

**Before the**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

<b>In the Matter of</b>	)	<b>DOCKET NO. UT-003013, PHASE B</b>
<b>The Continued Costing and Pricing</b>	)	
<b>of Unbundled Elements, Transport</b>	)	<b>VERIZON NORTHWEST INC.</b>
<b>and Termination, and Resale</b>	)	<b>RESPONSES TO BENCH REQUEST</b>
	)	<b>NOS. 32 - 33</b>

**BR 32**

Provide a copy of an ASR, production order entry form, the MOG order form, and LSR, and any other forms related to a fax order for EELs.

**Response:**

**Access Service Request**

The Access Service Request (“ASR”) (see sample form Attachment 32A) is used when a CLEC seeks to migrate a circuit being provided pursuant to special access to an EEL UNE. In order for Verizon to perform the migration, the CLEC must complete the first five pages of the seven-page ASR and submit it to Verizon’s NACC. The ASR serves as the “order” for the migration. It’s function is to provide Verizon with all of the necessary information to migrate the circuit from special access to an EEL.

Following is a brief explanation of the information required on the ASR:

Page 1	Page 1 contains the “Administrative” section. It includes the UNE Billing Account Number (BAN) and the remarks section, which together identify the service or services being requested.
Page 2	Page 2 contains the “Billing” section. This section includes the necessary billing information. In addition, it includes the “Contact Information” section, which identifies the CLEC contact person, the CLEC engineering contact, and the contact person for inquiries relating to testing and turn-up of the circuit.
Page 3	Page 3 contains the “Circuit Detail” section that provides information regarding the network channel (type of signaling), the type of service, and the connecting points of the circuit and equipment.
Page 4	Page 4 contains the “Circuit Information” section that provides the necessary information to identify the primary equipment location. Page 4 also includes the “Secondary Location Information” section, which provides the end user contact name and number, as well as the loop information (cable and pair and connecting points from the central office to the end user location). The “Circuit Detail,” “Circuit Information” and “Secondary Location Information” sections of the ASR must be filled out for <u>each</u> special access circuit for a given customer of which the CLEC is requesting a migration.
Page 5	Page 5 contains the “Address Detail” section that provides the end user name and address.

Once the CLEC has completed the first five pages of the ASR, the CLEC submits it to Verizon’s NACC. The NACC representative who receives the ASR reviews the first five pages of the ASR to assure that it is complete and accurate. Then the NACC representative completes the last two pages of the ASR:

Page 6	Page 6 contains the “ASR Tracking Information” section, which provides the Verizon NACC representative with the information necessary for tracking the ASR as it moves through Verizon’s ordering and provisioning process.
Page 7	Page 7 contains the “Generate ORD/CKT/DATE” section, which provides the new circuit identification number for the UNE EEL as well as critical dates for processing and provisioning the order. This information is also provided to the CLEC for tracking and confirmation.

### **On-Line Production Order Entry**

The on-line “production order entry” form is the same format as the ASR. It is used to input the CLEC ASR information into Verizon’s ordering system. NACC representatives perform this data entry. A separate production order entry form/shell must be completed for each circuit. If the CLEC’s ASR indicates that the CLEC wishes to migrate fifty or more special access circuits, then the NACC representative will utilize what is called the on-line Mass Order Generator, or MOG, order form/shell (see sample form Attachment 32B) rather than the production order entry form/shell. If the MOG order form/shell is utilized, then only one such order form is required, rather than separate individual production order entry form/shells.

### **Local Service Request**

The Local Service Request (“LSR”) (see sample form, Attachment 32C) is not used to process EEL migration requests. The LSR is used by CLECs to order Exchange Basic and Exchange Complex UNEs.

Instructions for completing the ASR and LSR are available on Verizon's web site ([www.verizon.com/wise](http://www.verizon.com/wise)). All forms noted above follow the Ordering and Billing Forum (“OBF”) format.

Response by: Larry Richter  
Consultant - Witness

**BR 33**

Explain whether the NOMC shared fixed costs were included as a direct cost or included in the common costs established in UT-960369, et al. and identify any exhibits that illustrate whether those costs were backed out of the common costs established in that docket, and attach any work papers.

**Response:**

In the previous docket (UT-960369, et al), Verizon's NOMC shared/fixed costs were included as part of its Non-recurring Cost Study (NRC) submitted in that proceeding (See Exhibit C-565; Wholesale NRC Study; Tab 9; Pages 2WA 108 – 2WA 135). Verizon's Common Cost Study filed in that docket did not exclude the NOMC shared/fixed costs. However, the Commission rejected that Common Cost Study and used U S WEST's common cost data as a proxy for GTE's common costs. See 17<sup>th</sup> Supplemental Order at par. 204.

In the current proceeding (UT-003013), Verizon's NOMC shared/fixed costs were not backed out of the common costs or the direct costs developed by ICM, which was an oversight. Verizon classifies NOMC costs as non-recurring in nature since they are attributable directly to the non-recurring activity of receiving and processing wholesale orders. Thus, these costs should not have been included in the development of expenses in ICM. See Exhibit T-1170 at 20, lines 18-19 (Collins). Attachment BR 33A provides a comparison of the previous rates and the revised rates with the NOMC shared/fixed costs removed. This comparison illustrates that the impact of removing the NOMC shared-fixed costs is minimal. It should be noted that Attachment BR 33A does not currently contain the revised deaveraged rates for DS1 loops, but Verizon will provide this information in a supplemental bench request response.

The ordering NRC rates adopted by the Commission in Docket UT-960369, et. al and that became effective December 15, 2000 (See para. 9 of the 30<sup>th</sup> Supplemental Order), contained a rate component that recovered NOMC shared/fixed costs. When Verizon made its February 21, 2001 tariff compliance filing per the Phase A Order of Docket UT-003013 (13<sup>th</sup> Supplemental Order), Verizon adjusted its previously approved ordering NRC rates for UNEs and resale to remove the interim OSS and NOMC shared/fixed costs rate components and replaced them with the permanent rate components adopted by the Commission in that Order. A Commission order approving Verizon's February 21, 2001 tariff compliance filing is still pending.

Response by: Larry Richter  
Consultant - Witness