

Before the

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UT-050814

VERIZON COMMUNICATIONS INC.

AND

MCI, INC.

**OBJECTIONS AND RESPONSES TO INTEGRA TELECOM'S DATA REQUESTS,
SET 1, NOS. 1-77**

JULY 19, 2005

Verizon Communications Inc. ("Verizon") hereby provides its general and specific objections, and responses, to Integra Telecom's Data Request Set 1, Nos. 1-77 ("Requests").

GENERAL OBJECTIONS

1. Verizon objects to the Requests to the extent that they require disclosure of information protected from discovery by the attorney-client privilege or the attorney work product immunity.
2. Verizon objects to the Requests to the extent that they purport to impose upon Verizon a duty to disclose information or documents outside of Verizon's possession, custody or control.
3. Verizon objects to the Requests to the extent that they seek confidential or proprietary information. Any confidential or proprietary information provided by Verizon is done so subject to the terms of the Protective Order that was agreed to or entered in this proceeding.
4. Verizon objects to the Requests to the extent that they are cumulative or duplicative.
5. Verizon objects to the Requests to the extent that they are so broadly phrased that it would be impossible to assemble all potentially responsive documents; that compliance would be unduly burdensome; or that compliance would require production of materials and information that are neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.
6. Verizon objects to the Requests to the extent that they relate and/or seeks information pertaining to Verizon entities that are not parties to this proceeding and, therefore, are beyond the scope of this proceeding.
7. Verizon objects to the Requests to the extent that they seek operational and/or proprietary information regarding other telecommunications carriers.
8. Verizon objects to the Requests to the extent that they call for legal conclusions.
9. Verizon objects to the Requests to the extent that they are argumentative.
10. Verizon objects to the Requests to the extent they call for information that is not readily available and that can only be provided with the performance of a special study.

11. Verizon objects to the Requests to the extent that they call for speculation and/or conjecture.

12. Verizon objects to the Requests to the extent that they seek information in the public domain that is as readily available to Integra as it is to Verizon.

OBJECTIONS TO INSTRUCTION AND DEFINITIONS

Verizon objects to Integra's "Definitions and Instructions" ("Objections to Instructions") to the extent they seek to impose requirements different from those imposed by applicable law.

CONFIDENTIAL INFORMATION

Any confidential or proprietary information or documents Verizon produces are subject to the terms of the Protective Agreement and any clarifications or amendments thereto.

SPECIFIC OBJECTION

1. Verizon hereby objects to Integra's Requests in their entirety, and to each Request individually, because they concern factual and legal issues that are presently before the Commission in Docket No. UT-053038, and that have nothing to do with the transaction between Verizon and MCI ("Specific Objection"). Integra's attempt to use the discovery process in this proceeding to augment its position in Docket No. UT-053038 is an abuse of process, and should not be countenanced by the Commission.

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Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 1:

Admit that Verizon has owned and operated the assets formerly owned by GTE in Washington since at least December 16, 1999

Response:

Subject to its General Objections and its Specific Objection, Verizon responds that the company presently known as Verizon Northwest Inc. was previously known as GTE Northwest Incorporated and that the articles of amendment changing the name was filed with the Secretary of State for Washington State on June 30, 2000; that GTE Northwest Incorporated was a subsidiary of GTE Corporation; and that the parent company merger of GTE Corporation and Bell Atlantic Inc. occurred on June 30, 2000, and the resulting parent company changed its name to Verizon Communications Inc. on September 22, 2000. Except as so admitted and stated, Verizon does not make the requested admission.

Prepared By: James Miggans

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Witness: To be determined

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DATA REQUEST NO. 2:

Admit that, in the areas formerly served by GTE in Washington, Verizon is now the incumbent local exchange carrier ("LEC").

Response:

Subject to its General Objections and its Specific Objection, Verizon responds as set forth in its response to Data Request No. 1. Except as so admitted and stated, Verizon does not make the requested admission.

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DATA REQUEST NO. 3:

Admit that, in the areas in which it is the incumbent LEC, Verizon is the primary source of unbundled loops for competitive LECs.

Response:

Subject to its General Objections and its Specific Objection, Verizon responds that if the request means to inquire about the provision of unbundled loops by an incumbent local exchange carrier (ILEC) pursuant to Section 251 of the Telecommunications Act, to the best of Verizon's knowledge, Verizon Northwest Inc. is the only ILEC providing such unbundled loops within its exchanges. Except as so admitted and stated, Verizon does not make the requested admission.

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DATA REQUEST NO. 4:

Admit that Integra Telecom is the largest purchaser of unbundled network elements from Verizon in the state of Washington.

Response:

In addition to its General Objections and its Specific Objection Verizon objects because Request No. 4 calls for information that can only be provided with the performance of a special study. Verizon does admit that Integra Telecom purchases unbundled network elements (UNEs) from Verizon in the state of Washington, but cannot confirm that Integra is the largest purchaser of UNEs without performing a special study.

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DATA REQUEST NO. 5:

If the answer to request no. 4 above is "no" or anything but an unqualified admit, please identify by company name the largest purchaser of unbundled network elements from Verizon in the state of Washington.

Response:

See Verizon's response to Request No. 4 above.

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DATA REQUEST NO. 6:

Identify every person or entity that has purchased unbundled network elements from Verizon in Washington since January 1, 2003.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects to Request No. 6 because it is overly broad and unduly burdensome, and also because it would require Verizon to perform a special study. Verizon further objects because Verizon Northwest Inc. is legally obligated to protect its customers' proprietary information.

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DATA REQUEST NO. 7:

Admit that competitive LECs are customers of Verizon for wholesale services and unbundled network elements.

Response:

Verizon admits that Verizon Northwest Inc. provides wholesales services and/or unbundled network elements to local exchange carriers that are classified as competitive companies by the WUTC. Except as so admitted and stated, Verizon does not make the requested admission.

Prepared By: James Miggans

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Witness: To be determined

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DATA REQUEST NO. 8:

Admit that Integra Telecom is a customer of Verizon for wholesale services and unbundled network elements.

Response:

Verizon admits that Integra Telecom obtains wholesale services and/or unbundled network elements from Verizon Northwest Inc.

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DATA REQUEST NO. 9:

Admit that the WUTC has not promulgated any rules that include or set forth any wholesale service quality standards.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because Request No. 9 calls for a legal conclusion, and Integra presumably is just as capable as Verizon of determining whether the WUTU has promulgated a particular rule.

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DATA REQUEST NO. 10:

Admit that the WUTC has not issued an order that includes or sets forth any wholesale service quality standards.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because Request No. 10 calls for a legal conclusion and Integra presumably is just as capable as Verizon of determining whether the WUTU has issued a particular order.

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DATA REQUEST NO. 11:

Admit that no Washington statute includes or sets forth any wholesale service quality standards.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because Request No. 11 calls for a legal conclusion and Integra presumably is just as capable as Verizon of determining the existence or nonexistence of statutes.

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DATA REQUEST NO. 12:

Admit that Verizon is not currently bound by any statute, regulation, or order in Washington to meet any wholesale service quality standards.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because Request No. 12 calls for a legal conclusion and Integra presumably is just as capable as Verizon of determining the state of the law.

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Witness: To be determined

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DATA REQUEST NO. 13:

Does Verizon follow any standards for providing unbundled network elements to competitive LECs on a wholesale basis in Washington?

Response:

In addition to its General Objections and its Specific Objection, Verizon objects to Request No. 13 because it calls for a legal conclusion.

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DATA REQUEST NO. 14:

If the answer to request no. 13 is "yes," please (a) provide a copy of the standards, and (b) identify the source of the standards and explain why Verizon follows those standards.

Response:

See Verizon's response to Request No. 13.

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Witness: To be determined

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DATA REQUEST NO. 15:

Please explain the difference between "Verizon East" and "Verizon West."

Response:

Subject to its General Objections and its Specific Objection, Verizon states that in certain contexts "Verizon East" refers to the former Bell Atlantic telephone operating companies, and that "Verizon West" refers to the former GTE telephone operating companies.

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DATA REQUEST NO. 16:

Please admit that the state of Washington is considered "Verizon West."

Response:

Verizon admits that geographically speaking the State of Washington is covered by the term "Verizon West" in certain contexts; see also Verizon's preceding responses. Except as so admitted and stated, Verizon does not make the requested admission.

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DATA REQUEST NO. 17:

Please admit that Verizon does not have standard provisioning intervals posted on its wholesale Web page for Verizon West.

Response:

See Verizon's General Objections and its Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 18:

Please admit that Verizon does have standard provisioning intervals posted on its wholesale Web page for Verizon East.

Response:

See Verizon's General Objections and its Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 19:

Please explain why Verizon posts standard provisioning intervals for Verizon East but not Verizon West.

Response:

See Verizon's General Objections and its Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 20:

Please admit that Verizon does allow competitive LECs access to Verizon West's standard provisioning intervals, if any.

Response:

See Verizon's General Objections and its Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 21:

Admit that Verizon does not give standard provisioning intervals for Verizon West to competitive LECs.

Response:

See Verizon's General Objections and its Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 22:

Please admit that the wholesale standards, if any, that Verizon follows to provide unbundled network elements to competitive LECs in Washington are the same as the standards that Verizon follows in Oregon.

Response:

See Verizon's General Objections and its Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 23:

Please identify every wholesale service standard, if any, that Verizon East follows but Verizon West does not follow.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because the information sought in Request No. 23 is neither relevant to the Verizon/MCI transaction nor reasonably likely to result in the production of admissible information. Verizon further objects because Request No. 23 is overly broad and unduly burdensome, and seeks to require Verizon to perform a special study.

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Witness: To be determined

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DATA REQUEST NO. 24:

Please identify every area where Verizon East performs at a higher level than Verizon West in providing unbundled network elements to competitive LECs.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because the information sought in Request No. 24 is neither relevant to the Verizon/MCI transaction nor reasonably likely to result in the production of admissible information. Verizon further objects because Request No. 24 is overly broad and unduly burdensome, and seeks to require Verizon to perform a special study.

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DATA REQUEST NO. 25:

Please identify every area in which Verizon's wholesale service standards, if any, are different from the wholesale service standards of Qwest in the state of Washington.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because the information sought in Request No. 25 is neither relevant to the Verizon/MCI transaction nor reasonably likely to result in the production of admissible information. Verizon further objects because Request No. 25 is overly broad and unduly burdensome, and seeks to require Verizon to perform a special study.

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DATA REQUEST NO. 26:

Please identify all states in which Verizon provides service as an incumbent LEC in which Verizon is required to satisfy wholesale service quality standards that are set forth in statutes, regulations, or agency orders, and provide citations to the applicable statutes, regulations, or agency orders.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because the information sought in Request No. 26 is neither relevant to the Verizon/MCI transaction nor reasonably likely to result in the production of admissible information. Verizon further objects because Request No. 24 is overly broad and unduly burdensome, and seeks to require Verizon to perform a special study. Verizon also objects because Request No. 26 calls for a legal conclusion, and seeks to require Verizon to perform legal research that Integra presumably is as capable of performing as Verizon.

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Witness: To be determined

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DATA REQUEST NO. 27:

Please admit that it is in the public interest of Washington consumers to have competition in the provision of telecommunications services.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because Request No. 27 calls for a legal conclusion.

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Witness: To be determined

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DATA REQUEST NO. 28:

Please admit that many consumers in the state of Washington rely on competitive LECs for the provision of telecommunications services and many of those competitive LECs rely on Verizon's network to provide those services.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 29:

Please admit that it is in the public interest of Washington consumers to have an incumbent LEC provision unbundled network elements to competitive LECs in a timely and effective manner.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 30:

Please admit that it is in the public interest of Washington consumers to have wholesale service quality standards that telecommunications carriers must satisfy in their provision of telecommunications services to other carriers.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 31:

Please admit that there are areas in the state of Washington in which Verizon's network design prevents a competitor from offering services to end users using Verizon's unbundled network elements.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 32:

Please identify each instance in which Verizon's network design prevents a competitor from offering services to end users using Verizon's unbundled network elements in the state of Washington.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 33:

Please admit that Verizon's network uses remote terminals or remote switches to serve customers in the state of Washington.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 34:

Please identify the number of customers or access lines in the state of Washington that are "behind remotes" or, in other words, are served using Verizon remote switches or terminals.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects because Request No. 34 is overly broad and unduly burdensome, and would require Verizon to perform a special study.

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Witness: To be determined

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DATA REQUEST NO. 35:

Please admit that competitive LECs cannot provide some services to customers served by Verizon's remote terminals.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 36:

Please admit that competitive LECs cannot provide DSL service using a DSO loop to customers served by Verizon remote switches or remote terminals.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 37:

Please admit that Verizon provides DSL service using DSO loops to its retail customers who are served by remote switches or terminals.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 38:

Please admit that there are areas in Verizon's service territory in Washington where Verizon can provide DSO, voice-grade loops that provide disconnect service to end users but where competitive LECs cannot use Verizon's network to provide such service to end users.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 39:

Please admit that, where a customer is served by a Verizon remote switch or terminal, Verizon requires competitive LECs to use channel bank facilities that are inferior to the facilities Verizon uses to service its own retail customers.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 40:

Please admit that Verizon required Integra to provide service to the following customers through a channel bank instead of direct copper facilities: Boys & Girls Club of Kirkland; Liposonix; Washington Academy of Performing Arts; Applied SBC; Quzar; Woodinville Weekly; Powercom; and Springstar LLC. (Integra has previously provided to Verizon telephone numbers and circuit identifications for these customers; if Verizon needs that information again to respond to these data requests, please contact Integra immediately.)

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 41:

Please admit that, when Integra provided service to the customers referenced in request no. 40 using channel banks, Integra reported to Verizon that the customers' telephones would not hang up and instead the callers were receiving continued busy signals.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 42:

Please admit that Verizon believes the disconnect problem was caused by a problem with signaling (disconnect supervision) flowing through Verizon's channel bank.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 43:

Please admit that Verizon was unable to fix the disconnect problem experienced by the customers listed in request no. 40.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 44:

Please admit that Integra was required to purchase resale services from Verizon, which use the same products and equipment that Verizon itself uses to serve its retail customers, to provide service to Boys & Girls Club and Woodinville Weekly without the disconnect problem.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 45:

Please admit that Integra has not reported to Verizon that Boys & Girls Club or Woodinville Weekly have experienced the disconnect problem since Integra purchased resale services from Verizon for those customers.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 46:

Please admit that Verizon charges more for resale services than for unbundled network elements.

Response:

In addition to its General Objections and Specific Objection, Verizon objects to Request No. 46 because it is overly broad and unduly burdensome and cannot be answered as posed. Resale services are priced based on the retail rate for the specific service and the wholesale discount approved by the commission. Whether or not the rate for a given service is higher or lower than the rate for a comparable UNE-based service depends on multiple factors, including what UNEs are purchased, what volumes are purchased, over what term the services are purchased, etc.

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Witness: To be determined

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DATA REQUEST NO. 47:

Please admit that Verizon currently supplies service to the Washington Academy of Performing Arts, Applied SBC, Quzar, and Powercom.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 48:

Please admit that Verizon began supplying service to the Washington Academy of Performing Arts, Applied SBC, Quzar, and Powercom after Integra notified Verizon that those customers had complained about the disconnect problem and Verizon was unable to fix the disconnect problem.

Response:

See Verizon's General Objections and Specific Objection.

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Date: July 15, 2005

Witness: To be determined

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DATA REQUEST NO. 49:

Please admit that Verizon was and is able to provide voice service to the Washington Academy of Performing Arts, Applied SBC, Quzar, and Powercom using its own network facilities without those customers experiencing the disconnect problems they experienced when Integra provided them service through channel banks.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 50:

Please explain why Verizon can provide service to the Washington Academy of Performing Arts, Applied SBC, Quzar, and Powercom without the customers experiencing the disconnect problems they experienced when Integra provided them service through channel banks.

Response:

See Verizon's General Objections and Specific Objection.

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Witness: To be determined

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DATA REQUEST NO. 51:

Please admit that Verizon does not provide competitive LECs access to the location of remote switches or terminals.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 52:

Please admit that Verizon does not provide competitive LECs access to the telephone numbers served by remote switches or terminals.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 53:

Please provide a map(s) that shows all Verizon's remote switches and terminals in the state of Washington.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 54:

Please provide a list of all telephone numbers served by Verizon's remote switches and terminals in the state of Washington, including an identification of the individual remote switch or terminal out of which the number is served.

Response:

In addition to its General Objection and its Specific Objection, Verizon objects to Request No. 54 because it is overly broad and unduly burdensome, and would require Verizon to perform a special study.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 55:

Please admit that there are areas in Verizon's service territory in Washington where Verizon can provide DS1 loops to end users using its network but where competitive LECs cannot provide DS1 loops to end users using Verizon's network.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 56:

Please admit that Verizon West requires competitive LECs to specify whether ordered facilities are "designed" or "non-designed" based on information provided by Verizon in WISE.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 57:

Please admit that Verizon East does not require competitive LECs to specify whether ordered facilities are "designed" or "non-designed."

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 58:

Please admit that Qwest does not require competitive LECs to specify whether ordered facilities are "designed" or "non-designed."

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 59:

Please identify Verizon's standard interval, if any, for provisioning a loop that is designated as "designed" by the ordering competitive LEC or by Verizon.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 60:

Please admit that identifying an unbundled network element as "designed" results in a longer provisioning interval and additional charges that do not apply to "non-designed" unbundled network elements.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 61:

Please admit that WISE sometimes contains inaccurate or misleading information about Verizon's network.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 62:

Please admit that Verizon requires competitive LECs to obtain a different "certificate" to obtain access to each of Verizon's ordering, provisioning, and escalation systems, including, but not limited to, eWPTS (enhanced Wholesale Provisioning Tracking System), LSI (Local Service Interface), and WISE.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 63:

Please admit that Verizon requires competitive LECs to choose from among five different combinations of NCINCI codes to order a DSL-capable loop.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 64:

Please admit that Qwest has a single NCINCI code for competitive LECs to order a DSL-capable loop.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects to Request No. 64 because it should be directed to Qwest, not Verizon.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 65:

Please fully explain the purpose and function of Verizon's Customer User Forum.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 66:

Please explain why Verizon initiated or created the Customer User Forum.

Response:

See Verizon's General Objections and its Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 67:

Please explain when the Customer User Forum began.

Response:

See Verizon's General Objections and its Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 68:

Please admit that Verizon did not invite Integra to participate in the Customer User Forum until November 2004.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 69:

Please admit that, until March 28, 2005, when a Verizon customer had both voice service and DSL from Verizon on the same line and Integra ordered the number to be ported so Integra could begin providing voice and DSL service to the customer, Verizon refused to port the telephone number for such customers until they canceled their DSL service with Verizon.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 70:

Please admit that Verizon's policy of refusing to port telephone numbers until the customer canceled DSL service with Verizon resulted in a longer provisioning interval for voice lines with DSL than for voice lines without DSL.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 71:

Please admit that Integra has never imposed on Verizon a policy of refusing to port a voice line number with DSL on it until the retail customer canceled the DSL service.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 72:

Please admit that Integra asked Verizon to stop its policy of refusing to port the number for a voice line until the customer canceled its DSL service, but Verizon refused to change its policy.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 73:

Please admit that Verizon canceled its policy of refusing to port a voice line number with DSL on it until the retail customer canceled the DSL service as a result of the FCC's decision in *In the Matter of BellSouth Telecommunications, Inc. Request for Declaratory Ruling that State Commissions May Not Regulate Broadband Internet Access Services*, WC Docket No. 03-251, FCC 05-78, (released March 25, 2005) (the "BellSouth Decision").

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 74:

Please admit that, in the BellSouth Decision, Comcast Phone and Time Warner complained that other ILECs were refusing to port the telephone number for the voice line until the customer cancels its DSL service, just as Verizon had refused to do for Integra and other competitive LECs.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects to Request No. 74 because it calls for a legal conclusion; Integra presumably is just as capable of reading the BellSouth Decision as Verizon.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 75:

Please admit that, in the BellSouth Decision, the FCC reiterated that the policy of refusing to port telephone numbers for voice lines until the customer cancels DSL service is unlawful.

Response:

In addition to its General Objections and its Specific Objection, Verizon objects to Request No. 75 because it calls for a legal conclusion; Integra presumably is just as capable of reading the BellSouth Decision as Verizon.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 76:

Please identify (a) all persons by full name, job title, location, and telephone number who participated in providing responses to these data requests, (b) for which responses each person provided information, (c) the date each response was prepared, and (d) the witness who can be cross-examined on each request.

Response:

See Verizon's General Objections and Specific Objection.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined

Docket No. UT-050814

Verizon's Objections and Responses to Integra Telecom Data Requests Set 1 Nos. 1-77

July 19, 2005

DATA REQUEST NO. 77:

Please provide a copy of every response of Verizon to every data request served by any other party in this proceeding.

Response:

Subject to Verizon's General Objections and its Specific Objection, Verizon will provide copies of its responses to other parties' data requests, subject to the same proprietary designations and restrictions afforded those responses

As noted in the initial productions to the Staff and the Office of the Public Counsel, the production of highly competitive information to governmental entities was in no way to be construed as a waiver of Verizon's right to further object, or to refuse to produce this information, or seek a higher level of protection, should a further request for such information be received from competitive carriers or any entity that has a competitive interest in this information. Verizon objects to producing any third party carrier information that is confidential and proprietary that is in its possession. However, Verizon will produce Verizon information that is considered Verizon "Highly Confidential" under the "Counsel only" terms of the protective order.

Prepared By: James Miggans

Date: July 15, 2005

Witness: To be determined