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May 19, 2005

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VIA U.S. MAIL

Carole Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 Evergreen Park Drive, SW
Olympia, WA 98504

**Re: Docket No. UT-043013
In re Verizon Arbitration**

Dear Ms. Washburn:

Enclosed please find the original and two copies of Verizon's Response to Bench Request No. 1.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Timothy J. O'Connell".

Timothy J. O'Connell

cc: Service List

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Docket No. UT-043013
RESPONSE TO BENCH REQUEST

BENCH REQUEST NO. 1

Paragraph 95 of Verizon's brief and Section 3.4.2.6 of Verizon's Amendment 2 refer to Verizon's "conversion guidelines." Section 3.4.2.6 of Verizon's Amendment 2 states "All requests for conversions will be handled in accordance with Verizon's conversion guidelines." Please provide a copy of the referenced "conversion guidelines," or, in the alternative, please provide an Internet universal resource locator (URL) identifying where the document can be reviewed online and/or downloaded.

RESPONSE

A copy of the requested document, "Verizon Guidelines For Converting Eligible Special Access Services to UNE Transport and UNE Loop-Transport Combinations" is attached. The document is also available at the following URL:

http://www22.verizon.com/wholesale/local/order/ordering_une/1,,,00.html

Prepared by: Timothy O'Connell
Raphael H. Mingo

Telephone: (206) 6244-0900

Date: May 19, 2005



VERIZON

GUIDELINES FOR

CONVERTING ELIGIBLE SPECIAL ACCESS

SERVICES

TO UNE TRANSPORT AND UNE LOOP-

TRANSPORT COMBINATIONS

VERIZON

GUIDELINES FOR CONVERTING ELIGIBLE SPECIAL ACCESS SERVICES TO UNE TRANSPORT AND LOOP-TRANSPORT COMBINATIONS

A. INTRODUCTION

These guidelines (the "Guidelines") apply in the Verizon service territories in the District of Columbia and in the states of Arizona, California, Connecticut, Delaware, Florida, Hawaii, Idaho, Indiana, Maine, Maryland, Massachusetts, Michigan, Nevada, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Vermont, Virginia, Washington, West Virginia and Wisconsin (individually and collectively, as appropriate, "Verizon"), as set forth herein. These Guidelines revise the conversion processes that Verizon previously made available to carriers in the aforementioned service territories.

THESE GUIDELINES DO NOT ESTABLISH ANY RIGHTS OR OBLIGATIONS UPON VERIZON OR UPON ANY OTHER CARRIER WITH RESPECT TO CONVERSIONS OF SPECIAL ACCESS SERVICES TO UNBUNDLED NETWORK ELEMENTS ("UNEs") OR COMBINATIONS OF UNEs. THESE GUIDELINES ARE SUBJECT TO CHANGE BY VERIZON FROM TIME TO TIME.

Any rights or obligations to conversions of special access services to UNEs or combinations of UNEs derive from applicable and effective regulatory requirements, as and to the extent reflected in interconnection agreements between Verizon and applicable carriers or in applicable Verizon wholesale tariffs. Accordingly, the aim of these Guidelines is merely to assist carriers in consummating conversions, if any, of special access services to UNE transport (or to UNE loop-transport combinations) that Verizon is required to perform pursuant to the terms of particular interconnection agreements or Verizon tariffs. For the avoidance of any doubt, Verizon does not waive (and expressly reserves) all of its rights to not provide as a UNE or combination of UNEs any elements for which Verizon does not have that obligation.

To the extent that Verizon and a carrier are not parties to an interconnection agreement that incorporates the special access conversion provisions of the FCC's Triennial Review Order, CC Docket Nos. 01-338, 96-98, and 98-147 released August 21, 2003, and effective October 2, 2003 (the "TRO"), affirmed in part and remanded in part in *United States Telecom Ass'n v. FCC*, Nos. 00-1012 *et al.*, 2004 WL 374262 (D.C. Cir. Mar. 2, 2004) but, under the terms of their interconnection agreement, or under the terms of a Verizon tariff, Verizon is required to convert eligible special access circuits to UNE loop-transport combinations pursuant to the pre-TRO rules, these Guidelines set forth eligibility criteria and ordering procedures for completing such conversions.

To the extent that Verizon and a carrier are parties to an interconnection agreement that incorporates the special access conversion provisions of the TRO, the carrier should refer to its interconnection agreement with respect to terms and conditions for completing eligible conversions of special access circuits to UNE loop-transport combinations. For ease of

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reference, these Guidelines set forth standard terms and conditions, as well as ordering procedures, to facilitate completing such conversions.

On February 6, 2004, Verizon sent an industry mailing notifying carriers of Verizon's revised, ASR-driven, special access circuit conversion ordering process (the "SPUNE process"), including that, effective May 1, 2004, the SPUNE process would replace Verizon's interim special access circuit conversion ordering process in Verizon's former Bell Atlantic service territories. On July 9, 2004, Verizon sent an industry mailing notifying carriers that, effective September 19, 2004, the SPUNE process would also replace Verizon's interim special access circuit conversion ordering process in Verizon's former GTE service territories. Following up on that second mailing, to the extent that Verizon has an obligation, in its former GTE service territories, to convert special access circuits to UNE transport (or to UNE loop-transport combinations) under an interconnection agreement or a Verizon tariff (regardless of whether such conversions are governed by the terms of the TRO), effective September 19, 2004, Verizon will only perform such conversions pursuant to the revised conversion ordering process (i.e., the SPUNE process), which is described in further detail in these Guidelines. The existing, interim conversion ordering process may be used, in Verizon's former GTE service territories, until (but not after) September 17, 2004.

B. ELIGIBILITY CRITERIA

Eligibility Criteria for Conversions of Special Access Circuits to UNE Loop-Transport Combinations Under Interconnection Agreements That Do Not Incorporate the TRO

Where Verizon is required to convert eligible special access circuits to UNE loop-transport combinations under interconnection agreements that do not incorporate the special access conversion provisions of the TRO, the carrier must certify in writing that each circuit meets the local use rules set forth in the FCC's Supplemental Order Clarification, CC Docket No. 96-98, released June 2, 2000, and effective June 20, 2000 (the "Supplemental Order Clarification"). The foregoing certification is described in further detail in these Guidelines and must be provided at the time of the conversion request for the service territory in which the special access services are provisioned.

Under the Supplemental Order Clarification, it is presumed that a carrier is providing a significant amount of local exchange service if it meets one of three circumstances:

1. The carrier certifies that it is the exclusive provider of an end user's local exchange service. The loop-transport combinations must terminate at the carrier's collocation arrangement in at least one Verizon central office. This option does not allow loop-transport combinations to be connected to Verizon's tariffed services. Under this option, the carrier is the end user's only local service provider.
2. The carrier certifies that it provides local exchange and exchange access service to the end user customer's premises and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer local dialtone lines; and for DS-1 circuits and above, at least 50 % of the activated channels on the loop portion of the loop-transport combination have at least 5 % local voice traffic individually, and the entire loop facility has

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at least 10 % local voice traffic. When a loop-transport combination includes multiplexing (e.g., DS-1 multiplexed to DS-3 level), each of the individual DS-1 circuits must meet these criteria. The loop-transport combination must terminate at the carrier's collocation arrangement in at least one Verizon central office. This option does not allow loop-transport combinations to be connected to Verizon's tariffed services.

3. The carrier certifies that at least 50 % of the activated channels on a circuit are used to provide originating and terminating local dialtone service and at least 50 % of the traffic on each of these local dialtone channels is local voice traffic, and that the entire loop facility has at least 33 % local voice traffic. When a loop-transport combination includes multiplexing (e.g., DS-1 multiplexed to DS-3 level), each of the individual DS-1 circuits must meet these criteria. This option does not allow loop-transport combinations to be connected to Verizon's tariffed services. Under this option, collocation is not required. The carrier does not need to provide a defined portion of the end user's local service, but the active channels on any loop-transport combination, and the entire facility, must carry the amount of local exchange traffic specified in this option.

Eligibility Criteria for Conversions Of Eligible Special Access Circuits to Loop-Transport Combinations (or EELs) Under Verizon New York Inc.'s Tariff

Where Verizon New York Inc. is required to convert eligible special access circuits to UNE loop-transport combinations under interconnection agreements that do not incorporate the special access conversion provisions of the TRO, the carrier must certify in writing that each circuit meets the local use rules set forth in its NY PSC #10 tariff. The foregoing certification is described in further detail in these Guidelines and must be provided at the time of the conversion request.

Under Verizon New York Inc.'s NY PSC #10 tariff, it is presumed that a carrier is providing "primarily local" service if:

1. All channels on DS-1 and above links (i.e., loops), when combined by Verizon with interoffice transport into an EEL arrangement, are connected to a carrier switch that provides local exchange service (POTS).
2. In addition, EEL arrangements with DS-1 level and above links (i.e., loops) are used to transmit primarily local exchange traffic. The "primarily local" standard will consist of a channel count test at the transport and loop level. Specifically, both the transport and loop components of the arrangement will qualify for EEL rates when some local traffic is carried on 50% or more of the DS-1 level and above loop channels that are connected to a transport facility, to the extent that each of the loops serves customers whose local needs are being satisfied by the EEL arrangement.
3. If the "primarily local" test, as set forth above, is not met, and the arrangement therefore does not qualify as an EEL, then a DS-1 level or above loop that is included in the arrangement will qualify for UNE loop rates only if some local traffic is carried on 50% or more of the channels in that loop. In such cases, the transport portion of the arrangement will be treated

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as an access facility pursuant to intrastate private line or interstate special access tariffs, as appropriate.

Eligibility Criteria for Conversions Of Eligible Special Access Circuits to Loop-Transport Combinations Under the TRO

Where Verizon is required to convert eligible special access circuits to loop-transport combinations under interconnection agreements that incorporate the special access conversion provisions of the TRO, the carrier must certify in writing for each DS-1 circuit or DS-1 equivalent circuit that it is in compliance with each of the service eligibility criteria set forth in 47 C.F.R. Section 51.318. The foregoing certification must be provided at the time of the conversion request.

The following information for each DS-1 circuit or DS-1 equivalent should be provided with the certification:

1. The local number assigned to each DS-1 or DS-1 equivalent circuit;
2. The local numbers assigned to each DS-3 circuit (must have 28 local numbers assigned to it);
3. The date each circuit was established in the 911/E911 database;
4. The collocation termination connecting facility assignment for each circuit, showing that the collocation arrangement was established pursuant to 47 U.S.C. Section 251(c)(6), and not under a federal collocation tariff;
5. The interconnection trunk circuit identification number that serves each DS-1 circuit (there must be one such identification number per every 24 DS-1 circuits); and
6. The local switch that serves each DS-1 circuit.

This information must be contained in the REMARKS section of the ASR, unless provisions are made to populate other fields on the ASR to capture this information.

To facilitate processing of orders, each item of information must be separated from the next with a semi-colon (;). Illustrative samples appear below.

DS-1 Information Example:

2015846107;020403;201Y991045045;NNNNAAXXAAXXXXXXXXXAAAAAXXXXXXXXXAA
AAAAXXXXX;NWRKNJ02W45

DS-3 Information Example:

2015846107;020403;201Y991045045;6000T1Z3NWRKNJ02W45MRTWNJMRK31;NWRKNJ
02W45

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Due to space limitations in the REMARKS section of the current ASR, only one local telephone number is required for each DS-3, the DS-0 interconnection trunk ID is required only for DS-1s, and only one DS-1 interconnection facility ID is required for DS-3s. However, the foregoing does not affect the carrier's obligation to comply with the TRO with respect to, among other things, maintenance of complete and correct records.

C. THE SPECIAL ACCESS CIRCUIT CONVERSION PROCESS

1) Certification; Circuit Information

When certifying pursuant to the Supplemental Order Clarification rules or Verizon New York Inc.'s NY PSC #10 tariff, an authorized representative of the carrier must certify in writing that the carrier has met the eligibility criteria for conversion of the applicable special access circuits to UNE loop-transport combinations. A signed copy of the certification document must be received by Verizon before conversion activities can be initiated.

Sample certification forms can be found at:

Certification of Local Usage Options - Form - New York Only

Certification of Local Usage Options - Form - All States except New York

When certifying pursuant to the FCC's Triennial Review Order (or TRO) rules, an authorized representative of the carrier must certify in writing that the carrier has met the eligibility criteria for conversion of the applicable special access circuits to UNE loop-transport combinations. The carrier should also provide, together with such certification, the required circuit eligibility information (as specified earlier in these Guidelines). A signed copy of the certification document must be received by Verizon before conversion activities can be initiated.

2) Termination Liabilities and Minimum Service Period Charges

Termination liability and minimum service period charges may be applicable to early termination of special access services purchased pursuant to Verizon's Tariffs FCC Nos. 1, 11, 14 and 16, and Verizon's state tariffs. All applicable termination liabilities and minimum service period charges will apply pursuant to the tariff terms and conditions for early termination of services.

3) Revised Conversion Ordering Process (the SPUNE Process)

Further to Verizon's February 6, 2004 and July 9, 2004 industry mailings regarding conversions of eligible special access circuits, set forth below are ordering guidelines for Verizon's revised special access circuit conversion ordering process, which took effect, in Verizon's former Bell Atlantic service territories, on May 1, 2004, and which will take effect, in Verizon's former GTE service territories, on September 19, 2004.

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To the extent Verizon is required, under interconnection agreements with individual carriers, to process conversions of eligible special access circuits to the following UNEs and combinations thereof, it will do so through use of ASRs (i.e., through the SPUNE process):

- Voice grade (DS-0), DS-1, and DS-3 loop-transport combinations (or EELs); and
- DS-1 and DS-3 UNE dedicated transport.

Use of ASRs provides a more efficient means to accomplish complete circuit conversions, thereby enabling ordering, billing, provisioning and maintenance systems to be updated on a mechanized basis to reflect the conversions and changes in circuit IDs. This new SPUNE process replaces Verizon's interim, semi-manual conversion ordering process.

For the avoidance of any doubt, this revised process does not obviate (and is in addition to) the applicable requirements set forth in sections 1 and 2 directly above (i.e., with respect to certification, circuit information, termination liabilities and minimum service period charges).

Project Planning Call:

1. A carrier wishing to convert eligible special access circuits to UNEs or combinations thereof must request that its account manager (for the first request), or Verizon's Durham NACC Project Manager (for subsequent requests) arrange a project planning call to communicate details for all special access circuit to UNE transport (or special access circuit to UNE loop-transport combination) conversions regardless of the quantity of circuits.
2. During the call, the carrier will be asked to provide information allowing the project manager to properly prepare for the conversion. This information includes:
 - The type of conversion being performed (i.e., serial circuits only without a CFA conversion, multiplexed DS-3 with subtends, or multiplexed DS-1 with subtends);
 - The ACNA for the circuits being converted; and
 - The LATA in which the circuits reside.
3. The carrier will be provided a project ID prior to the end of the call. The carrier will not be able to issue conversion ASRs without this project ID.
4. A project end date will be negotiated during the project planning call.

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ASR Requirements:

1. One circuit per ASR.
2. A disconnect ASR and a new connect ASR are required for each circuit to be converted.
3. Each disconnect ASR and new connect ASR must be RPON'd to the corresponding disconnect ASR or new connect ASR.
4. Both the disconnect and the new connect ASRs must be received in the same batch file.
5. **Very Important:** The ASR project ID must be populated with a valid SPUNE project ID to pass the edits and fall into the proper SPUNE ASR order flow.
6. An effective bill date will be assigned to the order equal to the standard interval from the date a complete and correct ASR is received.
7. Edits will be applied as defined in validation guidelines posted on January 6, 2004, for Verizon's former Bell Atlantic service territories, and on July 6, 2004, for Verizon's former GTE service territories, to ensure no design changes occur. Access to CSRs to validate key design data is available through CSG.

SPUNE1 – CLS (serial circuit – ex: 12.HCGS.345678..NY) only, no higher level CFA converting

1. Each pair of related add and disconnect ASRs will be managed individually.

SPUNE2 – Multiplexed DS-3 is the highest level converting – with or without lower level conversions

1. The related add and disconnect ASRs for the DS-3 must be sent to Verizon prior to any circuits riding the DS-3.
2. The new DS-3 circuit ID will be returned to the carrier via the ASR order confirmation.
3. The carrier will then send the DS-1 level circuits that ride the DS-3 CFA. The CFA field must be populated with new DS-3 circuit ID on the new connect ASR.
4. Multiplexed DS-1 circuit(s) converting as part of a SPUNE2 conversion will require the confirmation with the new DS-1 circuit ID before submitting ASRs for the DS-0 level circuits.

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5. The carrier will then send the DS-0 level conversion ASRs that are riding the DS-1 CFA.
6. ASRs for the non-multiplexed DS-1 circuits riding the DS-3 can be sent after the confirmation of the DS-3 is received.
7. The Desired Due Date (or DDD) must be the same on all levels of circuits being converted.
8. Only one multiplexed DS3 circuit is allowed per project ID.

SPUNE3 – Multiplexed DS-1 is the highest level converting – with or without DS-0 level conversions

1. The related add and disconnect ASRs for the DS-1 must be sent to Verizon prior to any DS-0 circuit riding the DS-1.
2. The new DS-1 circuit ID will be returned to the carrier via the ASR order confirmation.
3. The carrier will then send the DS-0 level circuits that ride the DS-1 CFA. The CFA field must be populated with the new DS-1 circuit ID on the new connect ASR.
4. The Desired Due Date (or DDD) must be the same on all levels of circuits being converted.