZON RI'S EVIDENCE OF INTEROFFICE TRANSPORT ROUTES IN RHODE ISLAND THAT MEET THE FCC'S TRIGGERS FOR DEDICATED INTEROFFICE TRANSPORT.

A. Verizon RI has evidence that 25 pairs of Verizon wire centers -- or 25 direct routes -- in Rhode Island meet one or both of the FCC's triggers with respect to dark fiber. The evidence also shows that eight (8) pairs of Verizon RI wire centers -- or eight direct routes -- meet one or both of the FCC's triggers with respect to DS3 dedicated

1 transport, and that five (5) pairs of Verizon RI wire centers meet the FCC's
2 wholesale trigger for DS1 dedicated transport.[23] These results are depicted in the
3 table below:
4

Capacity Level	**Pairs of Verizon Wire Centers With ≥ 3 Self-Provisioning Carriers**	**Pairs of Verizon Wire Centers With ≥ 2 Wholesale Providers**	**Pairs of Verizon Wire Centers With Either ≥ 3 Self-Provisioning Carriers Or ≥ 2 Wholesale Providers**
Dark Fiber	20	23	25
DS-3	6	5	8
DS-1	N/A[24]	5	5

5
6 Attached to our testimony as Attachment 5.A is a map showing the particular direct
7 routes that satisfy the FCC's triggers for dark fiber, as summarized in the table
8 above. Attachment 5.B shows the particular routes that satisfy the DS3 triggers.
9 Attachment 5.C shows the particular routes that satisfy the DS1 trigger. Taken
10 together, the three maps reflect the vast amount of fiber that carriers other than
11 Verizon RI have deployed over the last several years. Not surprisingly, the wire
12 centers with multiple CLECs and wholesale providers with operational, fiber-based
13 collocation arrangements tend to be clustered in highly populated areas.
14

[23] As discussed in detail below, carriers who deploy their own transport almost always build at an OCn speed and then subdivide or channelize to DS1 and DS3 levels. For this reason, the routes in Rhode Island that satisfy the wholesale trigger for DS-3 transport also satisfy the wholesale trigger for DS1 transport, and vice versa.

[24] There is no self-provisioning trigger for dedicated DS1 capacity level transport.

Q. PLEASE DESCRIBE THE EVIDENCE OF TRANSPORT ROUTES IN RHODE ISLAND MEETING THE SELF-PROVISIONING TEST FOR DARK FIBER.

A. The evidence shows that there are 20 routes between pairs of Verizon wire centers in Rhode Island meeting the FCC's self-provisioning trigger for dark fiber. Each pair has (at least) the same three unaffiliated competing carriers with operational, fiber-based collocation facilities. The evidence showing that these routes meet the trigger is presented in Attachment 6.A, which identifies the relevant pair of wire centers for each route.[25]

For example, the Ashton (ASTNRIAN) wire center, identified on the first line and first two columns of Attachment 6.A., has the same three CLECs in common with the Centredale (NPRVRIMS) wire center, shown on the first line and in the third and fourth columns of Attachment 6.A. In this instance, the self-provisioning trigger is met through two competing carriers and one wholesale provider, each of whom has provisioned dark fiber between these two Verizon wire centers.

Q. PLEASE DESCRIBE VERIZON RI'S EVIDENCE OF TRANSPORT ROUTES MEETING THE FCC'S WHOLESALE TRIGGER FOR DARK FIBER.

A. In Rhode Island, 23 pairs of Verizon RI wire centers meet the FCC's wholesale trigger for dark fiber. Each pair of wire centers has (at least) the same two or more carriers that offer dark fiber facilities to other carriers, including arrangements such as competitive access transport terminations (known as "CATTs").

[25] The proprietary versions of Attachments 6 A, B, D and E also identify the particular CLECs with operational, fiber-based collocation arrangements in the Verizon RI wire centers. These proprietary attachments are being filed with the Commission and served on those parties that have signed the Protective Agreement in this proceeding. CLEC names are removed from the public versions of these Attachments.

Verizon RI's evidence that these transport routes meet the FCC's wholesale trigger for dark fiber is shown by Verizon wire center and wholesale provider in Attachment 6.B. For example, Attachment 6.B shows that there are at least two wholesale transport providers collocated at both the Washington Street and Broad Street wire centers in Providence, and each has fiber facilities exiting its arrangements.

Q. HOW MANY ROUTES SATISFY EITHER THE SELF-PROVISIONING TRIGGER FOR DARK FIBER OR THE WHOLESALE TRIGGER?

A. There are 25 routes that satisfy either the self-provisioning trigger for dark fiber or the wholesale trigger for dark fiber. Attachment 6.C depicts these routes, again by listing the Verizon RI wire centers that they connect. The total number of routes that satisfy either trigger is smaller than the sum of the routes that meet the self-provisioning trigger (20) and the routes that meet the wholesale trigger (23) because there is substantial overlap in the two sets of routes, *i.e.* many routes satisfy both triggers.

Q. PLEASE DESCRIBE THE EVIDENCE OF TRANSPORT ROUTES IN RHODE ISLAND MEETING THE SELF-PROVISIONING TEST FOR DS3 DEDICATED TRANSPORT.

A. There are six (6) routes between pairs of Verizon wire centers in Rhode Island meeting the FCC's self-provisioning trigger for DS3 dedicated transport. Each pair has (at least) the same three unaffiliated competing carriers with operational, fiber-based collocation facilities.

The evidence showing that these routes meet the trigger is presented in Attachment 6.D, which shows the relevant routes by the wire centers they

connect. For example, the first line of Attachment 6.D shows that the Cranston (CNTNRIPH) wire center (identified in the first two columns) has the same three CLECs in common with the Washington Street, Providence (PRVDRIWA) wire center (shown in columns three and four).

Q. PLEASE DESCRIBE VERIZON RI'S EVIDENCE OF TRANSPORT ROUTES MEETING THE FCC'S WHOLESALE TRIGGER FOR DS3 AND DS1 DEDICATED TRANSPORT.

A. In Rhode Island, five (5) pairs of Verizon RI wire centers meet the FCC's wholesale trigger for DS1 and DS3 dedicated transport. Each pair of wire centers has (at least) the same two or more carriers that offer wholesale dedicated transport services to other carriers. The evidence showing that these routes meet the wholesale trigger for DS1 and DS3 transport is shown in Attachment 6.E.

Q. HOW MANY ROUTES SATISFY EITHER THE SELF-PROVISIONING TRIGGER FOR DS3 DEDICATED TRANSPORT OR THE WHOLESALE TRIGGER FOR DS3 OR DS1 DEDICATED TRANSPORT?

A. Eight (8) routes meet either the self-provisioning trigger for DS3 dedicated transport or the wholesale trigger for DS1 and DS3 dedicated transport in Rhode Island. These routes are shown on Attachment 6.F. Again, some of the routes meet both of the triggers.

Q. ARE THE TRANSPORT FACILITIES THAT VERIZON RI HAS IDENTIFIED AS MEETING THE FCC'S TRIGGERS OPERATIONAL, AND DO THEY CONTAIN FIBER?

A. Yes. To count toward either of the FCC's triggers, the transport facility must be "operationally ready to provide transport into or out of" the Verizon RI wire centers; *i.e.*, the carrier's collocation facility must be provisioned and powered, and its fiber

1 must have been pulled into the collocation arrangement. *Triennial Review Order* ¶
2 406 nn.1256, 1257.
3 Verizon RI has relied on three sources of evidence in determining which collocation
4 arrangements should be included in defining the routes that satisfy the triggers.
5 First, in order to determine which collocation arrangements have been provisioned,
6 powered and fed by fiber, Verizon RI conducted physical inspections of all
7 collocation arrangements in 11 of its 30 wire centers in Rhode Island.[26] Inspectors
8 checked each collocation facility in those Verizon RI wire centers to verify that there
9 is powered equipment in place (*i.e.*, it is operational), and that the collocating carrier
10 had non-Verizon fiber optic cable that both terminated at its collocation facility and
11 left the wire center. Verizon RI adopted rigorous controls to ensure the reliability of
12 these data, including supervision by the director in charge of provisioning
13 collocation throughout Verizon RI, written procedures for each step of the inspection
14 process, standard forms that were filled out by each inspector, signed statements by
15 the inspectors verifying the accuracy and reliability of the information provided and
16 the inspector's compliance with the written procedures, and signed statements by
17 each inspector's supervisor confirming that the inspector followed the appropriate
18 procedures. Those collocation arrangements which, through this rigorous process of
19 inspection and verification, were found to be operational and to have non-Verizon

[26] Because conducting these physical inspections is labor intensive and time consuming, Verizon RI did not inspect every wire center in the State where there was a potential that multiple competing carriers have placed equipment and installed fiber transport facilities into these arrangements. For this reason, among others, data submitted by competing carriers in this proceeding identify additional collocation arrangements or transport routes, that were not identified in Verizon's inspections, which, nevertheless, meet one or both of the FCC's triggers.

1 RI fiber were included in Verizon RI's data for the triggers analyses. Copies of the
2 Methods and Procedure for conducting the physical inspections, and verification
3 form, are attached to our testimony as Attachment 7 and 7.A, respectively.
4 Second, Verizon RI has incorporated into its triggers analyses the information
5 provided by CLECs in response to the Commission's First Set of Data Requests.
6 Specifically, in response to Data Request PUC 1-7, a number of CLECs have stated
7 that they have provisioned their own transport between particular Verizon RI wire
8 centers, which they have identified. Third, the websites of two companies who did
9 not respond to the Commission's Data Requests (NEESCOM and NEON) indicate
10 the Verizon RI wire centers to which they offer wholesale transport. Thus, Verizon
11 RI concludes that a CLEC has provisioned transport to a given wire center if: (1)
12 Verizon RI's wire center inspections found the CLEC to have an operational
13 collocation arrangement in the wire center fed by non-Verizon RI fiber; (2) the
14 CLEC has admitted in its responses to Data Requests that it has self-provided
15 transport to that wire center; or (3) in the absence of responses to Data Requests, the
16 CLEC's website states that it offers wholesale transport to that wire center.
17 Verizon RI's transport case is of limited scope. Verizon RI inspected less than 37
18 percent of its Rhode Island wire centers and seeks relief from the Commission for
19 routes that originate and terminate in an even lower percentage of Verizon RI
20 wire centers. Put differently, there are 435 possible intraLATA direct transport
21 routes in Rhode Island, but Verizon RI is only asking the Commission to affirm
22 that 25 of those routes (less than 6%) meet one or more of the FCC's dedicated

transport triggers and, therefore, should no longer be unbundled under Section 251 of the Act.

Q. WITH RESPECT TO VERIZON RI'S WIRE CENTER INSPECTIONS, IF A CARRIER HAS OPERATIONAL FIBER IN TWO VERIZON RI WIRE CENTERS, IS IT REASONABLE TO INFER THAT THE CARRIER HAS A TRANSPORT ROUTE BETWEEN THOSE WIRE CENTERS?

A. Yes. When carriers deploy their own fiber transport facilities, they typically deploy fiber optic rings that connect to their points-of-presence (or "POPs") in the LATA and various customer premises, in addition to connecting to Verizon RI's wire centers. Therefore, if the same carrier has fiber-based facilities in two Verizon RI wire centers, it is reasonable to infer that those fiber facilities are part of a CLEC-operated ring and that traffic can be routed from one Verizon RI wire center to the other. It is also reasonable to infer that these CLEC-operated fiber rings connect to the CLEC's POP, and that traffic can flow to and from all parts of the carrier's network through the POP. Indeed, substantial public information distributed on numerous facilities-based carrier websites confirms that carriers engineer their fiber optic networks specifically to interconnect ILEC central offices to InterExchange Carriers ("IXC") and CLEC POPs as well as larger customer premises. For example, NEESCom's website includes detailed maps of two fiber rings it operates in Providence, RI.[27] As noted on its website, NEESCom's Providence Hub Ring "connects directly to the ILEC Central Office." Fibertech boasts on its website that, "You'll find Fibertech Networks in leading second and third-tier markets throughout

[27] URL: http://www.neescom.com

the Northeast…"[28] and that, "All told, in an average market we're building and operating over 100 route miles connecting an average of 15 central offices and Carrier Hotels."

Of course, Verizon RI does not have direct knowledge of how a carrier uses its fiber facilities. However, no carrier has asserted in response to the Commission's Data Requests that, though it has self-provisioned its own transport to particular wire centers, it cannot route telecommunications traffic from one of those wire centers to another. Absent a showing by a carrier that its transport facilities do not and cannot connect pairs of Verizon RI wire centers, the Commission should reasonably infer that these carriers' networks connect together the transport facilities known to exist at each end of each identified route.

Q. DOES THE EVIDENCE WARRANT THE INFERENCE THAT THESE FIBER TRANSPORT FACILITIES DEPLOYED BY OTHER CARRIERS ARE USED FOR DS1 AND DS3 TRANSPORT?

A. Yes. The identification of the routes meeting the FCC's triggers is based on the reasonable inference that when competing carriers deploy fiber and attach OCn electronics (*e.g.*, OC48 multiplexers), they then subdivide -- *i.e.*, channelize -- the OCn system into the lower transport levels required by their customers, including DS3s and DS1s. While fiber transport facilities are capable of operating at various levels of capacity, the capacity of the fiber is almost entirely a function of the electronics that a carrier attaches, not something inherent in the fiber itself. Once the fiber is deployed, it is operated at a DS1, DS3, OC48 or higher level – or at all of

[28] URL: http://www.fibertech.com

1 these levels simultaneously – simply by changing the electronics. The electronics
2 used to channelize the OCn system to DS1 and DS3 transport levels are commonly
3 available.

4 Verizon RI's inference that competing carriers who deploy fiber optics generally
5 build OCn level transport facilities, capable of channelization to DS1 or DS3, is
6 consistent with standard industry practices. Few, if any, carriers deploy transport
7 facilities to accommodate only a DS1 or only a DS3. *Triennial Review Order* ¶¶
8 386, 391. To the contrary, as the FCC found in its *Triennial Review Order*, carriers
9 deploying fiber transport facilities almost always build at an OCn speed. *Triennial*
10 *Review Order* ¶ 382 ("The record indicates that when competing carriers self-deploy
11 transport facilities, they often deploy fiber optic facilities that are activated at OCn
12 levels."). For example, AT&T reports that it, along with "most carriers, including
13 incumbent LECs," *Triennial Review Order* ¶ 372 n.1144, generally constructs its
14 interoffice transport networks at an OC48 capacity. Verizon RI's interoffice
15 transport facilities likewise are generally built at an OC48 capacity.

16 These OCn facilities are then subdivided or channelized to a DS1 or DS3 level
17 because these are the levels at which transport is typically requested by end user
18 customers. There is considerable public evidence, that competing carriers deploy
19 DS3 and DS1 circuits over their OC transport facilities in Rhode Island. For
20 example:

- MCI, which claims to have "the most scalable IP network available," offers end users "speeds from dial to OCn48;"[29] and
- AT&T offers private line services at all speeds up to OC192, including DS3.[30]

The inferences underlying Verizon RI's self-deployment trigger case are entirely consistent with the way transport facilities commonly are constructed and operated. The Commission therefore should find that self-provisioned fiber optic transport facilities carry individual DS3 circuits -- unless a carrier shows, for a particular route, that it is not carrying DS3 circuits over its fiber facility.

Q. DO THESE FIBER TRANSPORT FACILITIES ALSO CONTAIN DARK FIBER?

A. Since dark fiber is simply fiber optic cable "that has not been activated through connections to optronics that light it, and thereby render it capable of carrying communications," *Triennial Review Order* ¶ 381, all fiber transport facilities, regardless of the capacities at which they now operate, once consisted entirely of dark fiber. Put differently, evidence of "lit" fiber is also evidence that a carrier has self-provisioned dark fiber.

Additionally, as a matter of standard industry network engineering design and sound economics, the vast majority of self-provisioned fiber transport facilities will have spare dark fibers. Carriers simply do not incur the large fixed and sunk costs

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[29] http://global.mci.com/about/network. MCI advertises private line services encompassing "all speeds from Voice Grade to OC12c." Http://www.global.mci.com/us/enterprise/data/privatelines/domestic.

[30] AT&T Communications of New England, Inc. Rhode Island P.U.C. No. 5; *see also* http://serviceguide.att.com/servicelibrary/business/ext/files/MA09SD.pdf#page=1.

required to self-provision fiber transport facilities – including the costs of obtaining rights of way, digging up the streets, placing the fiber and/or attaching it to poles – without leaving even a single strand of dark fiber. Fiber transport facilities are always installed with extra fiber strands to meet projected demand growth. Furthermore, fiber cables are commonly manufactured and deployed in increments of 12 fiber strands (*i.e.*, 12, 24, 48, etc., fibers per cable). Verizon RI looked at data from fiber-based collocation applications in Rhode Island. These data indicated that the majority of CLEC fiber-based collocation applications requested the ability to pull two fiber cables with each cable containing 144 fibers through Verizon RI's cable vault to their collocation arrangements. OCn electronics (*e.g.*, fiber multiplexers) generally require only 4 fibers to activate ("light") the fiber to provide dedicated transport. The difference between the large number of fibers CLECs anticipated pulling into their collocation arrangements (e.g., 288 fibers) and the small number of fibers required for dedicated transport strongly suggests the existence of spare fiber. And if there is unlit fiber in a self-deployed transport facility, the facility meets the FCC's self-deployment trigger for dark fiber.

Again, Verizon RI does not have direct knowledge of how much dark fiber a carrier has provisioned. However, absent a showing by a carrier that its transport facilities have no spare dark fiber, the Commission should rely on Verizon RI's evidence that these carriers' fiber networks also include available dark fiber on each identified route.

Q. HOW DID VERIZON RI IDENTIFY CARRIERS OFFERING TRANSPORT FACILITIES ON A WHOLESALE BASIS?

A. There is considerable evidence that allows Verizon RI to identify routes that qualify for the wholesale trigger, including the following.

- A CLEC's admission in response to the Commission's Data Requests, specifically PUC 1-8, that it provides wholesale transport in Rhode Island.
- If a carrier holds itself out as a wholesale provider on its website -- and does not limit its representation to particular routes -- Verizon RI identified the carrier as a wholesale provider.
- If a carrier has a CATT arrangement in any of Verizon RI's wire centers, which is an arrangement specifically designed for wholesale providers, Verizon RI considered the carrier to be a wholesale provider.
- Verizon RI identified a carrier as a wholesale provider if it is listed in the *New Paradigm CLEC Report 2003* as offering dedicated access transport, unless the offering is limited to particular routes, and unless the carrier indicates that it will not provide its dedicated access transport to other carriers. The New Paradigm Resources Group ("NPRG"), which prepared the *New Paradigm CLEC Report*, provides, among other things, business planning advice to CLECs. NPRG reports that it gets information from the CLECs themselves, and provides these carriers with the opportunity to provide direct input on coverage.[31]

[31] In addition, certain carriers in Rhode Island may supply transport facilities to Universal Access, Inc. Universal Access is a broker of transport services, and is a certificated carrier in all of Verizon's territories, including Rhode Island. All carriers that sell transport facilities to Universal Access are selling to another carrier, and, therefore, are appropriately considered wholesale providers. In

1 The carriers that Verizon RI has identified as offering transport facilities to other
2 carriers in Rhode Island are the following:

3 • Fibertech Networks offers "open access" networks that connect ILEC central
4 offices, carrier hotels, data centers, and other traffic aggregator points,
5 enabling numerous telecommunications providers the ability to offer facilities-
6 based services.[32] Fibertech has also stated in its response to PUC 1-8 that it
7 offers wholesale transport over its own dark fiber in Rhode Island.

8 • NEON Communications' Central Office Access Service provides wholesale,
9 high bandwidth SONET private line connectivity to key ILEC COs for
10 carriers and service providers serving the enterprise market. NEON offers
11 SONET private line connectivity from OC-3 through OC-48 as well as
12 electrical DS3s. NEON also offers individual dark fiber strands to its carrier
13 customers.[33]

14 • NEESCom promotes itself as a "carrier neutral provider" that builds and
15 leases dark fiber networks and metro rings for data transmission, telephone
16 and Internet access.[34] NEESCom's website states that its "mission is to make
17 local telecommunications competition work by connecting New England
18 communities with the power of light." And, "The NEESCom's [sic] point-to-
19 point network currently totals more than 700 route miles and is strategically

---

addition, Universal Access indicates in its website materials that many of its customers are carriers, further supporting Verizon's conclusion that Universal Access' suppliers are wholesale providers.

[32] http://www.fibertech.com/about.cfm.

[33] http://www.neoninc.com/

[34] http://www.neescom.com./company/index.htm

designed to offer our customers access to over 50 ILEC central offices and major carrier POPS." NEESCom's website also includes maps of its "Providence Capitol Ring" and "Providence Hub Ring" among others.

- AT&T and MCI/WorldCom. The *New Paradigm CLEC Report 2003* indicates that both of these carriers offer dedicated access transport in Rhode Island.

The above evidence shows that these carriers hold themselves out as offering transport facilities on a wholesale basis. Absent particularized, route-specific evidence to the contrary, the Commission should rely on Verizon RI's evidence of a carrier's general willingness to offer its transport facilities on a wholesale basis and treat all such carrier's transport facilities as available for leasing at wholesale.

Q. HOW DID VERIZON RI IDENTIFY THE CAPACITIES AT WHICH THE WHOLESALE PROVIDERS OFFER DEDICATED TRANSPORT?

A. As demonstrated above, when a carrier deploys its own transport, that transport will include both DSn capacity level service and dark fiber. Accordingly, Verizon RI has treated each of the above wholesale providers as making transport available at each capacity level (DS1, DS3 and dark fiber) unless Verizon RI has evidence that a particular carrier does not offer a particular capacity level. For example, the websites of both Fibertech and NEESCOM make clear that they offer dark fiber only and leave it to their customers to light the fiber by installing multiplexing equipment. Accordingly, Verizon RI has included the networks of these companies toward meeting the FCC's dark fiber triggers only, and has not counted them toward meeting the triggers for DS1 or DS3 transport. Absent

similar specific evidence that the other wholesalers listed above refuse to sell transport at specific capacities on a particular route, the Commission should find that they will sell DS1 and DS3 transport and dark fiber facilities on their routes.

C. Conclusion Regarding Dedicated Transport Triggers

Q. PLEASE SUMMARIZE THE CONCLUSIONS YOU DRAW FROM YOUR TESTIMONY ON DEDICATED INTEROFFICE TRANSPORT.

A. Verizon RI has presented evidence that, in Rhode Island, 25 direct routes (or pairs of Verizon RI wire centers) meet one or both of the FCC's two objective triggers for dark fiber transport, eight routes meet one or both of the FCC's triggers for DS3 dedicated transport and five routes meet the FCC's wholesale trigger for DS1 dedicated transport.

IV. HIGH CAPACITY LOOPS TRIGGERS

Q. IS VERIZON RI PRESENTING EVIDENCE OF THE HIGH CAPACITY LOOPS DEPLOYED BY OTHER CARRIERS THAT MEET THE FCC'S TWO TRIGGERS?

A. Not at this time or in this docket. In the *Triennial Review Order*, the FCC established two triggers for state commissions to apply to determine whether competing carriers are impaired without access to Verizon RI's unbundled high capacity loops. Information about where carriers other than Verizon RI have deployed high capacity loops is almost exclusively within the control of those other carriers. Though some competing carriers have provided some of that information to the Commission in response to its Data Requests, such data does not warrant the

time and expense of pursuing a high capacity loops case at this time. Verizon RI reserves its right to petition the Commission in the future, however, as provided in the *Triennial Review Order*, to find that competing carriers have deployed high capacity loops to particular customer locations in Rhode Island in satisfaction of the FCC's triggers or other criteria set forth in the *Triennial Review Order*, and therefore that Verizon RI need no longer unbundle its high capacity loops serving those locations.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

RHODE ISLAND LATA 130

Count				CLEC								
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	009	020	022	024	025	026	035	066
ASTNRIAN	ASHTON	NPRVRIMS	CENTREDALE					1		1		1
		PRVDRIBR	BROAD STREET					1		1		1
		PRVDRIWA	WASHINGTON STREET					1		1		1
		PWTCRIHI	PAWTUCKET					1		1		1
		WNSCRICL	WOONSOCKET					1		1		1
CNTNRIPH	CRANSTON	PRVDRIWA	WASHINGTON STREET					1	1		1	1
		PWTCRIHI	PAWTUCKET					1	1			1
		WNSCRICL	WOONSOCKET					1	1			1
NPRVRIMS	CENTREDALE	PRVDRIBR	BROAD STREET					1		1		1
		PRVDRIWA	WASHINGTON STREET					1		1		1
		PWTCRIHI	PAWTUCKET					1		1		1
		WNSCRICL	WOONSOCKET					1		1		1
PRVDRIBR	BROAD STREET	PRVDRIWA	WASHINGTON STREET					1		1	1	1
		PWTCRIHI	PAWTUCKET				1	1		1		1
		WNSCRICL	WOONSOCKET				1	1		1		1
PRVDRIWA	WASHINGTON STREET	PWTCRIHI	PAWTUCKET	1				1	1	1		
		WNSCRICL	WOONSOCKET					1	1	1		
		WRWKRIWS	WARWICK	1	1	1		1				
PWTCRIHI	PAWTUCKET	WNSCRICL	WOONSOCKET					1	1	1		
		WRWKRIWS	WARWICK	1				1				1

RHODE ISLAND LATA 130

Count				CLECNum				
WIRE CENTER 1	WIRE CENTER 1 Name	WIRE CENTER 2	WIRE CENTER 2 Name	003	022	026	035	066
ASTNRIAN	ASHTON	NPRVRIMS	CENTREDALE			1		1
		PRVDRIBR	BROAD STREET			1		1
		PRVDRIWA	WASHINGTON STREET			1		1
		PWTCRIHI	PAWTUCKET			1		1
		WNSCRICL	WOONSOCKET			1		1
CNTNRIPH	CRANSTON	PRVDRIBR	BROAD STREET				1	1
		PRVDRIWA	WASHINGTON STREET				1	1
		WRWKRIWS	WARWICK				1	1
EPRVRINB	EAST PROVIDENCE	PRVDRIWA	WASHINGTON STREET	1		1		
		PWTCRIHI	PAWTUCKET	1		1		
NPRVRIMS	CENTREDALE	PRVDRIBR	BROAD STREET			1		1
		PRVDRIWA	WASHINGTON STREET			1		1
		PWTCRIHI	PAWTUCKET			1		1
		WNSCRICL	WOONSOCKET			1		1
PRVDRIBR	BROAD STREET	PRVDRIWA	WASHINGTON STREET			1	1	1
		PWTCRIHI	PAWTUCKET		1	1		1
		WNSCRICL	WOONSOCKET		1	1		1
		WRWKRIWS	WARWICK				1	1
PRVDRIWA	WASHINGTON STREET	PWTCRIHI	PAWTUCKET	1		1		1
		WNSCRICL	WOONSOCKET			1		1
		WRWKRIWS	WARWICK	1			1	1
PWTCRIHI	PAWTUCKET	WNSCRICL	WOONSOCKET		1	1		1
		WRWKRIWS	WARWICK	1				1

RHODE ISLAND LATA 130						
WIRE CENTER 1	**WIRE CENTER 1NAME**	**WIRE CENTER 2**	**WIRE CENTER 2 NAME**	**LATA**	**Self-Provider Trigger**	**Wholesale-Provider Trigger**
ASTNRIAN	ASHTON	NPRVRIMS	CENTREDALE	130	Y	Y
ASTNRIAN	ASHTON	PRVDRIBR	BROAD STREET	130	Y	Y
ASTNRIAN	ASHTON	PRVDRIWA	WASHINGTON STREET	130	Y	Y
ASTNRIAN	ASHTON	PWTCRIHI	PAWTUCKET	130	Y	Y
ASTNRIAN	ASHTON	WNSCRICL	WOONSOCKET	130	Y	Y
CNTNRIPH	CRANSTON	PRVDRIBR	BROAD STREET	130		Y
CNTNRIPH	CRANSTON	PRVDRIWA	WASHINGTON STREET	130	Y	Y
CNTNRIPH	CRANSTON	PWTCRIHI	PAWTUCKET	130	Y	
CNTNRIPH	CRANSTON	WNSCRICL	WOONSOCKET	130	Y	
CNTNRIPH	CRANSTON	WRWKRIWS	WARWICK	130		Y
EPRVRINB	EAST PROVIDENCE	PRVDRIWA	WASHINGTON STREET	130		Y
EPRVRINB	EAST PROVIDENCE	PWTCRIHI	PAWTUCKET	130		Y
NPRVRIMS	CENTREDALE	PRVDRIBR	BROAD STREET	130	Y	Y
NPRVRIMS	CENTREDALE	PRVDRIWA	WASHINGTON STREET	130	Y	Y
NPRVRIMS	CENTREDALE	PWTCRIHI	PAWTUCKET	130	Y	Y
NPRVRIMS	CENTREDALE	WNSCRICL	WOONSOCKET	130	Y	Y
PRVDRIBR	BROAD STREET	PRVDRIWA	WASHINGTON STREET	130	Y	Y
PRVDRIBR	BROAD STREET	PWTCRIHI	PAWTUCKET	130	Y	Y
PRVDRIBR	BROAD STREET	WNSCRICL	WOONSOCKET	130	Y	Y
PRVDRIBR	BROAD STREET	WRWKRIWS	WARWICK	130		Y
PRVDRIWA	WASHINGTON STREET	PWTCRIHI	PAWTUCKET	130	Y	Y
PRVDRIWA	WASHINGTON STREET	WNSCRICL	WOONSOCKET	130	Y	Y
PRVDRIWA	WASHINGTON STREET	WRWKRIWS	WARWICK	130	Y	Y
PWTCRIHI	PAWTUCKET	WNSCRICL	WOONSOCKET	130	Y	Y
PWTCRIHI	PAWTUCKET	WRWKRIWS	WARWICK	130	Y	Y

RHODE ISLAND LATA 130

Count				CLEC						
WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	003	009	020	024	025	026	035
CNTNRIPH	CRANSTON	PRVDRIWA	WASHINGTON STREET				1	1		1
PRVDRIBR	BROAD STREET	PRVDRIWA	WASHINGTON STREET				1		1	1
PRVDRIWA	WASHINGTON STREET	PWTCRIHI	PAWTUCKET	1			1	1	1	
		WNSCRICL	WOONSOCKET				1	1	1	
		WRWKRIWS	WARWICK	1	1	1	1			
PWTCRIHI	PAWTUCKET	WNSCRICL	WOONSOCKET				1	1	1	

RHODE ISLAND LATA 130

Count				CLEC			
WIRE CENTER 1	WIRE CENTER 1 NAME	WIRE CENTER 2	WIRE CENTER 2 NAME	003	026	035	
EPRVRINB	EAST PROVIDENCE	PRVDRIWA	WASHINGTON STREET	1	1		
		PWTCRIHI	PAWTUCKET	1	1		
PRVDRIBR	BROAD STREET	PRVDRIWA	WASHINGTON STREET		1	1	
PRVDRIWA	WASHINGTON STREET	PWTCRIHI	PAWTUCKET	1	1		
		WRWKRIWS	WARWICK	1		1	

RHODE ISLAND LATA 130						
WIRE CENTER 1	**WIRE CENTER 1 NAME**	**WIRE CENTER 2**	**WIRE CENTER 2 NAME**	**LATA**	**Self-Provider Trigger**	**Wholesale-Provider Trigger**
CNTNRIPH	CRANSTON	PRVDRIWA	WASHINGTON STREET	130	Y	
EPRVRINB	EAST PROVIDENCE	PRVDRIWA	WASHINGTON STREET	130		Y
EPRVRINB	EAST PROVIDENCE	PWTCRIHI	PAWTUCKET	130		Y
PRVDRIBR	BROAD STREET	PRVDRIWA	WASHINGTON STREET	130	Y	Y
PRVDRIWA	WASHINGTON STREET	PWTCRIHI	PAWTUCKET	130	Y	Y
PRVDRIWA	WASHINGTON STREET	WNSCRICL	WOONSOCKET	130	Y	
PRVDRIWA	WASHINGTON STREET	WRWKRIWS	WARWICK	130	Y	Y
PWTCRIHI	PAWTUCKET	WNSCRICL	WOONSOCKET	130	Y	

Appendix D:

Verizon testimony and data submitted in state TRO proceedings

Exhibit 3: New Jersey

STATE OF NEW JERSEY

BOARD OF PUBLIC UTILITIES

In the Matter of the Implementation Of the Federal Communications Commission's Triennial Review Order	)))))	Docket No. TO03090705

SUPPLEMENTAL TESTIMONY OF HAROLD E. WEST III

AND

JOHN WHITE

ON BEHALF OF VERIZON NEW JERSEY INC.

PUBLIC

January 16, 2004

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ATTACHMENTS

Attachment 1: Summary of CLEC Discovery Responses
Attachment 2: Maps showing location of mass market customers being serviced by CLEC switches.
Attachment 3: Tab A – Direct routes meeting the FCC's self-provisioning trigger for dark fiber;
Tab B – Direct routes meeting the FCC's self-provisioning trigger for DS3s level capacity;
Tab C – Direct routes meeting the wholesale trigger for dark fiber;
Tab D – Direct routes meeting the wholesale trigger for DS1s;
Tab E – Direct routes meeting the wholesale trigger for DS3s.
Attachment 4: CLEC responses to discovery requests.
Attachment 5: Customer locations meeting loop triggers.
Attachment 6: CLEC web pages.

1 **I. INTRODUCTION**

2 Q. **MR. WEST, ARE YOU THE SAME MR. WEST THAT FILED INITIAL**
3 **TESTIMONY IN THIS PROCEEDING ON DECEMBER 3, 2003?**

4 A. Yes. I am.

5

6 R. **MR. WHITE, PLEASE STATE YOUR FULL NAME AND BUSINESS**
7 **ADDRESS.**

8 A. My name is John White. My business address is Sunset Drive, North Salem, New
9 York.

10

11 **Q. BY WHOM ARE YOU EMPLOYED, AND IN WHAT CAPACITY?**

12 A. I am a principal of 8 Degree Research and Consulting, Inc.

13

14 **Q. PLEASE BRIEFLY DESCRIBE YOUR EXPERIENCE IN THE**
15 **TELECOMMUNICATIONS INDUSTRY AND EDUCATIONAL**
16 **BACKGROUND.**

17 A. I was employed by Verizon, or by its affiliates and predecessor companies, from
18 1966 to November 2003. Before joining Verizon, I worked for a number of
19 engineering and construction firms. During my first 12 years at Verizon, I was
20 involved in virtually every aspect of Outside Plant telephone engineering. From
21 1979 to 1994, I held managerial positions in Construction, Installation and
22 Maintenance, and Engineering, in both line and staff capacities. I was appointed
23 Executive Director for Transport Technology Planning in 1994, and became

Executive Director Wholesale Services in June 2000 with responsibility for introduction of wholesale digital services. In March of 2003, I was appointed Executive Director for Fiber to the Premises.

I began undergraduate engineering studies at the University of Buffalo and went on to receive a Bachelors Degree in Business Administration and a Masters in Business Administration from Pace University. I have also continued graduate work at Pace University in Finance and Economics as part of a Doctorate of Professional Studies Program.

In November 2003, I left Verizon and started my own consulting company, 8 Degree Research and Consulting, Inc.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE STATE UTILITY COMMISSIONS?

A. Yes, I have testified before the FCC and state commissions in connection with Verizon's applications for long distance entry (*i.e.*, Section 271 proceedings) for New York, Massachusetts, Pennsylvania, New Jersey, Vermont, New Hampshire, Maine, Virginia, Maryland, District of Columbia and West Virginia. I also testified in UNE proceedings in New York, Massachusetts, the District of Columbia, Maryland, New Jersey and Pennsylvania. I have also been involved in a number of arbitrations related to DSL services and line sharing in New York, Massachusetts, Maryland and Pennsylvania.

Q. MR. WHITE, ARE YOU ADOPTING MR. PEDUTO'S TESTIMONY FILED WITH THE BOARD ON DECEMBER 3, 2003?

A. Yes. I am.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY.

A. Our Supplemental Direct Testimony presents additional evidence provided by the CLECs in response to various Discovery Requests, which further demonstrates that, under the standards set forth in the Federal Communications Commission's ("FCC") Triennial Review Order ("TRO"), Verizon is not required to provide unbundled access to mass market switching in any of the markets identified in our December 3, 2003 Direct Testimony. In this Supplemental Direct Testimony, we are also providing the Board with analyses of the evidence of self-provisioned and wholesale dedicated interoffice transport and enterprise high capacity loops produced by certain CLECs in response to discovery requests.

III. MASS MARKET SWITCHING

Q. WHAT ADDITIONAL INFORMATION DID THE CLECS PROVIDE REGARDING MASS MARKET SWITCHING?

A. In response to the discovery requests propounded by Board Staff, Verizon, and other parties, several CLECs identified the Verizon wire center locations where they provide voice grade DS0 service to mass market customers using their own

switches, or the switches of an affiliate. In addition, some CLECs provided even more granular information, identifying the total number of voice grade equivalent lines that they provide to customers in each wire center. Verizon compared this information with the results of the Line Count Study and residential E911 analysis described in our Direct Testimony, both at the MSA and Density Zone level, and at the wire center level.

Q. DID EVERY CLEC IDENTIFIED BY VERIZON IN THE LINE COUNT STUDY AND RESIDENTIAL E911 ANALYSIS FULLY AND ADEQUATELY RESPOND TO THE VARIOUS DISCOVERY REQUESTS?

A. No, not all of them. Some CLECs have provided deficient responses that make a side-by-side comparison with the results of Verizon's Line Count Study difficult, as described later in our testimony. Verizon will continue its efforts to obtain complete, detailed information from all carriers in New Jersey so that this information is available to the Board. However, the evidence that Verizon has obtained so far fully supports the mass market trigger showing in our initial Direct Testimony.

Q. WHAT DOES THE DATA PRODUCED BY THE CLECS SHOW?

A. As demonstrated in Attachment 1, the CLEC responses to the discovery requests received to date are consistent with results of Verizon's Line Count Study and residential E911 analysis, and demonstrate that each of the carriers identified by Verizon in our initial Direct Testimony does, in fact, serve mass market customers in the MSAs identified by Verizon in the Line Count Study:

1 **[BEGIN CLEC PROPRIETARY DATA]**

[END CLEC PROPRIETARY DATA]

Moreover, there are some CLECs -- **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxxxx **[END CLEC PROPREITARY INFORMATION]** that have indicated that they provide service to mass market customers using their own switching that Verizon did not identify in its own internal data. The maps contained in Attachment 2 show the location of mass market customers currently being served by CLEC switches based on the data in Attachment 1 compared with the market areas where Verizon is seeking relief.

As this analysis shows, the CLECs' own data confirm that Verizon meets the FCC's mass market switching trigger in Density Zones 1 and 2 within the New York-Newark-Edison and Philadelphia-Camden-Wilmington MSAs. Therefore, the Board should make a finding of no impairment in each of these markets.

IV. DEDICATED TRANSPORT

Q. PLEASE SUMMARIZE THE DEDICATED TRANSPORT ROUTES IN NEW JERSEY THAT VERIZON BELIEVES MEET ONE OR BOTH OF THE FCC'S TWO TRANSPORT TRIGGERS ONCE THE CLEC DISCOVERY RESPONSES HAVE BEEN APPROPRIATELY INCORPORATED?

A. Verizon has combined competitive carriers' discovery responses, where appropriate,

with the information used in its initial testimony, which was drawn largely from public and internal sources. In a number of cases, Verizon has also adjusted the information it used in its initial testimony to reflect the competitive carriers' responses. This combined and adjusted evidence is presented in Attachment 3 (Tabs A-E). Tab A presents the direct routes meeting the FCC's self-provisioning trigger for dark fiber; Tab B presents the direct routes meeting the self-provisioning trigger for DS3s level capacity; Tab C presents the direct routes meeting the wholesale trigger for dark fiber; Tab D presents the direct routes meeting the wholesale trigger for DS1s; and Tab E presents the direct routes meeting the wholesale trigger for DS3s. The proprietary version of these attachments identifies the competitive carriers with operational, fiber-based collocation arrangements in the Verizon wire centers. CLEC names are removed from the public versions of these attachments.

Q. PLEASE DESCRIBE THE DIRECT TRANSPORT ROUTES MEETING THE FCC'S SELF-PROVISIONING TRIGGER FOR DARK FIBER (ATTACHMENT 3 - TAB A)?

A. Once the CLECs' discovery responses are combined with Verizon's information, there are 182 direct routes (or pairs of Verizon wire centers) meeting the FCC's self-provisioning trigger for dark fiber in LATA 224.

Q. PLEASE DESCRIBE THE DIRECT TRANSPORT ROUTES MEETING THE FCC'S SELF-PROVISIONING TRIGGER FOR DS3 CAPACITY (ATTACHMENT 3 - TAB B)?

A. Based on the combined data, there are 182 direct routes (or pairs of Verizon wire centers) in LATA 224 meeting the FCC's self-provisioning trigger for DS3-level

capacity.

Q. PLEASE DESCRIBE THE DIRECT TRANSPORT ROUTES MEETING THE FCC'S WHOLESALE TRIGGER FOR DARK FIBER (ATTACHMENT 3 - TAB C)?

A. The combined data show 572 direct routes (or pairs of Verizon wire centers) meeting the FCC's wholesale trigger for dark fiber. There are 9 direct routes in LATA 222, and 563 direct routes in LATA 224.

Q. PLEASE DESCRIBE THE DIRECT ROUTES MEETING THE FCC'S WHOLESALE TRIGGER FOR DS1 TRANSPORT (ATTACHMENT 3 - TAB D)?

A. Based on the combined data, there are 572 direct routes (or pairs of Verizon wire centers) in LATAs 222 and 224 meeting the FCC's wholesale trigger for DS1s. There are 9 direct routes in LATA 222, and 563 direct routes in LATA 224.

Q. PLEASE DESCRIBE THE DIRECT TRANSPORT ROUTES MEETING THE FCC'S WHOLESALE TRIGGER FOR DS3 TRANSPORT (ATTACHMENT 3 - TAB E)?

A. Based on the combined data, there are 572 direct routes (or pairs of Verizon wire centers) in LATAs 222 and 224 meeting the FCC's wholesale trigger for DS3s. There are 9 direct routes in LATA 222, and 563 direct routes in LATA 224.

Q. PLEASE EXPLAIN THE ADJUSTMENTS VERIZON MADE BASED ON CLEC DISCOVERY RESPONSES?

A. In its initial testimony, Verizon identified **[BEGIN CLEC PROPRIETARY DATA]**

1 xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx
2 xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx **[END CLEC**
3 **PROPRIETARY DATA]** Because **[BEGIN CLEC PROPRIETARY**
4 **DATA]**xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx
5 xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx **[END CLEC**
6 **PROPRIETARY DATA]** and adjusted the number of wholesale routes for which it
7 seeks relief accordingly.[1]
8
9 Verizon continues to treat XO and Allegiance as wholesale providers, however. In
10 contrast to **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxx **[END CLEC**
11 **PROPRIETARY DATAEND CLEC PROPRIETARY DATA]**, XO and
12 Allegiance both unambiguously hold themselves out as wholesale providers. XO
13 has an entire section on its website devoted to its "carrier services," including
14 SONET and carrier private line services.[2] XO's website materials also state that its
15 markets include New Jersey, specifically, Bergen-Passaic; Jersey City; Middlesex-
16 Somerset-Hunterdon; Monmouth; Newark; and Trenton.[3] (In addition, in the FCC's
17 Triennial Review docket, Covad identified XO as a transport provider.[4] To

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[1] The number of DS1 and DS3 routes are the same, even though Verizon no longer treats **[BEGIN CLEC PROPRIETARY DATA]** xxxx **[END CLEC PROPRIETARY DATA]** as a wholesale provider of DS1s, because more than two carriers are providing DS1s on each of those routes.

[2] www.xo.com/products/carrier/portfolio.html. In addition, XO offers "Wholesale Dial-Up," including the "redundancy and high availability" of XO's "self-healing SONET metro fiber rings and a meshed SuperPOP network architecture." www.xo.com/products/carrier/wholesaledial/index.html.

[3] www.xo.com/markets.html

[4] Comments of Covad Communications Company, In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338; 96-98; 98-147 (Apr. 5, 2002), at 68.

1 Verizon's knowledge, XO never told the FCC that Covad was mistaken.), In
2 response to Verizon discovery (question 16), which specifically asked carriers to
3 identify transport facilities made available to other carriers, XO replied that "This
4 question is not applicable to the telecommunications services provided by XO in
5 New Jersey." This non-response is squarely inconsistent with XO's web material
6 and the Covad Comments to the FCC.
7
8 Allegiance likewise unambiguously holds itself out on its website and elsewhere as
9 offering transport at wholesale: "Our Broadband-xSP, Enterprise and Government
10 groups provide a wide range of telephony and Internet solutions *for service carriers*,
11 including ISPs, local and international carriers, building centric access providers,
12 Fortune 500 Companies, governmental and educational organizations."[5] Indeed,
13 Allegiance declares on its website that *in New Jersey* it offers carriers two
14 "Dedicated DS1 Aggregation" products -- "DS3 Hub" and "DS3 Mux" – which
15 allow other carriers to "sell T1-based services to [its] customers, nationwide, without
16 building a point-of-presence in each geographic location" – all on a network that
17 Allegiance "owns."[6] Allegiance even has a "Carrier and Service Provider Solutions"
18 brochure posted on its website, along with information on how to contact
19 Allegiance's "Wholesale" representatives, and to obtain Allegiance's "Wholesale
20 Service Level Agreement." Finally, and dispositively, Allegiance has filed an
21 Access Tariff in New Jersey stating that it will provide DS1 and DS3 private line

---

[5] www.algx.com/wholesale/wholesale.jsp (emphasis added).

[6] www.algx.comwholesale/dds1.jsp.

services, without excluding carriers as end users. In contradiction to the tariff filed by Allegiance and approved by the NJ BPU and external material as detailed above, Allegiance states in response to Verizon discovery (question 16) that "Allegiance does not make fiber facilities available to other carriers in New Jersey."

Q. DID CLECS RESPOND FULLY AND APPROPRIATELY TO DISCOVERY REQUESTS CONCERNING DEDICATED TRANSPORT?

A. No, not all of them. Verizon has identified numerous problems and inadequacies with these responses. And not every competitive carrier identified by Verizon as having operational, fiber-based collocation arrangements at a Verizon wire center has responded to discovery requests. For example, Telcove and CTC failed altogether to respond to the Staff's transport questions while others such as Cablevision did not furnish Verizon with is proprietary responses. The absence of responses from such carriers may well result in an undercount of transport facilities.

In addition, several CLECs claim to be unable to respond to discovery requests that are essential to the application of the FCC's triggers. For example, although MCI acknowledges that it [**BEGIN CLEC PROPRIETARY DATA]** xxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxx **[END CLEC PROPRIETARY DATA]** When asked by Verizon in discovery to identify transport facilities made available to other carriers, MCI's response was simply "MCI states that it is continuing to search for information that is responsive to this request and will provide any responsive information if it becomes available." Based upon the evidence in its initial filing, Verizon continues to count MCI as a wholesale provider.

Still other carriers did not respond fully and adequately to discovery requests. Most notably, AT&T has simply refused to respond to most of the Staff's transport discovery questions, including questions about the interconnections between collocations, the capacities of its transport facilities, the numbers of dark and lit fibers, and AT&T's willingness to provide transport to other carriers – *the answers to which are essential to the Board's discharge of its FCC-directed responsibility to apply the FCC's transport triggers*. AT&T attempts to justify its strategy of stonewalling and delay by claiming that it has *no* dedicated interoffice transport anywhere in New Jersey. The Board should simply disregard AT&T's implausible claim that its extensive dedicated transport facilities and numerous collocation arrangements at Verizon wire centers do not "count" under the FCC's dedicated transport trigger analysis because those transport facilities take traffic from AT&T's collocation at the Verizon wire center to AT&T's switch, and do

not transport traffic from a collocation in one Verizon central office directly to a collocation in another central office. AT&T's "position" is contrary to federal law. The FCC's regulations make clear that dedicated transport routes, for purposes of the triggers, "may pass through one or more intermediate wire centers or switches," and that a "direct" connection between wire centers is not required. 47 C.F.R. §51.319(e) (A "route" is "a transmission path between one of an incumbent LEC's wire centers or switches and another of the incumbent LEC's wire centers or switches. A route between two points (*e.g.*, wire center or switch 'A' and wire center or switch 'Z' may pass through one or more intermediate wire centers or switches (*e.g.*, wire center or switch 'X'). Transmission paths between identical points (*e.g.*, wire center or switch 'A' and wire center or switch 'Z') are the same 'route,' irrespective of whether they pass through the same intermediate wire centers or switches."); *see also* TRO ¶ 402 n.1246 (declaring that a transport route may connect wire centers and switches that are not directly connected to each other). Thus, even assuming AT&T's factual claims are correct, it is irrelevant under the FCC's regulations that AT&T's transmission facilities may not *directly* link Verizon wire centers.

Further, the FCC also explained in its regulations that the test is not, as AT&T appears to be claiming, whether a carrier is actually sending traffic over a route directly or indirectly connecting Verizon wire centers; it is whether a route is "*operationally ready* to provide transport into or out of" Verizon's wire centers. TRO ¶ 406 (emphasis added). Thus, it is utterly irrelevant if AT&T does not self-

provision circuits directly linking Verizon wire centers because AT&T is "operationally ready" to transport traffic between Verizon wire centers.

Finally, AT&T's argument makes no sense in terms of how dedicated transport networks operate, or in terms of the policy rationales underlying the FCC's triggers, since AT&T's fiber clearly connects AT&T's collocation facilities at Verizon wire centers to the AT&T network. The purpose of a modern telecommunications network, like AT&T's, is to allow the connection of any two points connected to that network.

V. HIGH CAPACITY LOOPS TRIGGER CASE

Q. WHAT SUPPLEMENTAL EVIDENCE DOES VERIZON HAVE FOR THE ANALYSIS OF HIGH CAPACITY LOOP FACILITIES?

A. In the TRO, the FCC established that a state commission must find that competing carriers are not impaired without access to Verizon's unbundled dark fiber, DS-1, and DS-3 loop facilities (or "hi-cap loops") at specific customer locations if Verizon meets one of two objective "triggers." In our December 3, 2003 testimony, we indicated that Verizon was unable to identify customer locations meeting the hi-cap loop triggers because information on CLEC loop deployment was in the hands of the CLECs. Since that time, Verizon has reviewed responses to the hi-cap loop discovery questions served by the Board, RPA, and Verizon, and can now identify customer locations in New Jersey that satisfy the FCC's hi-cap loop triggers.

Q. DID ALL OF THE CLECS PROVIDE THE INFORMATION REQUESTED IN VERIZON OR THE BOARD'S HI-CAP LOOP DISCOVERY REQUESTS?

A. No. For example, **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxx **[END CLEC PROPRIETARY DATA]** simply identified the customer locations to which it has deployed hi-cap loop facilities and indicated that another carrier is using those facilities to provide service to retail customers. However, **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxxx **[END CLEC PROPRIETARY DATA]** did not answer any other loop questions, and for the reasons outlined in our testimony, Verizon assumed that **[BEGIN CLEC PROPRIETARY DATA]** xxxxx **[END CLEC PROPRIETARY DATA]** has dark fiber deployed, has access to the entire customer location, and is willing to offer DS-1 and DS-3 loops at wholesale to other carriers at each location.

HIGH CAPACITY LOOP TRIGGERS

Q. PLEASE DESCRIBE THE FCC'S OBJECTIVE TRIGGERS FOR IDENTIFYING THE CUSTOMER LOCATIONS FOR WHICH COMPETING CARRIERS ARE NOT IMPAIRED WITHOUT ACCESS TO VERIZON'S HI-CAP LOOP FACILITIES.

A. As noted above, the *Triennial Review Order* contains the FCC finding that requesting carriers are impaired on a nationwide basis without access to unbundled dark fiber, DS1, and DS3 hi-cap loop facilities serving the enterprise market. *Triennial Review Order* ¶¶ 311-14, 320-27. The FCC recognized, however, that competing carriers often self-provision hi-cap facilities or obtain them on a wholesale basis from carriers other than the ILEC. *Id.* ¶¶ 328-39. Consequently, the FCC required state commissions to determine the specific customer locations

that meet one of two objective triggers — which show that CLECs are already providing non-ILEC hi-cap loop facilities, either to themselves (self-provisioning trigger) or to other carriers (wholesale trigger). If a state commission finds that either trigger is met for a specific loop capacity at a specific customer location, the state commission is required to make a finding of non-impairment, and the ILEC no longer must unbundle that loop capacity to that customer location. *Triennial Review Order* ¶ 328; *see also* 47 C.F.R. §51.319(a)(4)-(6). In other words, when a customer location meets one of the FCC's triggers, the state commission conducting the customer location-specific review ***must*** find that the FCC's national finding of impairment has been overcome for the relevant loop capacity at that location.

The first of the FCC triggers looks at whether competing carriers have ***self-deployed*** or ***self-provisioned*** dark fiber or DS3 capacity loop facilities. Under the self-provisioning trigger for dark fiber, the Board must find no impairment if ***two or more*** unaffiliated competing carriers have deployed to a particular customer location their own dark fiber facilities. 47 C.F.R. § 51.319(a)(6)(i). Dark fiber obtained under a long-term indefeasible right of use is considered to be that carrier's own fiber for purpose of applying the self-provisioning trigger. *Id.; see also Triennial Review Order* ¶ 333 n. 981. Under the self-provisioning trigger for DS3 loop facilities, the Board must find no impairment if ***two or more*** unaffiliated competing carriers have (i) deployed to a particular customer location their own dark fiber facilities and are serving customers via those facilities at that location, or (ii) deployed DS3 facilities by attaching their own optronics to activate dark fiber

1 facilities obtained under a long-term indefeasible right of use and is serving
2 customers via those facilities at that location. 47 C.F.R. § 51.319(a)(5)(i)(A).
3
4 The second FCC trigger looks at whether DS1 or DS3 loop facilities are available
5 from other carriers on a ***wholesale*** basis. Under this test, competing carriers are not
6 impaired without access to Verizon's DS-1 or DS-3 facilities if there are ***two or***
7 ***more*** competing providers (including intermodal providers of service comparable in
8 quality to the ILEC) not affiliated with each other or the ILEC each of which (i) has
9 deployed its own DS1 or DS3 facilities; (ii) offers a DS1 or DS3 loop over its own
10 facilities on a widely available wholesale basis to other carriers desiring to serve
11 customers at that location; and (iii) has access to the entire customer location
12 (including each individual unit within that location). 47 C.F.R. § 51.319(a)(4)(ii), 47
13 C.F.R. § 51.319(a)(5)(i)(B). Dark fiber obtained on an unbundled, leased, or
14 purchased basis from another carrier counts as the buying carrier's own DS1 or DS3
15 loop facility if that carrier attaches its own electronics and offers the activated fiber
16 at wholesale. *Id.*
17
18 **Q. WHAT IS A CUSTOMER LOCATION?**
19
20 A. The FCC distinguishes between "customer locations" and individual units within
21 that location. *See* 47 C.F.R. §§ 51.319(a)(4)(ii), (5)(i)(B). This distinction indicates
22 that a customer location is a building, not an individual unit or suite in a multi-unit
23 building. Based on their discovery responses, the CLECs in New Jersey appear to
24 have complied with that provision in identifying relevant locations. Verizon, RPA,

and the Board's discovery specifically asked CLECs to identify the "customer locations" to which they have deployed their own loop facilities, and in response, the CLECs provided the addresses of specific buildings.

Q. THE FCC'S TWO TRIGGERS APPLY TO DIFFERENT "CAPACITIES" OF LOOPS. WHAT DOES IT MEAN TO UTILIZE A FIBER OPTIC LOOP FACILITY AT OCN, DS1, OR DS3 LEVELS OF CAPACITY?

A. As with transport, DS1 and DS3 loops refer to the digital speed/capacity level (i.e. Digital Signal or "DS") of the digital circuit/facility. A Digital Signal Level 0 ("DS0") circuit has a bandwidth or speed of 64 Kbps and is the equivalent of one voice-grade line. A DS0 is also the elemental building block for higher DS Level circuits (e.g., DS1s and DS3s). For example, a DS1 capacity circuit contains the equivalent of 24 voice-grade or DS0 channels, and a DS3 capacity circuit contains the equivalent of 28 DS1 channels or 672 DS0 channels. Individual DS0s, DS1s and DS3s utilize an electronic/metallic interface or handoff such as copper or coaxial cable termination.

OCn loops likewise refer to the speed/capacity level (*i.e.*, Optical Carrier or "OC") of the optical circuit/facility. For example, an optical carrier-level 3, or OC3, capacity circuit is approximately 155 Mbps. It is the equivalent of about three DS3 circuits but terminates on a fiber optic interface or handoff as opposed to an electronic interface.

Q. WHAT DETERMINES THE CAPACITY AT WHICH FIBER LOOP FACILITIES OPERATE?

A. The capacity of a fiber optic loop is almost exclusively based on the equipment that a carrier attaches to activate or "light" the fiber. *See Triennial Review Order* ¶311. As the FCC found in its *Triennial Review Order*, carriers that self-deploy fiber predominantly do so at the OCn level. *Id.* ¶ 298. Indeed, the underlying capacity of a strand of dark fiber is comparable in total capacity to an OCn loop, which can operate at a wide range of capacities. *See id.* ¶ 311.

Fiber optic cable is generally "channelized"-- that is, larger capacity facilities are subdivided into smaller capacity facilities -- by attaching the appropriate electronics at both ends of the fiber cable to provide these various capacities. For example, lower capacity DS1 and DS3 facilities are channelized within the larger capacity OC12 or OC48 multiplexed loop facility system. The FCC noted that CLECs that serve customers over their own DS1 loops have previously deployed an OCn level facility that they are using to serve other customers at lower loop capacity levels. *Id.* n. 859. The electronic equipment used to activate and provide these various levels of capacity is widely available.

Alternately, these same transport services can be provided over fiber optic cable with newer hardware utilizing MSP (Multiservice Platform) technology. In this instance, the services with committed bit rates such as DS1 or DS3 dedicated to a customer can be combined with IP data, video or voice in a shared facility.

Q. CAN ANY FIBER LOOP FACILITY DEPLOYED BY A CLEC BE USED TO PROVIDE A DS1 OR DS3 LOOP?

A. Yes. In identifying the customer locations meeting the FCC's triggers, Verizon made the reasonable assumption that when competing carriers deploy fiber and attach OCn electronics (*e.g.*, OC12 or OC48 multiplexers), they then channelize the OCn system into the lower loop levels required by their customers, including DS3s and DS1s. This is consistent with the FCC's finding discussed above.

Again, while fiber loop facilities are capable of providing various levels of capacity, the capacity of the fiber itself is almost entirely a function of the electronics that a carrier attaches and activates, not something inherent in the fiber itself. Once the fiber is deployed, it can potentially provide a DS1, DS3, OC3, OC12 or possibly higher level circuits simultaneously, simply by changing or adding the appropriate electronics.

Verizon's assumption that competing carriers who deploy fiber optics generally build OCn level transport facilities, capable of channelization to DS1 or DS3, is consistent with standard industry practice. Few if any carriers deploy fiber loop facilities to accommodate ***only*** a DS1 or ***only*** a DS3. To the contrary, as the FCC found in the *Triennial Review Order,* carriers deploying fiber predominantly do so at the OCn level. *Triennial Review Order* ¶ 298. For example, discovery responses indicate that **[BEGIN CLEC PROPRIETARY DATA]** xxxxxx **[END CLEC PROPRIETARY DATA]** generally deploys loop facilities at the OC-3 level. *See* **[BEGIN CLEC PROPRIETARY DATA]** xxxxxx **[END CLEC PROPRIETARY DATA]** Response to RPA Request 30 (Attachment 4.1). Verizon

likewise generally deploys fiber loops at the OC3, OC12 or OC48 level. These OCn facilities are then channelized (multiplexed/demultiplexed) to a DS1 or DS3 level because these are the capacity levels/circuits at which service is typically requested by end user customers that use hi-cap facilities. Indeed, **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxx **[END CLEC PROPRIETARY DATA]** admitted that the actual amount of traffic that is supported on a given facility depends upon the portion of the facility that is lit. *Id.*

The assumptions underlying Verizon's self-deployment trigger case are entirely consistent with the way fiber loop facilities commonly are constructed and operated. The Board therefore should find that CLECs who have deployed fiber optic loop facilities have the ability to provision DS1 and DS3 circuits, unless a carrier shows, for a particular customer location, that it cannot deploy DS1 or DS3 circuits at that location.

Q. THE FCC'S LOOP TRIGGERS ARE SEPARATELY APPLIED TO DARK FIBER FACILITIES. WHAT IS DARK FIBER?

A. Dark fiber is the unused fiber within an existing fiber optic cable that has not yet been activated through optronics to render it capable of carrying communications services. *Triennial Review Order* ¶ 311. Dark fiber has virtually unlimited capacity, and it is the electronics that define the capacity. *Id.* n. 909.

Q. DO FIBER LOOP FACILITIES ALSO CONTAIN DARK FIBER?

A. Absent evidence to the contrary, it reasonably can be assumed that all self-

provisioned fiber loop facilities deployed to customer locations have dark fiber. Since dark fiber is simply fiber optic cable "that has not been activated through connections to optronics that light it, and thereby render it capable of carrying communications," (*Triennial Review Order* ¶ 311), all fiber loop facilities, regardless of the capacities at which they now operate, once consisted entirely of dark fiber. Put differently, evidence of "lit" fiber is also evidence that a carrier has likely self-provisioned dark fiber.

Generally, as a matter of standard industry network engineering design and sound economics, the vast majority of self-provisioned fiber loop facilities will have spare dark fibers. As the FCC recognized, dark fiber exists in a carrier's network as available unused fiber available because that carrier has deployed fiber in the first instance. Deploying fiber is done for the express purpose of lighting certain strands to serve a particular customer location. *Triennial Review Order* ¶ 312. The FCC explained,

> When a fiber build decision is made, carriers take advantage of the fact that they are already incurring substantial fixed costs to obtain the rights-of-way, dig up streets, and trench cable, to lay more fiber than they immediately need. Once the significant fiber construction cost is incurred, the record reflects that it is relatively easy and inexpensive to install fiber strands in excess of current demand at that time to maximize the use of conduit and avoid the need to incur duplicate costs to retrench the same location in the future if demand for additional fiber facilities occurs.

Id.

Thus, fiber facilities are generally installed with extra fiber to meet projected demand growth. Furthermore, fiber cables are commonly manufactured and

deployed in increments of 12 fiber strands (*i.e.,* 12, 24, 48, etc., fibers per cable) and generally only 2 or 4 fibers are required to activate/light a loop fiber system. This means that it is likely that there are additional unused fibers available within the standard cable size the carrier deployed. Indeed, **[BEGIN CLEC PROPRIETARY DATA]** xxxxx **[END CLEC PROPRIETARY DATA]** typically deploys two 24-strand fiber cables to each building to which it has deployed loops. **[BEGIN CLEC PROPRIETARY DATA]** xxx **[END CLEC PROPRIETARY INFORMATION]** Response to Verizon Hi-Cap Loop Request 3 (Attachment 4.2) and RPA Request 30 (Attachment 4.1). Similarly, for new construction, it is **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx **[END CLEC PROPRIETARY DATA]** *See* **[BEGIN CLEC PROPRIETARY DATA]** xxxxx **[END CLEC PROPRIETARY DATA]** Response to Verizon Hi-Cap Loop Request 4 (Attachment 4.3). In fact, **[BEGIN CLEC PROPRIETARY DATA]** xxxx **[END CLEC PROPRIETARY DATA]** readily admits that unlit, spare, and/or dark fiber facilities exist as a result of the regular construction and engineering activities related to its network deployment, and thus exist throughout its deployed facilities in New Jersey. *See* **[BEGIN CLEC PROPRIETARY DATA]** xxxx **[END CLEC PROPRIETARY DATA]** Response to RPA-33 (Attachment 4.4). Verizon therefore assumed (and the Board should find) that CLECs who have deployed fiber optic loop facilities also have dark fiber deployed at that location— unless a carrier shows, for a particular customer location, that it

1 does not have any dark fiber.

2

3 **Q. DID VERIZON COUNT CLECS WHO HAVE OBTAINED DARK FIBER**
4 **UNDER A LONG-TERM INDEFEASIBLE RIGHT OF USE TOWARD**
5 **THE DARK FIBER SELF-PROVISIONING TRIGGER?**
6
7 A. Yes. FCC Rule 319(a)(6)(i) specifically states that a competing provider that has
8 obtained dark fiber facilities under a long-term indefeasible right of use ("IRU")
9 shall be considered a competing provider with its own dark fiber facilities. 47 C.F.R.
10 §51.319(a)(6)(i). Thus, while **[BEGIN CLEC PROPRIETARY DATA]** xxx
11 **[END CLEC PROPRIETARY DATA]** claimed in response to RPA Request 30
12 that it has not self-provisioned dark fiber loops, it admitted in response to RPA
13 Request 32(b) that it deploys DS-3 loop facilities by adding its own electronics to
14 dark fiber obtained under an IRU. *See* **[BEGIN CLEC PROPRIETARY DATA]**
15 xxxx **[END CLEC PROPRIETARY DATA]** Response to RPA-30 and 32
16 (Attachment 4.5 and 4.6). Thus, the Board should count [**BEGIN CLEC**
17 **PROPRIETARY DATA]** xxx **[END CLEC PROPRIETARY DATA]** toward the
18 dark fiber self-provisioning trigger at each location where it has deployed a DS3.
19 Because it is unclear whether **[BEGIN CLEC PROPRIETARY DATA]** xxxx
20 **[END CLEC PROPRIETARY DATA]** obtained the dark fiber to which it
21 attached its electronics to deploy DS-1s under an IRU, Verizon did not count XO
22 toward the dark fiber trigger where it has only deployed a DS1.
23

EVIDENCE OF CUSTOMER LOCATIONS MEETING THE TRIGGERS

Q. PLEASE DESCRIBE VERIZON'S EVIDENCE OF CUSTOMER LOCATIONS IN NEW JERSEY THAT MEET THE FCC'S HI-CAP LOOP TRIGGERS.

A. Verizon presents evidence that 41 customer locations meet one or both of the FCC's triggers. There are 4 customer locations that meet the DS-1 wholesale trigger. With respect to DS-3 loops, 4 customer locations meet the self-provisioning trigger, and 4 meet the wholesale trigger. Finally, there are 41 customer locations meeting the dark fiber self-provisioning trigger. Attachment 5 identifies each customer location meeting the triggers. The proprietary version of this attachment identifies the CLECs with loop facilities at each customer location. CLEC names are removed from the public version of Attachment 5.

Q. HOW DID VERIZON IDENTIFY CARRIERS OFFERING LOOP FACILITIES ON A WHOLESALE BASIS, AND THE CAPACITIES AT WHICH THOSE FACILITIES ARE OFFERED?

A. Verizon primarily relied on carriers to self-identify as wholesale providers in response to the hi-cap loop discovery requests by stating whether their loop facilities are being used by another CLEC to serve retail customers and whether they have access to the entire customer location. **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx **[END CLEC PROPRIETARY DATA]** identified customer locations where their loop facilities are used by another CLEC to serve retail customers, and thus identified themselves as wholesale providers. **[BEGIN CLEC PROPRIETARY DATA]** xxxxx **[END CLEC PROPRIETARY DATA]** likewise identified itself as a wholesale provider of DS1 and DS3 loops.

1 **[BEGIN CLEC PROPRIETARY DATA]** xxx **[END CLEC PROPRIETARY**
2 **DATA]** Response to RPA Request 32 (Attachment 4.6). As discussed above, where
3 CLECs failed to provide responses to discovery questions designed to identify
4 wholesale providers, the Board should assume that they are wholesale providers
5 unless they provide information indicating that they are not.
6
7 Verizon Hi-Cap Loop Request 2 also asked parties to identify where they obtain hi-
8 cap loops from a wholesale provider other than Verizon. **[BEGIN CLEC**
9 **PROPRIETARY DATA]** xxxxxxxxxxxxxxxxxxxxx **[END CLEC**
10 **PROPRIETARY DATA]** identified **[BEGIN CLEC PROPRIETARY DATA]**
11 xxxx **[END CLEC PROPRIETARY DATA]** as a wholesale supplier of loops.[7] If
12 a carrier is willing to offer loops wholesale at some customer locations, the Board
13 should assume that it is willing to do so at all customer locations to which it has
14 deployed hi-cap loops—unless a carrier indicates that it is not.
15
16 Verizon also found evidence of CLEC wholesale providers from public sources. As
17 with its transport evidence, Verizon identified carriers that hold themselves out as
18 wholesale providers on their websites. For example:

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[7] **[BEGIN CLEC PROPRIETARY DATA]** xxx **[END PROPRIETARY DATA]** did not provide the exact customer locations where it receives loop facilities from **[BEGIN CLEC PROPRIETARY DATA]** xxx **[END CLEC PROPRIETARY DATA]**, but stated that it provides both DS1 and DS3 loops. **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxxxxxxxxxxxxxx **[END CLEC PROPRIETARY DATA]** identified **[BEGIN CLEC PROPRIETARY DATA]** xxx **[END CLEC PROPRIETARY DATA]** as their wholesale supplier at customer locations that were not included in **[BEGIN CLEC PROPRIETARY DATA]** xxxx **[END CLEC PROPRIETARY DATA]** list of customer locations to which it had deployed high capacity loops or dark fiber.

1 AboveNet offers access services that "bypass the copper local loop by
2 delivering private fiber connectivity and end-to-end optical performance
3 directly to your office".[8]

4 AT&T's Private Line Service offers Single Channel to T3 services.[9]

5 MCI offers DS-1 and DS-3's at wholesale.[10]

6 If a carrier publicly holds itself out as a wholesale provider or loops (or
7 telecommunications facilities generally)— and does not limit its representation to
8 particular locations —Verizon identified the carrier as a wholesale provider.
9 Finally, Verizon assumes that a carrier that has deployed fiber loop facilities and is
10 willing to provide those facilities to other carriers on a wholesale basis is providing
11 (or is willing to provide) various levels of capacity at wholesale, including dark
12 fiber, DS1, and DS3. Therefore, unless there is specific evidence that a carrier
13 refuses to sell to other carriers specific capacities and dark fiber to a particular
14 customer location, the Board should find that a wholesale provider will sell DS1 and
15 DS3 capacity at that location.
16
17 Based on the discovery responses and carrier websites, Verizon has identified
18 **[BEGIN CLEC PROPRIETARY DATA]** xxxxxxxxxxxxxxxxxxxxxxxxxxxx
19 **[END CLEC PROPRIETARY DATA]** as counting toward the competitive
20 wholesale trigger in at least one building. If these carriers wish to attempt to show

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8 http://www.abovenet.com/products/access.html (Attachment 6.1).

9 See AT&T Wholesale Services at http://www.business.att.com/default/?pageid=wholesale_index&branchid=wholesale&CMP=IL20874 and http://www.business.att.com/content/gws_sheet.pdf (Attachment 6.2).

10 http://global.mci.com/publications/service_guide/products/, and http://global.mci.com/publications/service_guide/products/products_currently_available/ (Attachments 6.3 & 6.4).

that a specific location is not available at wholesale, the burden is now properly put on them to make such a demonstration. Absent such particularized, location-specific evidence, however, the Board should rely on Verizon's evidence of a carrier's general willingness to offer its loop facilities on a wholesale basis and treat all such carriers' loop facilities as available for leasing at wholesale.

Q. HOW DID VERIZON IDENTIFY WHETHER CLECS HAVE ACCESS TO AN ENTIRE CUSTOMER LOCATION?

A. The Board's and RPA's hi-cap loop discovery requests specifically ask carriers to indicate whether they have access to the entire customer location to which their facilities are deployed, and Verizon relied primarily on CLECs to provide this information. Where CLECs did not provide such information, Verizon assumed that they have access to the entire location. It is reasonable to assume that a carrier with fiber optic facilities into a large commercial building has access to the entire building. Most, if not all, commercial properties designate a location, often called the "Minimum Point of Entry" (MPOE), into which all carriers serving the building bring facilities and to/from which all customer premise equipment (*i.e.*, CPE) vendors serving occupants of the building arrange intra-building cabling to interface with these facilities. Typically, fiber entrance facilities into commercial properties enter via this MPOE.

Q. HOW DID VERIZON IDENTIFY WHETHER CLECS SERVE END-USER CUSTOMERS OVER DS3 FACILITIES THEY HAVE DEPLOYED?

A. The Board's hi-cap loop discovery requests specifically asked CLECs to indicate

whether their deployed hi-cap loop facilities are being used to serve their end users. Verizon primarily relied upon CLEC responses to this question.

Q. DID VERIZON EXCLUDE ANY BUILDINGS FROM ITS TRIGGER ANALYSIS?

A. Yes. Verizon assumed that CLECs are not serving customers in buildings that house Verizon central offices and excluded them from its trigger analysis. Additionally, certain carriers identified themselves as serving Newark Liberty International Airport, but were insufficiently specific for a single building to be properly identified.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

LATA 224

Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
BDBKNJBD	BOUND BROOK	BNTNNJBN	BOONTON	1		1								1			
		MRTWNJMR	MORRISTOWN	1		1								1			
		NBWKNJNB	NEW BRUNSWICK	1		1								1			
		PSWYNJPI	PISCATAWAY	1		1								1			
		SOVLNJSM	SOMERVILLE	1		1								1			
BNTNNJBN	BOONTON	ELZBNJEL	ELIZABETH	1		1		1									
		FRFDNJFA	FAIRFIELD	1		1		1									
		HCKNNJHK	HACKENSACK	1		1		1									
		JRCYNJBR	BERGEN	1		1		1									
		JRCYNJJO	JOURNAL SQUARE	1		1		1									
		MRTWNJMR	MORRISTOWN	1		1		1						1			
		NBWKNJNB	NEW BRUNSWICK	1		1								1			
		NWRKNJ02	MARKET	1		1		1									
		NWRKNJIR	IRONBOUND	1		1		1									
		PSWYNJPI	PISCATAWAY	1		1								1			
		RTFRNJRU	RUTHERFORD	1		1		1									
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1		1									
		WHIPNJWH	WHIPPANY	1		1		1									
EDSNNJED	EDISON	HCKNNJHK	HACKENSACK			1					1				1		
		JRCYNJBR	BERGEN			1					1				1		
		JRCYNJJO	JOURNAL SQUARE			1					1				1		
		LVTNNJLI	LIVINGSTON			1					1				1		
		MRTWNJMR	MORRISTOWN			1					1				1		
		NBWKNJNB	NEW BRUNSWICK			1					1				1		
		NWRKNJ02	MARKET			1					1				1		
		RTFRNJRU	RUTHERFORD			1					1				1		
		UNCYNJ02	UNION CITY			1					1				1		
ELZBNJEL	ELIZABETH	EORNNJEO	EAST ORANGE	1				1							1		
		FRFDNJFA	FAIRFIELD	1		1		1								1	
		HCKNNJHK	HACKENSACK	1		1		1								1	
		JRCYNJBR	BERGEN	1		1		1									
		JRCYNJJO	JOURNAL SQUARE	1		1		1									
		LTFLNJLF	LITTLE FALLS					1					1		1		
		LVTNNJLI	LIVINGSTON			1		1							1		
		MRTWNJMR	MORRISTOWN	1		1		1								1	
		NBWKNJNB	NEW BRUNSWICK	1		1										1	
		NWRKNJ02	MARKET	1		1		1								1	
		NWRKNJIR	IRONBOUND	1		1		1					1				
		PSSCNJPS	PASSAIC	1				1								1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1		1		1								1	
		UNCYNJ02	UNION CITY	1		1		1									
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
EORNNJEO	EAST ORANGE	FRFDNJFA	FAIRFIELD	1				1							1		
		HCKNNJHK	HACKENSACK	1				1			1						
		JRCYNJBR	BERGEN	1				1			1						
		JRCYNJJO	JOURNAL SQUARE	1				1			1						
		LVTNNJLI	LIVINGSTON					1			1				1		
		MRTWNJMR	MORRISTOWN	1				1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1							1				1		
		NWRKNJ02	MARKET	1				1			1						
		NWRKNJIR	IRONBOUND	1				1							1		

LATA 224

Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
		PSSCNJPS	PASSAIC	1				1			1						
		RCPKNJ02	ROCHELLE PARK	1				1							1		
		RTFRNJRU	RUTHERFORD	1				1			1						
		UNCYNJ02	UNION CITY	1				1			1						
		WHIPNJWH	WHIPPANY	1				1							1		
FRFDNJFA	FAIRFIELD	HCKNNJHK	HACKENSACK	1		1		1								1	
		JRCYNJBR	BERGEN	1		1		1									
		JRCYNJJO	JOURNAL SQUARE	1		1		1									
		LVTNNJLI	LIVINGSTON			1		1							1		
		MRTWNJMR	MORRISTOWN	1		1		1								1	
		NBWKNJNB	NEW BRUNSWICK	1		1										1	
		NWRKNJ02	MARKET	1		1		1								1	
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1								1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1		1		1								1	
		UNCYNJ02	UNION CITY	1		1		1									
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
HCKNNJHK	HACKENSACK	JRCYNJBR	BERGEN	1		1		1			1						
		JRCYNJJO	JOURNAL SQUARE	1		1		1			1						
		LVTNNJLI	LIVINGSTON			1		1			1						
		MRTWNJMR	MORRISTOWN	1		1		1			1					1	
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1					1					1	
		NWRKNJ02	MARKET	1	1	1		1			1					1	
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1					1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1		1		1			1					1	
		UNCYNJ02	UNION CITY	1		1		1			1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1	1	1		1								1	
JRCYNJBR	BERGEN	JRCYNJJO	JOURNAL SQUARE	1		1		1	1		1						
		LVTNNJLI	LIVINGSTON			1		1			1						
		MRTWNJMR	MORRISTOWN	1		1		1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1			1		1						
		NWRKNJ02	MARKET	1		1		1	1		1						
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1						
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1							1		
		RTFRNJRU	RUTHERFORD	1		1		1			1						
		UNCYNJ02	UNION CITY	1		1		1	1		1						
		WHIPNJWH	WHIPPANY	1		1		1									
JRCYNJJO	JOURNAL SQUARE	LVTNNJLI	LIVINGSTON			1		1			1						
		MRTWNJMR	MORRISTOWN	1		1		1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1			1		1						
		NWRKNJ02	MARKET	1		1		1	1		1	1					1
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1						
		PSWYNJPI	PISCATAWAY	1		1									1		

LATA 224

Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
		RCPKNJ02	ROCHELLE PARK	1				1				1					
		RTFRNJRU	RUTHERFORD	1		1		1			1						
		UNCYNJ02	UNION CITY	1		1		1	1		1						
		WHIPNJWH	WHIPPANY	1		1		1									
LTFLNJLF	LITTLE FALLS	NWRKNJIR	IRONBOUND					1					1		1		
LVTNNJLI	LIVINGSTON	MRTWNJMR	MORRISTOWN			1		1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK			1					1				1		
		NWRKNJ02	MARKET			1		1			1						
		NWRKNJIR	IRONBOUND			1		1							1		
		PSSCNJPS	PASSAIC					1			1				1		
		RTFRNJRU	RUTHERFORD			1		1			1						
		UNCYNJ02	UNION CITY			1		1			1						
		WHIPNJWH	WHIPPANY			1		1							1		
MRTWNJMR	MORRISTOWN	NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1	1				1			1		1	
		NWRKNJ02	MARKET	1		1	1	1			1					1	
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1					1	
		PSWYNJPI	PISCATAWAY	1		1								1			
		RCPKNJ02	ROCHELLE PARK	1			1	1								1	
		RTFRNJRU	RUTHERFORD	1		1		1			1					1	
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1		1			1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
NBRGNJNB	NORTH BERGEN	NWRKNJ02	MARKET					1			1				1		
		PSSCNJPS	PASSAIC					1			1				1		
		RTFRNJRU	RUTHERFORD					1			1				1		
		UNCYNJ02	UNION CITY					1			1				1		
NBWKNJNB	NEW BRUNSWICK	NWRKNJ02	MARKET	1		1	1		1		1					1	
		NWRKNJIR	IRONBOUND	1		1									1		
		PSSCNJPS	PASSAIC	1							1					1	
		PSWYNJPI	PISCATAWAY	1		1								1			
		RCPKNJ02	ROCHELLE PARK	1			1									1	
		RTFRNJRU	RUTHERFORD	1		1					1					1	
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1			1		1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1										1	
NWRKNJ02	MARKET	NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1					1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1			1	1				1				1	
		RTFRNJRU	RUTHERFORD	1		1		1			1					1	
		UNCYNJ02	UNION CITY	1		1		1	1		1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1	1	1		1								1	
NWRKNJIR	IRONBOUND	PSSCNJPS	PASSAIC	1				1							1		
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1							1		
		RTFRNJRU	RUTHERFORD	1		1		1									
		UNCYNJ02	UNION CITY	1		1		1									
		WHIPNJWH	WHIPPANY	1		1		1									
PSSCNJPS	PASSAIC	RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1				1			1					1	

LATA 224																	
Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
		UNCYNJ02	UNION CITY	1				1			1						
		WHIPNJWH	WHIPPANY	1				1								1	
PSWYNJPI	PISCATAWAY	RTFRNJRU	RUTHERFORD	1		1									1		
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1									1		
		WHIPNJWH	WHIPPANY	1		1									1		
RCPKNJ02	ROCHELLE PARK	RTFRNJRU	RUTHERFORD	1				1								1	
		UNCYNJ02	UNION CITY	1				1		1					1		
		WHIPNJWH	WHIPPANY	1				1								1	
RTFRNJRU	RUTHERFORD	UNCYNJ02	UNION CITY	1		1		1			1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
UNCYNJ02	UNION CITY	WHIPNJWH	WHIPPANY	1		1		1									
WDBRNJWD	WOODBRIDGE	WHIPNJWH	WHIPPANY			1									1	1	

LATA 224

Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
BDBKNJBD	BOUND BROOK	BNTNNJBN	BOONTON	1		1								1			
		MRTWNJMR	MORRISTOWN	1		1								1			
		NBWKNJNB	NEW BRUNSWICK	1		1								1			
		PSWYNJPI	PISCATAWAY	1		1								1			
		SOVLNJSM	SOMERVILLE	1		1								1			
BNTNNJBN	BOONTON	ELZBNJEL	ELIZABETH	1		1		1									
		FRFDNJFA	FAIRFIELD	1		1		1									
		HCKNNJHK	HACKENSACK	1		1		1									
		JRCYNJBR	BERGEN	1		1		1									
		JRCYNJJO	JOURNAL SQUARE	1		1		1									
		MRTWNJMR	MORRISTOWN	1		1		1						1			
		NBWKNJNB	NEW BRUNSWICK	1		1								1			
		NWRKNJ02	MARKET	1		1		1									
		NWRKNJIR	IRONBOUND	1		1		1									
		PSWYNJPI	PISCATAWAY	1		1								1			
		RTFRNJRU	RUTHERFORD	1		1		1									
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1		1									
		WHIPNJWH	WHIPPANY	1		1		1									
EDSNNJED	EDISON	HCKNNJHK	HACKENSACK			1					1				1		
		JRCYNJBR	BERGEN			1					1				1		
		JRCYNJJO	JOURNAL SQUARE			1					1				1		
		LVTNNJLI	LIVINGSTON			1					1				1		
		MRTWNJMR	MORRISTOWN			1					1				1		
		NBWKNJNB	NEW BRUNSWICK			1					1				1		
		NWRKNJ02	MARKET			1					1				1		
		RTFRNJRU	RUTHERFORD			1					1				1		
		UNCYNJ02	UNION CITY			1					1				1		
ELZBNJEL	ELIZABETH	EORNNJEO	EAST ORANGE	1				1							1		
		FRFDNJFA	FAIRFIELD	1		1		1								1	
		HCKNNJHK	HACKENSACK	1		1		1								1	
		JRCYNJBR	BERGEN	1		1		1									
		JRCYNJJO	JOURNAL SQUARE	1		1		1									
		LTFLNJLF	LITTLE FALLS					1					1		1		
		LVTNNJLI	LIVINGSTON			1		1							1		
		MRTWNJMR	MORRISTOWN	1		1		1								1	
		NBWKNJNB	NEW BRUNSWICK	1		1										1	
		NWRKNJ02	MARKET	1		1		1								1	
		NWRKNJIR	IRONBOUND	1		1		1					1				
		PSSCNJPS	PASSAIC	1				1								1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1		1		1								1	
		UNCYNJ02	UNION CITY	1		1		1									
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
EORNNJEO	EAST ORANGE	FRFDNJFA	FAIRFIELD	1				1							1		
		HCKNNJHK	HACKENSACK	1				1			1						
		JRCYNJBR	BERGEN	1				1			1						
		JRCYNJJO	JOURNAL SQUARE	1				1			1						
		LVTNNJLI	LIVINGSTON					1			1				1		
		MRTWNJMR	MORRISTOWN	1				1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1							1				1		
		NWRKNJ02	MARKET	1				1			1						
		NWRKNJIR	IRONBOUND	1				1							1		

LATA 224

Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
		PSSCNJPS	PASSAIC	1				1			1						
		RCPKNJ02	ROCHELLE PARK	1				1							1		
		RTFRNJRU	RUTHERFORD	1				1			1						
		UNCYNJ02	UNION CITY	1				1			1						
		WHIPNJWH	WHIPPANY	1				1							1		
FRFDNJFA	FAIRFIELD	HCKNNJHK	HACKENSACK	1		1		1								1	
		JRCYNJBR	BERGEN	1		1		1									
		JRCYNJJO	JOURNAL SQUARE	1		1		1									
		LVTNNJLI	LIVINGSTON			1		1							1		
		MRTWNJMR	MORRISTOWN	1		1		1								1	
		NBWKNJNB	NEW BRUNSWICK	1		1										1	
		NWRKNJ02	MARKET	1		1		1								1	
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1								1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1		1		1								1	
		UNCYNJ02	UNION CITY	1		1		1									
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
HCKNNJHK	HACKENSACK	JRCYNJBR	BERGEN	1		1		1			1						
		JRCYNJJO	JOURNAL SQUARE	1		1		1			1						
		LVTNNJLI	LIVINGSTON			1		1			1						
		MRTWNJMR	MORRISTOWN	1		1		1			1					1	
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1					1					1	
		NWRKNJ02	MARKET	1	1	1		1			1					1	
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1					1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1		1		1			1					1	
		UNCYNJ02	UNION CITY	1		1		1			1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1	1	1		1								1	
JRCYNJBR	BERGEN	JRCYNJJO	JOURNAL SQUARE	1		1		1	1		1						
		LVTNNJLI	LIVINGSTON			1		1			1						
		MRTWNJMR	MORRISTOWN	1		1		1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1			1		1						
		NWRKNJ02	MARKET	1		1		1	1		1						
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1						
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1							1		
		RTFRNJRU	RUTHERFORD	1		1		1			1						
		UNCYNJ02	UNION CITY	1		1		1	1		1						
		WHIPNJWH	WHIPPANY	1		1		1									
JRCYNJJO	JOURNAL SQUARE	LVTNNJLI	LIVINGSTON			1		1			1						
		MRTWNJMR	MORRISTOWN	1		1		1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1			1		1						
		NWRKNJ02	MARKET	1		1		1	1		1	1					1
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1						
		PSWYNJPI	PISCATAWAY	1		1									1		

LATA 224

Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
		RCPKNJ02	ROCHELLE PARK	1				1				1					
		RTFRNJRU	RUTHERFORD	1		1		1			1						
		UNCYNJ02	UNION CITY	1		1		1	1		1						
		WHIPNJWH	WHIPPANY	1		1		1									
LTFLNJLF	LITTLE FALLS	NWRKNJIR	IRONBOUND					1					1		1		
LVTNNJLI	LIVINGSTON	MRTWNJMR	MORRISTOWN			1		1			1						
		NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK			1					1				1		
		NWRKNJ02	MARKET			1		1			1						
		NWRKNJIR	IRONBOUND			1		1							1		
		PSSCNJPS	PASSAIC					1			1				1		
		RTFRNJRU	RUTHERFORD			1		1			1						
		UNCYNJ02	UNION CITY			1		1			1						
		WHIPNJWH	WHIPPANY			1		1							1		
MRTWNJMR	MORRISTOWN	NBRGNJNB	NORTH BERGEN					1			1				1		
		NBWKNJNB	NEW BRUNSWICK	1		1	1				1			1		1	
		NWRKNJ02	MARKET	1		1	1	1			1					1	
		NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1					1	
		PSWYNJPI	PISCATAWAY	1		1								1			
		RCPKNJ02	ROCHELLE PARK	1			1	1								1	
		RTFRNJRU	RUTHERFORD	1		1		1			1					1	
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1		1			1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
NBRGNJNB	NORTH BERGEN	NWRKNJ02	MARKET					1			1				1		
		PSSCNJPS	PASSAIC					1			1				1		
		RTFRNJRU	RUTHERFORD					1			1				1		
		UNCYNJ02	UNION CITY					1			1				1		
NBWKNJNB	NEW BRUNSWICK	NWRKNJ02	MARKET	1		1	1		1		1					1	
		NWRKNJIR	IRONBOUND	1		1									1		
		PSSCNJPS	PASSAIC	1							1					1	
		PSWYNJPI	PISCATAWAY	1		1								1			
		RCPKNJ02	ROCHELLE PARK	1			1									1	
		RTFRNJRU	RUTHERFORD	1		1					1					1	
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1			1		1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1										1	
NWRKNJ02	MARKET	NWRKNJIR	IRONBOUND	1		1		1									
		PSSCNJPS	PASSAIC	1				1			1					1	
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1			1	1				1				1	
		RTFRNJRU	RUTHERFORD	1		1		1			1					1	
		UNCYNJ02	UNION CITY	1		1		1	1		1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1	1	1		1								1	
NWRKNJIR	IRONBOUND	PSSCNJPS	PASSAIC	1				1							1		
		PSWYNJPI	PISCATAWAY	1		1									1		
		RCPKNJ02	ROCHELLE PARK	1				1							1		
		RTFRNJRU	RUTHERFORD	1		1		1									
		UNCYNJ02	UNION CITY	1		1		1									
		WHIPNJWH	WHIPPANY	1		1		1									
PSSCNJPS	PASSAIC	RCPKNJ02	ROCHELLE PARK	1				1								1	
		RTFRNJRU	RUTHERFORD	1				1			1					1	

LATA 224																	
Count				CLECNum													
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	020	026	027	033	039	044	050	053	054	057	060	074	077
		UNCYNJ02	UNION CITY	1				1			1						
		WHIPNJWH	WHIPPANY	1				1								1	
PSWYNJPI	PISCATAWAY	RTFRNJRU	RUTHERFORD	1		1									1		
		SOVLNJSM	SOMERVILLE	1		1								1			
		UNCYNJ02	UNION CITY	1		1									1		
		WHIPNJWH	WHIPPANY	1		1									1		
RCPKNJ02	ROCHELLE PARK	RTFRNJRU	RUTHERFORD	1				1								1	
		UNCYNJ02	UNION CITY	1				1		1					1		
		WHIPNJWH	WHIPPANY	1				1								1	
RTFRNJRU	RUTHERFORD	UNCYNJ02	UNION CITY	1		1		1			1						
		WDBRNJWD	WOODBRIDGE			1									1	1	
		WHIPNJWH	WHIPPANY	1		1		1								1	
UNCYNJ02	UNION CITY	WHIPNJWH	WHIPPANY	1		1		1									
WDBRNJWD	WOODBRIDGE	WHIPNJWH	WHIPPANY			1									1	1	

LATA 222						
Count				CLECNum		
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	053
CMDNNJCE	CAMDEN	LRSPNJLS	LAUREL SPRINGS	1		1
		MHVLNJME	MERCHANTVILLE	1		1
LRSPNJLS	LAUREL SPRINGS	MHVLNJME	MERCHANTVILLE	1		1
		PNNKNJPN	PENNS NECK	1	1	
		PRTNNJPC	PRINCETON	1	1	
		TRENNJTE	TRENTON	1	1	
PNNKNJPN	PENNS NECK	PRTNNJPC	PRINCETON	1	1	
		TRENNJTE	TRENTON	1	1	
PRTNNJPC	PRINCETON	TRENNJTE	TRENTON	1	1	

LATA 224

Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
BDBKNJBD	BOUND BROOK	BDMNNJ01	BEDMINSTER	1	1								
		BNTNNJBN	BOONTON	1	1						1		
		ELZBNJEL	ELIZABETH	1	1								
		FRFDNJFA	FAIRFIELD	1	1								
		HCKNNJHK	HACKENSACK	1	1								
		JRCYNJBR	BERGEN	1	1								
		JRCYNJJO	JOURNAL SQUARE	1	1								
		MRTWNJMR	MORRISTOWN	1	1						1		
		MTCHNJMT	METUCHEN	1	1								
		NBWKNJNB	NEW BRUNSWICK	1	1						1		
		NWRKNJ02	MARKET	1	1								
		NWRKNJIR	IRONBOUND	1	1								
		PSWYNJPI	PISCATAWAY	1	1						1		
		RTFRNJRU	RUTHERFORD	1	1								
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
BDMNNJ01	BEDMINSTER	BNTNNJBN	BOONTON	1	1								
		ELZBNJEL	ELIZABETH	1	1								
		FRFDNJFA	FAIRFIELD	1	1								
		HCKNNJHK	HACKENSACK	1	1								
		JRCYNJBR	BERGEN	1	1								
		JRCYNJJO	JOURNAL SQUARE	1	1								
		MRTWNJMR	MORRISTOWN	1	1								
		MTCHNJMT	METUCHEN	1	1								
		NBWKNJNB	NEW BRUNSWICK	1	1								
		NWRKNJ02	MARKET	1	1								
		NWRKNJIR	IRONBOUND	1	1								
		PSWYNJPI	PISCATAWAY	1	1								
		RTFRNJRU	RUTHERFORD	1	1								
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
BNTNNJBN	BOONTON	ELZBNJEL	ELIZABETH	1	1	1							
		ENWDNJEN	ENGLEWOOD	1		1							
		EORNNJEO	EAST ORANGE	1		1							
		FRFDNJFA	FAIRFIELD	1	1	1							
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1	1	1							
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1							
		JRCYNJJO	JOURNAL SQUARE	1	1	1							
		LVTNNJLI	LIVINGSTON		1	1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1					1		
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBWKNJNB	NEW BRUNSWICK	1	1						1		
		NWRKNJ02	MARKET	1	1	1							
		NWRKNJIR	IRONBOUND	1	1	1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PSWYNJPI	PISCATAWAY	1	1						1		
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1	1							
		WHIPNJWH	WHIPPANY	1	1	1							
BYNNNJ02	BAYONNE	ELZBNJEL	ELIZABETH			1						1	
		EORNNJEO	EAST ORANGE			1						1	
		FRFDNJFA	FAIRFIELD			1						1	
		HCKNNJHK	HACKENSACK			1						1	
		JRCYNJBR	BERGEN			1						1	
		JRCYNJJO	JOURNAL SQUARE			1						1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LVTNNJLI	LIVINGSTON			1						1	
		MRTWNJMR	MORRISTOWN			1						1	
		NBRGNJNB	NORTH BERGEN			1						1	
		NWRKNJ02	MARKET			1						1	
		NWRKNJIR	IRONBOUND			1						1	
		PSSCNJPS	PASSAIC			1						1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RTFRNJRU	RUTHERFORD			1						1	
		UNCYNJ02	UNION CITY			1						1	
		WHIPNJWH	WHIPPANY			1						1	
		WORNNJWO	WEST ORANGE			1						1	
EDSNNJED	EDISON	ELZBNJEL	ELIZABETH		1							1	
		EORNNJEO	EAST ORANGE						1			1	
		FRFDNJFA	FAIRFIELD		1							1	
		HCKNNJHK	HACKENSACK		1				1			1	
		JRCYNJBR	BERGEN		1				1			1	
		JRCYNJJO	JOURNAL SQUARE		1				1			1	
		LVTNNJLI	LIVINGSTON		1				1			1	
		MRTWNJMR	MORRISTOWN		1				1			1	
		NBRGNJNB	NORTH BERGEN						1			1	
		NBWKNJNB	NEW BRUNSWICK		1				1			1	
		NWRKNJ02	MARKET		1				1			1	
		NWRKNJIR	IRONBOUND		1							1	
		PSSCNJPS	PASSAIC						1			1	
		PSWYNJPI	PISCATAWAY		1							1	
		RTFRNJRU	RUTHERFORD		1				1			1	
		UNCYNJ02	UNION CITY		1				1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY		1							1	
ELZBNJEL	ELIZABETH	ENWDNJEN	ENGLEWOOD	1		1							
		EORNNJEO	EAST ORANGE	1		1						1	
		FRFDNJFA	FAIRFIELD	1	1	1						1	
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1	1	1						1	
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1						1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1						1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1						1	
		MDSNNJMA	MADISON	1		1							

LATA 224

Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		MRTWNJMR	MORRISTOWN	1	1	1						1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1						1	
		NBWKNJNB	NEW BRUNSWICK	1	1							1	
		NWRKNJ02	MARKET	1	1	1						1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1						1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1						1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1						1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
ENWDNJEN	ENGLEWOOD	EORNNJEO	EAST ORANGE	1		1							
		FRFDNJFA	FAIRFIELD	1		1							
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1		1							
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1		1							
		JRCYNJJO	JOURNAL SQUARE	1		1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
EORNNJEO	EAST ORANGE	FRFDNJFA	FAIRFIELD	1		1						1	
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1		1			1			1	
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1		1			1			1	
		JRCYNJJO	JOURNAL SQUARE	1		1			1			1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON			1			1			1	
		MDSNNJMA	MADISON	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		MRTWNJMR	MORRISTOWN	1		1			1			1	
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1					1			1	
		NWRKNJ02	MARKET	1		1			1			1	
		NWRKNJIR	IRONBOUND	1		1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1								1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1			1			1	
		WHIPNJWH	WHIPPANY	1		1						1	
		WORNNJWO	WEST ORANGE			1						1	
FRFDNJFA	FAIRFIELD	FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1	1	1						1	
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1						1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1						1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1						1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1						1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1						1	
		NBWKNJNB	NEW BRUNSWICK	1	1							1	
		NWRKNJ02	MARKET	1	1	1						1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1						1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1						1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1						1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
FTLENJLE	LEONIA	HCKNNJHK	HACKENSACK	1		1							
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1		1							
		JRCYNJJO	JOURNAL SQUARE	1		1							
		MDSNNJMA	MADISON	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
HCKNNJHK	HACKENSACK	HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1			1			1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1			1			1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1			1			1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1				1			1	
		NWRKNJ02	MARKET	1	1	1			1			1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1			1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
HLDLNJWE	WESTWOOD	JRCYNJBR	BERGEN	1		1							
		JRCYNJJO	JOURNAL SQUARE	1		1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
JRCYNJBR	BERGEN	JRCYNJJO	JOURNAL SQUARE	1	1	1	1		1			1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1			1			1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1		1		1			1	
		NWRKNJ02	MARKET	1	1	1	1		1			1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1	1		1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
JRCYNJJO	JOURNAL SQUARE	LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1			1			1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1		1	1	1			1	
		NWRKNJ02	MARKET	1	1	1	1	1	1	1		1	1
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1		1		1		1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1		1	1			1	
		RVEDNJOR	ORADELL	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1	1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
LTFLNJLF	LITTLE FALLS	LVTNNJLI	LIVINGSTON			1						1	
		MRTWNJMR	MORRISTOWN			1						1	
		NBRGNJNB	NORTH BERGEN			1						1	
		NWRKNJ02	MARKET			1						1	
		NWRKNJIR	IRONBOUND			1						1	
		PSSCNJPS	PASSAIC			1						1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RTFRNJRU	RUTHERFORD			1						1	
		UNCYNJ02	UNION CITY			1						1	
		WHIPNJWH	WHIPPANY			1						1	
		WORNNJWO	WEST ORANGE			1						1	
LTFYNJLF	LITTLE FERRY	MRTWNJMR	MORRISTOWN	1								1	
		NBWKNJNB	NEW BRUNSWICK	1								1	
		NWRKNJ02	MARKET	1								1	
		NWRKNJIR	IRONBOUND	1								1	
		PSSCNJPS	PASSAIC	1								1	
		PSWYNJPI	PISCATAWAY	1								1	
		RCPKNJ02	ROCHELLE PARK	1								1	
		RTFRNJRU	RUTHERFORD	1								1	
		UNCYNJ02	UNION CITY	1								1	
		WHIPNJWH	WHIPPANY	1								1	
LVTNNJLI	LIVINGSTON	MRTWNJMR	MORRISTOWN		1	1			1			1	
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK		1				1			1	
		NWRKNJ02	MARKET		1	1			1			1	
		NWRKNJIR	IRONBOUND		1	1						1	
		PSSCNJPS	PASSAIC			1			1			1	
		PSWYNJPI	PISCATAWAY		1							1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RHWYNJRA	RAHWAY		1	1							
		RTFRNJRU	RUTHERFORD		1	1			1			1	
		UNCYNJ02	UNION CITY		1	1			1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY		1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
MDSNNJMA	MADISON	MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							

LATA 224

Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
MRTWNJMR	MORRISTOWN	MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1				1		1	1	
		NWRKNJ02	MARKET	1	1	1			1			1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1	1			1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
MTCHNJMT	METUCHEN	NBWKNJNB	NEW BRUNSWICK	1	1								
		NWRKNJ02	MARKET	1	1								
		NWRKNJIR	IRONBOUND	1	1								
		PSWYNJPI	PISCATAWAY	1	1								
		RTFRNJRU	RUTHERFORD	1	1								
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
MTCLNJMC	MONTCLAIR	NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
NBRGNJNB	NORTH BERGEN	NBWKNJNB	NEW BRUNSWICK						1			1	
		NWRKNJ02	MARKET			1			1			1	
		NWRKNJIR	IRONBOUND			1						1	
		PSSCNJPS	PASSAIC			1			1			1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RTFRNJRU	RUTHERFORD			1			1			1	
		UNCYNJ02	UNION CITY			1			1			1	
		WHIPNJWH	WHIPPANY			1						1	
		WORNNJWO	WEST ORANGE			1						1	
NBWKNJNB	NEW BRUNSWICK	NWRKNJ02	MARKET	1	1		1	1	1			1	
		NWRKNJIR	IRONBOUND	1	1							1	
		PSSCNJPS	PASSAIC	1					1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	1	

LATA 224

Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		RCPKNJ02	ROCHELLE PARK	1				1				1	
		RTFRNJRU	RUTHERFORD	1	1			1	1			1	
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1		1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1							1	
NWRKNJ02	MARKET	NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1		1		1		1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1		1	1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1	1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
NWRKNJIR	IRONBOUND	PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1						1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1						1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1						1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
PLFDNJPF	PLAINFIELD	PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
PSSCNJPS	PASSAIC	PSWYNJPI	PISCATAWAY	1								1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1			1			1	
		RVEDNJOR	ORADELL	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1			1			1	
		WHIPNJWH	WHIPPANY	1		1						1	
		WORNNJWO	WEST ORANGE			1						1	
PSWYNJPI	PISCATAWAY	RCPKNJ02	ROCHELLE PARK	1								1	
		RTFRNJRU	RUTHERFORD	1	1							1	
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1							1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1							1	
PTSNNJAR	PATERSON	RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
RCPKNJ02	ROCHELLE PARK	RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1		1				1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1		1				1	
		WHIPNJWH	WHIPPANY	1		1						1	
		WORNNJWO	WEST ORANGE			1						1	
RGWDNJRW	RIDGEWOOD	RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
RHWYNJRA	RAHWAY	RTFRNJRU	RUTHERFORD		1	1							
		UNCYNJ02	UNION CITY		1	1							
		WHIPNJWH	WHIPPANY		1	1							
RMSYNJRM	RAMSEY	RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
RTFRNJRU	RUTHERFORD	RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1		1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
RVEDNJOR	ORADELL	SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
SMMTNJSM	SUMMIT	UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
SOVLNJSM	SOMERVILLE	UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
UNCYNJ02	UNION CITY	WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		WORNNJWO	WEST ORANGE			1						1	
WDBRNJWD	WOODBRIDGE	WHIPNJWH	WHIPPANY		1							1	
WHIPNJWH	WHIPPANY	WORNNJWO	WEST ORANGE			1						1	

LATA 222						
Count				CLECNum		
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	053
CMDNNJCE	CAMDEN	LRSPNJLS	LAUREL SPRINGS	1		1
		MHVLNJME	MERCHANTVILLE	1		1
LRSPNJLS	LAUREL SPRINGS	MHVLNJME	MERCHANTVILLE	1		1
		PNNKNJPN	PENNS NECK	1	1	
		PRTNNJPC	PRINCETON	1	1	
		TRENNJTE	TRENTON	1	1	
PNNKNJPN	PENNS NECK	PRTNNJPC	PRINCETON	1	1	
		TRENNJTE	TRENTON	1	1	
PRTNNJPC	PRINCETON	TRENNJTE	TRENTON	1	1	

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
BDBKNJBD	BOUND BROOK	BDMNNJ01	BEDMINSTER	1	1							
		BNTNNJBN	BOONTON	1	1					1		
		ELZBNJEL	ELIZABETH	1	1							
		FRFDNJFA	FAIRFIELD	1	1							
		HCKNNJHK	HACKENSACK	1	1							
		JRCYNJBR	BERGEN	1	1							
		JRCYNJJO	JOURNAL SQUARE	1	1							
		MRTWNJMR	MORRISTOWN	1	1					1		
		MTCHNJMT	METUCHEN	1	1							
		NBWKNJNB	NEW BRUNSWICK	1	1					1		
		NWRKNJ02	MARKET	1	1							
		NWRKNJIR	IRONBOUND	1	1							
		PSWYNJPI	PISCATAWAY	1	1					1		
		RTFRNJRU	RUTHERFORD	1	1							
		SOVLNJSM	SOMERVILLE	1	1					1		
		UNCYNJ02	UNION CITY	1	1							
		WHIPNJWH	WHIPPANY	1	1							
BDMNNJ01	BEDMINSTER	BNTNNJBN	BOONTON	1	1							
		ELZBNJEL	ELIZABETH	1	1							
		FRFDNJFA	FAIRFIELD	1	1							
		HCKNNJHK	HACKENSACK	1	1							
		JRCYNJBR	BERGEN	1	1							
		JRCYNJJO	JOURNAL SQUARE	1	1							
		MRTWNJMR	MORRISTOWN	1	1							
		MTCHNJMT	METUCHEN	1	1							
		NBWKNJNB	NEW BRUNSWICK	1	1							
		NWRKNJ02	MARKET	1	1							
		NWRKNJIR	IRONBOUND	1	1							
		PSWYNJPI	PISCATAWAY	1	1							
		RTFRNJRU	RUTHERFORD	1	1							
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1							
		WHIPNJWH	WHIPPANY	1	1							
BNTNNJBN	BOONTON	ELZBNJEL	ELIZABETH	1	1	1						
		ENWDNJEN	ENGLEWOOD	1		1						
		EORNNJEO	EAST ORANGE	1		1						
		FRFDNJFA	FAIRFIELD	1	1	1						
		FTLENJLE	LEONIA	1		1						
		HCKNNJHK	HACKENSACK	1	1	1						
		HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1	1	1						
		JRCYNJJO	JOURNAL SQUARE	1	1	1						
		LVTNNJLI	LIVINGSTON		1	1						
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1	1	1				1		
		MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBWKNJNB	NEW BRUNSWICK	1	1					1		
		NWRKNJ02	MARKET	1	1	1						
		NWRKNJIR	IRONBOUND	1	1	1						
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1						
		PSWYNJPI	PISCATAWAY	1	1					1		
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1					1		
		UNCYNJ02	UNION CITY	1	1	1						
		WHIPNJWH	WHIPPANY	1	1	1						
BYNNNJ02	BAYONNE	ELZBNJEL	ELIZABETH			1					1	
		EORNNJEO	EAST ORANGE			1					1	
		FRFDNJFA	FAIRFIELD			1					1	
		HCKNNJHK	HACKENSACK			1					1	
		JRCYNJBR	BERGEN			1					1	
		JRCYNJJO	JOURNAL SQUARE			1					1	
		LTFLNJLF	LITTLE FALLS			1					1	
		LVTNNJLI	LIVINGSTON			1					1	
		MRTWNJMR	MORRISTOWN			1					1	
		NBRGNJNB	NORTH BERGEN			1					1	
		NWRKNJ02	MARKET			1					1	
		NWRKNJIR	IRONBOUND			1					1	
		PSSCNJPS	PASSAIC			1					1	
		RCPKNJ02	ROCHELLE PARK			1					1	
		RTFRNJRU	RUTHERFORD			1					1	
		UNCYNJ02	UNION CITY			1					1	
		WHIPNJWH	WHIPPANY			1					1	
		WORNNJWO	WEST ORANGE			1					1	
EDSNNJED	EDISON	ELZBNJEL	ELIZABETH		1						1	
		EORNNJEO	EAST ORANGE					1			1	
		FRFDNJFA	FAIRFIELD		1						1	
		HCKNNJHK	HACKENSACK		1			1			1	
		JRCYNJBR	BERGEN		1			1			1	
		JRCYNJJO	JOURNAL SQUARE		1			1			1	
		LVTNNJLI	LIVINGSTON		1			1			1	
		MRTWNJMR	MORRISTOWN		1			1			1	
		NBRGNJNB	NORTH BERGEN					1			1	
		NBWKNJNB	NEW BRUNSWICK		1			1			1	
		NWRKNJ02	MARKET		1			1			1	
		NWRKNJIR	IRONBOUND		1						1	
		PSSCNJPS	PASSAIC					1			1	
		PSWYNJPI	PISCATAWAY		1						1	
		RTFRNJRU	RUTHERFORD		1			1			1	
		UNCYNJ02	UNION CITY		1			1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY		1						1	
ELZBNJEL	ELIZABETH	ENWDNJEN	ENGLEWOOD	1		1						
		EORNNJEO	EAST ORANGE	1		1					1	
		FRFDNJFA	FAIRFIELD	1	1	1					1	
		FTLENJLE	LEONIA	1		1						
		HCKNNJHK	HACKENSACK	1	1	1					1	
		HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1	1	1					1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1					1	
		LTFLNJLF	LITTLE FALLS			1					1	
		LTFYNJLF	LITTLE FERRY	1							1	
		LVTNNJLI	LIVINGSTON		1	1					1	
		MDSNNJMA	MADISON	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		MRTWNJMR	MORRISTOWN	1	1	1					1	
		MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1					1	
		NBWKNJNB	NEW BRUNSWICK	1	1						1	
		NWRKNJ02	MARKET	1	1	1					1	
		NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1					1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1					1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1					1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
ENWDNJEN	ENGLEWOOD	EORNNJEO	EAST ORANGE	1		1						
		FRFDNJFA	FAIRFIELD	1		1						
		FTLENJLE	LEONIA	1		1						
		HCKNNJHK	HACKENSACK	1		1						
		HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1		1						
		JRCYNJJO	JOURNAL SQUARE	1		1						
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1		1						
		MTCLNJMC	MONTCLAIR	1		1						
		NWRKNJ02	MARKET	1		1						
		NWRKNJIR	IRONBOUND	1		1						
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1						
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
EORNNJEO	EAST ORANGE	FRFDNJFA	FAIRFIELD	1		1					1	
		FTLENJLE	LEONIA	1		1						
		HCKNNJHK	HACKENSACK	1		1		1			1	
		HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1		1		1			1	
		JRCYNJJO	JOURNAL SQUARE	1		1		1			1	
		LTFLNJLF	LITTLE FALLS			1					1	
		LTFYNJLF	LITTLE FERRY	1							1	
		LVTNNJLI	LIVINGSTON			1		1			1	
		MDSNNJMA	MADISON	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		MRTWNJMR	MORRISTOWN	1		1		1			1	
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1		1			1	
		NBWKNJNB	NEW BRUNSWICK	1				1			1	
		NWRKNJ02	MARKET	1		1		1			1	
		NWRKNJIR	IRONBOUND	1		1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1		1			1	
		PSWYNJPI	PISCATAWAY	1							1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1		1			1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1		1			1	
		WHIPNJWH	WHIPPANY	1		1					1	
		WORNNJWO	WEST ORANGE			1					1	
FRFDNJFA	FAIRFIELD	FTLENJLE	LEONIA	1		1						
		HCKNNJHK	HACKENSACK	1	1	1					1	
		HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1	1	1					1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1					1	
		LTFLNJLF	LITTLE FALLS			1					1	
		LTFYNJLF	LITTLE FERRY	1							1	
		LVTNNJLI	LIVINGSTON		1	1					1	
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1	1	1					1	
		MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1					1	
		NBWKNJNB	NEW BRUNSWICK	1	1						1	
		NWRKNJ02	MARKET	1	1	1					1	
		NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1					1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1					1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1					1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
FTLENJLE	LEONIA	HCKNNJHK	HACKENSACK	1		1						
		HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1		1						
		JRCYNJJO	JOURNAL SQUARE	1		1						
		MDSNNJMA	MADISON	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		MRTWNJMR	MORRISTOWN	1		1						
		MTCLNJMC	MONTCLAIR	1		1						
		NWRKNJ02	MARKET	1		1						
		NWRKNJIR	IRONBOUND	1		1						
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1						
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
HCKNNJHK	HACKENSACK	HLDLNJWE	WESTWOOD	1		1						
		JRCYNJBR	BERGEN	1	1	1		1			1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1		1			1	
		LTFLNJLF	LITTLE FALLS			1					1	
		LTFYNJLF	LITTLE FERRY	1							1	
		LVTNNJLI	LIVINGSTON		1	1		1			1	
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1	1	1		1			1	
		MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1		1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1			1			1	
		NWRKNJ02	MARKET	1	1	1		1			1	
		NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1		1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1		1			1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1		1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
HLDLNJWE	WESTWOOD	JRCYNJBR	BERGEN	1		1						
		JRCYNJJO	JOURNAL SQUARE	1		1						
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1		1						
		MTCLNJMC	MONTCLAIR	1		1						
		NWRKNJ02	MARKET	1		1						
		NWRKNJIR	IRONBOUND	1		1						
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1						
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
JRCYNJBR	BERGEN	JRCYNJJO	JOURNAL SQUARE	1	1	1	1	1			1	
		LTFLNJLF	LITTLE FALLS			1					1	
		LTFYNJLF	LITTLE FERRY	1							1	
		LVTNNJLI	LIVINGSTON		1	1		1			1	
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1	1	1		1			1	
		MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1		1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1		1	1			1	
		NWRKNJ02	MARKET	1	1	1	1	1			1	
		NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1		1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1		1			1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
JRCYNJJO	JOURNAL SQUARE	LTFLNJLF	LITTLE FALLS			1					1	
		LTFYNJLF	LITTLE FERRY	1							1	
		LVTNNJLI	LIVINGSTON		1	1		1			1	
		MDSNNJMA	MADISON	1		1						
		MRTWNJMR	MORRISTOWN	1	1	1		1			1	
		MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1		1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1		1	1			1	
		NWRKNJ02	MARKET	1	1	1	1	1	1		1	1
		NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1		1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1			1		1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1		1			1	
		RVEDNJOR	ORADELL	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
LTFLNJLF	LITTLE FALLS	LVTNNJLI	LIVINGSTON			1					1	
		MRTWNJMR	MORRISTOWN			1					1	
		NBRGNJNB	NORTH BERGEN			1					1	
		NWRKNJ02	MARKET			1					1	
		NWRKNJIR	IRONBOUND			1					1	
		PSSCNJPS	PASSAIC			1					1	
		RCPKNJ02	ROCHELLE PARK			1					1	
		RTFRNJRU	RUTHERFORD			1					1	
		UNCYNJ02	UNION CITY			1					1	
		WHIPNJWH	WHIPPANY			1					1	
		WORNNJWO	WEST ORANGE			1					1	
LTFYNJLF	LITTLE FERRY	MRTWNJMR	MORRISTOWN	1							1	
		NBWKNJNB	NEW BRUNSWICK	1							1	
		NWRKNJ02	MARKET	1							1	
		NWRKNJIR	IRONBOUND	1							1	
		PSSCNJPS	PASSAIC	1							1	
		PSWYNJPI	PISCATAWAY	1							1	
		RCPKNJ02	ROCHELLE PARK	1							1	
		RTFRNJRU	RUTHERFORD	1							1	
		UNCYNJ02	UNION CITY	1							1	
		WHIPNJWH	WHIPPANY	1							1	
LVTNNJLI	LIVINGSTON	MRTWNJMR	MORRISTOWN		1	1		1			1	
		NBRGNJNB	NORTH BERGEN			1		1			1	
		NBWKNJNB	NEW BRUNSWICK		1			1			1	
		NWRKNJ02	MARKET		1	1		1			1	
		NWRKNJIR	IRONBOUND		1	1					1	
		PSSCNJPS	PASSAIC			1		1			1	
		PSWYNJPI	PISCATAWAY		1						1	
		RCPKNJ02	ROCHELLE PARK			1					1	
		RHWYNJRA	RAHWAY		1	1						
		RTFRNJRU	RUTHERFORD		1	1		1			1	
		UNCYNJ02	UNION CITY		1	1		1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY		1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
MDSNNJMA	MADISON	MRTWNJMR	MORRISTOWN	1		1						
		MTCLNJMC	MONTCLAIR	1		1						
		NWRKNJ02	MARKET	1		1						
		NWRKNJIR	IRONBOUND	1		1						
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1						
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
MRTWNJMR	MORRISTOWN	MTCHNJMT	METUCHEN	1	1							
		MTCLNJMC	MONTCLAIR	1		1						
		NBRGNJNB	NORTH BERGEN			1		1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1			1		1	1	
		NWRKNJ02	MARKET	1	1	1		1			1	
		NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1		1			1	
		PSWYNJPI	PISCATAWAY	1	1					1	1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1		1			1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1					1		
		UNCYNJ02	UNION CITY	1	1	1		1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
MTCHNJMT	METUCHEN	NBWKNJNB	NEW BRUNSWICK	1	1							
		NWRKNJ02	MARKET	1	1							
		NWRKNJIR	IRONBOUND	1	1							
		PSWYNJPI	PISCATAWAY	1	1							
		RTFRNJRU	RUTHERFORD	1	1							
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1							
		WHIPNJWH	WHIPPANY	1	1							
MTCLNJMC	MONTCLAIR	NWRKNJ02	MARKET	1		1						
		NWRKNJIR	IRONBOUND	1		1						
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1						
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
NBRGNJNB	NORTH BERGEN	NBWKNJNB	NEW BRUNSWICK					1			1	
		NWRKNJ02	MARKET			1		1			1	
		NWRKNJIR	IRONBOUND			1					1	
		PSSCNJPS	PASSAIC			1		1			1	
		RCPKNJ02	ROCHELLE PARK			1					1	
		RTFRNJRU	RUTHERFORD			1		1			1	
		UNCYNJ02	UNION CITY			1		1			1	
		WHIPNJWH	WHIPPANY			1					1	
		WORNNJWO	WEST ORANGE			1					1	
NBWKNJNB	NEW BRUNSWICK	NWRKNJ02	MARKET	1	1		1	1			1	
		NWRKNJIR	IRONBOUND	1	1						1	
		PSSCNJPS	PASSAIC	1				1			1	
		PSWYNJPI	PISCATAWAY	1	1					1	1	

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		RCPKNJ02	ROCHELLE PARK	1							1	
		RTFRNJRU	RUTHERFORD	1	1			1			1	
		SOVLNJSM	SOMERVILLE	1	1					1		
		UNCYNJ02	UNION CITY	1	1		1	1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1						1	
NWRKNJ02	MARKET	NWRKNJIR	IRONBOUND	1	1	1					1	
		PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1		1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1			1		1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1		1			1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
NWRKNJIR	IRONBOUND	PLFDNJPF	PLAINFIELD	1		1						
		PSSCNJPS	PASSAIC	1		1					1	
		PSWYNJPI	PISCATAWAY	1	1						1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RHWYNJRA	RAHWAY		1	1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1	1	1					1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1					1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
PLFDNJPF	PLAINFIELD	PSSCNJPS	PASSAIC	1		1						
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
PSSCNJPS	PASSAIC	PSWYNJPI	PISCATAWAY	1							1	
		PTSNNJAR	PATERSON	1		1						
		RCPKNJ02	ROCHELLE PARK	1		1					1	
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1		1			1	
		RVEDNJOR	ORADELL	1		1						

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1		1			1	
		WHIPNJWH	WHIPPANY	1		1					1	
		WORNNJWO	WEST ORANGE			1					1	
PSWYNJPI	PISCATAWAY	RCPKNJ02	ROCHELLE PARK	1							1	
		RTFRNJRU	RUTHERFORD	1	1						1	
		SOVLNJSM	SOMERVILLE	1	1					1		
		UNCYNJ02	UNION CITY	1	1						1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1						1	
PTSNNJAR	PATERSON	RCPKNJ02	ROCHELLE PARK	1		1						
		RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
RCPKNJ02	ROCHELLE PARK	RGWDNJRW	RIDGEWOOD	1		1						
		RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1					1	
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1					1	
		WHIPNJWH	WHIPPANY	1		1					1	
		WORNNJWO	WEST ORANGE			1					1	
RGWDNJRW	RIDGEWOOD	RMSYNJRM	RAMSEY	1		1						
		RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
RHWYNJRA	RAHWAY	RTFRNJRU	RUTHERFORD		1	1						
		UNCYNJ02	UNION CITY		1	1						
		WHIPNJWH	WHIPPANY		1	1						
RMSYNJRM	RAMSEY	RTFRNJRU	RUTHERFORD	1		1						
		RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
RTFRNJRU	RUTHERFORD	RVEDNJOR	ORADELL	1		1						
		SMMTNJSM	SUMMIT	1		1						
		SOVLNJSM	SOMERVILLE	1	1							
		UNCYNJ02	UNION CITY	1	1	1		1			1	
		WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	
		WORNNJWO	WEST ORANGE			1					1	
RVEDNJOR	ORADELL	SMMTNJSM	SUMMIT	1		1						
		UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
SMMTNJSM	SUMMIT	UNCYNJ02	UNION CITY	1		1						
		WHIPNJWH	WHIPPANY	1		1						
SOVLNJSM	SOMERVILLE	UNCYNJ02	UNION CITY	1	1							
		WHIPNJWH	WHIPPANY	1	1							
UNCYNJ02	UNION CITY	WDBRNJWD	WOODBRIDGE		1						1	
		WHIPNJWH	WHIPPANY	1	1	1					1	

LATA 224												
Count				CLECNum								
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	050	053	057	060	077
		WORNNJWO	WEST ORANGE			1					1	
WDBRNJWD	WOODBRIDGE	WHIPNJWH	WHIPPANY		1						1	
WHIPNJWH	WHIPPANY	WORNNJWO	WEST ORANGE			1					1	

LATA 222						
Count				CLECNum		
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	053
CMDNNJCE	CAMDEN	LRSPNJLS	LAUREL SPRINGS	1		1
		MHVLNJME	MERCHANTVILLE	1		1
LRSPNJLS	LAUREL SPRINGS	MHVLNJME	MERCHANTVILLE	1		1
		PNNKNJPN	PENNS NECK	1	1	
		PRTNNJPC	PRINCETON	1	1	
		TRENNJTE	TRENTON	1	1	
PNNKNJPN	PENNS NECK	PRTNNJPC	PRINCETON	1	1	
		TRENNJTE	TRENTON	1	1	
PRTNNJPC	PRINCETON	TRENNJTE	TRENTON	1	1	

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
BDBKNJBD	BOUND BROOK	BDMNNJ01	BEDMINSTER	1	1								
		BNTNNJBN	BOONTON	1	1						1		
		ELZBNJEL	ELIZABETH	1	1								
		FRFDNJFA	FAIRFIELD	1	1								
		HCKNNJHK	HACKENSACK	1	1								
		JRCYNJBR	BERGEN	1	1								
		JRCYNJJO	JOURNAL SQUARE	1	1								
		MRTWNJMR	MORRISTOWN	1	1						1		
		MTCHNJMT	METUCHEN	1	1								
		NBWKNJNB	NEW BRUNSWICK	1	1						1		
		NWRKNJ02	MARKET	1	1								
		NWRKNJIR	IRONBOUND	1	1								
		PSWYNJPI	PISCATAWAY	1	1						1		
		RTFRNJRU	RUTHERFORD	1	1								
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
BDMNNJ01	BEDMINSTER	BNTNNJBN	BOONTON	1	1								
		ELZBNJEL	ELIZABETH	1	1								
		FRFDNJFA	FAIRFIELD	1	1								
		HCKNNJHK	HACKENSACK	1	1								
		JRCYNJBR	BERGEN	1	1								
		JRCYNJJO	JOURNAL SQUARE	1	1								
		MRTWNJMR	MORRISTOWN	1	1								
		MTCHNJMT	METUCHEN	1	1								
		NBWKNJNB	NEW BRUNSWICK	1	1								
		NWRKNJ02	MARKET	1	1								
		NWRKNJIR	IRONBOUND	1	1								
		PSWYNJPI	PISCATAWAY	1	1								
		RTFRNJRU	RUTHERFORD	1	1								
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
BNTNNJBN	BOONTON	ELZBNJEL	ELIZABETH	1	1	1							
		ENWDNJEN	ENGLEWOOD	1		1							
		EORNNJEO	EAST ORANGE	1		1							
		FRFDNJFA	FAIRFIELD	1	1	1							
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1	1	1							
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1							
		JRCYNJJO	JOURNAL SQUARE	1	1	1							
		LVTNNJLI	LIVINGSTON		1	1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1					1		
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBWKNJNB	NEW BRUNSWICK	1	1						1		
		NWRKNJ02	MARKET	1	1	1							
		NWRKNJIR	IRONBOUND	1	1	1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		PSWYNJPI	PISCATAWAY	1	1						1		
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1	1							
		WHIPNJWH	WHIPPANY	1	1	1							
BYNNNJ02	BAYONNE	ELZBNJEL	ELIZABETH			1						1	
		EORNNJEO	EAST ORANGE			1						1	
		FRFDNJFA	FAIRFIELD			1						1	
		HCKNNJHK	HACKENSACK			1						1	
		JRCYNJBR	BERGEN			1						1	
		JRCYNJJO	JOURNAL SQUARE			1						1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LVTNNJLI	LIVINGSTON			1						1	
		MRTWNJMR	MORRISTOWN			1						1	
		NBRGNJNB	NORTH BERGEN			1						1	
		NWRKNJ02	MARKET			1						1	
		NWRKNJIR	IRONBOUND			1						1	
		PSSCNJPS	PASSAIC			1						1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RTFRNJRU	RUTHERFORD			1						1	
		UNCYNJ02	UNION CITY			1						1	
		WHIPNJWH	WHIPPANY			1						1	
		WORNNJWO	WEST ORANGE			1						1	
EDSNNJED	EDISON	ELZBNJEL	ELIZABETH		1							1	
		EORNNJEO	EAST ORANGE						1			1	
		FRFDNJFA	FAIRFIELD		1							1	
		HCKNNJHK	HACKENSACK		1				1			1	
		JRCYNJBR	BERGEN		1				1			1	
		JRCYNJJO	JOURNAL SQUARE		1				1			1	
		LVTNNJLI	LIVINGSTON		1				1			1	
		MRTWNJMR	MORRISTOWN		1				1			1	
		NBRGNJNB	NORTH BERGEN						1			1	
		NBWKNJNB	NEW BRUNSWICK		1				1			1	
		NWRKNJ02	MARKET		1				1			1	
		NWRKNJIR	IRONBOUND		1							1	
		PSSCNJPS	PASSAIC						1			1	
		PSWYNJPI	PISCATAWAY		1							1	
		RTFRNJRU	RUTHERFORD		1				1			1	
		UNCYNJ02	UNION CITY		1				1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY		1							1	
ELZBNJEL	ELIZABETH	ENWDNJEN	ENGLEWOOD	1		1							
		EORNNJEO	EAST ORANGE	1		1						1	
		FRFDNJFA	FAIRFIELD	1	1	1						1	
		FTLENJLE	LEONIA	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		HCKNNJHK	HACKENSACK	1	1	1						1	
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1						1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1						1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1						1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1						1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1						1	
		NBWKNJNB	NEW BRUNSWICK	1	1							1	
		NWRKNJ02	MARKET	1	1	1						1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1						1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1						1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1						1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
ENWDNJEN	ENGLEWOOD	EORNNJEO	EAST ORANGE	1		1							
		FRFDNJFA	FAIRFIELD	1		1							
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1		1							
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1		1							
		JRCYNJJO	JOURNAL SQUARE	1		1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
EORNNJEO	EAST ORANGE	FRFDNJFA	FAIRFIELD	1		1						1	
		FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1		1			1			1	
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1		1			1			1	
		JRCYNJJO	JOURNAL SQUARE	1		1			1			1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON			1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1		1			1			1	
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1					1			1	
		NWRKNJ02	MARKET	1		1			1			1	
		NWRKNJIR	IRONBOUND	1		1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1								1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1			1			1	
		WHIPNJWH	WHIPPANY	1		1						1	
		WORNNJWO	WEST ORANGE			1						1	
FRFDNJFA	FAIRFIELD	FTLENJLE	LEONIA	1		1							
		HCKNNJHK	HACKENSACK	1	1	1						1	
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1						1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1						1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1						1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1						1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1						1	
		NBWKNJNB	NEW BRUNSWICK	1	1							1	
		NWRKNJ02	MARKET	1	1	1						1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1						1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1						1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1						1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
FTLENJLE	LEONIA	HCKNNJHK	HACKENSACK	1		1							
		HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1		1							
		JRCYNJJO	JOURNAL SQUARE	1		1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
HCKNNJHK	HACKENSACK	HLDLNJWE	WESTWOOD	1		1							
		JRCYNJBR	BERGEN	1	1	1			1			1	
		JRCYNJJO	JOURNAL SQUARE	1	1	1			1			1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1			1			1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1				1			1	
		NWRKNJ02	MARKET	1	1	1			1			1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1			1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
HLDLNJWE	WESTWOOD	JRCYNJBR	BERGEN	1		1							
		JRCYNJJO	JOURNAL SQUARE	1		1							
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
JRCYNJBR	BERGEN	JRCYNJJO	JOURNAL SQUARE	1	1	1	1		1			1	
		LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1			1			1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1		1		1			1	
		NWRKNJ02	MARKET	1	1	1	1		1			1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1	1		1			1	

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
JRCYNJJO	JOURNAL SQUARE	LTFLNJLF	LITTLE FALLS			1						1	
		LTFYNJLF	LITTLE FERRY	1								1	
		LVTNNJLI	LIVINGSTON		1	1			1			1	
		MDSNNJMA	MADISON	1		1							
		MRTWNJMR	MORRISTOWN	1	1	1			1			1	
		MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1		1	1	1			1	
		NWRKNJ02	MARKET	1	1	1	1	1	1	1		1	1
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1		1		1		1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1		1	1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1	1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
LTFLNJLF	LITTLE FALLS	LVTNNJLI	LIVINGSTON			1						1	
		MRTWNJMR	MORRISTOWN			1						1	
		NBRGNJNB	NORTH BERGEN			1						1	
		NWRKNJ02	MARKET			1						1	
		NWRKNJIR	IRONBOUND			1						1	
		PSSCNJPS	PASSAIC			1						1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RTFRNJRU	RUTHERFORD			1						1	
		UNCYNJ02	UNION CITY			1						1	
		WHIPNJWH	WHIPPANY			1						1	
		WORNNJWO	WEST ORANGE			1						1	
LTFYNJLF	LITTLE FERRY	MRTWNJMR	MORRISTOWN	1								1	
		NBWKNJNB	NEW BRUNSWICK	1								1	
		NWRKNJ02	MARKET	1								1	
		NWRKNJIR	IRONBOUND	1								1	
		PSSCNJPS	PASSAIC	1								1	
		PSWYNJPI	PISCATAWAY	1								1	
		RCPKNJ02	ROCHELLE PARK	1								1	
		RTFRNJRU	RUTHERFORD	1								1	
		UNCYNJ02	UNION CITY	1								1	
		WHIPNJWH	WHIPPANY	1								1	
LVTNNJLI	LIVINGSTON	MRTWNJMR	MORRISTOWN		1	1			1			1	

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK		1				1			1	
		NWRKNJ02	MARKET		1	1			1			1	
		NWRKNJIR	IRONBOUND		1	1						1	
		PSSCNJPS	PASSAIC			1			1			1	
		PSWYNJPI	PISCATAWAY		1							1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RHWYNJRA	RAHWAY		1	1							
		RTFRNJRU	RUTHERFORD		1	1			1			1	
		UNCYNJ02	UNION CITY		1	1			1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY		1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
MDSNNJMA	MADISON	MRTWNJMR	MORRISTOWN	1		1							
		MTCLNJMC	MONTCLAIR	1		1							
		NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
MRTWNJMR	MORRISTOWN	MTCHNJMT	METUCHEN	1	1								
		MTCLNJMC	MONTCLAIR	1		1							
		NBRGNJNB	NORTH BERGEN			1			1			1	
		NBWKNJNB	NEW BRUNSWICK	1	1				1		1	1	
		NWRKNJ02	MARKET	1	1	1			1			1	
		NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1	1			1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
MTCHNJMT	METUCHEN	NBWKNJNB	NEW BRUNSWICK	1	1								
		NWRKNJ02	MARKET	1	1								

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		NWRKNJIR	IRONBOUND	1	1								
		PSWYNJPI	PISCATAWAY	1	1								
		RTFRNJRU	RUTHERFORD	1	1								
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
MTCLNJMC	MONTCLAIR	NWRKNJ02	MARKET	1		1							
		NWRKNJIR	IRONBOUND	1		1							
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
NBRGNJNB	NORTH BERGEN	NBWKNJNB	NEW BRUNSWICK						1			1	
		NWRKNJ02	MARKET			1			1			1	
		NWRKNJIR	IRONBOUND			1						1	
		PSSCNJPS	PASSAIC			1			1			1	
		RCPKNJ02	ROCHELLE PARK			1						1	
		RTFRNJRU	RUTHERFORD			1			1			1	
		UNCYNJ02	UNION CITY			1			1			1	
		WHIPNJWH	WHIPPANY			1						1	
		WORNNJWO	WEST ORANGE			1						1	
NBWKNJNB	NEW BRUNSWICK	NWRKNJ02	MARKET	1	1		1	1	1			1	
		NWRKNJIR	IRONBOUND	1	1							1	
		PSSCNJPS	PASSAIC	1					1			1	
		PSWYNJPI	PISCATAWAY	1	1						1	1	
		RCPKNJ02	ROCHELLE PARK	1				1				1	
		RTFRNJRU	RUTHERFORD	1	1			1	1			1	
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1		1	1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1							1	
NWRKNJ02	MARKET	NWRKNJIR	IRONBOUND	1	1	1						1	
		PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1			1			1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1		1		1		1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1		1	1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1	1	1	1			1	

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
NWRKNJIR	IRONBOUND	PLFDNJPF	PLAINFIELD	1		1							
		PSSCNJPS	PASSAIC	1		1						1	
		PSWYNJPI	PISCATAWAY	1	1							1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RHWYNJRA	RAHWAY		1	1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1	1	1						1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1						1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
PLFDNJPF	PLAINFIELD	PSSCNJPS	PASSAIC	1		1							
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
PSSCNJPS	PASSAIC	PSWYNJPI	PISCATAWAY	1								1	
		PTSNNJAR	PATERSON	1		1							
		RCPKNJ02	ROCHELLE PARK	1		1						1	
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1			1			1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1			1			1	
		WHIPNJWH	WHIPPANY	1		1						1	
		WORNNJWO	WEST ORANGE			1						1	
PSWYNJPI	PISCATAWAY	RCPKNJ02	ROCHELLE PARK	1								1	
		RTFRNJRU	RUTHERFORD	1	1							1	
		SOVLNJSM	SOMERVILLE	1	1						1		
		UNCYNJ02	UNION CITY	1	1							1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1							1	
PTSNNJAR	PATERSON	RCPKNJ02	ROCHELLE PARK	1		1							
		RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							

LATA 224													
Count				CLECNum									
CLLI 1	CLLI 1 Name	CLLI 2	CLLI 2 Name	003	026	033	039	044	050	053	057	060	077
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
RCPKNJ02	ROCHELLE PARK	RGWDNJRW	RIDGEWOOD	1		1							
		RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1		1				1	
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1		1				1	
		WHIPNJWH	WHIPPANY	1		1						1	
		WORNNJWO	WEST ORANGE			1						1	
RGWDNJRW	RIDGEWOOD	RMSYNJRM	RAMSEY	1		1							
		RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
RHWYNJRA	RAHWAY	RTFRNJRU	RUTHERFORD		1	1							
		UNCYNJ02	UNION CITY		1	1							
		WHIPNJWH	WHIPPANY		1	1							
RMSYNJRM	RAMSEY	RTFRNJRU	RUTHERFORD	1		1							
		RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
RTFRNJRU	RUTHERFORD	RVEDNJOR	ORADELL	1		1							
		SMMTNJSM	SUMMIT	1		1							
		SOVLNJSM	SOMERVILLE	1	1								
		UNCYNJ02	UNION CITY	1	1	1		1	1			1	
		WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
RVEDNJOR	ORADELL	SMMTNJSM	SUMMIT	1		1							
		UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
SMMTNJSM	SUMMIT	UNCYNJ02	UNION CITY	1		1							
		WHIPNJWH	WHIPPANY	1		1							
SOVLNJSM	SOMERVILLE	UNCYNJ02	UNION CITY	1	1								
		WHIPNJWH	WHIPPANY	1	1								
UNCYNJ02	UNION CITY	WDBRNJWD	WOODBRIDGE		1							1	
		WHIPNJWH	WHIPPANY	1	1	1						1	
		WORNNJWO	WEST ORANGE			1						1	
WDBRNJWD	WOODBRIDGE	WHIPNJWH	WHIPPANY		1							1	
WHIPNJWH	WHIPPANY	WORNNJWO	WEST ORANGE			1						1	

New Jersey Customer locations Meeting FCC's Loop Triggers

	Street address	City	State	Zip Code	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-1 Wholesale Trigger	DS-3 Wholesale Trigger
1	1 Evertrust Plz	Jersey City	NJ	07302	044	X		X	X
					027	X	X	X	X
					053	X	X	X	X
2	1 Path Plz	Jersey City	NJ	07306	003	X			
					027	X			
3	10 2nd St	Jersey City	NJ	07302	003	X			
					027	X			
4	10 Exchange Pl	Jersey City	NJ	07302	003	X			
					027	X			
5	101 Hudson St	Jersey City	NJ	07302	044	X		X	X
					027	X		X	X
6	111 Pavonia Ave	Jersey City	NJ	07310	003	X			
					039	X		X	X
					027	X	X	X	X
					053	X	X	X	X
7	2 Journal Square Plz	Jersey City	NJ	07306	003	X			
					027	X			
8	30 Montgomery St	Jersey City	NJ	07302	003	X			
					027	X			
9	34 Exchange Pl	Jersey City	NJ	07302	003	X			
					027	X	X		
					053	X	X		
10	40 Amity St	Jersey City	NJ	07304	003	X			
					027	X			
11	525 Washington Blvd	Jersey City	NJ	07310	003	X			
					027	X			
12	70 Hudson St	Jersey City	NJ	07302	003	X			
					027	X			
13	90 Hudson St	Jersey City	NJ	07302	003	X			
					027	X			
14	2 Peach Tree Hill Rd	Livingston	NJ	07039	003	X			
					027	X			
15	650 Cit Dr	Livingston	NJ	07039	003	X			
					027	X			
16	1050 Wall St W	Lyndhurst	NJ	07071	003	X			
					027	X			
17	125 Chubb Ave	Lyndhurst	NJ	07071	003	X			
					027	X			
18	1 Gateway Ctr	Newark	NJ	07102	003	X			
					027	X			
19	1085 Raymond Blvd	Newark	NJ	07102	003	X			
					027	X			
20	520 Broad St	Newark	NJ	07102	003	X			
					027	X			
21	744 Broad St	Newark	NJ	07102	039	X		X	X
					027	X	X	X	X
					053	X	X	X	X
22	5851 W Side Ave	North Bergen	NJ	07047	003	X			
					027	X			

New Jersey Customer locations Meeting FCC's Loop Triggers

	Street address	City	State	Zip Code	CLECs Counting Towards Triggers	Dark Fiber Trigger	DS-3 Self Provisioning Trigger	DS-1 Wholesale Trigger	DS-3 Wholesale Trigger
23	15 Seeley Ave	Piscataway	NJ	08854	003	X			
					027	X			
24	225 Old New Brunswick Rd	Piscataway	NJ	08854	003	X			
					027	X			
25	25 Corporate Pl S	Piscataway	NJ	08854	003	X			
					027	X			
26	55 Livingston Ave	Roseland	NJ	07068	003	X			
					027	X			
27	201 Route 17	Rutherford	NJ	07070	003	X			
					027	X			
28	745 State Rt 3	Rutherford	NJ	07070	003	X			
					027	X			
29	110 Meadowlands Pkwy.	Secaucas	NJ	07094	039	X			
					053	X			
30	100 Plaza Dr	Secaucus	NJ	07094	003	X			
					027	X			
31	200 Meadowlands Pkwy	Secaucus	NJ	07094	003	X			
					027	X			
32	275 Hartz Way	Secaucas	NJ	07094	003	X			
					039	X			
					027	X			
33	300 Harmon Meadow Blvd	Secaucus	NJ	07094	003	X			
					027	X			
34	400 Plaza Dr	Secaucus	NJ	07094	003	X			
					027	X			
35	500 Plaza Dr	Secaucus	NJ	07094	003	X			
					027	X			
36	100 Franklin Sq Dr	Somerset	NJ	08873	003	X			
					027	X			
37	800 Rahway Ave.	Union	NJ	07803	003	X			
					016	X			
38	1919 Park Ave	Weehawken	NJ	07086	003	X			
					027	X			
39	300 Boulevard E	Weehawken	NJ	07087	044	X			
					027	X			
40	800 Harbor Blvd	Weehawken	NJ	07087	003	X			
					027	X			
41	115 S Jefferson Rd	Whippany	NJ	07981	003	X			
					027	X			