

-----Original Message-----

From: Kopta, Greg <GregKopta@DWT.COM>  
To: Huther, Chris (DC) <CHuther@prestongates.com>  
Sent: Tue Apr 06 18:41:29 2004  
Subject: RE: HM 5.3 DVD

Chris --

It would be easier for Kevin to be available after 1:30 EDT, so can we schedule a call for that time? Kevin also appropriately pointed out to me that without out some detailed information about the discrepancies beyond what you have provided so far, he may not have much to say on the call other than to get information about the discrepancies and then research them.

Greg

Gregory J. Kopta  
Davis Wright Tremaine LLP  
2600 Century Square  
1501 Fourth Avenue  
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(206) 628-7692

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-----Original Message-----

From: Huther, Chris (DC) [<mailto:CHuther@prestongates.com>]  
Sent: Tuesday, April 06, 2004 2:34 PM  
To: Kopta, Greg  
Subject: RE: HM 5.3 DVD

Greg,

We have reviewed Mr. Denney's proposed explanation, as well as the data request response and file referenced therein, and have concluded that they do not explain or remedy the problems and inconsistencies we have encountered with the TNS data. The discrepancies Verizon discovered (as described in my previous correspondence) relate to the derivation of HM 5.3's customer location count, not the assignment of lines or any "true up" thereof. The file that Mr. Denney references seems to explain how Mr. Denney modified the end result of the TNS pre-processing (i.e., the cluster data table in "hm53.dbf"). The data discrepancies we discovered are in the processes prior to the creation of this file. Because this file relates to the end result of the TNS pre-processing, we don't believe it can explain the problems and inconsistencies observed in the TNS data which lead to the file's creation. Accordingly, we would like to schedule the call with Mr. Landis as early on Wednesday as possible to confirm, once again, that TNS maintains that the files and data contained on the DVD are in fact those that yielded the January 23, 2004 version of the HM 5.3 cluster input database. Since you and Verizon's consultant, Mr. Dippon, are on Pacific time, could we schedule the call for 12:00 p.m. (Eastern) / 9:00 a.m. (Pacific)?

Regards,

Chris

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From: Kopta, Greg [<mailto:GregKopta@DWT.COM>]  
Sent: Monday, April 05, 2004 6:05 PM  
To: Huther, Chris (DC)  
Cc: ddenney@att.com; nataliebaker@att.com  
Subject: RE: HM 5.3 DVD

Chris --

Kevin Landis has limited availability this week, but he can schedule a call on Wednesday. In preparation, however, he would like as complete an explanation of the issue as possible from your expert so that he can try to have some information to share on the call. Let me know what time works best for you on Wednesday. Thanks.

Greg

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-----Original Message-----

From: Huther, Chris (DC) [<mailto:CHuther@prestongates.com>]  
Sent: Friday, April 02, 2004 3:38 PM  
To: Kopta, Greg  
Cc: ddenney@att.com; nataliebaker@att.com  
Subject: RE: HM 5.3 DVD

Greg:

We can find no reference to the "line count true up process" you referenced below in AT&T's Responses to Verizon's Ninth Set of Data Requests. Nevertheless, we doubt that the numerous data discrepancies we have discovered would be caused by any such "true up" of line counts. For example, the data contained on the DVD shows that the number of households and firms identified in Step 15 of the pre-clustering process (where the SQL database apparently exports the "cluster\_data\_aggr\_boundwcs" data via Visual FoxPro to the clustering process) differs significantly from the number of households and firms used in the version of HM 5.3 filed on January 23, 2004. Also, when we take the cluster output files that AT&T provided on the DVD and follow the TNS instructions included therewith, we are unable to reproduce the UNE cost estimates as filed on January 23, 2004.

If TNS continues to maintain that the files and data contained on the DVD are in fact those that yielded the January 23, 2004 version of the HM 5.3 cluster input database, we'd welcome the opportunity to discuss the discrepancies we have discovered with TNS and AT&T representatives early next week.

I look forward to hearing from you.

Regards,

Chris

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Washington, DC 20006  
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From: Kopta, Greg [<mailto:GregKopta@DWT.COM>]  
Sent: Thursday, April 01, 2004 2:58 PM  
To: Huther, Chris (DC)  
Cc: 'ddenney@att.com'; 'nataliebaker@att.com'  
Subject: RE: HM 5.3 DVD

Chris --

AT&T checked with TNS, and the TNS representative confirmed that the files on the DVD were the ones used for the most recent HM 5.3 inputs. The AT&T folks suggest that it's possible that the "cost" differences your expert observed are due to the true up of line counts performed on the data TNS provided. AT&T provided Verizon with the line count true up process in response to the latest set of Verizon data requests. Without more information on the "discrepancies," however, they are unable to provide any other explanation. If you can give us some additional information on the nature and location of the "discrepancies" to which you refer, we can try to provide a further explanation. Alternatively, perhaps we can schedule a conference call with TNS, AT&T, and Verizon representatives to discuss the issue. Let me know how you would like to proceed.

Greg

Gregory J. Kopta  
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-----Original Message-----

From: Huther, Chris (DC) [<mailto:CHuther@prestongates.com>]

Sent: Tuesday, March 30, 2004 3:25 PM  
To: Kopta, Greg  
Subject: HM 5.3 DVD

Dear Greg,

On March 4, 2004, you sent a DVD, marked "TNS Data," to Christian Dippon at NERA. This DVD purportedly contained data and information responsive to Verizon NW's data requests seeking the production of all preprocessing files that yielded the HM 5.3 cluster input database, as filed on January 23, 2004. The specific data and information sought by Verizon were summarized in my letter to you, dated February 13, 2004.

Based on our review, it appears that the data and files contained on the DVD are not responsive to the data requests at issue (i.e., they did not yield the January 23, 2004 version of the HM 5.3 cluster input database). For example, when the preprocessing is rerun with the files and data contained on the DVD, the cost estimates produced differ from the cost estimates produced by the January 23, 2004 version of HM 5.3. Given this and other discrepancies, Verizon NW's hereby seeks immediate confirmation that AT&T contends that the files and data contained on the DVD submitted on March 4, 2004 are in fact the files and data that yielded the January 23, 2004 version of the HM 5.3 cluster input database.

Regards,

Chris

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