

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	
)	DOCKET NO. UT-041127
THE JOINT PETITION FOR)	
ENFORCEMENT OF)	VERIZON'S RESPONSES TO MCI'S
INTERCONNECTION)	FIRST SET OF DATA REQUESTS
AGREEMENTS WITH VERIZON)	
NORTHWEST INC.)	
_____)	

Verizon Northwest Inc. (Verizon) hereby responds to MCI's First Set of Data Requests.

GENERAL OBJECTIONS

1. Verizon objects to MCI's Data Requests to the extent that all or any of them seek materials protected by the attorney-client privilege or the work product doctrine.
2. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations or timetables beyond those required by law.
3. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are vague, duplicative, overly broad and/or unduly burdensome.
4. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, call for the production of information that Verizon does not maintain in its possession or in the requested format.
5. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon's territory.

6. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the footprint of Verizon Communications Inc. This proceeding involves only Verizon Northwest Inc.

7. Verizon objects to MCI's Data Requests to the extent that any or all of them call for a legal opinion.

8. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC, or other third party that Verizon has an obligation to safeguard from disclosure.

9. Verizon objects to MCI's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek confidential and proprietary materials relating to Verizon's customers or business practices whose probative value in this proceeding is substantially outweighed by the risk of prejudice or other potential harm to Verizon.

RESERVATION OF RIGHTS

Any information or materials provided in response to these data requests shall be without prejudice to Verizon's right to object to the admissibility or relevance of such evidence, or its right to object to further discovery of documents, other information, or materials relating to the same or similar subject matter upon any valid ground. Verizon also reserves the right to designate documents as confidential and insist upon the execution of a nondisclosure agreement or other protective order prior to disclosing responsive and otherwise relevant information or documents. Notwithstanding the execution of a nondisclosure agreement and/or the stated intention to respond to a Data Request below, Verizon further reserves the right to withhold documents which are highly confidential or trade secrets pending further negotiations on appropriate protective treatment or a determination by the ALJ that Verizon has no obligation to produce the document or information.

RESPONSES

1. Please describe in detail the operational support systems (OSS) changes that were made by Verizon relating to the switch replacement?

Response: Verizon is not asserting that changes to its OSS, if any, relating to the switch replacement are relevant to Verizon's Motion for Judgment on the Pleadings and Answer ("Verizon's Motion").

2. Are the changes described in response to Data Request No. 1 being made to Verizon's OSS interface (i.e., a new reject or table to determine whether UNE-P orders are accepted) or to the Verizon back end processing systems? Please provide a detailed explanation of your response, including a listing of each system impacted (e.g., Service order processor, billing system, etc.) and the change made to that system.

Response: See response to 1.

3. When were these OSS changes discussed in the Change Management forum? Please provide the minutes from the meeting(s) and any documents provided by Verizon to the Change Management forum relating to the OSS changes required by the replacement of the circuit switch with the Nortel succession switch.

Response: See response to 1. Moreover, the "OSS changes" referenced in this question had no impact on the OSS interfaces, which are the subject of the "Change Management forum." Therefore, it was neither necessary nor appropriate for these "OSS changes" to be "discussed" in the "Change Management forum."

4. Will Verizon provide "plain old telephone service" or "POTS" to its retail customer using the new switch?

Response: Yes. Moreover, this POTS service will also be available to CLECs pursuant to resale at the wholesale rates set by the Commission. *See* 47 U.S.C. § 251(c)(4).

5. What advanced services, that is, services other than POTS, will Verizon be providing to its retail customers that were not available prior to installing this switch? Please describe each service in detail.

Response: Initially, only current services will be available. Packet switches can be used to provide voice service and are ideally suited to be an initial element in the deployment of IP enabled services. The deployment for such IP enabled services is done incrementally; it is therefore Verizon's intention to deploy packet switches and other elements of an IP enabled service incrementally so that, when fully deployed, these elements will have the capacity to provide IP enabled services as well as voice services.

6. Please describe any plans that Verizon has to replace additional Washington switches with the Nortel Succession system installed at Mt. Vernon.

Response: Verizon objects to this question. This fact is not "directly related to matters at issue" nor is it "essential to the requesting party." WAC 480-07-650(4)(c). Verizon further objects to this Data Request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the discovery of relevant information.

7. Will Verizon retail customers with DSL continue to receive DSL?

Response: Yes.

8. Will Verizon customers with line sharing (ILEC voice/CLEC data) continue to receive this service after the replacement?

Response: Verizon's Line sharing is not provided to retail customers. Verizon objects to this question. This fact is not "directly related to matters at issue" nor is it "essential to the requesting party." WAC 480-07-650(4)(c). Verizon further objects to this Data Request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the discovery of relevant information.

9. Will Verizon's retail customers need to make any changes to their telephone equipment to utilize the new switch? For example, will these customers now receive their voice service as data packets? Will they have Voice Over Internet Protocol ("VOIP") service?

Response: Verizon retail customers will not "need to make any changes to their telephone equipment to utilize the new switch." Retail customers receiving POTS service will

not “receive their voice service as data packets.” VOIP service will not be required “to utilize the new switch.”

10. Specify which Nortel Succession switch was installed by Verizon at Mt. Vernon and provide all Nortel product documentation in Verizon’s possession relating to the switch.

Response: Verizon objects to this question. This fact is not “directly related to matters at issue” nor is it “essential to the requesting party.” WAC 480-07-650(4)(c). Verizon further objects to this Data Request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the discovery of relevant information. Without waiving these objections or Verizon’s general objections, the response is – See response to MCI Data Request 21 (Second Set).

11. Has Verizon implemented the bearer paths for voice on the Succession system via ATM AAL 1, ATM AAL2, or ATM AAL5?

Response: Verizon objects to this question. This fact is not “directly related to matters at issue” nor is it “essential to the requesting party.” WAC 480-07-650(4)(c). Verizon further objects to this Data Request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the discovery of relevant information.

12. Has Verizon installed the Nortel Succession system in any other location in the United States? If yes, please identify the central offices where the switch is in use.

Response: Verizon objects to this question. This fact is not “directly related to matters at issue” nor is it “essential to the requesting party.” WAC 480-07-650(4)(c). Verizon further objects to this Data Request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the discovery of relevant information.

13. Has Verizon installed packet switches in any other location in the United States? If yes, please identify the central offices where the switch is in use.


Response: Verizon objects to this question. This fact is not “directly related to matters at issue” nor is it “essential to the requesting party.” WAC 480-07-650(4)(c). Verizon further

objects to this Data Request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the discovery of relevant information.

ATTORNEY CERTIFICATION

The undersigned attorney for Verizon Northwest Inc. has read the foregoing Answers, Responses and Objections to MCI's First Set of Data Requests and they are in compliance with CR 26(g).

RESPONSES AND OBJECTIONS dated this 15 day of October, 2004.



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CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of October, 2004, served the true and correct original, along with the correct number of copies, of *Verizon's Response to MCI's First Data Requests* and a *Certificate of Service* upon the parties noted below via E-Mail and U.S. Mail:

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I hereby certify that I have this 15th day of October, 2004, served a true and correct copy of the foregoing documents upon parties noted below via U.S. Mail:

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I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

DATED this 15th day of October, 2004, at Seattle, Washington.



Heidi L. Wilder