

Before the

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket No. UT-040788**

**VERIZON NORTHWEST INC.**

**Response to Time Warner Telecom of Washington, Inc., and XO Washington, Inc  
REQUEST NOS: TWTC/XO 1-001 to 1-007**

**INCLUDES CONFIDENTIAL MATERIAL  
Per Protective Order**

**December 3, 2004**

Docket No. UT-040788

Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007

December 3, 2004

**Data Request TWTC/XO 1-001:**

Does Verizon provide intrastate special access services in Washington at speeds of DS1 or higher other than those for which Verizon has proposed rate increases in this proceeding? If so, please identify each such service, provide the current rate, and explain why Verizon has not proposed to increase that rate.

**Response:**

Yes, Verizon provides DS3 Services. Attachment 1-001 is an excerpt from Verizon's tariff (WN U-16, Section 5, Sheets 466-469), which shows the details for this service.

We have not proposed rate increases for these services due to the small number of current units for DS3 and, thus, the revenue generating potential associated with a price increase.

Prepared By: Sue Vaughan

Date: December 2, 2004

Witness: Doug Fulp

Verizon Responses to TWTC/XO Data Request Nos. 1-001 through 1-007  
UT-040788

## **Attachment 1-001**

i. SPECIAL ACCESS (Cont'd)5.7 Rates and Charges (Cont'd)5.7.14 High Capacity DS3 (44.736 Mbps) Facilities - Three System

	<u>Nonrecurring Charges</u>	<u>Monthly Rate</u>
(A) <u>Electrical Interface</u>		
Special Access Line		
One Year (EU4PF/1CKPF) (NEU4PFE-3/EU4PFE1-3)	\$545.00	\$2,450.00
Three Year (EU4PF/1CKPF) (NEU4PFE-3/EU4PFE3-3)	545.00	2,275.00
Five Year (EU4PF/1CKPF) (NEU4PFE-3/EU4PFE5-3)	545.00	2,025.00
Seven Year (EU4PF/1CKPF) (NEU4PFE-3/EU4PFE7-3)	545.00	1,900.00

5. SPECIAL ACCESS (Cont'd)5.7 Rates and Charges (Cont'd)5.7.14 High Capacity DS3 (44.736 Mbps) Facilities - Three System (Cont'd)

	<u>Nonrecurring Charges</u>	<u>Monthly Rate</u>
(A) <u>Electrical Interface</u>		
Each Additional Special Access Line - Maximum of 2		
One Year {EU4SX/1CKSX} {NEU4SXE-3/EU4SXE1-3}	\$545.00	\$150.00
Three Year {EU4SX/1CKSX} {NEU4SXE-3/EU4SXE3-3}	545.00	130.00
Five Year {EU4SX/1CKSX} {NEU4SXE-3/EU4SXE5-3}	545.00	115.00
Seven Year {EU4SX/1CKSX} {NEU4SXE-3/EU4SXE7-3}	545.00	110.00

5.7.15 (Reserved for Future Use)

5.7 Rates and Charges (Cont'd)5.7.18 High Capacity DS3 (44.736 Mbps) Facilities - Special Transport

	<u>Monthly Rate</u>
(A) <u>DS3 Special Transport Termination</u>	
3 System or Individual Transport, per Termination	\$295.00
(TRS)	
(TRGDS3)	
(B) <u>DS3 Special Transport Facilities</u>	
3 System or Individual Transport, per Airline Mile	51.00
(1LFSX)	
(1LFD33)	

Docket No. UT-040788

Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007

December 3, 2004

**Data Request TWTC/XO 1-002:**

Please identify and explain each technical or functional difference between a Verizon DS1 special access line and transport and a Verizon DS1 unbundled loop and transport. Please provide a copy of all documents that support your response.

**Response:**

In general, there is no technical or functional difference between a Verizon special access circuit and a Verizon DS1 unbundled loop and transport. In either case, the DS1 may be provisioned over a variety of underlying technology, based on engineering design and the available facilities to provide service meeting the industry specifications for DS1 service.

Prepared By: Marian Howell

Date: December 2, 2004

Witness: Doug Fulp

Docket No. UT-040788

Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007

December 3, 2004

**Data Request TWTC/XO 1-003:**

Please explain why Verizon estimated the cost of an unbundled DS1 loop at \$189.23 in Docket No. UT-023003 and currently estimates the cost of a DS1 special access line at \$158.29. As part of your explanation, please identify each cost component and assumption that differs between the two estimates and explain each such difference. Please provide a copy of all documents that support your response.

**Response:**

The differences between the cost of an unbundled DS1 loop of \$189.23 and the cost of a DS1 special access line of \$158.29 are found in the application of the cost factors (for a UNE study versus an Access study) and the difference in the cost of money. The DS1 loop uses a cost of money of 15.98% and the cost of money for a special access line is 11.64%. Further, the reported cost/price of an unbundled DS1 loop also includes a share of common overhead while the cost for special access DS1 does not.

Prepared By: Nicole Lucas

Date: November 22, 2004

Witness: Kevin C. Collins



Docket No. UT-040788

Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007

December 3, 2004

**Data Request TWTC/XO 1-004:**

Please explain why Verizon estimated the cost of an unbundled DS1 transport at \$4.60 per mile in Docket No. UT-023003 and currently estimates the cost of a DS1 special access transport at \$4.11. As part of your explanation, please identify each cost component and assumption that differs between the two estimates and explain each such difference. Please provide a copy of all documents that support your response.

**Response:**

The costs referred to above for unbundled DS1 transport per mile of \$4.60 and the special access transport of \$4.11 are not direct comparisons. First, the special access transport cost is on a DS0 basis, not a DS1. In addition, the special access DS0 cost includes the cost of the termination, whereas the DS1 is purely per mile.

Prepared By: Nicole Lucas

Date: November 22, 2004

Witness: Kevin C. Collins

Docket No. UT-040788  
Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007  
December 3, 2004

**Data Request TWTC/XO 1-005:**

Are the **intrastate** special access rates that Verizon proposes in this proceeding the same as Verizon's **interstate** rates for the same or comparable special access provided in Washington? If not, please identify each service that has a different rate and the rate difference, and explain that difference. If the difference is in any way related to costs, please identify each cost component and assumption that differs between each comparable service and explain each such difference. Please provide a copy of all documents that support your response.

**Response:**

See Attachment 1-005.

Prepared By: Marian Howell  
Date: December 2, 2004  
Witness: Doug Fulp

Verizon Responses to TWTC/XO Data Request Nos. 1-001 through 1-007  
UT-040788

## **Attachment 1-005**

FCC No. 14 Section 5.7.7 (A) 3rd Revised Page 5-208.2

High Capacity DS1 (1.544 Mbps) Facilities - Standard Arrangements

Special Access Line

Monthly Rate

Washington

Price Band A	268.80
Price Band B	275.00
Price Band C	281.30
N-MSA	265.00

End User Special Access Line 8th Revised Page 5-208

Washington	268.80
------------	--------

FCC No. 14 Section 5.7.5 (A) 6th Revised Page 5-199.2

Digital Data Service Facilities - Standard Arrangements

Special Transport

Monthly Rate

Washington

Price Band A	6.19
Price Band B	6.19
Price Band C	6.19
N-MSA	4.93

Special Access Line

Monthly Rate

Washington

Price Band A	134.30
Price Band B	134.30
Price Band C	134.30
N-MSA	98.00

End User Special Access Line 10th Revised Page 5-199

Washington	98.00
------------	-------

FCC No. 14 Section 5.7.5 (A) 5th Revised Page 5-127.2

Voiceband Facilities - Standard ArrangementsSpecial Transport

## Monthly Rate

## Washington

Price Band A	5.70
Price Band B	5.90
Price Band C	6.00
N-MSA	4.75

FCC No. 14 Section 5.7.2 (A) 5th Revised Page 5-127.2

Voiceband Facilities - Standard ArrangementsSpecial Access Line

## Monthly Rate

	Two-Wire	Four-Wire
Washington		
Price Band A	31.30	49.50
Price Band B	32.60	51.50
Price Band C	33.90	53.60
N-MSA	29.15	45.47

End User Special Access Line 10th Revised Page 5-127

Washington	29.15	45.47
------------	-------	-------

Note: Interstate tariff rates are governed by price cap and pricing flexibility regulations. Metropolitan Statistical Areas (MSAs) wire centers are defined in FCC No. 14 Section 19. These are the areas that have the price flexibility (Pricing Bands A,B & C). The non-MSA is governed by price cap.

Docket No. UT-040788  
Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007  
December 3, 2004

**Data Request TWTC/XO 1-006:**

Please identify the total number of **intrastate** DS1 Special Access Lines that Verizon provides to all customers in Washington as of the most recent date for which such figures are available. In addition, please identify the total number of **intrastate** DS1 Special Access Lines that Verizon provides to other telecommunications companies in Washington as of the same date. If exact figures are not available, please provide the approximate percentage of **intrastate** DS1 Special Access Lines that Verizon provides to other telecommunications companies. Please provide a copy of all documents that support your response.

**Response:**

See Confidential Attachment 1-006.

Prepared By: Nan Cook  
Date: November 23, 2004  
Witness: Doug Fulp

Verizon Responses to TWTC/XO Data Request Nos. 1-001 through 1-007  
UT-040788

## **Confidential Attachment 1-006**

(Confidential per Protective Order in WUTC Docket No. UT-040788)

[REDACTED]

Docket No. UT-040788  
Verizon Responses to TWTC/XO Data Request Nos. 1-001 to 1-007  
December 3, 2004

**Data Request TWTC/XO 1-007:**

Please identify the total number of **interstate** DS1 Special Access Lines or equivalent services that Verizon provides to all customers in Washington as of the most recent date for which such figures are available. In addition, please identify the total number of **interstate** DS1 Special Access Lines that Verizon provides to other telecommunications companies in Washington as of the same date. If exact figures are not available, please provide the approximate percentage of **interstate** DS1 Special Access Lines that Verizon provides to other telecommunications companies. Please provide a copy of all documents that support your response.

**Response:**

See Confidential Attachment 1-006.

Prepared By: Nan Cook  
Date: November 23, 2004  
Witness: Doug Fulp