

Docket No. UT-050814

Verizon Responses to Integra Telecom Data Request Set2 Nos. 78-130

August 31, 2005

DATA REQUEST NO. 96:

Reference Verizon's response to Integra data requests 56 and 57: Please admit that the determination of whether or not facilities are "designed" or "non-designed" in Verizon West, including the state of Washington, is made based on the type of facility ordered.

Response:

The determination of whether or not facilities are designed or non-designed is based upon specific criteria related to the product and type of facility being ordered. Designed services require engineering intervention.

Prepared By: Beth Abesamis

Date: 8/25/2005

Witness: To be determined

Docket No. UT-050814

Verizon Response to Integra Telecom Data Request Data Request Set1 Nos. 1-77

August 12, 2005

DATA REQUEST NO. 16:

Please admit that the state of Washington is considered "Verizon West."

Response:

Verizon admits that, geographically speaking, the State of Washington is covered by the term "Verizon West" for Verizon's internal purposes. However, this is not a legal company name.

Prepared By: James Miggans

Date: August 10, 2005

Witness: To be determined

Confidential Exhibit Redacted

Docket No. UT-050814

Verizon Response to Integra Telecom Data Request Data Request Set1 Nos. 1-77

August 12, 2005

DATA REQUEST NO. 56:

Please admit that Verizon West requires competitive LECs to specify whether ordered facilities are "designed" or "non-designed" based on information provided by Verizon in WISE.

Response:

Verizon West requires Competitive Local Exchange Carriers (CLECs) to specify whether ordered facilities are "designed" or "non-designed". Verizon provides CLECs with a Pre-Ordering transaction (Loop Qualification) that CLECs can use to determine whether the facilities being ordered are designed or non-designed.

In the West, the Loop Qualification transaction is accessible on Verizon's Wholesale Internet System Engine (WISE).

As stated in Verizon's response to Data Request No. 57, Verizon East does not require CLECs to specify whether ordered facilities are designed or non-designed because the determination of whether or not facilities are "designed" or "non-designed" is made based on the type of facility ordered.

Prepared By: Beth Abesamis

Date: 8/10/05

Witness: To be determined

Docket No. UT-050814

Verizon Response to Integra Telecom Data Request Set2 Nos. 78-130

August 30, 2005

DATA REQUEST NO. 106:

Please admit that Verizon waits until after it has issued a firm order confirmation to a CLEC before it checks the facilities and issues a jeopardy notice, if such notice is necessary.

Response:

Yes. Verizon issues a Local Order Confirmation (also known as Firm Order Confirmation) to CLECs to indicate that the CLEC request was accepted in Verizon's systems. The Verizon provisioning process begins after the Local Order Confirmation notice is issued to the CLECs.

Information on Verizon's ordering process is documented on Verizon's Wholesale website. Please refer to the Process Diagram found on Verizon's Wholesale Website at the following URL

http://www22.verizon.com/wholesale/local/order/wsg_lo_prctdiagram/

Prepared By: Beth Abesamis

Date: 8/23/05

Witness: To be determined

Confidential Exhibit Redacted

August 31, 2005

DATA REQUEST NO. 79:

Reference Verizon's response to Integra data request no. 13: Please admit that Verizon would suffer no penalty if it failed to continue to record wholesale performance or post monthly performance reports for the state of Washington.

Response:

Verizon objects to this request on the grounds that the information requested is irrelevant to this proceeding and will not reasonably lead to the discovery of admissible evidence.

In addition, Verizon objects to the request because it calls for a legal conclusion, rather than an admission of fact. Furthermore, Integra's counsel is equally as capable as Verizon of determining the existence or non-existence of wholesale service performance reporting requirements under Washington law as well as the existence or non-existence of possible legal penalties. Subject to and without waiver of these objections, Verizon states the following:

As stated in Verizon response to WA Integra Data Request No. 13, Verizon voluntarily provides performance reports based upon the fGTE FCC West Guidelines that were required by the FCC pursuant to the Order approving the Bell Atlantic / GTE Merger.

The Washington UTC has not promulgated a rule or issued an order to Verizon Northwest Inc. requiring the reporting or posting of monthly wholesale performance reports for the state of Washington. Therefore, Verizon Northwest Inc. would not suffer any regulatory penalties if it failed to continue to record or post wholesale monthly performance reports.

Prepared By: Beth Abesamis

Date: 8/25/2005

Witness: To be determined

August 31, 2005

DATA REQUEST NO. 125:

Please explain why Verizon is opposed to wholesale service quality standards that may be set by the WUTC.

Response:

Verizon objects to this request on the grounds that the question posed is hypothetical, is unduly vague and subject to numerous different interpretations.

Subject to the foregoing objections and without waiving Verizon's rights Verizon responds as follows:

The Washington UTC has not proposed a set of Wholesale Service Quality Standards. Therefore, Verizon cannot reasonably state whether it would be in favor of or opposed to a set of Wholesale Service Quality Standards that may be set by the Washington UTC.

As stated in Verizon response to WA Integra Data Request No. 13, Verizon voluntarily provides monthly performance reports to the Washington UTC based upon the fGTE FCC West Guidelines that were required by the FCC pursuant to the Order approving the Bell Atlantic / GTE Merger. These reports show performance for pre-order, ordering, provisioning, maintenance, network performance and billing in Washington. The data reported to the WA UTC shows both the CLEC aggregate level and CLEC specific performance for each CLEC. CLECs can access and download reports for their specific data from Verizon's WISE system.

Verizon is willing to continue to report on a voluntary basis, or if acceptable to parties, willing to report measures created in a collaborative in California for the Joint Partial Settlement Agreement (JPSA) dated 2/21/2003.

Prepared By: Beth Abesamis

Date: 8/22/2005

Witness: To be determined