

**BEFORE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Review of:  
Unbundled Loop and Switching Rates; the Deaveraged  
Zone Rate Structure; and  
Unbundled Network Elements, Transport,  
and Termination (Recurring Costs)

Docket No. UT-023003

**SUPPLEMENTAL JOINT RESPONSES OF AT&T & MCI  
TO VERIZON'S FIRST AND FIFTH SETS OF DATA REQUESTS**

AT&T Communications of the Pacific Northwest, Inc., and AT&T Local Services on behalf of TCG Seattle ("AT&T") and Worldcom, Inc., k/n/a MCI ("MCI") hereby provide the following supplemental responses to Verizon's First and Fifth Sets of Data Requests to AT&T and MCI. These supplemental responses are made without waiver of any of the general or specific objections already asserted with respect to Verizon's First and Fifth Sets of Data Requests.

**WUTC Docket No. UT-023003**  
**AT&T and MCI Joint Supplemental Responses to**  
**Verizon 1<sup>st</sup> Set of Data Requests, November 5, 2003**

**Data Request No. 1-11:**

Please provide a detailed description of each user-adjustable input value to the clustering software.

**RESPONSE:**

There are no user-adjustable inputs to the clustering software.

**CORRECTED RESPONSE:**

There are typically no adjustments made by a user to inputs to the clustering software. There are a few variables that may be changed. These variables and the values used in this proceeding are as follows:

Grid size -	150 feet
Minimum Lines in a Cluster -	19
Maximum Lines in a Cluster	6,451
Maximum Cluster Radius	17,000

**SUPPLEMENTAL RESPONSE:**

The variables listed above are defined as follows:

Grid size – The grid size defines the size of the square cells into which the wire center is divided to bound the initial search radius used by the clustering algorithm to find adjoining cells that may be added to the initial cell in the clustering process, as described in the HAI Model Description at Section 5.3.3 (a) and (b).

Minimum Lines in a Cluster – The minimum lines in a cluster is the smallest number of lines within a cluster for that cluster to be considered as a “main cluster.” Clusters with line counts falling below this threshold are designated as an “outlier cluster” unless they contain fiber loops. This is documented in the HAI Model Description at Section 5.3.3.

Maximum Lines in a Cluster -- The maximum lines in a cluster is the greatest number of lines that may be contained in a cluster. As a part of the clustering process, each additional grid cell added to a cluster is checked to determine if the addition of the cell would cause the maximum number of lines to be exceeded. If so, the cell is not added to the cluster and no further grid cells may be added to the cluster. This is documented in the HAI Model Description at Section 5.3.3 (b).

**WUTC Docket No. UT-023003**  
**AT&T and MCI Joint Supplemental Responses to**  
**Verizon 1<sup>st</sup> Set of Data Requests, November 5, 2003**

**Data Request No. 1-11**

**SUPPLEMENTAL RESPONSE (con'd):**

Maximum Cluster Radius – The maximum cluster radius is a restriction on the clustering process that determines the maximum geographic size of a cluster. As a part of the clustering process, each additional grid cell added to a cluster is checked to determine whether the addition of the cell would add customer locations to the cluster that are further than 17,000 feet from the cluster centroid. If so, the cell is not added to the cluster. This is documented in the HAI Model Description at Section 5.3.3 (b).

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**WUTC Docket No. UT-023003**  
**AT&T and MCI Joint Supplemental Responses to**  
**Verizon 1<sup>st</sup> Set of Data Requests, November 5, 2003**

**Data Request 1-34:**

Please provide an electronic copy of the programming algorithm that computes the strand distance Dr. Bryant references at pages 22-23. Also provide a copy of the algorithm's decompiled code in its original programming environment, along with all documentation, input values and input files.

**RESPONSE:**

AT&T and MCI object to this data request on the ground that such information is not in their possession, custody or control. Any software and/or inputs used to derive customer locations are the intellectual property of TNS and are commercially available to Verizon from TNS.

**SUPPLEMENTAL RESPONSE:**

Pursuant to the Commission's Fourteenth Supplemental Order ("Order"), AT&T and MCI formally requested from TNS the data that was requested in this Request. While TNS is willing to provide some additional information for a substantial fee, TNS continues to refuse to provide other requested information. Accordingly, AT&T and MCI cannot provide any further substantive response to this Request at this time. AT&T and MCI continue to evaluate their options under these circumstances in light of the Order, including developing or using customer location data that does not require proprietary development or processing by TNS, and will update or revise this response consistent with the requirements of the Order.

**WUTC Docket No. UT-023003**  
**AT&T and MCI Joint Supplemental Responses to**  
**Verizon 5th Set of Data Requests, November 5, 2003**

**Data Request No. 5-10:**

Explain in detail how HM 5.3 calculates the investment required for the redundant paths and associated transmission terminal equipment for the point-to-point rings that connect small offices to tandem switches. Provide any and all documents concerning, referring or relating thereto.

**Response No. 5-10:**

AT&T and MCI object to this data request as it is vague and ambiguous. The phrase “point-to-point rings that connect small offices to tandem switches” is unclear.

**SUPPLEMENTAL RESPONSE:**

All investment calculations pertaining to transport, including facilities that Verizon calls “redundant paths” and “point-to-point rings,” are included in the HM5.3 switching/interoffice module, ‘wire center investment’ worksheet, cells AB2:BG2.

**WUTC Docket No. UT-023003  
AT&T and MCI Joint Supplemental Responses to  
Verizon 5th Set of Data Requests, November 5, 2003**

**Data Request No. 5-25:**

Provide all supporting information, data and documents concerning, referring or relating to the interoffice transport and 4-wire facility interface connection costs AT&T and MCI are proposing in this proceeding.

**Response No. 5-25:**

AT&T and MCI object to this data request as it is unreasonably broad.

**SUPPLEMENTAL RESPONSE:**

All information pertaining to facilities that Verizon calls “interoffice transport and 4-wire facility interface connection costs” is included in the HM5.3 Model Description and HAI Inputs Portfolio filed in this proceeding.

**WUTC Docket No. UT-023003**  
**AT&T and MCI Joint Supplemental Responses to**  
**Verizon 5th Set of Data Requests, November 5, 2003**

**Data Request No. 5-26:**

Provide all supporting information, data and documents (including, but not limited to, any invoices or contracts) concerning, referring or relating to the equipment prices that were used to identify the cost estimates for interoffice transport and 4-wire facility interface connection rate elements AT&T and MCI are proposing in this proceeding.

**Response No. 5-26:**

AT&T and MCI object to this data request as it is unreasonably broad.

**SUPPLEMENTAL RESPONSE:**

All information pertaining to equipment investments is available in the HAI Inputs Portfolio filed in this proceeding. This document explains that the transport equipment investments were obtained from a BellSouth *ex parte* presentation to the FCC staff; neither AT&T nor MCI has access to BellSouth's underlying documentation.

**WUTC Docket No. UT-023003**  
**AT&T and MCI Joint Supplemental Responses to**  
**Verizon 5th Set of Data Requests, November 5, 2003**

**Data Request No. 5-30:**

Identify the type of SONET equipment used by HM 5.3 to develop interoffice transport costs.

**Response No. 5-30:**

AT&T and MCI object to this data request as it is vague and ambiguous. The phrase “type of SONET equipment” is unclear.

**SUPPLEMENTAL RESPONSE:**

HM5.3 “assumes” that SONET add-drop multiplexers are used in the interoffice network. SONET regenerators are also employed as required.