Levine Blaszak
Block & Boothby LLP

August 3, 2010

By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: WC Docket No. 05-25, July 19, 2010 Staff Workshop

Dear Ms. Dortch:

On July 19, 2010, the Commission hosted a workshop to evaluate the analytical framework the Commission should use in reviewing the current special access rules.[1] Dr. Lee Selwyn, economic consultant to the Ad Hoc Telecommunications Users Committee, spoke at the invitation of the staff.

In the course of his presentation, Dr. Selwyn referred to data regarding the number and persistence of end office collocations by competitors that are used as "triggers" for eliminating price caps regulation under the Commission's rules. Dr. Selwyn observed that the Commission's rules fail to account for changes in the status quo once an incumbent carrier is deregulated based on the number of competitor collocations in an exchange area. In particular, the rules fail to account for the material shrinkage in competitor collocations which occurred after incumbent carriers relied on collocations to obtain pricing flexibility.

Attached to this letter are the data referenced by Dr. Selwyn. The data was obtained through interrogatories propounded by parties in several state PUC Section 271 proceedings in 2001 and 2002. These statistics were presented by Dr. Selwyn in testimony he submitted in these proceedings, and were admitted in evidence in each of them. Relevant portions of Dr. Selwyn's pre-filed testimony together with copies of the referenced interrogatory responses are attached. All of the data being provided here share the following characteristics:

(1) the data post-date some, if not all, of the special access pricing flexibility applications filed with the FCC by Verizon and Qwest in the 2000 time frame;

[1] See *Wireline Competition Bureau Anounces July 19, 2010 Staff Workshop to Discuss the Analytical Framework for Assessing the Effectiveness of the Existing Special Access Rules,* WC Docket No. 05-25, Public Notice, DA 10-1238 (rel. Jue 30, 2010).

(2) the data pre-date the Verizon/MCI merger, which means that competitor collocations in Verizon states are overstated by the inclusion of MCI collocations since those no longer constitute competitor collocations.

(3) the data pre-date the elimination of the "line sharing" UNE for the high-frequency channel of the subscriber loop used for DSL, which further reduced the number of competitor collocations by eliminating those established by data CLECs.

(4) The data also pre-date many of the CLEC bankruptcies that occurred following the *USTA II* ruling by the Court of Appeals and the financial upheaval in the mid- to late-2000 time frame, which would also have led to reductions in the number of active collocations.

This letter and attachment are being submitted for inclusion in the record of the above-referenced proceedings in accordance with the Commission's rules. If you require any additional information please contact the undersigned.

Sincerely,

Dorothy Nederman
Legal Assistant
Levine, Blaszak, Block & Boothby LLP
2001 L Street, NW; Suite 900
Washington, DC 20036
Phone: (202) 857-2550

Attachments
cc: Al Lewis
Don Stockdale
Sharon Gillett
Nick Alexander
Marcus Maher
Pamela Arluk
Jonathan Baker
Paul de Sa

Before the

PUBLIC SERVICE COMMISSION OF MARYLAND

In the Matter of the Review by the Commission Into Verizon Maryland's Compliance with the Conditions of 47 U.S.C. §271(c)	**Case No. 8921**

Direct Testimony of

LEE L. SELWYN

witness for the

Maryland Office of People's Counsel

July 29, 2002

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this case, since neither the cable modem nor the alternative second line would be used to access long distance telephone services.

Measuring CLEC penetration in Maryland by counting the number of completed collocation arrangements misrepresents the actual number of CLECs providing telecommunications services in Maryland.

Q. Dr. Selwyn, is the use of completed collocation arrangements an accurate indicator of CLEC competitive potential in Maryland?

A. No. This is another "shadow" approach relied upon by Verizon. The Company flaunts the number of completed collocation arrangements as an indicator of both the existence of and potential for facilities-based competition. Verizon points to "580 existing in-service collocations arrangements" in Verizon Maryland central offices as evidence that a significant number of CLECs are positioned to directly compete with Verizon.[46] The strength of potential competition as demonstrated by collocation arrangements is mitigated significantly when the number of failing CLECs is considered. Indeed, of the 460 traditional physical collocation arrangements in existence in January 2002, only 283, or 62%, were still in use in April 2002.[47] Similarly, of the 559 cageless collocation arrangements in existence in January 2002, only 213, or 38%, were in use in April.[48] "In

46. Roberts Declaration, at para. 7.

47. Verizon Maryland response to Staff 4-23.

48. Verizon Maryland response to Staff 4-24.

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use" virtual collocation arrangements numbered 45 in January, 2002, yet that quantity dropped to 30 by April.[49] Given the continued turmoil in the industry since April, it is not unreasonable to expect even fewer "in use" collocation arrangements for CLECs, especially considering the bankruptcy filings of Adelphia, XO Communications, ATG and WorldCom over the past three and a half months.[50]

Q. Could there be CLEC collocation arrangements that are used for something other than providing voice services included in the count of collocation arrangements?

A. Yes, some of the collocation arrangements cited by Verizon are undoubtedly associated with "data CLECs," *i.e.*, carriers providing Digital Subscriber Line (DSL) services. Verizon has itself demonstrated that carriers providing DSL service as separate entities from Verizon require collocation arrangements. In response to Staff 3-2 and 4-19, Verizon Maryland indicated that prior to the April 2002 reintegration of Verizon Advanced Data Inc. ("VADI") into the core Verizon company, VADI had BEGIN PROPRIETARY << >> END PROPRIETARY virtual collocation arrangements in that same number of Maryland central offices.[51] This information not only demonstrates that data CLECs account for some portion of the 580 collocation arrangements Verizon attributes generally to CLECs, but it

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49. Verizon Maryland response to Staff 4-25.

50. *See* footnote 17, *supra*.

51. The count of VADI collocation arrangements are not included in Verizon's count of 580 collocation arrangements attributed to CLECs. Roberts Declaration, at para. 7.

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VERIZON MARYLAND INC.

CASE NO. 8921

RESPONSE TO

STAFF DATA REQUEST NO. 4, DATED MAY 7, 2002

23. Please identify how many of the 460 physical collocation arrangements described in paragraph 64 are still in use? Have any of these collocation arrangements been abandoned or assumed by another carrier? Please provide the costs and revenues that are associated with the collocation arrangements that have either been abandoned or assumed by another carrier.

RESPONSE:

Verizon MD objects to this discovery request to the extent that it is overbroad, unduly burdensome, and seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Verizon MD also objects to the discovery requests to the extent that they require special studies. Notwithstanding this objection, Verizon MD will provide a response reflecting readily available data.

As of April 30, 2002, 283 physical collocation arrangements were in use. Determining whether or not other carriers have assumed any arrangements, and the costs and revenues that are associated with these collocation arrangements, to the extent this information is available, would require a time-consuming and burdensome special study.

VERIZON MARYLAND INC.

CASE NO. 8921

RESPONSE TO

STAFF DATA REQUEST NO. 4, DATED MAY 7, 2002

24. Please identify how many of the 559 cageless collocation arrangements described in paragraph 65 are still in use? Have any of these collocation arrangements been abandoned or assumed by another carrier? Please provide the costs and revenues that are associated with the collocation arrangements that have either been abandoned or assumed by another carrier.

RESPONSE:

Verizon MD objects to this discovery request to the extent that it is overbroad, unduly burdensome, and seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Verizon MD also objects to the discovery requests to the extent that they require special studies. Notwithstanding this objection, Verizon MD will provide a response reflecting readily available data.

As of April 30, 2002, 213 cageless collocation arrangements were in use. Determining whether or not other carriers have assumed any arrangements, and the costs and revenues that are associated with these collocation arrangements, to the extent this information is available, would require a time-consuming and burdensome special study.

Before the

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of a Commission Investigation into Qwest's Compliance with Section 271(d)(3)(C) of the Telecommunications Act of 1996 that the Requested Authorization is Consistent with the Public Interest, Convenience and Necessity	**PUC Docket No. P-421/CI-01-1373** **OAH Docket No. 7-2500-24487-2**

Affidavit

of

LEE L. SELWYN

on behalf of the

Minnesota Department of Commerce

May 3, 2002

REDACTED VERSION

the Department's data request, <<Begin CLEC Specific Trade Secret>> <<End CLEC Specific Trade Secret>> indicated that it currently provides local service to only <<Begin CLEC Specific Trade Secret>> <<End CLEC Specific Trade Secret>> As such, this CLEC could not possibly account for even a fraction of the E911 tabulation attributed to it by Mr. Teitzel. Since Qwest states, "The CLEC E911 database records contain no listings associated with independent telephone companies, wireless carriers, resellers, or CLECs utilizing UNE-P service to end users,"[33] in fact, this CLEC <<Begin CLEC Specific Trade Secret>> <<End CLEC Specific Trade Secret>>

Measuring CLEC penetration in Minnesota by counting the number of completed collocation arrangements misrepresents the actual number of CLECs providing telecommunications services in Minnesota.

27. Another "shadow" approach that Mr. Teitzel uses to estimate CLEC competitive potential is to offer the number of completed collocation arrangements as an indicator of both the existence of and potential for facilities-based competition.[35] Mr. Teitzel points to 619 collocations in Qwest wire centers[36] as evidence that a significant number of CLECs are positioned to directly compete with Qwest.[37] The strength of potential competition, however, is mitigated significantly when the number of failing CLECs is considered. According to Qwest's

32. CLEC Response to DOC IR No. 18042, provided in Attachment 8.

33. Teitzel Affidavit, p. 19.

34. <<Begin CLEC Specific Trade Secret>> <<End CLEC Specific Trade Secret>>

35. Teitzel Affidavit, p. 28.

36. *Id.*

37. *Id.*

own records, a full $2 million dollars were owed to Qwest as past due CLEC collocation payments.[38] Additionally, as of October 2001, 49 collocation sites were operating under Chapter 11 bankruptcy, and another 21 had requested "decommissioning."[39] Were the information presented by Qwest more recent, it would likely be even more dismal for CLECs, especially considering the bankruptcy filing of McLeod in January 2002.[40]

28. Moreover, some of the collocation arrangements cited by Mr. Teitzel are undoubtedly associated with "data CLECs," *i.e.*, carriers providing Digital Subscriber Line (DSL) services. As has been demonstrated with respect to CLEC entry into the local voice telephone service market, entry into these other service areas is also proving to be expensive, due to high fixed costs associated with acquiring the necessary facilities. A compelling demonstration of the prevailing dearth of confidence in the data CLECs' ability to successfully develop their networks and even to expand into voice-over-IP service can be seen in the decision last year by Verizon to pull out of its plans to acquire a 55% stake in NorthPoint Communications. Following this decision, a Verizon spokesperson claimed that the Company had "several other ways" of gaining customers in the DSL markets outside of Verizon's traditional territory.[41] In March 2001, AT&T acquired the *physical assets* of NorthPoint for about $135-million, less than 10% of the pre-Verizon-merger market value of NorthPoint as a going concern, and only about "'25 cents on the

38. Qwest response to DOC IR 18020-a, provided in Attachment 2.

39. Qwest response to DOC IR 18020-b,c, provided in Attachment 2.

40. "McLeodUSA Bankruptcy: Bondholders Get Sweeter Deal, but Only 23% Commit," *TR Daily*, January 31, 2002, provided in Attachment 9.

41. "Citing Declining Operations, Financial Results, Verizon Backs Away From Takeover Of NorthPoint," *TR Daily*, November 29, 2000, provided in Attachment 9.

State Of Minnesota
Department of Commerce
INFORMATION REQUEST

P421/CI-01-1373

Information Requested From: Qwest Corporation

Information Requested By: Ferguson, Sharon
Date Requested: 01/22/2002
Date Response Due: 02/01/2002

REQUEST:

Regarding the Affidavit of David L. Teitzel:

1. Regarding page 28 "As of October 2001, there were 570 completed physical collocations and 49 completed virtual collocations in the state of Minnesota."

a. Provide the total number of completed collocation arrangements, cited herein, which are currently in arrears.

b. Designate the number of these accounts belonging to companies currently operating under chapter 11.

c. Indicate the number of pending disconnect orders for collocation arrangements.

d. Indicate the number of arrangements with disconnect orders that are currently in arrears.

2. Regarding Data Source, 3, provide:

a. The quantity of numbers ported from Qwest in Minnesota to CLECs by month from the end of 1998

b. The quantity of numbers ported from CLECs to Qwest in Minnesota by month from the end of 1998

RESPONSE:

1.a. Qwest's systems are dynamic and information is continually updated as payments are received. As a CLEC's collocation payment is received, it is applied to the associated outstanding balance and the associated history is purged. As of October 31, 2001, the total amount past due for Minnesota CLECs was $2,047,958.53.
1.b. As of the end of October 2001, there were 23 Cageless, 25 Physical, and 1 Virtual CLEC collocation sites that were operating under Chapter 11 bankruptcy.
1.c. Qwest does not issue disconnects on Collocation. A request for disconnect order is a request that is issued by the CLEC and is called a "Decommission" order. As of the end of October 2001, there were 21 such requests of which 12 have been completed and work on 9 is in process.
1.d. There are no decommissions in arrears. It is Qwest's policy that before a decommission order can begin, that the CLEC's outstanding billing for their associated nonrecurring (one-time charge) and all applicable recurring (monthly) charges that are more than 30 days past due be current. This

requirement is applicable on the collocation site that the CLEC is requesting to be decommissioned. Qwest does not charge the CLEC for any of the associated costs to perform the decommission and Qwest ceases the CLEC's collocation site-associated monthly billing at the date Qwest receives a valid application for the decommission.

2. Qwest objects to this request on grounds that the request is not reasonably limited in time. Notwithstanding and without waiving the objection, Qwest states:

a. Tracking data is not available prior to June 1998 when this service began to be offered. Please refer to Trade Secret Attachment DOC 18020(2)(a) for the quantity of numbers ported from Qwest in Minnesota to CLECs, by month, between June 1998 and December 2001.
2.b. Qwest's tracking systems do not contain the requested data prior to July 1999. See Trade Secret attachment DOC 18020(2)(b) for the quantity of telephone numbers ported from CLECs to Qwest in Minnesota, by month, between July 1999 and October 2001.

Respondent: Robin Terry

Before the

PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

In the Matter of Verizon Washington, D.C., Inc.'s Compliance With the Conditions Established in Section 271 of the Federal Telecommunications Act of 1996	)))))	**Formal Case No. 1011**

Affidavit and Exhibits of
the Office of the People's Counsel
of the District of Columbia
(Public Version)
Volume 1 of 1

DR. LEE L. SELWYN **EXHIBIT OPC (A)**

Office of the People's Counsel
of the District of Columbia
1133 Fifteenth Street, N.W.
Suite 500
Washington, D.C. 20005
(202) 727-3071

September 30, 2002

INFORMATION ALLEGED TO BE PROPRIETARY BY VERIZON DC HAS BEEN REDACTED FROM THIS DOCUMENT.

Measuring CLEC penetration in DC by counting the number of completed collocation arrangements misrepresents the actual number of CLECs providing telecommunications services in the District.

22. The use of completed collocation arrangements as an indicator of CLEC competitive potential in the District is another "shadow" approach being relied upon by Verizon DC. The Company flaunts the number of completed collocation arrangements as an indicator of both the existence of and potential for facilities-based competition. Verizon DC points to "approximately 150 existing in-service collocations arrangements" in Verizon DC central offices as evidence that a significant number of CLECs are positioned to directly compete with Verizon.[24] The strength of potential competition as demonstrated by collocation arrangements is mitigated significantly when the number of failing CLECs is considered. Indeed, of the 109 traditional physical collocation arrangements in existence in April 2002, only 70 were still in use in July 2002[25] — which represents a 36% decline in only three months. "In use" virtual collocation arrangements numbered 9 in April 2002, yet that quantity dropped to 7 by July.[26] CATT arrangements also declined from 14 in April 2002 to 12 in July. Given the continued turmoil in the industry since April, it is reasonable to expect even fewer "in use" collocation arrangements for CLECs now and in the foreseeable future, especially considering the bankruptcy filings of Adelphia, XO Communications, ATG and WorldCom over the past four months.[27]

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24. Johns Declaration, at para. 5.

25. Verizon DC response to OPC 1-42.

26. Verizon DC responses to OPC 1-41, 1-43.

27. "Adelphia Succumbs To Bankruptcy", *TR Daily*, June 26, 2002; "XO Files For Bankruptcy, Pledges Reorg With Or Without Forstmann/Telmex", *TR Daily*, June 17, 2002; (continued...)

23. Moreover, some of the collocation arrangements being cited by Verizon DC are undoubtedly associated with "data CLECs," *i.e.*, carriers providing Digital Subscriber Line (DSL) services and *not* voice dial-tone services. Verizon DC has itself demonstrated that carriers providing DSL service as separate entities from Verizon DC require collocation arrangements. In response to OPC 1-49, Verizon DC indicated that prior to the December 31, 2002 reintegration of Verizon Advanced Data Inc. ("VADI") into the core Verizon company, VADI had BEGIN PROPRIETARY << >> END PROPRIETARY virtual collocation arrangements in that same number of DC central offices.[28] This information clearly demonstrates that data CLECs account for some portion of the 150 collocation arrangements Verizon attributes generally to CLECs.

24. Furthermore, as has been demonstrated with respect to CLEC entry into the local voice telephone service market, entry into other service areas such as DSL is also proving to be difficult and expensive, due to high fixed costs associated with acquiring the necessary facilities. A compelling demonstration of the prevailing dearth of confidence in the data regarding CLECs' ability to successfully develop their networks and even to expand into voice-over-IP ("VOIP") service can be seen in the November 2000 decision by Verizon to pull out of its plans to acquire

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27. (...continued)
"Integra Telecom to Buy assets of Advanced Telecom Group", *The Business Journal Portland*, May 31, 2002, http://portland.bizjournals.com/portland/stories/2002/05/27/daily37.html, accessed 9/24/02; "Bankruptcy at WorldCom Is the Largest in U.S. History", *The New York Times*, July 22, 2002, http://www.nytimes.com/2002/07/22/business/22worl.html?todays headlines, accessed 9/24/02.

28. The count of VADI collocation arrangements are not included in Verizon's count of 150 collocation arrangements attributed to CLECs. Johns Declaration, Attachment 101, at 3.

VERIZON WASHINGTON, DC INC.

FORMAL CASE NO. 1011

RESPONSES TO THE OFFICE OF THE PEOPLE'S COUNSEL'S DATA REQUEST NO. 1

1-41. Provide the number of physical collocation, virtual collocation, and CATT arrangements in place in Verizon DC central offices as of January, 2002.

As of January 2002, there were 137 physical collocation, 6 virtual, and 10 CATT arrangements in place in Verizon DC Central Offices.

VERIZON WASHINGTON, DC INC.

FORMAL CASE NO. 1011

RESPONSES TO THE OFFICE OF THE PEOPLE'S COUNSEL'S DATA REQUEST NO. 1

1-42. Reference the Checklist Declaration, at para. 63. Identify how many of the 150 physical collocation arrangements are still in use? Have any of these collocation arrangements been abandoned or assumed by another carrier? Please provide the costs and revenues that are associated with the collocation arrangements that have either been abandoned or assumed by another carrier.

Verizon DC objects to this discovery request to the extent that it is overbroad, unduly burdensome, and seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Verizon DC also objects to this discovery request to the extent it is vague and ambiguous. Verizon DC also objects to this request to the extent that it would require Verizon DC to undertake special or burdensome studies. Notwithstanding these objections, and without waiving them, Verizon DC will provide a response.

This request is unclear as the Checklist Declaration at paragraph 63 indicates that Verizon DC had provisioned 109 traditional physical collocation arrangements through April 2002, not 150 as identified in the request. As of July 31,2002, 70 of the traditional physical arrangements referenced in the Checklist Declaration in paragraph 63 remain in use. Determining whether or not other carriers have assumed any arrangements, and the costs and revenues that are associated with these collocation arrangements, to the extent this information is available, would require a time-consuming and burdensome special study.

VERIZON WASHINGTON, DC INC.

FORMAL CASE NO. 1011

RESPONSES TO THE OFFICE OF THE PEOPLE'S COUNSEL'S DATA REQUEST NO. 1

1-43. Reference the Checklist Declaration, at para. 65. Identify how many of the 9 virtual collocation arrangements are still in use? Have any of these collocation arrangements been abandoned or assumed by another carrier? Please provide the costs and revenues that are associated with the collocation arrangements that have either been abandoned or assumed by another carrier.

Verizon DC objects to this discovery request to the extent that it is overbroad, unduly burdensome, and seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Verizon DC also objects to this discovery request to the extent it is vague and ambiguous. Verizon DC also objects to this request to the extent that it would require Verizon DC to undertake special or burdensome studies. Notwithstanding these objections, and without waiving them, Verizon DC will provide a response.

As of July 31,2002, 7 of the virtual collocation arrangements referenced in the Checklist Declaration in paragraph 65 remain in use. Determining whether or not other carriers have assumed any arrangements, and the costs and revenues that are associated with these collocation arrangements, to the extent this information is available, would require a time-consuming and burdensome special study.

Before the

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

In the Matter of the Application of Verizon New Jersey, Inc. for FCC Authorization to Provide In-Region, InterLATA Service in New Jersey	**Docket No. TO01090541**

Declaration

of

LEE L. SELWYN

witness for the

State of New Jersey
Division of the Ratepayer Advocate

October 22, 2001

counts" that Mr. Bone interprets as CLEC *access lines* include DID numbers, the CLEC market share figures that he presents based thereon would be seriously exaggerated. Moreover, a CLEC will typically include its own customer in the E911 database where the CLEC provides the *switch*, even if Verizon is the underlying provider of the access line facility connecting the customer's premises with the CLEC switch. Hence, when combined with the lack of correspondence between E911 listings and CLEC customer access lines, the E911 database count is not a reliable indicator of the amount of CLEC-provided facilities in the New Jersey market.

34. Another "shadow" approach that Mr. Bone uses to estimate CLEC competitive potential is to offer the number of completed collocation arrangements as an indicator of both the existence of and potential for facilities-based competition.[51] Mr. Bone cites 1,000 collocations in VNJ wire centers,[52] and thus asserts that a significant number of CLECs are positioned to directly compete with Verizon NJ.[53] The strength of potential competition, however, is mitigated significantly when the number of failing CLECs is considered.

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50. (...continued)
in the DID number block in the E911 entry for that customer. Pending FCC rules would require PBXs to have the IOD capability for E911 purposes at least with respect to a limited number of PBX station lines. *In the Matter of Revision of the Board's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, 9 FCC Rcd 6181, at para. 60.

51. Bone (Verizon NJ), Declaration at para. 6.

52. *Id.*

53. *Id.*

According to Verizon NJ's own records, a full 232 collocations — more than 23% of the total cited by Mr. Bone — currently have a payment due to Verizon NJ for the collocation space that is more than 30 days past due.[54] Additionally, Verizon NJ has also admitted that it has received discontinuation orders for 391 existing collocation arrangements.[55] Thus, as none of the discontinuation orders are currently past due,[56] fully 62% of the 1,000 current collocation arrangements that Mr. Bone claims to exist pose no serious competitive threat to Verizon NJ, since they are unlikely to have a long-term potential for survival. Again, Verizon's support for purported local competition in New Jersey falls short.

35. Moreover, some (albeit an unspecified number) of the collocation arrangements cited by Mr. Bone are undoubtedly associated with "data CLECs," i.e., carriers providing Digital Subscriber Line (DSL) services. As has been demonstrated with respect to CLEC entry into the local voice telephone service market, entry into these other service areas is also proving to be expensive, due to high fixed costs associated with acquiring the necessary facilities. A compelling demonstration of the prevailing dearth of confidence in the data CLECs' ability to successfully develop their networks and even to expand into voice-over-IP service can be seen in the decision last year by Verizon to pull out of its plans to acquire a 55% stake in NorthPoint Communications. Following this decision, a Verizon spokesperson claimed that the Company had "several other ways" of gaining customers in the DSL markets outside of

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54. Verizon NJ Response to RPA-27.a.i.

55. Verizon NJ Response to RPA-27.a.iii.

56. Verizon NJ Response to RPA-27.a.iv.

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #27
WITNESS: VERIZON NEW JERSEY INC.

REQUEST: Regarding the Declaration of Dennis M. Bone:

a. Paragraph 6 states "CLECs have more than 1,000 existing completed collocation arrangements and 90 collocation arrangements in progress:
   i. Provide the total number of completed collocation arrangements cited in paragraph 6 with Verizon NJ collocation accounts currently in arrears.
   ii. Designate the number of these accounts belonging to companies currently operating under Chapter 11 or under any other form of bankruptcy or receivership.
   iii. Indicate the number of pending disconnect orders for collocation arrangements.
   iv. Indicate the number of collocation arrangements with disconnect orders that are currently in arrears.

b. Regarding paragraph 6, "CLECs have obtained approximately 1,300 NXX codes in New Jersey, representing a total of about 13 million telephone numbers." Indicate the total number of telephone numbers from these NXX codes that are associated with actual CLEC retail customers through June 2001.

RESPONSE: a)
   i. Currently there are 232 collocation arrangements that are at least 30 days in arrears.
   ii. There are 9 companies that have filed for bankruptcy or some form of receivership and also have accounts in the arrears
   iii. There are 391 pending disconnects.
   iv. None of the pending disconnect orders are currently in arrears.

b) Verizon NJ does not have this information. It is known to the CLECs.