

**AT&T'S PROPOSED DISCOVERY QUESTIONS**

1. For each month since 1999, provide the number of and the total charges assessed for unbundled loop cutovers when the "CHC" field on the LSR form is populated with a "Y", for existing customers by wire center, separated between each type or classification of cutover provided by ILEC, including, but not limited to, "coordinated installation with cooperative testing," "coordinated installation without cooperative testing," "frame due time" or "project coordinated installation" cutovers.
2. Provide the average [ILEC] personnel time attributable to a single cutover on a single order, separated between each type or classification of cutover provided by ILEC, including, but not limited to, "coordinated installation with cooperative testing," "coordinated testing without cooperative testing," "frame due time" or "project coordinated installation" cutovers.
3. Provide the average [ILEC] personnel time attributable to multiple cutovers contained on a single order, separated between each type or classification of cutover provided by ILEC, including, but not limited to, "coordinated installation with cooperative testing," "coordinated installation without cooperative testing," "frame due time" or "project coordinated installation" cutovers.
4. Has [ILEC] ever communicated to any CLEC the total number of cutovers [ILEC] is capable of performing per central office per day? Or in any specific geographic area per day? If yes, provide the substance of those communications, including all documents relating to limitations on the number of hot cuts that can be performed. If there are differences in the maximum number of cutovers that can be performed in a central office or geographic area, explain the reasons for the differences.
5. State the highest number of unbundled loop cutovers, when the "CHC" field on the LSR form is populated with a "Y," [ILEC] has ever performed in a single day for each central office.
6. State, for the most recent 30, 60 and 90-day periods for which data are available, the average number of lines [ILEC] processes on an order when the "CHC" field on the LSR form is populated with a "Y". State the time period used to develop the averages provided and the number of observations used to develop the average.

7. For the last quarter for which such information is available, provide by end-office (by applicable CLLI code), the CLLI of the tandem switch on which each end-office homes.
  
8. Identify the overall number and percentage of loops in [ILEC's] territory in [STATE] that are currently provisioned on:
  - a. All-copper loop facilities without pair-gain devices of any type (e.g., analog pair gain, DAMLs, etc.).
  - b. All-copper loop facilities with pair gain devices.
  - c. All-copper loop facilities less than 18K feet in length.
  - d. All-copper loop facilities greater than 18K feet in length.
  - e. Fiber-fed DLC facilities that do not support DSL.
  - f. Fiber-fed DLC facilities that do or will support DSL.
  
9. If [ILEC] has plans for provisioning fiber-fed NGDLC equipment, identify the overall number and percentage of loops in [ILEC's] territory in [STATE] that will be provisioned after the completion of the deployment on:
  - a. All-copper loop facilities without pair-gain devices of any type (e.g., analog pair gain, DAMLs, etc.).
  - b. All-copper loop facilities with pair gain devices.
  - c. All-copper loop facilities less than 18K feet in length.
  - d. All-copper loop facilities greater than 18K feet in length.
  - e. Fiber-fed DLC facilities that do not support DSL.
  - f. Fiber-fed DLC facilities that do or will support DSL.
  
10. Provide the best estimate available within [ILEC] or its affiliates of the percentage of access lines that will be used (in whole or in part) to provide services in the next five years based on each of the following types of DSL:

- a. ADSL.
  - b. HDSL.
  - c. HDSL2.
  - d. GSHDLS.
  - e. VDSL
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11. Describe in detail each of the OSS upgrades, modifications or changes that [ILEC] asserts are necessary to support DSL services on loops provisioned on fiber-fed NGDLC facilities. Provide all documents, including correspondence, vendor contracts, RFPs to vendors, statements of work, business cases, electronic mail, methods & procedures, core team minutes, action log, or notes, or other information that refer to such upgrades or upon which [ILEC] relied to respond to this request.
  12. Describe in detail the step-by-step physical process that must take place to convert a loop provided under a UNE-P arrangement (i.e., served by ILEC's unbundled switch), to UNE-L (served by CLEC's switch)
  13. Does [ILEC] have a "project-based" hot cut process for moving UNE-P customers to UNE-L? If so, describe the process in detail, produce all documents describing the process, identify the standard intervals and indicate the per unbundled loop charges for the process.
  14. Has [ILEC]'s "project-based" UNE-P to UNE-L migration process been subjected to testing, third party or otherwise? If so, provide the detailed results of such testing, including all documentation of the methodology that substantiates the statistical and operational validity of such testing.
  15. Can the current capacity of the UNE-P to UNE-L "project-based" process be increased? If so, how? Does ILEC have any current plans to increase the current capacity? If so, describe such plans.
  16. Describe in detail any process [ILEC] has to restore service if an end-user experiences problems resulting in loss of service during a hot cut.

17. Does ILEC have in place a single LSR process to migrate UNE loops from ILEC to CLEC, CLEC to ILEC and CLEC to CLEC for each of the following?
  - a. Voice service.
  - b. Data service.
  - c. Voice and data service
18. If [ILEC] has a single LSR process to migrate UNE loops, state whether the process provides flow through capability, and provide:
  - a. The capacity of each process in terms of number of UNE loops per day that can be migrated.
  - b. State the percentage of the service orders that flow through to completion.
19. Does [ILEC] have plans to increase its capacity to perform single LSR migrations? If so, provide the planned capacity for each type of migration and service.
20. Provide all documents analyzing or describing any external “market” for leased local switching capacity that [ILEC] reviewed in evaluating its proposed pricing for non-UNE local switching to serve voice grade loops. If no documents were reviewed, explain how [ILEC] established its prices for non-UNE local switching.
21. Provide the average revenue per line ILEC has derived from its residential customers in [STATE] in each of the last two years. Include in the average revenue per line all revenues associated with the basic retail price charged residential customers, vertical features, universal service payments, access charges, subscriber line charges, intraLATA toll, interLATA long distance, voice mail, local number portability, data and line revenues derived from any other sources. Provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total.
22. Provide the average total revenue in each of the past two years, per POTs and per DS0 line, that [ILEC] has received from business customers that are served by 1-3 voice-grade equivalent lines at one location, or are otherwise included in the definition of mass market customer as determined by the [STATE COMMISSION]. The average revenue per POTs and DS0 line should include revenues associated with the basic retail price charged to business customers,

- vertical features, voice mail, universal service payments, access charges, subscriber line charges, intraLATA toll, interLATA long distance, local number portability and data. Provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total. Produce all documents that reflect, refer or relate to the information provided in your response to this request.
23. Provide the average total cost per line for each of the past two years that [ILEC] has incurred to install and maintain lines used to serve mass market customers (residential customers and business customers that are served by 1-3 voice-grade equivalent lines at one location, or are otherwise included in the definition of mass market customer as determined by the [STATE COMMISSION]). Provide a breakdown of each cost component (*e.g.*, investment-related costs, network operations, maintenance, and SG&L) that is part of the average total cost per line, identifying the type and amount of each cost. Produce all documents that reflect, refer or relate to the information provided in your response to this request.
  24. Identify each instance in the last three years in which [ILEC] has denied a CLEC request for UNE interoffice transport in [STATE] on the basis of “no facilities available.”
  25. Specify the CLLI code for each pair of end offices (if any) between which the CLEC requested UNE interoffice transport was denied due to “no facilities available.” Provide all documents, information or communications on which [ILEC] relies for its response to this request.
  26. Identify each instance in the last three years in which [ILEC] has delayed provisioning a CLEC request for UNE interoffice transport on the basis of “no facilities available.”
  27. Specify the CLLI code for each pair of end offices (if any) between which the CLEC requested UNE interoffice transport was delayed due to “no facilities available” at the time of the request.
  28. In each instance where provisioning of a CLEC’s UNE interoffice transport was delayed due to “no facilities available” at the time of the request, describe in detail why there were no facilities available at the time of the request. How long was each such request delayed before facilities became available? Provide all documents, information or communications on which [ILEC] relies for its response to this request.