

BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION



In the Matter of

THE JOINT PETITION FOR  
ENFORCEMENT OF  
INTERCONNECTION  
AGREEMENTS WITH VERIZON  
NORTHWEST INC.

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DOCKET NO. UT-041127

**VERIZON'S SUPPLEMENTAL  
RESPONSES TO MCI'S FIRST  
AND SECOND SET OF  
DISCOVERY REQUESTS**

**VERIZON'S SUPPLEMENTAL RESPONSES  
TO MCI'S FIRST AND SECOND SET**

Verizon Northwest Inc. (Verizon) hereby supplements its responses to MCI's First and Second Set of Data Requests. These supplemental responses are made subject to and without waiving the specific and general objections made in response to MCI's First Set of Data Requests.

**SUPPLEMENTAL 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").

**Supplemental Response:** Paragraph 4 of the "Introduction" section to Verizon's Motion states, "Saddling the deployment of new technology with burdensome new unbundling duties, including the development of the necessary wholesale operations support systems (OSS), is not only unnecessary and unlawful, but would render these

**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).

**Supplemental Response:** The Nortel Switch that was installed by Verizon at Mt. Vernon is a CS2000 Succession Platform with Generic SN06.2

**28. Please identify every feature that Verizon intends to provide its retail customers in Washington before July 2005 using the Nortel Succession switch, that Verizon does not currently provide today in wire centers that use circuit switches.**

**Response:** Initially, the same features Verizon “currently provide[s] today in wire centers that use circuit switches” will be provided “using the Nortel Succession switch.”

**Supplemental Response:** The features Verizon provides today using the Nortel Succession Switch are those set forth in Verizon’s “General and Local Exchange Tariff,” WN U-17, or filed price lists as applicable.

**On October 18, 2004, MCI orally modified its Data Request 13 as reflected by the additional, underlined language:**

**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. Also, if yes, please state whether Verizon (a) has unbundled the packet switch or (b)**

continued to maintain the old circuit switch and use it to provide unbundled switching.

**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.

**Supplemental Response:** Verizon has not deployed a packet switch to replace a local circuit switch in any other location. Verizon has installed packet switches in California to replace circuit switches, but these packet switches are not in use and to date have not replaced circuit switches.

Dated October 19, 2004

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2004, the enclosed document was sent via U.S. First Class Mail to the following:

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